

November 4<sup>th</sup> 2020

**SUBMISSION from Clare Public Participation Network (PPN)  
in respect of the Department of Children, Equality, Disability, Integration and Youth's  
Statement of Strategy 2021 to 2023**

About Clare PPN: Clare PPN is a network of 296 community & voluntary, environmental and social inclusion groups from Clare. Clare PPN has three 'Colleges' which gathers the member groups in terms of their interests and activities – these are environmental college, social inclusion college and community and voluntary college. Clare PPN exists to facilitate the formal participation by the community sector in Clare County Council's decision making structures and to assist our member groups to engage with national policy-making initiatives where relevant. Clare PPN also serves as a support and information sharing network for the Community and Voluntary Sector in Clare. It is funded jointly by the Department of Rural and Community Development and Clare County Council but is autonomous and its activities are directed by its members through an elected secretariat.

Clare PPN welcomes the opportunity to make this submission in respect of the Statement of Strategy for the Department of Children, Equality, Disability, Integration and Youth (DCEDIY).

Clare PPN notes the considerable expansion of the remit of this department and wishes the staff and Minister the best with this vital programme of work. While we look forward greatly to working in many areas which fall under the department's remit, in relation to the Statement of Strategy (SOS) we have comments to make in respect of the following aspects of the Department's remit:

1. International Protection Accommodation Service
  2. International Protection Procurement Service
  3. Migrant Integration Policy
  4. Disability Policy
  5. Traveller and Roma Inclusion Policy
  6. LGBTI+ Inclusion Policy
- Clare PPN would like to see DCEDIY make a firm commitment to taking a human rights based approach to each of its policy areas in its SOS.
  - We would like to see DCEDIY commit in its statement of strategy to conducting its work from an anti-racism perspective and to putting in place the training, supports and policies needed to make this approach a real departmental practice.
  - We note that certain of our member groups have expressed their concern at the manner in which the International Protection Accommodation Service and the International Protection Procurement Service have carried out their remit and in

particular we would like DCEDIY commit itself in its SOS to respecting the full human rights of every person to whom you are accountable or to whom they provide a service.

- Clare PPN calls for DCEDIY to include within its SOS a commitment to end the practice and operation of Direct Provision for International Protection Applicants by 2023 as is recommended by the Catherine Day Working Group Report and as the Programme for Government mandated. Clare PPN requests that a commitment that DCEDIY will immediately commence implementing all aspects of the European Communities Reception Conditions Regulation 2018 which the department is responsible for in particular the Vulnerability Assessments will be included in the SOS.
- Clare PPN notes that under the remit of the Department of Justice that a decision was taken that no more than three unrelated international protection applicants should share a room in a Direct Provision or Emergency Accommodation Centre during the Covid-19 Pandemic. Clare PPN calls on DCEDIY to end the practice of unrelated adults sharing rooms entirely as it fails to respect the right to privacy of those affected and may in particular put LGBTQI+ or other vulnerable International Protection Applicants at risk. Clare PPN would like to see a commitment to achieving single occupancy for each individual or family unit in the shortest possible timeframe included in the SOS.
- Clare PPN welcomes the transfer of Traveller and Roma Inclusion Policy to DCEDIY. We have noted that the Statutory Instrument in which this responsibility was transferred referred to **'the Coordination of Government Policy in relation to Traveller and Roma Rights in Irish Society'** and we recommend that DCEDIY use this wording or similar rather than using 'inclusion' which can easily be misread or misapplied as assimilation. Clare PPN requests that in the statement of strategy that a firm explicit commitment to working in partnership with the Traveller Community and the Roma community to achieve their separate and shared aims and improve their circumstances. Clare PPN notes that this will entail the need for resourcing of community based supports such as Traveller-led Community Development and Traveller Support Organisations.
- Clare PPN recommends strongly that DCEDIY include within their statement of strategy a commitment to work directly with disabled people wherever possible rather than directing all its communications through disability support organisations and to ensure that all provisions for disabled peoples full participation in policy making that can be provided are put in place. Clare PPN notes that this may entail the necessity for community based supports and resourcing.
- Clare PPN notes that in respect of LGBTQI+ communities that there is a particular need for supports including social, legal, economic and mental health resources for these communities in rural areas across all age groups. Clare PPN would like to see

this noted in DCEDIY's statement of strategy along with a commitment to resource supports in rural areas.

- Clare PPN would like to see all government departments including DCEDIY making an express commitment to openness and information sharing in their statements of strategy. We would like to see a commitment from DCEDIY outlined in the SOS to respect the GDPR rights of all individuals including their right to their own information. We would like DCEDIY commit to providing all information that it is entitled to share, quickly and willingly and in a usable format when requested- whether such requests come through Freedom of Information, or Data Subject Access Requests or other modes.

Submission Concludes.

We thank you for the opportunity to make this submission and we wish you the very best for your programme of work which is of great importance to every community in Ireland. Any queries in relation to this submission can be directed to [sarah@clareppn.ie](mailto:sarah@clareppn.ie)

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