

REFUGEE INTEGRATION PERSPECTIVES IN MALTA

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aditus foundation is a young, independent, voluntary, non-profit and non-governmental organization established in 2011 by a group of young lawyers dedicated to ensuring human rights access in Malta.

Named for the Latin word meaning 'access', aditus foundation's mission is the attentive analysis of access in Malta to human rights recognition and enjoyment. In practical terms, aditus was established to monitor, report and act on issues of fundamental human rights access for individuals and groups.

aditus foundation
149, Old Mint Street, Valletta VLT 1513 Malta
Telephone: +356 2010 6295
Fax: +356 2010 6296
Website: www.aditus.org.mt
Blog: www.easomonitor.blogspot.com
Contact: info@aditus.org.mt

UNHCR Malta Office
72, Market Street Floriana FRN 1080 Malta
Telephone: +356 2248 9400
Fax: +356 2122 5550
Website: www.unhcr.org.mt
Contact: mtava@unhcr.org



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EXECUTIVE SUMMARY

This report presents the outcomes of two separate integration projects that are closely linked, both implemented in cooperation between UNHCR and aditus foundation.

The approach is essentially based on the dual role integration measures play in the enjoyment of fundamental human rights by refugees. On the one hand, integration policies open the doors of important processes such as education, employment, political participation, non-discrimination, long-term residence or citizenship and family unity. On the other hand, integration opportunities act as a significant incentive for refugees to strive to be socially proactive, improving their educational profiles and engaging in fruitful employment.

This report reviews settlement and integration realities from the perspective of beneficiaries of protection living in the community, as well as from the viewpoint of personnel within relevant mainstream services in Malta. It is hoped that the findings can contribute towards development of a better framework to facilitate a positive integration process, to the benefit of people in need of protection, as well as for the Maltese society at large.

Meet the Other – Community Outreach project

In 2011, UNHCR and aditus foundation launched a primary research project titled ‘Meet The Other’ (MTO), with the aim to develop an empirically grounded understanding of the issues that affect refugees who are living in private accommodation in local communities in Malta.

It had been observed that many refugees who lived in private accommodation were disconnected from available support services. People were not regularly reaching out to government services nor approaching humanitarian organisations for support. Living outside the more visible migrant communities residing in open accommodation centres, their level of integration in Maltese society had not been analysed in any detail. The MTO project was launched to target this group through research and information activities, implemented through house visits involving more than 150 beneficiaries of protection.

The key conclusions are illustrative of the situation for refugees in Malta in terms of their interaction with Maltese society in various respects. Some key points in this regard include:

- » More than half of the refugees confirmed that they were in employment at the time of the interview. It was noted, however, that several women had never been employed during their time in Malta. Many reported working for extremely low

wages, particularly when their work was unregistered. Few refugees were aware of labour rights, and many confirmed that they did not report substandard conditions and abuse for fear of losing their jobs.

- » All school-age children assessed in the survey confirmed that they were attending school. A number of parents noted the challenge of settling children properly in the education system when their intentions were to remain in Malta for only for the shorter term.
- » A majority of refugees confirmed that they were generally able to access **public health** centres without major problems. Overall, the quality of health related services received was considered very good. Communication remained a main challenge, and some respondents indicated that they had not always been able to understand the guidance and instructions provided by medical service-providers.
- » Around two thirds of the refugees reported that they did not have any Maltese friends or acquaintances. Many confirmed that they lived their lives separately from locals, rarely engaging in **social interaction**. Of those who reported to have Maltese acquaintances, one third stated that they had developed friendly relations through the workplace. The majority of interviewees said that they had never actively participated in community events, although many have attended village feasts. A number of refugees reported that they opted not to attend local events due to negative experiences in terms of encountering racist or xenophobic attitudes.
- » A majority of the people interviewed relied on friends and personal contacts to find **private housing**. Several people raised their concern that owners rarely provided rental contracts or any other related documentation, with consequential serious implications in terms of their eligibility for housing and social support etc.

Stakeholder Information Sessions project

The on-going ‘Stakeholder Information Sessions’ project (SIS) is aimed at engaging with mainstream services in Malta. The project is implemented primarily by aditus foundation, through development of tools for information sharing and as well as through organising tailored group sessions directly with front desk staff to discuss experiences and challenges relating to their interaction with migrants and refugees.

Joint training sessions on selected topics have been organised with relevant experts on cultural competency skills in response to needs identified by the participating agencies.

The main issues that emerged from the sessions with participating agencies include the following:

- » All participating agencies and services indicated a strong commitment towards improving their quality of service to all, irrespective of nationality, status, gender, etc. However, there often was not a clear understanding of institutional and personal limitations that affect such services.
- » The increasing number of community-based refugees was seen as a logistical and resource challenge for all stakeholders. Communication challenges were consistently mentioned as a main obstacle to effective service-provision. Lack of refugees' understanding of the role, nature, functions and procedures of the various agencies often led to unnecessary calls, visits and requests.
- » All participants noted the absence of clarity on several institutional, legal and policy matters, resulting in inconsistencies in practices as regards the level and nature of entitlements depending on protection status.
- » Many agencies confirmed that lack of inter-agency coordination could lead to divergent approaches. Cooperation with other institutions and NGOs remained mainly ad hoc.
- » The social exclusion suffered by most refugees was highlighted as a key issue requiring further attention, especially to avoid the creation of ghettos, marginalisation and further socio-economic instability. Staff working in the specialised shelters commented on the difficulties faced by refugees, particularly refugee women, in securing even basic levels of self-reliance. Reflections were made on the impact of these difficulties on the capacity of the service-provider to offer effective and sustainable social support.

General conclusion

Beneficiaries of protection in Malta have access to basic rights that can facilitate the settlement and integration process. However, there is a need to address gaps and obstacles that hinder their effective engagement with mainstream Maltese society. These challenges are linked to the lack of awareness and resources, both within mainstream agencies and among refugees themselves.

While it is acknowledged that Malta may remain a transit country for many of the refugees arriving here, the goal should be to create, support and foster a social and legal environment that is conducive to refugees being recognised and treated as active members of society. In order to achieve this goal, it is essential to conduct further evidence-based data collection and analysis to identify key obstacles and opportunities. On this basis it will be possible to promote further stakeholder dialogue and develop specific initiatives to strengthen individual and community support. This includes proactive engagement by refugee communities in Malta.

To provide an overall direction for such concerted efforts, it is essential that the Government lead the way by defining a policy that can provide a long-term vision and a framework to facilitate settlement and integration of beneficiaries of protection in Malta.

Clarifications

1. Throughout this report, use of the term "*refugee*" is used to include all beneficiaries of international protection. Where required to only refer to persons recognised as refugees as distinct from beneficiaries of subsidiary protection, the context or use of specific terms shall clearly indicate this intention.
2. Unless specified, references to EU directives are to the original instruments and not to the recast versions.

FOREWORD

Immigration has remained high on the national agenda as boat arrivals have continued steadily in recent years. This is our reality. Malta is continuing to make the case for further engagement with the EU on the basis of principles of solidarity and fair responsibility-sharing.

On the other hand, we also need to seriously address the reality of immigrants and refugees who are here to stay. Integration is a dynamic, multifaceted process of mutual accommodation by immigrants and residents of member states. Integration implies respect for the basic values of the European Union, including respect for diversity.

Employment is a key part of the integration process and is central to the participation of immigrants, to the contributions immigrants make to the host society and to making such contributions more visible.

Basic knowledge of the host society's language, history and institutions is indispensable to integration. Enabling immigrants to acquire this basic knowledge is essential to successful integration. Moreover, Development Education for the Maltese population is another crucial element for integration to become a real possibility. Whilst education is critical to preparing immigrants and, particularly, their descendants to be more successful and more active participants in society, it is also important for society at large to better grasp the complex realities of irregular migration.

Access for immigrants to public and private services such as health care, education and social support in a non-discriminatory way is a critical foundation for better integration. Frequent interaction between immigrants and member state citizens is a fundamental mechanism for integration. Shared fora, intercultural dialogue, education about migration and different cultures can enhance interaction between immigrants and Malta's citizens.

Children arriving and staying in Malta have need for care as do Maltese children. This means that we must ensure an effective social inclusion and integration policy, with all the necessary safeguards, so as to give them the opportunity to live, enjoy their childhood years and have the possibility to grow in adulthood with the requisites to lead a fruitful and dignified life.

The participation of immigrants in the democratic process and in the formulation of integration policies and measures, especially at the local level, supports the process. Mainstreaming integration policies and measures in all relevant policy portfolios and levels of government and public services is an important consideration in public policy formation and implementation.

Against this background we take note of the information presented by UNHCR and aditus in the following pages, giving attention to the views of those granted asylum in Malta as well as the perspective of Maltese institutions and service providers.

Developing clear goals, indicators and evaluation mechanisms is necessary to adjust policy, evaluate progress on integration and to make the exchange of information more effective. Only through establishing the facts of the current situation is it possible to define what is required to facilitate a positive settlement process and foster integration of people granted protection in Malta.

Minister Helena Dalli
Minister for Social Dialogue,
Consumer Affairs and Civil Liberties

Minister Marie-Louise Coleiro Preca
Minister for the Family and Social Solidarity

REFUGEE INTEGRATION IN MALTA



Law and policy overview

Since 2002, asylum-seekers and migrants have been attempting to reach Europe by setting sail from North African shores, with an average of 1,650 persons reaching Malta every year. Characterised as mixed migratory flows, in many cases these vessels carry persons fleeing war or persecution together with migrants leaving their countries for reasons not related to international protection needs. Centrally-located in the Mediterranean and being responsible for a large Search and Rescue zone, Malta has struggled with the reception of a relatively large number of people who in the vast majority of cases are rescued at sea by the Armed Forces of Malta.

Following disembarkation, the reception arrangements and procedures are generally divided into three stages: detention¹ centres (closed), open transition centres and finally settlement in the community. The open centres provide accommodation for a variety of categories of people: asylum-seekers, recognised refugees, beneficiaries of subsidiary protection, failed asylum-seekers enjoying national protection, and other migrants. These individuals have different profiles and needs depending on their – age, health condition, family composition, ethnic/religious affiliation, gender, sexual orientation/gender identity, educational/professional background, etc.

According to UNHCR estimates, as of end of 2013, around 5-6000 people who entered the country as asylum seekers remain in Malta. Around 1,500 of them are accommodated in open transition centres. Under the prevailing government policy, the open centres are intended as temporary accommodation arrangements “until such time as these immigrants find alternative accommodation, proceed to a third country or return to their country of origin”², with accommodation in the community as the target for as long as beneficiaries of international protection remain living in Malta.

On this basis, Malta's third reception stage – community life – is aimed at seeing beneficiaries of international protection gaining independence, becoming self-reliant and seamlessly integrating into the host community. Yet effective integration remains problematic for many refugees and beneficiaries of subsidiary protection. Many are failing to successfully move out from the open centres and otherwise settle in a stable new life situation in Malta.

The lack of a clearly formulated national integration policy and framework remains a major challenge for protection beneficiaries, and asylum-seekers, living in Malta. Since 2002, when Malta first witnessed the first significant arrival of asylum-seekers on its shores, the authorities' national, regional and international discourse has mainly focused on resettlement and 'intra-EU relocation' within the European Union context. The premise for

these discussion has been that Malta is too small and densely populated to allow effective integration of refugees. In fact, a substantial number of persons benefited from resettlement to the United States of America or intra-EU relocation to other EU Member States. Various integration support initiatives have been launched, both by Government and civil society organisations, but these have primarily been implemented on an ad hoc project basis³.

The general approach of the authorities involved with social welfare and health care is that beneficiaries of international protection should access mainstream services – public and private – in the same manner as they are accessed by the local community. It is an integration orientation that generally seeks to avoid establishing separate services, procedures and entities created specifically to cater for the needs of the refugee population. This means that responsibilities for addressing the needs of refugees are shared among Maltese agencies that are not always well-prepared or capacitated to respond.

In terms of rights and obligations to be enjoyed by asylum-seekers and beneficiaries of international protection, the national set-up also reflects the fragmentation of rights contained in the relevant EU directives, with Maltese law and policy according rights in direct relation to a person's legal protection status. Under this approach, refugees are granted the wider, more extensive set of rights; the rights of beneficiaries of subsidiary protection are generally defined in terms of “core benefits”, and failed asylum-seekers are granted a bare minimum set of rights.

On the basis of the above considerations, it is possible to identify legal, political and practical integration obstacles that hinder the effective enjoyment by beneficiaries of international protection of the rights they are entitled to under relevant international and regional instruments as well as national legislation.

It is within this operational context that UNHCR and aditus foundation has developed the two integration related initiatives - the 'Stakeholder Information Sessions' and 'Meet The Other'. As described in the following parts of this report, the projects' themes and methodologies are complementary in the way that they embrace the traditional two-pronged approach to refugee integration by focusing, respectively, on the refugees' own experiences as well as relevant institutional perspectives.

In fact, this complementarity is underlined in the report's final section where the main outcomes of the two projects are merged in the formulation of a set of general conclusions.

1. Upon arrival in Malta all persons without entry documents are automatically detained. For more on the detention system, and concerns about its impact on refugees, see UNHCR's Position on the Detention of Asylum-seekers in Malta <http://www.refworld.org/docid/52498c424.html>

2. Ministry for Justice and Home Affairs, Ministry for the Family and Social Solidarity, Irregular Immigrants, Refugees and Integration: Policy Document (2005), page 23, <http://www.refworld.org/docid/51b197484.html> (accessed 10th January 2014).

3. Such initiatives include information and guidance to facilitate labour market access (AWAS), a comprehensive information booklet on Malta (IOM) and various social and cultural initiatives (SOS Malta, OFD and others).

REFUGEE PERSPECTIVES

Meet The Other Project

Background and rationale

In July 2011, UNHCR and aditus foundation launched a primary research project titled 'Meet The Other' (MTO), with the aim to develop an empirically grounded understanding of issues that affect those refugees who are living in private accommodation in communities in Malta.

It was observed that many refugees who lived in private accommodation were disconnected from available support services. Many in fact only sought guidance and services when they would have reached a crisis point. This means that many people were not regularly reaching out to government services nor approaching humanitarian organisations for support. As they did not form part of more visible migrant communities residing in open accommodation centres, their level of integration in Maltese society had not been documented or analysed in any detail. It was this particular group that was, and remains, targeted through the MTO research project.

Aims and objectives

Having at its core the overall goal to collect information about living conditions and coping mechanisms, the specific MTO objectives included:

- » Identification of tools and mechanisms that refugees are utilizing to facilitate settlement and integration in Maltese society;
- » Identification of obstacles and needs within the context of the settlement and integration processes;
- » Provision of complementary research carried out on integration related issues in Malta, as a potential precursor to more effective pursuit of integration strategies that enable self-reliance;
- » Development of an informed view of the situation that can in turn be used in crafting awareness campaigns relating to integration challenges affecting both beneficiaries of protection as well as local communities in Malta;
- » Provision of information that can support refugees towards increased awareness, higher degree of independence and an overall better standard of living overall;
- » Provision of individual follow up and support to refugees living outside of open centres by way of providing information, advice and referrals to other services, in particular through promoting and supporting integration initiatives.

Methodology

This project was guided by the understanding that many refugees were living in the Maltese community, largely disconnected from both asylum-related and mainstream government services. The research sought to discover the challenges they faced and to identify mechanisms that help people settle, integrate and live self-reliantly in Malta.

The project methodology was designed to obtain subjective, narrative responses from people who were in the midst of a settlement process, having taken steps towards self-reliance. The research sample included people in all phases of the settlement and integration processes. Whilst some presented positive examples of successful steps towards integration in Malta, others were evidently struggling with achieving fulfilment of even basic needs and progress towards self-reliance. In addition to this, beneficiaries of protection were prioritised for selection according to the following criteria:

- » **Protection status:** people with refugee status were prioritised over beneficiaries of subsidiary protection, since refugees enjoy more extensive rights under Maltese law;
- » **Location in Malta:** preference was given to refugees residing in central areas in Malta such as Msida, Gzira, Floriana and Valletta, or alternatively who could commute to Valletta to conduct their interview there. This was mainly due to practical considerations relating to the arrangement of appointments;
- » **Nationality:** the aim was to include multiple nationalities as part of this research project. Somalis and Eritreans constituted the majority of interviewees, reflecting the general numbers of both nationalities in the overall refugee/subsidiary protection population;
- » **Gender:** the aim was to assess the situation of both women and men. When dealing with couples, it was sought to interview husband and wife separately, although this was not always feasible. Specific focus was placed on single women with children because of their presumed vulnerability and challenges towards becoming self-reliant;
- » **Age:** efforts were made to include older beneficiaries of protection, as well as people with young children and early school age children, on the assumption that these groups generally require more services and assistance with accessing them;
- » **Date of arrival in Malta:** people who stayed in Malta for some time were given priority over more recent arrivals, so as to learn from their broader experience

about the overall settlement and integration process;

- » **The US Resettlement Programme (USRP) and Intra-EU Relocation:** people who were in the process for the USRP or Intra-EU Relocation were only interviewed in exceptional circumstances, as the purpose of the research was to assess the situation of those who were likely to consider their medium term future in Malta;
- » **Specific protection needs:** the research included individuals in need of various forms of support and follow-up through one-on-one support and guidance interventions from UNHCR and aditus foundation;
- » **Long-term integration:** some individuals stated that their aim was to remain in Malta, also demonstrating a higher level of self-reliance and engagement with Maltese society. It was considered a priority to include such individuals in the research to understand what key factors led to progress towards their independence and integration.

Research strategy

MTO was designed around a two-fold strategy:

- » To gather information about individual integration and settlement in Malta to guide support interventions and planning, in line with the implementing organisations' strategies for participatory approaches and service user involvement;
- » To provide situation specific information to the refugee, by means of a tailored information pack and individual follow-up sessions.

A standard questionnaire was used as a guide and entry point to a discussion with the interviewee and a point of reference for giving advice and information. If questions were deemed unsuitable to ask during a particular interview, they were omitted. The interviewee was informed at the time of the interview that the project was being implemented in order to understand the integration situation in Malta on a broader level, as well as to assess and try to address the need for individual support.

As highlighted throughout this report, the focus of the interviews was to engage in an open discussion with the refugees. Therefore not every question was answered by every person.

Needs-based research developments

Throughout project implementation, aditus foundation and UNHCR identified key needs

and responded with new activities addressing these needs. Further information about this can be provided upon request, yet a summary is presented hereunder:

1. Information Package

Many refugees had minimal understanding of the full range of rights and services available to them. Therefore UNHCR developed an integration resource kit for volunteers to use during the interviews. This pack contains information about main integration related services and service providers. All interviewed refugees were given an information page with key services highlighted. Additionally, UNHCR phoned every interviewed refugee after the interview in order to provide information that might not have been available at the time of the interview.

2. Mentoring Programme

Many refugees were disconnected from the Maltese population and aside from employment-related fora had no other opportunities to socialise with Maltese people. UNHCR Malta, together with local NGO Kopin, developed a 'Befriending' project, firstly specifically focused on female refugees, but with the scope to expand to a wider group. There is also the possibility to link this with a more intensive integration initiative, the 'Integration Priority Track': a package of intensive services designed to support refugees who wish to focus solely on their integration (rather than their resettlement).

3. Volunteering

The questionnaire, as amended from its original version, asked interviewees whether they would consider volunteering. This was done in order to sensitise refugees to the possibility of voluntary work as an avenue to paid work, also in acknowledgement of the fact that volunteering has the potential of providing the opportunity to rise from inactivity to feeling useful, to learn the local language and to combat prejudices.

4. Interview Maltese people

In 2012 UNHCR commissioned the 'What do you think' research whereby 400 Maltese people or long-term residents in Malta were interviewed about general attitudes and perceptions of refugees in Malta. This survey provided valuable information about public perception and guided UNHCR's work with regard to public information campaigns and other targeted initiatives. Follow up questions were asked in 2013 to measure whether public perceptions changed, with results being published shortly (2014)⁴.

(In the 'What do you think survey', 58% agreed with the statement that "people coming to Malta should change their ways to be more like other Maltese citizens.")

⁴ <http://www.unhcr.org.mt/news-and-views/press-releases/567-what-do-you-think-majority-do-not-consider-migration-to-be-a-threat> (accessed 10th January 2014).

5. Advocacy activities with service-providers

The feedback gathered from 'Meet The Other' regularly updated UNHCR and aditus on gaps and concerns in relation to service provision by public stakeholders, as well as on available good practices. This information readily fed into the advocacy work of the two organisations, with UNHCR developing a rapport with a number of these stakeholders through the 'Focal Points' project⁵, established with a view to promote good practices and advocate for improvements.

Interview methodology

All interviews followed a pre-established research methodology:

1. Identify the Individuals

The UNHCR database of beneficiaries of protection in Malta was used to identify candidates, based on the above criteria. The candidates were initially approached by phone, at times with the support of an interpreter. Some refugees declined to participate upon learning that the project was about their settlement and integration in Malta, as opposed to a possibility of being relocated or resettled. Some calls were unanswered, and some refugees were not reachable.

2. Conduct the Interviews

Preference was given to conducting interviews in the interviewees' homes, since this approach enabled the interviewers to observe living conditions as part of the project's social outreach efforts. Otherwise, interviews were held at aditus' or UNHCR's office. In some cases public areas were used, such as a cafeterias.

In all cases a consent form was explained and completed before conducting the interview. Detailed project information was also provided.

3. Record the Data

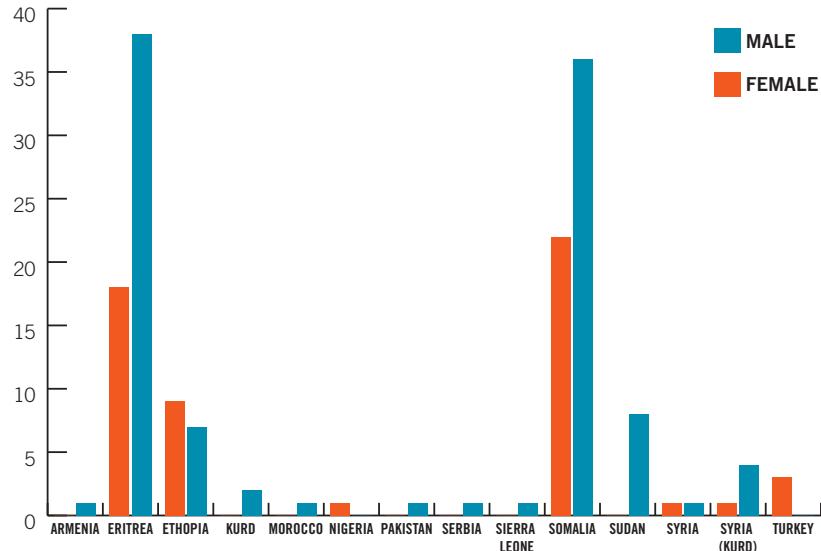
During the interview, the thematically divided questionnaire was completed by hand. Data was then transferred to the main findings database. Recording in this manner facilitated the formulation of statistics and data charts, allowing for analysis and assessment of trends.

⁵ Through this on-going project, a variety of public and private service-providers are approached by UNHCR with a view to facilitating networking, exchange of information, training support and referral mechanisms.

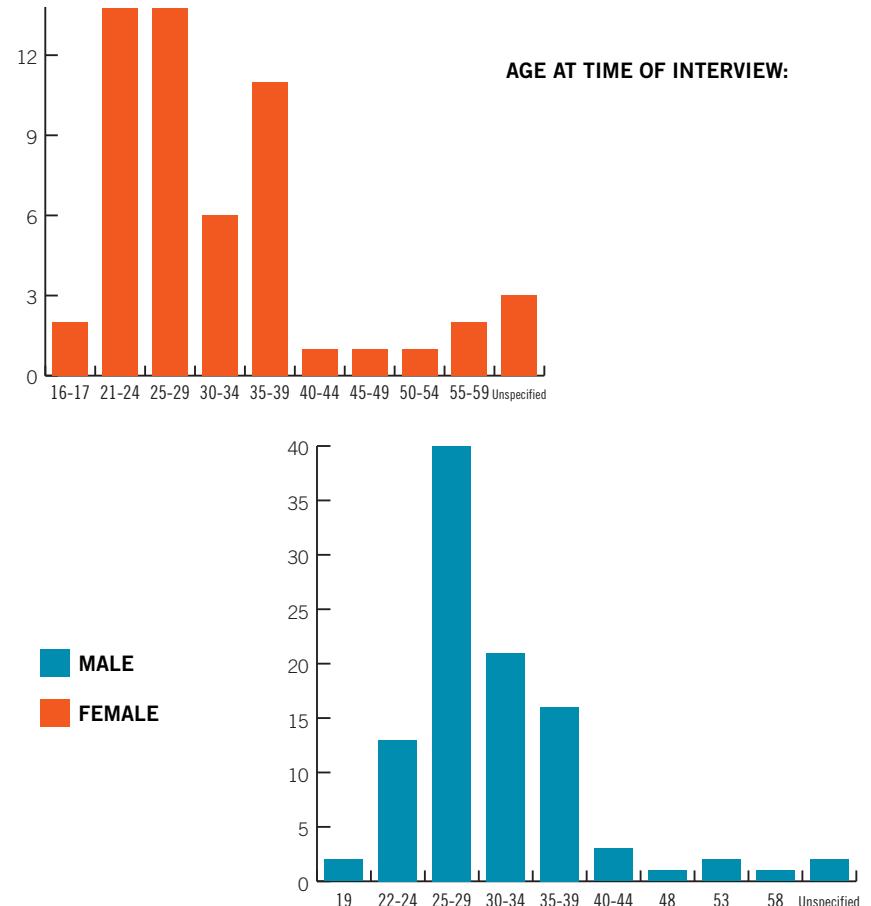
Interviews breakdown

Between 2011 and 2013, an overall of 156 people were interviewed in the MTO project. 81interviews were carried out in 2011, 35 in 2012 and 40 in 2013. From this number, 55 were female, while 101 were male.

As demonstrated in the below chart, the largest number of people interviewed were Somali and Eritrean.



Representative of the overall population of beneficiaries of protection, the largest group interviewed were single males, however it was ensured that other relevant categories were also represented. Most of the interviews were conducted with people aged between 22-39 years old. This was quite representative of the overall refugee population demographic⁶.



Interpreters were available for interviews when required. In all, 72 interviews were done with an interpreter while 84 were done without. The interpreters were commonly from the refugee population, explaining why in some cases the refugee preferred to participate without an interpreter. This also highlights the ability of many refugees to communicate in either English or Maltese.

Key conclusions

The conclusions drawn from the MTO project are presented thematically in order to highlight the various components necessary for the success of any national integration framework. Each section opens with a brief summary of the relevant law or policy elements.

⁶ For more details on statistics, see <http://www.unhcr.org.mt/statistics> (accessed 10th January 2014).

EDUCATION

All beneficiaries of protection are covered under compulsory and free of charge state education up to the age of 16. After secondary school, and after obtaining relevant necessary Ordinary Level examination passes ('O'Levels'), students may enrol for post-secondary education: two years of study in preparation for Advanced Level examinations ('A'Levels'). All beneficiaries of protection may also apply to enrol at the University of Malta and in principle they are treated as all other third-country national applicants in terms of application procedures, fees, and stipends. Beneficiaries of protection may apply for an exemption of fees.⁷

Previously obtained qualifications may be recognised in Malta in accordance with established procedures.⁸

All persons may also apply to follow courses at the Malta College of Arts, Science and Technology (MCAST)⁹. Refugees are treated equally to other applicants, and may also apply for a fee exemption for full time courses. Refugees studying at MCAST may also apply for a student stipend. Malta also offers various other learning possibilities, including those offered by the Employment and Training Centre (ETC)¹⁰, Local Councils, the Life-Long Learning Directorate¹¹ and other entities. A number of NGOs also organise informal educational sessions accessible to refugees.¹²

Key findings:

- » Most interviewees had attended or completed secondary school in their countries of origin, whilst a lower number said they had only attended primary classes. Some individuals had completed other levels of education, including tertiary, while a few had never gone to school or studied.

⁷ See Procedural Standards in Examining Applications for Refugee Status Regulations, Legal Notice 243 of 2008 (Procedural Regulations), Article 14. Also the Students Maintenance Grants Regulations, Legal Notice 372 of 2005.

⁸ For further information see: <http://www.ncfhe.org.mt/content/home-about-us-malta-qualifications-recognition-information-centre-mqrhc/5668870/> (accessed 10th December, 2013).

⁹ <http://www.mcast.edu.mt/> (accessed 10th December, 2013).

¹⁰ <http://www.etc.gov.mt/Index.aspx> (accessed 10th December, 2013).

¹¹ <http://lifelonglearning.gov.mt/> (accessed 10th December, 2013).

¹² For example, see the courses offered by Integra Foundation at <http://integrafoundation.org/our-work/> (accessed 10th January 2014).

- » All school-age children confirmed that they are attending school. One woman described taking her children to school as an opportunity to engage with Maltese parents, and one of her main channels of communication with the local community. Many other interviewees, particularly single women, seemed to struggle to communicate with their children's teachers since they lacked knowledge of either English or Maltese.
- » Some parents commented that their teenage children were facing difficulties when entering the Maltese school system. Since children over 16 years of age are too old to access publicly funded compulsory schooling, and most children/teenagers would not have sat for any O'Level examination, they are also unable to attend post-secondary school. Remaining options include MCAST or courses at private institutes, generally against payment.
- » A number of refugees, including parents, noted the challenge of settling in the school system when their intentions were to remain in Malta for only a short term. It was noted, in fact, that interviewees who were in the US Resettlement Programme (USR) preferred not to focus on investing time and effort in pursuing long-term courses in Malta.
- » Many interviewees expressed a desire to continue their studies in Malta. Many, however, admitted to facing serious challenges in just supporting themselves on a daily basis, including making payments for rent and utilities. Whilst some students potentially qualified for a student stipend, the provided amount did not seem sufficient to cover all living costs and those costs associated with studies.
- » Many refugees were engaged in working environments that did not generally allow for part-time studies. Some refugees experienced little possibility of achieving the degree of flexibility in their working hours needed to combine their work and studies. Many people in fact worked until early morning hours on a daily basis (e.g. kitchen and cleaning work), preventing them from being available for morning classes.
- » Most private accommodation was shared by large groups of persons, often making study conditions at home very challenging.
- » Some interviewees were aware of the above-mentioned 'Life-Long Learning' courses, and had registered to attend. Also here, concerns were expressed with regard to retention rates, generally linked to the challenges referred to above.
- » English and Maltese classes were of interest to a large majority of the interviewees, and many had already attended some of the free courses organised inter alia by NGOs. Feedback from interviewees told us that often these classes were too large, with participants having different levels of knowledge and impacting the overall

quality.

- » Employment was the clear priority for the vast majority of interviewees.
- » Other relevant elements raised in the interviews included lack of affordable and flexible childcare, poor working conditions, the need to send remittances to family members and the cessation of social assistance benefits when in study.

HEALTHCARE

'Core' medical services are freely available to all beneficiaries of protection. Together with the main public hospital, Mater Dei Hospital, there are also a number of public clinics scattered throughout Malta providing free consultations, referrals and other medical services.¹³

Access to medication and to non-core medical services is not always free of charge, in the same way as it is also not always free of charge for Maltese nationals. All low-income individuals may be given a 'Yellow Card' to indicate entitlement to free medication.¹⁴

The main public mental health facility, Mount Carmel Hospital, offers free mental health services to refugees. Since 2007, more than 500 people have been provided with such treatment and Mount Carmel staff has also participated in the capacity-building sessions organised in the SIS project.

The public health service provides interpreters on a roster basis¹⁵. This service can be booked by anyone within the public health sector in order to aid a specific patient, although it appears that not all health professionals are aware of this support.

Key findings:

- » Most interviewees confirmed that they were generally able to access public health centres without major problems. Overall, the quality of health services received was considered very good.
- » Communication seemed to be the main challenge, and some respondents indicated that they were not always able to understand the guidance and instructions provided by medical service-providers.
- » A small number of interviewees felt that they had been given an inferior standard of treatment owing to their refugee or migrant status.
- » Some refugees were in possession of the 'Yellow Card'; others were not clear as to the eligibility criteria and the application process.
- » Many interviewees reported positively on the interpreters available at Mater Dei Hospital.
- » A few interviewees said that, when needed, they had sought private medical services by visiting a pharmacy where a doctor (General Practitioner or Specialist) would be available. They would then be referred to Mater Dei Hospital for necessary follow-up.
- » A small number of participants also mentioned that they had made use of private hospital facilities.

NATURALISATION, FAMILY LIFE AND FUTURE PLANS

Recognised refugees have the right to be issued a Convention Travel Document to enable them to travel. Beneficiaries of subsidiary protection may apply for an 'aliens passport'.¹⁶

Family reunification is only open to recognised refugees, allowing them to apply to obtain

13 Procedural Regulations, Article 14.

14 For extensive information on entitlements within Malta's healthcare system see https://ehealth.gov.mt/HealthPortal/chief_medical_officer/pharm_pol_mon/med_entitle_unit/introduction.aspx (accessed 10th January 2014).

15 Languages covered include the main language groups relevant to Malta's refugee population.

16 Procedural Regulations, Article 14. Also see the FAQ's on the website of the Malta Passport Office, <https://mhais.gov.mt/en/MHAS-Departments/The%20Passport%20Office/Pages/FAQ.aspx> (accessed 10th January 2014).

authorisation for their spouse and/or minor children to come to Malta. Beneficiaries of subsidiary protection have no right to family reunification in Malta.

Refugees who have lived in Malta for at least ten years are eligible to apply for Maltese citizenship¹⁷. The responsible Minister has the discretion to ultimately decide on such applications. Beneficiaries of subsidiary protection have no right to apply for citizenship in Malta by virtue of their status, but are nonetheless entitled to be granted Maltese citizenship in accordance with citizenship rules relating to marriage by non-Maltese persons to Maltese individuals. Refugees are also included in this latter process.

All children born in Malta may be registered in Malta's Public Registry, including refugee children, yet are not automatically granted Maltese citizenship.

Key findings:

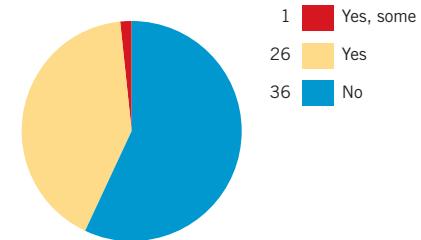
- » Unable to access family reunification, most beneficiaries of subsidiary protection remained separated from their spouses and/or children, whether these lived in countries of origin or elsewhere.
- » The lack of prospects for citizenship and long-term predictability of status was a regular theme that almost all interviewees spoke about with great concern.
- » Many of the interviewees said they were unable to predict their future life situation. Some said it was not possible for them to predict or plan ahead, and others said that they would wait for their chance to be resettled.
- » Despite the above, many had a clear vision of what they would like to achieve in the longer term. Many expressed the wish and intention to leave Malta, their reasons focusing on the need to be reunited with their families and the prospects of finding stable work and education opportunities.
- » Some refugees mentioned the lack of prospects for citizenship or a permanent status as a major element discouraging them from putting too much effort into integration in Malta.

SOCIAL LIFE, INCLUSION AND RELIGION

Studies and surveys confirm that there is limited interaction between refugees and the local population in Malta¹⁸. In recent years there have been several small-scale projects intending to promote social and cultural exchange, including activities involving food, music, art, dance and other traditional cultural elements¹⁹.

Common trends show that a high percentage of refugees are Muslim²⁰, and they can freely visit the main mosque, centrally situated in Marsa. Another predominant religion is Christian Orthodox, with some congregations utilising Maltese churches for their religious ceremonies.

DO YOU KNOW YOUR NEIGHBOURS?



¹⁸ For example: 'What do you think' project by UNHCR and 'I'm Not Racist, But...' by the National Commission for the Promotion of Equality (NCPE), accessible at https://secure3.gov.mt/socialpolicy/equal_opp/equality/projects/_m_not_racist_but (accessed 10th January 2014).

¹⁹ For example: 'Same Difference' by SOS Malta; 'Next Door Family' by GetUpStandUp; 'Youth Upbeat' by SOS Malta; 'Befriending pilot project' by UNHCR; 'I'm Not Racist, But...' by NCPE; 'Side by Side' by SOS Malta.

²⁰ Bureau of Democracy, Human Rights, and Labour, International Religious Freedom Report 2010, "There are approximately 4,500 irregular migrants resident in the country, approximately two-thirds of whom are Muslim (included in the 6,000 total previously mentioned). The remainder of the migrants embrace various Protestant denominations, Catholicism, Coptic Christianity, indigenous African forms of worship, or are non-religious." <http://www.state.gov/j/drl/rls/irf/2010/148961.htm> (accessed 10th January 2014).

¹⁷ This does not emerge from Maltese citizenship legislation, but from government policy. Relevant legislation includes the Maltese Citizenship Act, Act XXX of 1965 and the Citizenship Regulations, Legal Notice 106 of 1989.

Key findings:

- » Around two thirds of participants reported that they did not have any Maltese friends. Many explained this as being the result of not being able to speak and interact in Maltese. Many participants confirmed that they lived their lives separately from Maltese people, rarely engaging in conversation or social exchange.
- » Of those who reported to have Maltese acquaintances, one third stated that they had developed friendly relations through the workplace. However, most people commented that they would then not engage with their colleagues outside of the workplace in a social environment, and would not maintain contacts if they left the job.
- » The majority of those surveyed reported that they did not know the people living next door to them, yet a significant number also confirmed that they were on positive terms with their neighbours. In fact the participants living in Qormi, Valletta, San wann, amrun, G axaq and ejtun at the time of the interviews confirmed that they knew their Maltese neighbours. Statistically, refugees interacted less with their neighbours when living in localities having a larger migrant and refugee population.
- » When asked what they liked about living in Malta, respondents generally mentioned safety as a key positive aspect. Some also mentioned the sense of community, based on strong family links. Some also recalled their first encounter at sea with Maltese vessels, and expressed gratitude for having been rescued and provided with protection.
- » Some refugees reported positive elements based on personal relationships, such as friendly neighbours or landlords, or people from the same religious congregation. A number of refugees suggested that the Maltese government should provide more support or encouragement for those who seek to settle in Malta, whilst others acknowledged that the government was already providing important support through the open accommodation centres. Several refugees said that they were grateful for being allowed to work whilst others felt overburdened by the current situation and could not think of any positive aspects to their situation in Malta.
- » Most interviewees reported that their social links were purely with people of their own nationality. Some refugees further defined their communities as being linked to religious centres or gatherings. Others also considered their work environment part of their community, and this was the only context where Maltese people were included in their descriptions of social communities.
- » Most interviewees reported a positive relationship with other people who had come to Malta as asylum-seekers. In these social circles, religious events seemed to be the most popular meeting space, whilst house calls and or public spaces hardly featured. Some refugees mentioned Marsa Open Centre as a main socialising space, with some adding the seaside or meals as popular activities.
- » Some refugees stated that they were comfortable in engaging with police authorities if needed, whilst others expressed a lack of trust.
- » Whilst a number of refugees had benefitted from NGO support when in problematic situations, others mentioned their housemates or communities of co-nationals as the main sources of support and information.
- » Most interviewees had never been to any Local Council and did not have any understanding about the Councils' functions. Notably, most interviewees expressed interest in learning more about community-based services, including information about courses in languages, information technology and other core subjects.
- » The majority of interviewees said that they had never actively participated in community events, although many had attended village feasts²¹. Some refugees said that they had attended the yearly 'Isle of MTV' outdoor concert²². A number of refugees reported that they had opted not to attend any local events due to experiences (their own or of friends) of being subjected to racist or derogatory comments.
- » Interviewees commented that would be happy to present aspects of their own culture in order to encourage an understanding of their backgrounds. Suggestions included dancing, newsletters, and multicultural feasts. A few parents also said that they would like to see more activities supporting their children's interaction with the local community.
- » Most interviewees reported that they enjoyed religious freedom and the ability to practice their religion. One Muslim interviewee added that his employer regularly allowed him to leave work to pray.
- » Most of the interviewees confirmed that they generally bought food, clothes and similar items in regular local shops within their own neighbourhood. This activity was also described as one of the few where they interact with Maltese people within a non-employment environment.
- » Most of the interviewed families said that they looked after the own children, with a number of single mothers commenting that they did not work in order

²¹ 'Community events' are here being understood as events or activities not organised by their own or other migrant/refugee communities.

²² <http://www.isleofmtv.com/tv/> (accessed 20th December 2013).

to stay home with their children. Whilst awareness of the 'Smart Kids Childcare Centres' programme offered by the Foundation for Education Services (FES) was limited, some families were on the programme's waiting list, others mentioned that their child was too young to attend childcare, and others commented that the programme's hours were not suitable to their needs due to employment obligations²³.

- » Most interviewees made use of public transport as their sole means of transport. Others preferred to walk when possible. A few people confirmed that they owned their own cars.
- » Most refugees considered the 'Arriva' public transportation service to be a good one, or at least better than the former system. On the latter, most refugees referred to several instances of unfettered discrimination, such as buses not stopping to pick up refugees. Despite the overall positive evaluation of the 'Arriva' system, a number of refugees commented that instances of discrimination by drivers and other passengers still occurred. It was noted by some refugees that they asked Maltese people to hail buses to be sure they stopped for them.

EMPLOYMENT

Refugees and beneficiaries of other forms of protection enjoy the right to work.²⁴

Recognised refugees are entitled to access the labour market under the same conditions as Maltese nationals; however, they require a work permit.

Beneficiaries of subsidiary protection are required to apply for a work permit, issued by the Employment and Training Corporation (ETC), and this must be renewed annually. Under Maltese legislation, beneficiaries of subsidiary protection are granted access to employment subject to the undefined "labour market restrictions"²⁵. They are not eligible to register as unemployed, with the consequence that they do not qualify for regular unemployment benefits. In transposing the Qualification Directive²⁶, Malta granted beneficiaries of subsidiary protection the right to be granted "core social welfare benefits", a level of benefits that has been interpreted as meaning 'social assistance' in terms of the Malta Social Security Act²⁷.

Key findings under this sub-heading are as follows:

- » More than half of interviewees confirmed that they were in employment at the time of the interview. The majority of interviewees had in fact worked since arriving in Malta. It was noted, however, that several women had never been employed during their time in Malta.
- » Many reported working for extremely low wages, particularly when the work was unregistered. Several interviewees reported that they had been paid around fifteen Euros for eight to ten hours of informal work. Some also reported that they had struggled to obtain their agreed payments. In some cases the work was exceptionally tough and physically demanding.
- » Many of the interviewees who reported to be regularly employed at the time of the interview indicated a monthly wage of six hundred to eight hundred Euros, broadly reflecting the minimum wage level in Malta²⁸. Several interviewees reported that their income was often not sufficient to cover their living expenses. Generally, more

24 Procedural Regulations, Article 14.

25 Procedural Regulations, Article 14(1)(b)(iii).

26 Council Directive 2004/83/EC of 29 April 2004 on minimum standards for the qualification and status of third country nationals or stateless persons as refugees or as persons who otherwise need international protection and the content of the protection granted, replaced by the Recast version of the same Directive.

27 Act X of 1987. For more information on Malta's social welfare system, see this guidebook produced by JRS Malta, https://dl.dropboxusercontent.com/u/181171164/SocialSecurity_FINAL.pdf (access 10th January 2014).

28 http://industrialrelations.gov.mt/industryportal/employment_conditions/wages/national_minimum_wage.aspx (accessed 10th January 2014).

23 "Since March 2010, the Foundation for Educational Services has been entrusted with the running of Smart Kids Childcare Centres in various localities in Malta. The main aim of the centres is to offer a personalised service of quality care for all children, especially those at risk of social exclusion." http://www.fes.org.mt/index.php?option=com_content&view=article&id=122&Itemid=538 (accessed 20th December 2013).

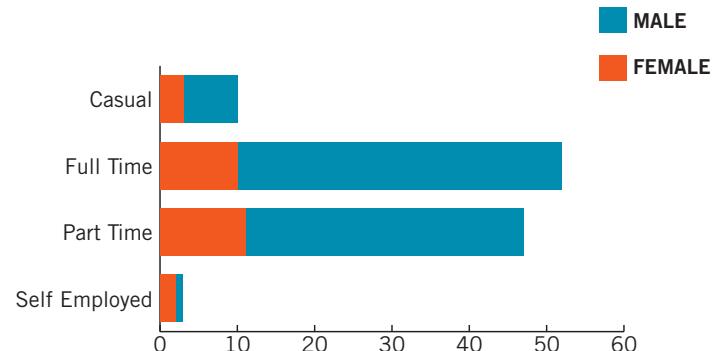
- than 70% of a monthly wage was spent on rent, utilities and food, and many people also regularly sent money home to dependants who require support in the country of origin. The highest reported salaries found the study were two males who each earn more than EUR 1,000 per month. Both men have a higher level of education and were working in skilled or semi-skilled jobs in Malta.
- » Many refugees and beneficiaries of subsidiary protection are assisting friends or family in Malta by providing for their share of rent and food while these are unemployed.
 - » Around two-thirds of those interviewed reported being subjected to poor working conditions. Several people reported that they were only receiving a part of their entitled salary. Others reported that while the employer treated them very well, some of their colleagues were disrespectful. Some interviewees reported that they were often assigned tougher work tasks than those assigned to their Maltese colleagues. Instances of abusive treatment, such as name-calling and bullying, were described. According to these accounts, in most situations no intervention or disciplinary procedures from the management ensued. In fact several interviewees reported that they generally did not interact with their colleagues.
 - » Approximately one-third of those surveyed stated that their work arrangements were appropriate, or at least that they were perceived to be such, that working conditions were tolerable and that they did not have any major problems at their work place. Some people also reported that their employers treated them well, with a number reporting to have made friends among colleagues, and that this had also improved their overall perception of Malta. Around half of the people who confirmed adequate working conditions were women.
 - » In general, few refugees were aware of their labour rights, and many confirmed they were not too keen on making themselves heard about, for example, substandard conditions for fear of losing their jobs. Instead they seemed to be doing their best at coping, the priority being to earn money in order to be in a position to meet basic daily needs. Abuses and inadequate conditions remained largely unreported.
 - » Many interviewees reported that they were unsatisfied with their work situation because they were not utilising their skills. For example, some interviewees had been engaged as teachers in their countries of origin whilst in Malta they were being employed as cleaners or construction workers. In this regard, most interviewees had no knowledge of the 'Malta Qualification Recognition Information Centre'²⁹ or of the possibility to have their skills, qualifications and experiences recognised and accredited in Malta. Some confirmed that they were unable to obtain necessary

- certificates from their countries of origin.
- » Most people reported to be working full-time at the time of the interview, with a significant number of people engaged in part-time employment. Nobody was engaged in both a full-and a part-time job. Irregular work and unpredictable hours were reported as common. Of the 156 interviews, three people reported to be self-employed at the time of the interview.
 - » A majority (two-thirds) of the people interviewed confirmed that they were paying income tax and social security contributions ('National Insurance', 'NI'), or that they did so when they had been employed. Among those who reported that they were not paying taxes, very few indicated that they preferred to work in an unregulated manner. Some of those who were not paying taxes and social security contributions said that they would willingly fulfil their fiscal obligations if their employers registered their employment. Some beneficiaries of subsidiary protection mentioned their concern that, despite paying social security contributions and taxes, they were not receiving contributory unemployment benefits.
 - » Some interviewees confirmed that they sought employment through newspapers and through the Employment and Training Corporation system³⁰. A larger number of people sought work through friends and personal contacts, or with support from NGOs. Some jobs were passed on following a departure from Malta, and many refugees referred friends when vacancies arose at their workplaces. Many people said they had found work by directly approaching potential employers. In fact very few of the interviewees indicated that they had found work or attended vocational training through ETC's referral system, despite having applied for every vacancy that had been sent to them. The number of people waiting at traffic junctions and roundabouts in search of short-term employment appeared to have reduced. No women indicated they had sought work in this manner.

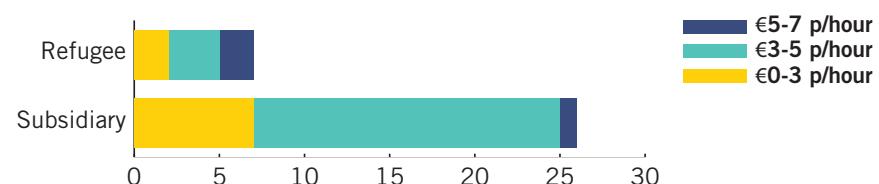
²⁹ <http://www.ncfhe.org.mt/content/home-about-us-malta-qualifications-recognition-information-centre-mqric/5668870/> (accessed 10th January 2014).

³⁰ <http://etc.gov.mt/index.aspx> (accessed 10th January 2014).

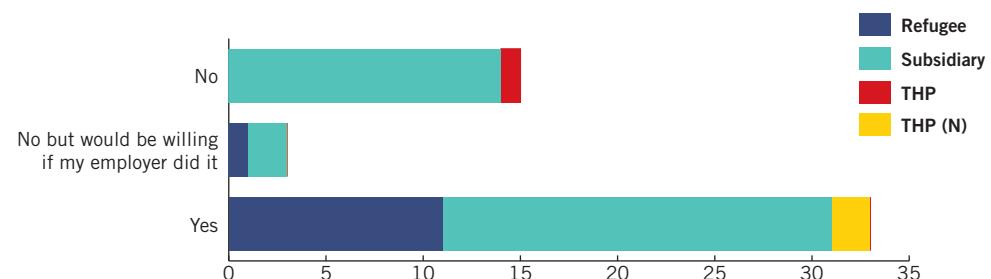
ACCOMMODATION



Euros per hour by protection status:



Payment of income tax and social security contributions, by protection status:

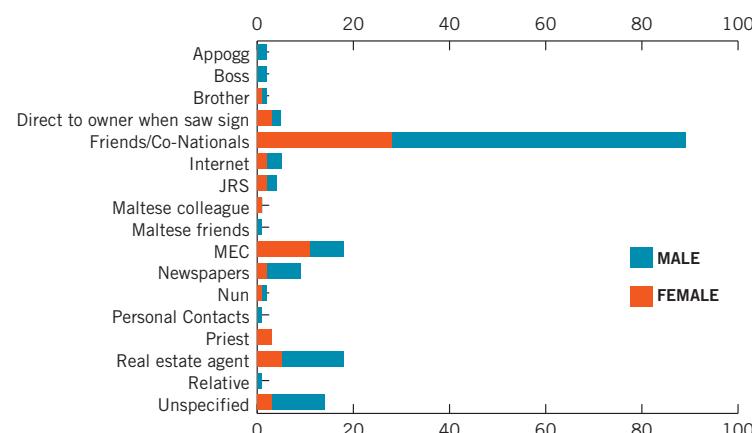


There are currently nine open reception centres in Malta hosting well over 1,000 persons. The Emigrants' Commission (MEC), a local NGO offering integration-related support to migrants and refugees, provides private housing arrangements for approximately 400 persons³¹. AWAS also coordinates separate centres for unaccompanied minors, single women and family units.

Recognised refugees are entitled to apply to the Maltese Housing Authority for rent assistance, a means-tested allowance. They are also entitled to apply for public housing, and their applications are treated in the same manner as those from Maltese nationals.³²

There is no comprehensive data available with regard to the number of beneficiaries of protection residing in rented accommodation.³³

How did you find private accommodation?



31 Information obtained directly from the Emigrants' Commission in December 2013.

32 Full list of schemes and related eligibility criteria can be found at <http://www.housingauthority.com.mt/en/content/26/Schemes%20and%20Social%20Housing> (accessed 10th January 2014).

33 Fsadni Marika, Dr. Pisani Maria, Immigrant and Ethnic Minority Groups and Housing in Malta – A Research Study, report for the National Commission for the Promotion of Equality (December 2012), http://www.academia.edu/2337953/Immigrant_and_Ethnic_Minority_Groups_and_Housing_in_Malta (accessed 10th January 2014).

Key findings:

- » At the time of the interviews, the vast majority of interviewees were living in Msida, Gzira, Valletta, amrun or other central areas of Malta. While a few beneficiaries of protection were living in smaller villages or towns, it was noted that a smaller group of mostly Somalis had settled within Maltese communities in Gozo. Very few refugees residing in Gozo were interviewed, mainly due to logistical considerations.
- » Most interviewees considered that living conditions in the open centres were not conducive to their integration, also since their location was usually quite distant from workplaces and integration-related services.
- » Furthermore, some interviewees had difficulties in maintaining a good level of personal hygiene while living in the centres, primarily due to overcrowding and its impact on living standards. Tough living conditions, they reported, led to several persons seeking to leave the open centres as quickly as possible. Others stated that they were required to leave the open centres once they had found a job.
- » Most interviewees were sharing private accommodation with other protection beneficiaries. Examples include: several women with children living in a single-bedroom shared apartment and four adults and three children living in a two-bedroom apartment. Generally, the majority of interviewees lived in apartments having two to four residents.
- » All interviewees were renting from Maltese house owners. Some landlords also provided material support including food and clothes, particularly in cases involving families with young children. A number of interviewees reported that their landlords were generally treating them in a decent manner.
- » The majority reported that they had good experiences living in their locality, with some also mentioning that neighbours had offered to provide support. Other interviewees stated that they do not communicate with their neighbours.
- » A few interviewees reported having been through periods of homelessness or squatting.
- » Most people relied on friends and personal contacts to find accommodation. Many reported that they had first moved in with friends, and then either took over the property or moved on to their own place. Several people also found accommodation through real estate agents, while others reported to have used services provided by NGOs.
- » Several of the interviewees who could, in principle, qualify for housing subsidies (persons enjoying refugees status) raised their concern that owners rarely provided them with rental contracts³⁴. In fact, some interviewees further reported that their landlords had warned them not to approach the Housing Authority. The majority of interviewed refugees had never heard of the Housing Authority, and only a few had been in contact with the office.
- » Many persons also highlighted the problems they faced accessing social assistance when not in possession of a rent contract.
- » None of the people interviewed had utility bills issued in their own names. In most cases landlords charged a flat rate (e.g. 100 a month) to cover these costs. With this system, refugees were unable to apply for utility vouchers or support schemes.
- » As mentioned above, many refugees were assisting friends or family by providing for their share of rent, food, and other life expenses through a period of unemployment.

³⁴ Proof of rental, either through the contract or through receipt of payment of rent, is a requirement of the housing subsidy scheme.

INSTITUTIONAL PERSPECTIVES

Stakeholder Information Sessions Project

Background and rationale

Following a 2010 UNHCR project implemented through the Jesuit Refugee Service (Malta), it was found that in order to improve the integration potential of international protection beneficiaries living in Malta, there was a need to raise the level of knowledge and awareness among desk officers within entities providing services to refugees and asylum-seekers in Malta.

As already mentioned the fragmentation of refugee entitlements and obligations was a result of the absence of a national integration framework and strategy. Refugee rights and obligations were distributed across various legal instruments and in many cases substantively supplemented by unwritten policies, resulting in not only an uninformed refugee population but also an uninformed host community. This was particularly problematic given Malta's focus on mainstreaming, requiring refugees to access regular public and private services. Effective enjoyment of refugee rights was therefore dependant on agencies and offices that in the vast majority of cases were unaware of the nature and content of these rights.

In order to target this institutional short-coming, aditus and UNHCR identified the need to target high-level management levels within public and private service-providers in order

to understand the precise extent of such information gaps. This mapping effort would then be closely followed by activities targeting lower-level representatives and staff, offering them specialised and comprehensible information on the relevant procedures, rights and obligations they are required to provide or make available to asylum-seekers and international protection beneficiaries.

This approach underlined the 'Stakeholder Information Sessions' project³⁵ throughout the three implementation phases being reported (2011, 2012, 2013), with the following developments occurring at various stages:

- » The Stakeholder tool on integration, self-reliance and access to services in Malta booklet was upgraded to a professionally-designed and published handbook, generally referred to as the *kun infurmat* booklet (be informed)³⁶;
- » On the basis of feedback from the majority of training beneficiaries of the 2012 phase, the 2013 phase also saw the organisation of a workshop on culturally competent service delivery. Details are given below;
- » The 2013 project further introduced the provision of bilateral legal/policy support activities in order to ensure a technical follow-up to the capacity-building sessions.

Aims and objectives

SIS' overall aims were to sustain the integration efforts of international protection beneficiaries. This would be achieved by reaching out to those key stakeholders that acted as service-providers, providing core asylum-related information and identifying the specific challenges, opportunities and best practices faced by individual stakeholders.

Specifically, therefore, the project sought to:

- » Improve access to entitlements from mainstream service-providers for beneficiaries of international protection;
- » Ensure that relevant public and commercial service-providers, including their front desk staff, are aware of the different statuses and corresponding entitlements of various groups of persons approaching them;
- » Guarantee a strong element of sustainability of the provided information, through the production and distribution of the practical and flexible *Stakeholder tool on integration, self-reliance and access to services in Malta* to support the provision

³⁵ http://www.aditus.org.mt/aditus_foundation/SIS.html (accessed 5th January 2014).

³⁶ <http://aditus.org.mt/aditus/Documents/kuninfurmat%282%29.zip> (accessed 5th January 2014). The link refers to the booklet's 2nd edition, updated to reflect legal and policy changes relevant to 2013.

- and implementation of services.
- » Contribute to the promotion and facilitation of the adoption of internal policies, standard operating procedures and other tools necessary for the appropriate provision of services;
 - » Stimulate and support inter-agency cooperation;
 - » Trigger a process of cultural awareness and sensitisation.

Methodology

In the course of the three years relevant to this report, SIS was composed of three deliverables: capacity-building sessions; technical support on law and policy; and a workshop on culturally competent service-delivery. Despite the complementary nature of the three deliverables, the capacity-building sessions remained the project's core activity.

Capacity-building/Information sessions

The sessions were intended for, and ultimately delivered to, front office staff of service-providing agencies. In view of the nature of the project's available resources, at the beginning of each implementation year aditus and UNHCR identified the principal stakeholders to be targeted in the implementation year. This exercise was conducted on the general understanding that primary targets should include private and public stakeholders having direct contact with protection beneficiaries and asylum-seekers, such as private companies, government departments, Local Councils, youth organisations and non-governmental organisations. Each year's identified stakeholders were further prioritised on the basis of the nature of interaction between the stakeholder and aditus and/or UNHCR; the role played by the stakeholder in refugee integration; and specific requests by individual entities.

Each session was preceded by a Management Meeting, where the partner organisations met with management-level staff of the identified stakeholders. The meetings served to initiate a technical discussion between the stakeholder, UNHCR and aditus on the key challenges, needs, best practices and policies relative to interaction with refugees. On the basis of the meeting's outcomes, the training content was slightly modified to ensure its relevance to each specific stakeholder.

“I will know what to do when a refugee calls...”

The **Information Session** (lasting around three to four hours) was then delivered to the stakeholder's front-office staff, in an informal manner with a view to triggering discussion and to sharing of concerns, opinions, recommendations and ideas. Sessions were delivered

in either English or Maltese, although the *kun infurmat* booklet was only published in Maltese³⁷. All sessions were delivered by aditus Director, Dr. Neil Falzon and whilst the provided information was objective and unbiased, it was nonetheless based on a human rights approach. Most sessions required participants to complete evaluation forms.

“It has helped to understand the feelings of all immigrants at open centres or in the community who come to our offices for help.”

All sessions were opened by a group introduction where aditus invited participants to highlight previous experiences, if any, with refugees, in order to ascertain level and quality of experiences as well as challenges encountered. Following this, the sessions proceeded on the basis of the *kun infurmat* booklet, covering the following sections:

- » “Terminology”, where key terms were explained, such as “asylum application”, “country of origin”, “voluntary return”, “refugee”, and “RefCom”;
- » “Chronology”, covering the life of a refugee in Malta from the moment of arrival until commencement of integration activities. In this section, aditus covered key processes and procedures, policies, stakeholders and misconceptions including: regular versus irregular arrival; detention; age assessment; vulnerability assessment; asylum procedure and the open centre system;
- » “Who is Who?” provided basic information on the central governmental, inter-governmental and non-governmental stakeholders (Malta Police Force, Office of the Refugee Commissioner, Refugee Appeals Board, UNHCR, IOM and NGOs);
- » “Status” clarified the distinction amongst international and national protection statuses in terms of the basis of each status and the rights/obligations attached to each (refugee status, subsidiary protection, temporary humanitarian protection, temporary humanitarian protection N, asylum-seeker, failed asylum-seeker);
- » “Frequently Asked Questions (FAQs)” presented a series of key queries/misconceptions commonly seen in national media or discourse: “what documents should I expect a refugee to be in possession of?”, “what should I do if I cannot communicate with a refugee client?”, “do refugee babies born in Malta automatically become Maltese nationals?”,
- » “Contacts” provided e-mail addresses and telephone numbers of supporting agencies.

³⁷ Since funds did not permit for publication in both English and Maltese, the latter was preferred due to its widespread use within the public service.

In the three implementation years relevant to this report, sessions were organised for the following entities:

Name of the entity	Functions/remit	Trained staff
Department of Social Security	Responsible for the administration of social security legislation, providing for the payment of benefits under contributory and non-contributory schemes	District offices Customer Care office International Relations Unit Social Work office
Foundation for Social Welfare Services (FSWS)	National social welfare service-provider	Aġenzija Appoġġ (Domestic Violence Services, Fostering Service, Child Protection Services, Out-of-Home Care Programme) Aġenzija Sedqa (substance abuse) Aġenzija Sapporġġ (disability) Support Line 179 Head Office
Foundation for Education Services (FES)	Development and implementation of education services to promote integration and social inclusion (public entity)	Smartkids Childcare Youth.inc (academic and vocational training for youth between 16-21 years of age) Klabb 3-16 (after-school service for school-age children) Head Office
Mount Carmel Hospital	Mental health service-provider (public entity)	Hospital Services Community Services (Crisis Intervention Group, Day Centres)
Malta Gay Rights Movement, We Are, Drachma	NGOs working in the area of LGBTI rights	Volunteers

As may be noted from the above table, one of the project's major shortcomings was its inability to attract sufficient interest from the private sector. Although efforts were made to engage with companies providing key services (public transport, telecommunications, banking), little interest was in fact shown³⁸.

Launch and evaluation seminars

In January 2012 a project launch conference was organised, in order to present the project's aims and objectives and also to engage in an active discussion on refugee integration. Presentations were delivered by aditus, the Department of Social Security and UNHCR, and were followed by lunch offered by SOS Malta's 'Same Difference' project³⁹. Participants included representatives of: civil society, various government departments, the National Commission for the Promotion for Equality (NCPE), University of Malta, Malta Council for the Voluntary Sector, Local Councils, public schools and the Malta Council for Culture and the Arts.

At the end of the 2012 project, an Evaluation Workshop gathered past and potential project beneficiaries with the aim of presenting the project's aims, implementation methodology and emerging themes. The latter are incorporated in this report's own findings and recommendations.

Technical support on law and policy

The 2013 project included a component that sought to provide technical input to stakeholders, shifting from a group focus to a more bilateral and specialised one. This component was based on an identified need of complementing and supporting staff efforts through the establishment of structures and frameworks within which these efforts would be harmonised and maximised. Specifically, the technical support was intended to:

- » Promote and facilitate the adoption of internal policies, standard operating procedures and other tools necessary for the appropriate provision of services;
- » Support inter-agency cooperation so as to maximise the potential of each relevant agency and to improve the overall quality of provided services.

In terms of delivery, aditus provided such technical support to a group of organisations offering shelter and support services to victims of domestic violence and other abuse, in the context of a regular meeting organised by the group to which aditus was invited to attend.

Other such support was provided, in the form of an extension to an Information Session, to the NGOs working in the area of LGBTI rights⁴⁰. aditus touched on the key legal and policy issues relevant to receiving and assessing LGBTI asylum-seekers, in order to highlight the potential institutional gaps and areas of needed advocacy and/or support. aditus also touched on the links between homophobia, xenophobia and the recently adopted

³⁸ One bank invited aditus to deliver presentations and distribute materials during a staff event organised as part of the company's diversity month.

³⁹ <http://www.sosmalta.org/samedifference2011> (accessed 10th January 2014).

⁴⁰ See the News item at http://www.aditus.org.mt/aditus_foundation/Home/Entries/2013/10/2_aditus_training_on_LGBTI_Asylum_issues.html (accessed 24th January 2014).

Victims' Rights Directive⁴¹, suggesting roles to be played by NGOs in ensuring its effective transposition and eventual implementation.

The partner organisations were unable to secure and implement further technical support sessions to the extent originally envisaged.

Culturally competent service-delivery workshop

Throughout the project's implementation, all training beneficiaries agreed on the need to receive training and information on cultural issues, as complimentary to the training sessions on legal and policy issues. This need emerged in all Information Sessions, indicating the widespread acknowledgement of the impact of cultural sensitivity to appropriate service delivery. In response to this identified need, the 2013 project saw the organisation of a two-day workshop that introduced the notion of culturally competent service-delivery.

"Cross Culturally Competent Professional has knowledge & information about the life experiences, cultural heritage, & historical background of his/her clients that will facilitate the working alliance."

The government entities that had received the training were invited and attended, together with JRS Malta⁴², UNHCR and aditus representatives, for a total of around thirty-five participants. Held over two mornings, the training was delivered by experts in the area⁴³ and provided participants the opportunity to engage in a number of exercises geared toward stimulating self-assessment and critical analysis⁴⁴.

"I can empathise more with the person in front of me."

⁴¹ Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA, <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:315:0057-0073:EN:PDF> (accessed 10th January 2014).

⁴² JRS Malta was invited due to the organisation's active involvement in the area of intercultural sensitivity, particularly within the health sector

⁴³ Academics and practitioners teaching at the University of Malta, within the Faculty for Social Wellbeing.

⁴⁴ All materials relating to the workshop, including presentations, may be downloaded from the aditus website, <http://aditus.org.mt/aditus/Documents/Culturallycompetentservicedeliveryworkshop.zip>

Key conclusions

These conclusions are based on the discussions held during the information sessions, the culturally sensitive service-delivery workshop and the two above-mentioned seminars. Whilst most findings were presented during the December 2012 Evaluation Workshop, they are here updated primarily to include input from the 2013 trained stakeholders.

SIS' conclusions include *refugee challenges*, reflecting the individual (refugee) elements, whilst the institutional perspectives are gathered under *agency challenges*. It is important to note that in both cases, the findings are based on the views expressed by institutional stakeholders, whilst those under the 'Meet The Other' (above) project represent the views expressed by individual refugees.

REFUGEE CHALLENGES

- » Many refugees seemed not to enjoy adequate livelihood due to and/or leading to extreme social vulnerabilities;
- » Childcare facilities were generally difficult to access owing primarily to limited availability and restricted opening hours. The acute impact of this limitation on employability was reported by training participants;
- » Participants expressed serious concern at what seemed to be relatively widespread informal fostering arrangements between refugee and Maltese families, in some cases also involving payment by the refugees or signed contracts;
- » Homelessness was repeatedly raised in a substantial number of sessions. This was linked to unsustainable departures from the protection offered by open centres (e.g. situations where refugees find themselves out of work following their entry into the community), termination of Open Centre Service Agreements and the policy of not authorising residence in open centres to asylum-seekers not reaching Malta⁴⁵;
- » Participants commented on the detrimental impact of sub-standard material living conditions in open centres and also in private accommodation on the possibility to provide effective and sustainable social support;
- » Refugees' loneliness and isolation was referred to as a common cause of

⁴⁵ aditus is informed that this policy was revised in 2013, in line with the requirements of the Reception Directive that makes no distinction between forms of arrival/entry for the purposes of eligibility to reception conditions.

- unemployability, mental health issues, substance abuse and permanence in the open centres;
- » Mental health seemed to be the major health issue affecting a large portion of the refugee community, including post-traumatic stress disorder, depression, anxiety, psychosis, paranoia and self-harm;
 - » In relation to children under Care Orders⁴⁶, participants commented that they had noted the application of monitoring systems for refugee children that were different to those adopted for Maltese children under identical Care Orders;
 - » Access to the labour market, although a protected right, seemed to be problematic, leading to personal and social conditions generally associated with chronic unemployment;
 - » Participants noted the absence of family support structures within the refugee community;
 - » Refugees seemed to have difficulties following instructions given by medical practitioners, leading to prolonged periods of illness, relapsing and a general state of lack of physical and/or psychological health;
 - » With specific reference to the Marsa Open Centre, participants noted how the Centre's choice of location in the heart of a notorious prostitution area was increasingly leading to prostitutes mothering children of absent refugees.

“We are all on the same boat, we all have dreams, hopes, inspiration and fears.” (Participant during the December 2013 workshop)

AGENCY CHALLENGES

- » All trained agencies indicated a strong commitment at improving their quality of service to ensure the well-being of all of their clients/patients/users, irrespective of nationality, status, gender, etc.;
- » The increasing number of community-based refugees was seen as a logistical and

- resource challenge for all stakeholders;
- » Communication was consistently mentioned as the main obstacle to effective service-provision;
- » Lack of refugee understanding on the role, nature, functions and procedures of the various agencies seemed to be leading to unnecessary calls, visits and request by refugees;
- » Most trained agencies confirmed the lack of inter-agency coordination on matters of shared or common competence, leading to fragmentation of policies and possibly divergent approaches;
- » Cooperation with other institutions and NGOs was, at the time, mainly *ad hoc*;
- » Staff working in the specialised shelters commented on the difficulties faced by refugees, particularly refugee women, in securing even basic levels of self-reliance. Reflections were made on the impact of these difficulties of the capacity of the service-provider to offer effective and sustainable social support;
- » Despite the best of intentions at the user/client/patient level, all participants noted the institutional and national absence of clarity on key legal and policy matters;
- » Service-providers said it was difficult to establish the level and nature of entitlements in cases with refugee families having internal different statuses (e.g. refugee husband and wife with subsidiary protection);
- » Throughout the sessions, there was an evident openness and willingness to discuss and assess challenging policy issues such as detention, integration, multi- and interculturalism;
- » There was an overall tension between, on the one hand, wishing to provide an excellent and indiscriminate service and, on the other hand, the understanding of institutional and personal limitations to actually provide such a service;
- » The social exclusion suffered by most refugees was highlighted as a key goal requiring further attention, especially to avoid the creation of ghettos, marginalisation and further socio-economic instability.

⁴⁶ In terms of the Children and Young Persons (Care Orders) Act, unaccompanied minors are placed under the care, protection and custody of the Minister for the Family and Social Solidarity by means of a Care Order.

GENERAL CONCLUSIONS BASED ON THE PROJECTS' FINDINGS

National integration framework and strategy

- » A national integration strategy should be established to provide a vision, direction and guidance as regards the process of settlement and integration of beneficiaries of protection in Malta. This would be important not only for defining the role of various government entities, but also as an entry point for shorter and longer term engagement by international organisations, non-governmental organisations and the refugee community.
- » The national integration strategy should be based on a strong public commitment to condemn and eradicate all forms of racism and discrimination, through a series of national measures as regards information services, education initiatives and individual interventions.

Legislation and policy

- » The relevant recast EU directives place obligations on all Member States, including Malta, to ensure their transposition within the national legal framework relating to reception arrangements and integration-related rights. These include specific elements that provide access to health care, education, the labour market and social rights. This exercise should also be an opportunity for Malta to clarify the specific rights of beneficiaries of protection and the corresponding responsibilities of institutions tasked with providing integration-related services.
- » Specific integration-related issues that would require further law and policy review include the right to family reunification with spouses and immediate family members, the absence of which in many cases constitutes a key obstacle to long-term settlement and integration. Likewise, a review of national law and policy is required to ensure that, when appropriate, beneficiaries of protection can effectively access naturalisation in line with the general citizenship legislation in Malta.

Monitoring, data collection and analysis

- » As part of the Government's responsibilities for integration, capacities should be established to comprehensively monitor and evaluate the impact of integration policies and measures, and their impact on the situation of refugees in Malta. Statistical data relating to the presence of migrants and refugees should systematically be collected, analysed and presented, including in key areas such as health, education, labour participation, living conditions and social inclusion. This effort should build upon the existing capacities for statistical data collection through NSO, ETC and other government institutions.
- » In order to improve efficiency and cooperation among government departments, a national integration strategy should include a framework for inter-Ministerial coordination, providing a mechanism for clarifying responsibilities and sharing of best practices. This should include involvement of all relevant institutions and authorities, as well interaction with international organisations and civil society as appropriate.

Strengthening accessibility and capacity of services

- » This report has highlighted the need for further targeted support to be provided to service-providers in order for them to meet the capacity requirements in the engagement with refugees. Mechanisms to make available appropriately trained translators and cultural mediators should be explored, possibly with the support of NGOs and the refugee community. There is also an expressed need for service-providers to receive information and training on cultural elements relevant to the provision of more sensitive and effective services.
- » While the approach of facilitating refugees' access to mainstream services brings advantages as regards inclusion in Maltese society, there are also evident gaps requiring further targeted support. In addition to facilitating translation and cultural mediation, this may include – for example – developing further information materials in relevant languages, establishing an online information portal for all categories of migrants and beneficiaries of protection, as well as strengthening capacities to provide individual guidance and advice. All or some of these areas may include involvement of support provided by civil society.
- » Existing public services may also evaluate the accessibility and availability of their own procedures through an age, gender and diversity perspective. People with particular needs may require further support in order to become self-reliant. As an example in this regard, reference may be made to the projects' findings relating to difficulties for some beneficiaries of protection in accessing childcare.

Refugees' engagement

- » At an institutional level, it could be considered to establish a formal consultation mechanism composed of refugees, migrants and representative of key governmental institutions, modelled on the experiences of other EU Member States. On a community level, efforts should also be made to support the creation of refugee-led organisations, both as interlocutors and potential service-providers.
- » In order to achieve integration objectives, refugees ought to themselves engage proactively in the complex and gradual settlement process, comprising all legal, economic, social and cultural dimensions. Government agencies, international organisations and civil society should make concerted efforts to encourage this approach. Based on the applicable rights framework, the engagement with refugee communities should acknowledge and promote their own skills and capacities to achieve self-reliance and empowerment.

APPENDIX – COMPLEMENTARY RECOMMENDATIONS BY ADITUS FOUNDATION

On the basis of the projects' findings, presented above, it is clear that both refugees and institutional stakeholders are facing a series of challenges when attempting to deal with integration measures. Whilst we have duly acknowledged the immense efforts being made by the majority of public entities, the absence of a clear and comprehensive national policy based primarily on a willingness to engage with the challenges presented by refugee integration is certainly this report's recurrent theme and, consequently, at the heart of our recommendations.

Our recommendations are here presented in no particular order of priority and are generally addressed to the relevant governmental authorities⁴⁷.

National integration strategy

1. A national integration strategy should be established. The strategy ought to be formulated on the basis of technical and inclusive consultations with all relevant stakeholders including government entities, international organisations, non-governmental organisations and the refugee community.
2. In substance, the strategy should be based on an endorsement of the view that refugees are welcome to start their lives in Malta in accordance with clearly stipulated rights and obligations as guaranteed in international and regional instruments. National discourse should therefore reflect this view by shifting from an exclusive focus on resettlement/relocation to a more balanced one incorporating local integration.
3. As with all effective policy measures, a national integration strategy should contain concrete targets to be achieved over short-, mid- and long-terms, coupled with detailed performance indicators against which the strategy should be evaluated on a regular basis in close consultation with key stakeholders.
4. In order to effectively position integration within a broader migration/asylum policy, the national integration strategy should carefully assess the direct

⁴⁷ These recommendations do not necessarily reflect the views of UNHCR.

and indirect impact on refugee integration of other regimes such as Malta's mandatory detention, the open centre system, poverty-reduction strategies, long-term residence and citizenship, forced and voluntary returns, and resettlement and relocation.

5. The national integration strategy should be based on a strong public commitment to condemn and eradicate all forms of racism and discrimination, to be translated in a series of national measures that should include (as highlighted below):

- a. Stepping up of educational efforts within schools and also targeting the general public;
- b. Strengthening the powers of the bodies tasked with receiving individual complaints from victims of discrimination.

Legal regime

The upcoming transposition of the EU recast directives offers an excellent opportunity to ensure a legal framework that does not merely reproduce *ad litteram* the directives' substantive content, but that is fully entrenched in Malta legal, institutional and policy framework.

6. Vague terminology such as "*core benefits*", and requirements to establish institutional responsibilities should be transposed in a language that is clear, intelligible and that fits into Malta's existing systems. This would guarantee legal primarily for refugees but also for those institutions tasked with providing integration-related services, such as health, social welfare, education, and employment.

7. Whilst it is admitted that the EU acquis retains – albeit to a limited degree – a differentiation in level of entitlements between refugees and beneficiaries of subsidiary protection, the two projects have clearly reiterated that such differences have a severe impact on the quality of peoples' lives and, consequently, on the level of effort and success of individual integration attempts.

8. In this regard, it is recommended that core issues such as family reunification, access to employment and social welfare are assessed with a particular view to determining the most humane, feasible and sustainable way ahead.

9. Access to citizenship should be made a legal and policy reality, not only for the small number of refugees but also for beneficiaries of subsidiary protection.

We believe that the sensitivity of the issue does not necessitate a blanket exclusion of persons who spend years making clear and committed efforts at validly contributing to Maltese society, socially and also financially, but that other safeguards may be explored to balance national sensitivities and integration opportunities.

10. Efforts should be made to strengthen the capacity and relevance of the national bodies competent to receive complaints about discriminatory practices, including the Malta Police Force, the Office of the Ombudsman, the National Commission for the Promotion of Equality and the Department for Industrial and Employment Relations. MTO confirmed the need to ensure effective information dissemination on the existence, functions and procedures before these bodies. Furthermore, increased efforts at understanding and dealing with the causes for refugee under-reporting of relevant incidents.

11. To further enhance the capacity of service-providers to meet the refugee needs, the national integration strategy should consider revising the ineligibility of refugees to be engaged within the public service. Beyond having a direct impact on the quality of life of individual refugees, we are convinced that the inclusion of refugees within public operational structures can play a pivotal role in bridging the gap between service-providers and refugee communities.

Institutional

SIS evidenced the lack of communication and coordination amongst public entities working with refugees. It also highlighted the fact that enhanced communication would not only contribute towards the identification of challenges but, more importantly, it would facilitate the timely exchange of good and promising practices amongst government entities.

12. Since it seems that this is largely due to the lack of a coordination institution and/or mechanism, we recommend that the national integration strategy:

- c. Identifies a ministerial responsibility for refugee integration; and
- d. Establishes an inter-agency or inter-ministerial structure with a remit to discuss, monitor and evaluate integration policies, measures, challenges, best practices and other elements.

13. In order to improve agency efficiency, the national integration strategy should require all institutions to formulate and implement internal policies and Standard Operating Procedures that internalise the national framework, thereby clarifying individual and collective responsibilities.

14. Following from the above, publication of available services, procedures, eligibility criteria and other useful information will streamline the volume and nature of refugees seeking to access specific services. In order to ensure that such information reaches the refugee community, relevant NGOs and other stakeholders could be approached to provide translation and dissemination support.
15. We strongly recommend a thorough revision of the open centre regime, on the basis of lessons learnt since 2002. Challenging material conditions, lack of interaction possibilities, institutionalisation risks and exacerbation of existing vulnerabilities are but a few of the justifications in support of such a revision, to be conducted within the context of the national integration strategy.

Service-provision

Both projects confirmed that, overall, service-providers are in fact making considerable efforts to ensure a service-provision that is efficient, non-discriminatory and respectful. Yet the projects also highlighted the need for further targeted support to be provided to service-providers in order for them to meet the 'new' capacity requirements in a professional manner.

16. Mechanisms to make available appropriately trained translators and cultural mediators should be explored, including with the support of NGOs and the refugee community.
17. The promising practices of the Office of the Refugee Commissioner and of the Migrant Health Unit⁴⁸ in successfully training and recruiting interpreters should be explored, with a view to replicating such practices for other departments. If more feasible, the idea of a national pool of available translators could be looked into.

One of SIS' main conclusions centred around the expressed need for service-providers to receive information and training on cultural elements relevant to the provision of a more sensitive and effective service. The workshop organised in 2013 served to provide a brief starting-point as to what such information and training could consist of, yet of course was not intended to meet all needs.

18. Intercultural competence should be offered to students following particular courses at the University of Malta, and should be made available as on-going

⁴⁸ https://ehealth.gov.mt/HealthPortal/health_institutions/primary_healthcare/migrant_healthunit.aspx (accessed 10th January 2014).

19. training to various professional sectors. Existing expertise should be built on and, where necessary, brought in from more experienced Member States.
20. Difficulties in accessing available childcare facilities should be tackled in order to support attempts at gainful employment and also as a tool to prevent informal bilateral arrangements made outside of existing regulated structures. So far, childcare capacity within the refugee community itself has not yet been fully explored and could provide a useful option if interested refugees were supported in pursuing the relevant courses to attain the required qualifications. Furthermore, existing public services could evaluate the accessibility of their own procedures in order to assess the feasibility and sustainability of amending them.
21. With regard to access to education⁴⁹, we urge the competent authorities to establish "*a formal, comprehensive national procedure for school entry that would include a thorough needs assessment (academic and non-), appropriate provision of comprehensible information to students and parents on all relevant elements, and a school orientation session*". This should be based on a collaborative approach with refugee students.
22. "Schools should not presume that all parents are able to communicate in Maltese. Standardised procedures for ensuring school/parent communication ought to be established...Individual teacher/parent communication should be encouraged."
23. As mentioned above, the extensive list of courses offered by institutions such as MCAST and the Lifelong Learning Directorate should be extensively disseminated as they offer excellent opportunities for refugees to improve their technical abilities and, consequently access the labour market.
24. Classes of English and Maltese should be offered of a more regular and sustained manner.

⁴⁹ We refer to recommendations made by aditus foundation in the recent research report: Falzon Neil, Pisani Maria and Cauchi Alba, Integration in Education of Third Country Nationals, for the Foundation of Educational Services (2012), pages 82-85, available at [http://aditus.org.mt/aditus/Documents/FES_report\(ENGLISH\).pdf](http://aditus.org.mt/aditus/Documents/FES_report(ENGLISH).pdf) (accessed 10th January 2014). The report was not focused on refugee-specific matters, yet parallel recommendations can easily be drawn. Two specific recommendations are quoted as examples.

Information and community empowerment

24. Refugees should be provided with comprehensible information on life in Malta, which information should include core elements such as: rights and obligations (especially where status-dependent), institutions and contact details, support services and organisations, basic history and geography, eligibility criteria and procedures, educational opportunities (for children but also including adult and vocational classes), and general information on Maltese life-style, and cultural norms and practices.
25. This *Life in Malta* handbook should be distributed to all refugees as early as possible so as to immediately trigger the integration process. As a bare minimum, all refugees should receive such information upon receiving a positive decision on their asylum claim.
26. The lack of social or social interaction between refugees and the Maltese community highlighted in the MTO project could be addressed by implementing programmes targeting, on the one hand, Maltese, refugee and other non-Maltese children and, on the other hand, adults. Social integration measures targeting these two groups, although clearly interlinked and interdependent, should be geared towards bringing communities together, outside the thorny parameters of Malta's migration/asylum discourse.
27. At an institutional level, we strongly recommend the establishment of a formal consultation mechanism composed of refugees, migrants and representative of key governmental institutions. The Portuguese example⁵⁰ of such a consultative body is generally hailed as a best practice in the European Union insofar as it gathers representatives of various migrants and refugee communities with a view to high-level dialogue and inter-institutional networking.
28. On a community level, efforts should be made to encourage and support the creation and effective operation of refugee-led organisations as key interlocutors with communities and also as active service-providers. Initiatives⁵¹ such as the 'Our Voice' project implemented by aditus foundation and Integra Foundation should be supported.

29. Activities at the local and community levels should be led by institutions operating on these levels, so as to maximise efficiency and strengthen the subsidiarity principle.

Vulnerable persons

30. The national integration strategy should include provisions and schemes intended to target the most vulnerable refugees, including those at risk of extreme poverty, persons suffering from health and mental health problems, single heads of households, unaccompanied minors and separated children, and victims of torture or other forms of severe human rights violations.
31. In this regard, specialised research is required in order to assess the current extent of vulnerability issues, risk factors and populations at risk. Whereas it is recommended that refugees be wholly included in national anti-poverty strategies, research and measures on refugee-specific considerations are necessary to take into account the impact of particular experiences suffered by refugees in countries of origin and transit.
32. Given the limited technical capacity to adequately meet the needs of the vulnerable refugees, especially in the context of victims of torture and other severe forms of human rights violations, networking activities and exchange of best practices should be initiated with other Member States and countries with developed expertise in such matters. The assistance of specialised organisations should also be engaged.
33. Furthermore, preventive mechanisms should be included within the national integration strategy so as to avoid refugees becoming vulnerable in Malta. In particular, we recommend a review of the mandatory detention policy and of the open centre system in view of their detrimental impact on the psychological and physiological condition of refugees.

⁵⁰ http://www.acidi.gov.pt/institucional_book.pdf (accessed 10th January 2014). More information can be obtained from aditus foundation, or from the project page of the 'Malta Integration Network' (in particular the 'Political Participation' meeting) http://www.aditus.org.mt/aditus_foundation/MIN.html (accessed 10th January 2014).

⁵¹ http://www.aditus.org.mt/aditus_foundation/Our_Voice.html (accessed 10th January 2014).



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