



2 July 2025

## Joint response by the Anaka Women's Collective and PPR to the Department of Education consultation on learners participating in education or training until age 18

We are writing in response to the DOE [consultation](#) on extending compulsory participation in education, apprenticeship or training until the age of 18, as recommended by the Independent Review of Education [report](#). We fully support the initiative but take this opportunity to point out some important omissions around young people with experience of the asylum system that must be addressed going forward.

The proposal to extend compulsory provision from age 16 to 18 is consistent with Article 1 of the [Convention on the Rights of the Child](#) (CRC), to which the UK is a State Party; it stipulates that “a child means every human being below the age of eighteen years”. States are obliged to “respect and ensure” Convention rights, including the right to education (article 28), to

each child within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. (article 2)

A [joint general comment](#) by the CRC's oversight committee, the Committee on the Rights of the Child, with the Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families (CMW), sets out that:

all children in the context of international migration, irrespective of status, shall have full access to all levels and all aspects of education, including early childhood education and vocational training, on the basis of equality with nationals of the country where those children are living. This obligation implies that States should ensure equal access to quality and inclusive education for all migrant children, irrespective of their migration status (para 59) ... The Committees strongly urge States to expeditiously reform regulations and practices that prevent migrant children, in particular undocumented children, from registering at schools and educational institutions. (para 60)

In September 2024 the Committee on the Eradication of all Forms of Racial Discrimination published its [Concluding Observations](#) on the UK's implementation of that convention and recommended that the UK

strengthen its measures to ensure the availability, accessibility and quality of education for children belonging to ethnic minority groups, notably children belonging to Gypsy, Roma and Traveller communities, children of African descent and migrant, asylum-seeking and refugee children. (para. 46(a))

Children's right to education is also protected by Article 2 of Protocol 1 of the European Convention on Human Rights (ECHR), incorporated through Human Rights Act 1998, and children are protected from discrimination connected to this right by Article 14 of the ECHR. Section 6 of the Human Rights Act 1998 prohibits public bodies from acting in ways that are incompatible with children's Convention Rights.

### Independent Review of Education findings

The Independent Review's report highlighted that Northern Ireland has a relatively high proportion of working-age people with no school qualifications – 11.8% here, compared with the UK average of 6.8% ([vol. 2](#), para. 6.35). Noting that around 23% of NI students left school with no qualifications in 2021/22, markedly higher than in England or Wales (both around 15%) ([vol. 2](#), figure 2.u), it observed that

the prevalence of Northern Ireland residents with no or low qualifications signals the need to provide a number of pathways back into education for adults who leave formal education with either no or low qualifications. (para. 2.94)

One such group of residents, currently frozen out of NI's education system, has joined together to produce the April 2025 [report](#) by Anaka Women's Collective, ***Stranded Dreams: the need for targeted education provision for young refugees and asylum seekers in Northern Ireland.***

The Independent Review had identified asylum seeking and refugee students as "vulnerable children and young people" for contingency planning purposes (para. 3.17) and concluded "we should have these groups of learners in mind ... when we think of a more inclusive education system." It further observed that

Northern Ireland society is becoming more diverse as mentioned earlier in our Report. The number of people coming to make Northern Ireland their home is increasing. Meeting the needs of "newcomer" children will be a growing priority for the service. (para. 4.112)

(The report defines a newcomer pupil as "one who has enrolled in a school but who does not have the satisfactory language skills to participate fully in the school curriculum, and the wider environment, and does not have a language in common with the teacher, whether that is English or Irish". (footnote 339))

As important as its findings are, the Independent Review report failed to identify a particular newcomer group suffering exclusion from education: **children with experience of the asylum system who have never managed to get a school place in the first instance, some of whom have since aged-out of the statutory education requirement without having benefitted from**

**any educational provision.** While overall figures are difficult to pin down, Anaka has been in touch with roughly 200 such young people excluded from education in the Greater Belfast area alone: many of them contributed to *Stranded Dreams*.

For its part, the Department of Education's consultation document acknowledges "particular groups of young people whose achievements at Key Stage 4 and post 16 are poorer than their peers" (under its "Traveller, Roma, Newcomer Children and Children known to social services" heading) and provides a link to an "effective example" from the Cork STAR pilot project amongst Roma and Traveler children. However like the Independent Review, it fails to recognize the existence of either the cohort of 14- to 16-year-old asylum seekers and refugees unable to get school places despite their age; or the 16+ aged young people who have since 'aged out' of education here. This oversight is a grave error that risks undermining the credibility and effectiveness of this important DOE initiative going forward.

The Anaka youth group's report provides important missing input, originating amongst young people currently living in Belfast. It explains the need, gives an overview of what has been tried to date (both in NI and the wider UK) and makes specific recommendations based on lessons learned. Inclusion of the issues raised by these young people is crucial to the Department's equality impact assessment process (section 4 of the consultation form) and to its wider effort for legislative change.

### **Filling the gap: the situation facing this unidentified at-risk group**

The Independent Review, while not naming them, did put its finger on some key obstacles blocking these young people's access to education. It noted for instance that "representatives of ethnic minority groups ... advised that navigating the education system is extremely challenging" (vol. 2, para. 2.70), and reported, "we see the age of 14 as critically important within the education journey and are concerned that this is a point in time where pathways tend to narrow" (para. 5.111). Evidence from the young people with experience of the asylum system supports both concerns.

While children seeking asylum are entitled to attend school, there are many hurdles: delays, lack of spaces and problems accessing uniform, school transport or language support. Those arriving in the second half of the academic year can face particular barriers to being admitted. Moreover, the closer a young newcomer is to 14, 15 or 16, the harder it is to find a secondary school place at any time of year. Once 16 they are told that they are no longer entitled to education; meanwhile, some not-yet-17 year olds are also told that they are too young to enrol for further education. (For more detail, see the 2024 [report](#) *Education Opportunities Needed: Recommendations of the YP (Young People's) Research Group* by Queens University Belfast and Anaka Women's Collective, as well as the 2023 QUB [research](#) by Rebecca Loader et al, *Experiences of education among minority ethnic groups in Northern Ireland*).

The Independent Review recommended that "ESOL [English as a Second Language] courses should be available to all newcomers to NI who have a limited command of English" (vol. 2, para. 6.146) but did not delve into the many obstacles; and the DOE's consultation document

did not refer to ESOL at all. This is another serious omission: an evaluation of an education programme for young 16+ refugee and asylum seekers in Northern Ireland, published in the 2024 UK-wide [review](#) of innovation in language learning and teaching, found that ESOL provision here “has been considered scant, reactionary and piecemeal rather than planned”.

Similarly, a 2023 [survey](#) carried out by PPR and Anaka amongst 35 Belfast asylum seekers aged 16-25 who were out of education revealed that since arriving, less than 30% were able to access English classes, despite two thirds describing their level of English as beginner or pre-intermediate. Young people in the Anaka group reported that in the run-up to the 2024/25 school year, places for Belfast Met’s ESOL courses were gone within 15 minutes of registration opening, with many excluded. Even those who have managed to secure a place in an English language course reported issues such as classes progressing too slowly, failing to prepare them for further study, or being targeted more towards their parents’ generation than their own.

For these reasons the young people worked to develop Anaka’s *Stranded Dreams* [proposal](#) for age-appropriate programming which offer intensive English support alongside other learning and skills to prepare them to access further and higher education. We recommend their findings and proposals to the Department’s consultation to help inform its future work.

Exclusion from school – whatever its source – is devastating for young people. It is particularly acute for those who are uprooted from home, new to NI and to English, and who lack a network of friends and a strong community. They feel deeply the absence of a place to interact and integrate with their peers, a school routine, and most importantly a pathway towards reaching their hopes and aspirations. The Department’s initiative “to create a minimum offer for all young people and ensure equity of opportunity and a structured pathway of support and guidance” (Minister’s Foreword to the consultation) could be a vital step towards closing this gap – but only if the Department recognises this as-yet overlooked group and addresses their needs in its proposals and programming.

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