PROJECT 101049166 – L.A.W. – CERV-2021-EQUAL

ADVOCACY POLICY PAPER

According to the final report of the *L.A.W. project - Leverage the Access to Welfare* presented in Rome on 28th March at the conference "Ricomincio dal 3", institutional discrimination - *i.e.* unfavourable treatment by public bodies based on the different nationality or ethnicity of the person subjected to it - is one of the most pervasive and heinous forms of discrimination suffered by foreigners living in Italy. These discriminations are apparently 'incontestable' in that they derive sometimes from legislative acts, sometimes from administrative acts such as resolutions, regulations, circulars, etc.

It should be clarified that, even if a legal act provides for different treatment between Italian citizens and foreigner citizens, this does not mean that the provision cannot be considered discriminatory, because it could instead conflict with a higher-ranking, constitutional or European law. This is the case with the citizenship income, a poverty support benefit that, by law, introduces a long residency requirement that indirectly discriminates against the foreign population currently residing in Italy. This legal requirement has not only been the subject of an infringement procedure initiated by the EU Commission itself, but is also currently being examined by the Italian Constitutional Court and the Court of Justice of the European Union.

Therefore, a change of perspective is needed: the culture of equality should begin to spread, even before it does in civil society, among legislators and public administrators who set the rules of coexistence, as well as among the officials that are supposed to enforce those rules.

The moral suasion and strategic litigation actions carried out by ASGI in recent years have attempted to remedy what is a structural situation resulting from an exclusionary and discriminatory political culture. However, a change of pace is needed, starting with the choices of our legislators. Below we provide some proposals for regulatory changes and for bringing illegitimate practices and norms in line with the constitutional and European Union standards on anti-discrimination.

1. Creation of an equality body

In accordance with the principles and recommendations of international and European bodies - in particular the legislative initiative launched by the EU Commission in December 2022 for a directive to strengthen independent authorities according to uniform standards in the EU countries - an independent public authority against national, ethno-racial and religious discrimination should be established, possibly within the framework of the envisaged Independent Commission for the Protection of Human Rights. The authority should have political members of parliamentary appointment and members from civil society, chosen from associations with a specific track record identified on the basis of a public call for applications. Unlike the currently existing UNAR – the National Office against Racial Discriminations, which belongs to the Equal Opportunities Department of the Presidency of the Council of Ministers, it should operate completely autonomously and

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independently from public authorities, as a National Anti-Discrimination Agency (Equality Body). This would entail broader powers than those currently recognised to UNAR, such as bringing cases to court, (as does the Equality Adviser in the area of gender discrimination); carrying out investigations and acquiring data or documents; imposing administrative sanctions in the event of failure or omission to provide the requested information or documents, as well as in the event of a finding of discriminatory conduct (on the model of what is already envisaged for the Authority for the Protection of Personal Data).

2. Reform of the anti-discrimination process

There is a need for a comprehensive reform of anti-discrimination procedures in order to reorganise legislation that has been formed by successive layers. In particular, it is considered that the following steps should be taken.

2.1. To unify the anti-discrimination procedures in the simplified summary proceedings ("rito semplificato di cognizione"), as introduced by Legislative Decree 149/2022, bringing under the scope of Article 28 of Legislative Decree 150/2011 also the proceedings against gender discrimination in employment, currently regulated by the Equal Opportunities Code. This should be done in order to rationalise the current system and also to allow a single action to be brought against cases of multiple or intersectional discrimination (as in the case of the headscarf, which can be read as both gender and religious discrimination), thus also unifying the criteria for identifying jurisdiction as well as the fields of application of the various discrimination factors, which are currently differentiated.

2.2. To allow related claims to be brought under the anti-discrimination procedure in order to facilitate access to the procedure and avoid the multiplication of proceedings.

2.3. To provide that the territorial jurisdiction established by Article 28 of Legislative Decree 150/2011 may be derogated from in the case of joinder of active parties, in order to allow several parties (in particular if they are associations) to act jointly before a single Court to combat multiple or collective discrimination.

2.4. To provide that anti-discrimination proceedings shall be free of charge (at least below certain income limits, by analogy with what is provided for labour cases); as well as for the action of bodies and associations that are granted active legal standing.

2.5. To unify the criteria of legal standing against collective discrimination by adopting for all factors of discrimination and all areas considered by the anti-discrimination law the criterion set out in Article 5 of Legislative Decree 216/03, i.e. that of the "bodies and associations representing the injured interest", eliminating the filter of registers or lists subject to the control of the administrative authority.

2.6. To clarify, in accordance with the case law of the Court of Cassation, that the entities and associations referred to in Article 5 of Legislative Decree 215/2003 (to be identified as per the previous paragraph) are also legitimated to act against collective discrimination provided for in

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Articles 43 and 44 of the Single Immigration Act and therefore, in particular, against discrimination of foreigners and not only against discrimination determined by belonging to a specific ethnic group.

2.7. To extend the scope of application of the provisions on harassment and victim protection (currently only contained in legislative decrees 215/2003 and 216/2003 and in the Equal Opportunities Code) also to the discrimination factors covered by Articles 43 and 44 of the Single Immigration Act and therefore also to the factors of citizenship (i.e. harassment determined by foreign status) of language, religion, geographical origin.

2.8. To introduce the notion of multiple or intersectional harassment in order to better protect personal identities and intervene more effectively on situations of disadvantage, which are often the result of the concurrence of several protected factors: at the very least, by providing, in para. 5 of Article 28 of Legislative Decree 150/2011, that, in any liquidated damages, the judge must take into account not only the retaliatory nature of the act or conduct (as currently provided for) but also the concurrence of several protected factors.

3. Equal opportunities in employment and social rights

With regard to employment, research carried out by the Centro Studi Medì through the L.A.W. Project - Leverage the Access to Welfare Project found that one third of the sample surveyed believed they had suffered discrimination on the grounds of their origin, ethnicity or nationality while looking for a job or on the workplace. In particular, 38.9% of the respondents were unable to apply to jobs in the public sector, almost one in three was not hired by a company even though they had the necessary qualifications, 46.6% worked without a contract and 32.6% worked in 'grey work' situations, with contracts that did not reflect their actual working hours; finally, 33.3% referred they had obtained a job below their professional qualifications.

3.1. With regard to procedures for access to employment and equal treatment in access to private employment, it is therefore necessary to:

I. repeal the residence contract, provided for in Art. 5 bis of the Single Immigration Act, ensuring that - in accordance with Directive 2011/98 - the residence authorisation and the work authorisation are contained in a single act;

II. repeal any reference to the obligation of the employer to provide for the accommodation and expenses of the employee's return to their country of origin, thus ensuring that, from the moment of first entry, all legally resident foreigners authorised to work can offer their services under the same conditions as Italians, without any burden on the person who is willing to employ them;

III. eliminate, in the procedures for issuing a permit to work, any reference to the certificate of housing suitability, since it is clear that the possibility of acquiring suitable accommodation is a consequence of the possibility of concluding a work contract and cannot be a prerequisite for it.

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IV. simplify the procedures for recognising education qualifications in order to reduce the situation of underutilisation of the skills of foreign working people, which all statistics point to;

V. combat early school drop-out and the dynamics leading to predominant access to vocational training by second-generation foreigners;

VI. encourage - with support mechanisms similar to those currently provided for the various forms of corporate welfare - employers who, making significant use of foreign staff, set up positive actions for their benefit (such as Italian courses or vocational training initiatives); to this end, 'equality certificates' could be provided, similar to those provided for the fight against gender discrimination, enabling employers to obtain advantages in their relations with the PA.

VII. implement inspection systems with a specific focus on the working conditions of foreigners;

VIII. follow up on the proposals already put forward by trade unions and political actors to strengthen the fight against unstable and “poor” employment - which can affect the foreign working population in particular - such as the legal minimum wage, the fight against digital “caporalato” (gangmaster system) and piecework, and the protection of safety at work;

IX. incentivise positive actions to support the employment of foreign women, eliminating any discrimination, such as the one that still exists today for access to the nursery school bonus (the provision formally in force excludes foreigners without a long-term permit, despite a ruling by the Court of Appeal of Milan requiring its extension to all foreigners).

3.2. As for access to public employment

Widening foreigners' access to public employment constitutes an important instrument of social integration, of overcoming those stereotypes that see the foreign workforce necessarily addressed only to 'menial' jobs, of strengthening the sense of belonging to the community and of protecting its interests, even when the formal link of citizenship is missing. Moreover, given the constraint of public competitions, widening the possibilities of access to selective procedures would also respond to the interests of the Public Administration, which would have greater possibilities of drawing on the best interested persons without exclusions determined by reasons completely unrelated to the competences of the candidate.

Appropriate measures in this regard would be:

- the amendment of Article 38 of Legislative Decree 165/2011 allowing access to selective procedures to all third-country nationals holding a residence permit allowing them to work;

- in any case, at least, the stabilisation of the legislative changes that had allowed, until 31.12.2022, the recruitment of health personnel without citizenship constraints;

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- the revision of the Prime Ministerial Decree of 7 February 1994 no. 174 (which has already been recently amended by a provision not yet published in the Official Gazette but which, from the anticipations provided, appears to be completely inadequate on this point), which contains an excessively broad list of posts and functions reserved only for those with Italian citizenship, eliminating the provision that excludes foreigners from access to employment in certain ministries in any event regardless of the nature of the duties and access to all managerial positions, regardless of their technical or managerial nature (this last provision has the effect of preventing the recruitment of medical staff from non-EU countries, which is particularly illogical in light of the serious shortage of staff);

- clarifying, in accordance with the prevailing case law, that the remaining limitations must refer only to the public administration in the strict sense, thus excluding publicly controlled companies and entities, for which the obligation of absolute equality of treatment in force for the private sector applies.

3.3. As for the procedures for access to social benefits

Article 3 of Presidential Decree 445/2000 should be repealed insofar as it limits the possibility to access self-certifications for foreigners. This rule, although partly superseded by the ISEE regulations (which also provide foreigners with the possibility of self-certifying assets and income owned abroad), continues to create significant obstacles for some social benefits and for access to public housing. Moreover, it is sometimes used by local administrations to make access to local welfare benefits more difficult.

On the other hand, it is necessary to fully implement art. 2, para. 5 of the Single Immigration Act, which provides for equal treatment between Italian and foreign persons in relation with the public administration. This entails introducing the same possibility of self-certification, without prejudice to the administration's obligation to carry out all the necessary checks, by means of appropriate exchanges of information with foreign countries, as is the case for the foreign income and assets of Italian citizens.

In any case, it should at least be clarified that Article 18, para. 3 bis of Law 241/90 must be applied: under this article, in proceedings concerning social benefits, the declarations made pursuant to Articles 46 and 47 of Presidential Decree 445/00 replace, for both Italian and foreign persons, any further documentation.

A fortiori, this principle must apply to all benefits and to all countries not included in the list in Ministerial Decree 21.10.2019 on reddito di cittadinanza (income of citizenship), modifying any contrary administrative provisions (see then also sub social allowance).

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3.4. As for access to family, maternity and disability benefits

The introduction of the universal single allowance has finally overcome, in application of EU law, the long-standing exclusion of foreigners without a long-term permit.

Subsequent clarifications by INPS resulted in an almost total extension of the benefit even to cases for which the text of the law appeared uncertain.

However, two categories of permits still remain excluded unjustly: residence permits for awaiting employment ("attesa occupazione", for whom the right to the benefit derives from Directive 2011/98, since it is a single work permit) and permits for medical treatment, which can extend even for years, leaving the person, already suffering from a disability, without any support for the children.

It is also necessary that asylum seekers who are employed are at least eligible for tax deductions for dependent family members, otherwise they would be deprived of any parental benefits.

As regards the universal single allowance, in February 2023 the European Commission started an infringement procedure against Italy, considering the two-year residence requirement and the exclusion of children who are not 'dependent', and therefore resident abroad, to be contrary to EU law. In particular, the Commission found that these rules do not respect the equal treatment provided by EU legislation for EU citizens and their family members and violate Regulation 883/2004, which does not foresee any residence limitations for family benefits.

Also in the light of the Commission's considerations, it is necessary to eliminate the requirement of "length" of residence - which constitutes an indirect discrimination against foreign nationals - and to reconsider the exclusion, introduced by the new scheme, of children who reside abroad. Their inclusion would in fact respond - as it was for the previous family benefit scheme - to the need (for both Italian and foreign nationals) to protect a family that is increasingly dispersed, due to international mobility, in several countries.

With regard to invalidity benefits, the new and not very straightforward wording of Article 41, par. 1 bis of the Single Immigration Act could lead to the exclusion from these benefits of persons holding a residence permit of one year's duration, if different from the single work permit: it is therefore necessary to clarify the correct interpretation of the rule, affirming the right to invalidity benefits of all foreign persons with a residence permit of at least one year, specifying also that the expression "annual permit" must be understood as referring also to the accumulation of two six-monthly permits, as already affirmed by case law.

3.5. Regarding access to social benefits to combat poverty

The income of citizenship (RdC) introduced by Law Decree 4/2019 converted into Law 26/2019, is an important measure to combat poverty and for social inclusion. The Decree limits the scope of application for non-EU citizens only to holders of long-term permits, family members of EU citizens

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and (thanks to the application made by INPS) to holders of international protection. Therefore, people with a single work permit are excluded, and thus precisely those categories that are often in a state of greater poverty, having been unable to access the minimum income required to obtain a long-term permit.

The Constitutional Court, in Judgement 19 of 2022, held that the requirement of a long-term permit does not conflict with Article 3 of the Constitution given the multiplicity of purposes pursued by the benefit (not only to combat poverty, but also to support social and labour inclusion); according to the Court, it should follow from this multiplicity of purposes that the benefit cannot be qualified as a benefit of pure assistance to the population in need.

It follows that if the reform of the RdC envisaged by the current government were to provide it (as is stated) only to 'unemployable' persons, that is, persons in need, without the aim of job placement, then the Court's argument would fall apart and the extension of the benefit should be envisaged regardless of the residence title.

As for labour policy interventions (i.e. those that in the currently prospected reform would be reserved for 'employable' people), there is no doubt that they should be recognised for all foreigners, also in compliance with the equal treatment obligation in access to work provided for by Directives 2011/98 and 2011/95.

It is also considered that, without it being necessary to wait for the pronouncements of the Constitutional Court and the Court of Justice (which have already examined the issue), the requirement of 10-years residence (which applies indiscriminately to Italian and foreign citizens) should be repealed, since it is an entirely unreasonable requirement, introduced for the sole purpose of preventing non-EU citizens from accessing the benefit. Of the same opinion is, in fact, the European Commission, which in February 2023 initiated an infringement procedure against Italy, considering the 10-year residence requirement to be contrary to EU law insofar as it does not guarantee equal treatment to persons with EU citizenship and non-EU citizenship with a long-term permit or for international protection.

Similarly, it is necessary to repeal the requirement of a long-term permit still provided for the social allowance (“assegno sociale”). This, moreover, violates the provisions of Directive 2011/98/EU, if the person aged over 65 holds a permit that allows them to work (the Court of Cassation on 08.03.2023 referred the matter to the Constitutional Court).

3.6. As for benefits related to access to public housing and private housing

The research carried out by the Centro Studi Medí within the framework of the L.A.W. Project reveals a dramatic picture with regard to access to housing: 40% of the people interviewed stated that they had suffered discrimination in this area. In particular, 2 out of 3 respondents (66.7%) were prevented from renting a house because the landlord was not willing to rent it to a foreigner, 50% were asked for additional guarantees by the landlord and 36.6% were discouraged from searching by

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real estate agencies. In addition, 28.7% were asked for higher sums as deposit and 27.6% for higher rent.

Together with the difficulties encountered in relation to private housing, foreigners also encounter significant obstacles in accessing public housing and rent support grants: various regional laws and municipal notices in fact introduce discriminatory requirements such as previous residence or employment in the region, overestimating the previous duration of residence and an additional documentary burden on foreigners. These requirements often remain despite the fact that various rulings of the Constitutional Court have sanctioned their illegitimacy.

The right to housing, also guaranteed by Article 34 of the Charter of Fundamental Rights of the EU and emphasised by important rulings of the Constitutional Court (among the most recent, no. 166/2018 and no. 404/2020) can only be guaranteed through a public offer that can cover the real needs of all people residing in the territory, foreigners and Italian citizens alike. In the meantime, however, it is necessary to eliminate, for the same reasons mentioned above, all the provisions that make it more difficult for people with non-EU citizenship to access housing, by intervening on both national and regional legislation (given the regional competence in the matter).

And therefore:

I. to amend art. 40, para. 6 of the Single Immigration Act by eliminating the requirement, foreseen only for foreign persons, of the performance of regular autonomous and subordinate work activities, since it is illogical that a person with Italian citizenship can access accommodation even if unemployed, while a foreign person can access it only if they work;

II. to eliminate from all regional legislation the rules that still require a five-year residency in the region for access to public housing, in accordance with Constitutional Court ruling 44/2020; this requirement results in indirect discrimination against foreigners - who have a higher degree of mobility from region to region - and prevents reasonable freedom of movement within the national territory in search of better living conditions for all;

III. for the same reason, to remove from regional laws and regulations all provisions that provide for an excessive assessment of previous presence in the regional or municipal territory, in accordance with Constitutional Court ruling No. 9/2021;

IV. to encourage positive actions to support foreigners' access to the private housing on equal terms, through the implementation of social mediation actions, forms of public guarantee of rents, tax concessions for owner-occupiers, etc., including possibly through the creation of special housing mediation agencies.

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3.7. As for access to financial services, in particular basic current accounts

Article 126-noviesdecies of the Consolidated Banking Law (Legislative Decree 385/1993), transposing Directive 2014/92/EU into national law, enshrines the right to open a basic current account for all persons legally residing in the European Union, including asylum seekers and homeless people. However, practices of exclusion from basic current accounts by banking and postal institutions throughout Italy persist: 33.5% of the people interviewed by Centro Studi Medí in the research carried out as part of the L.A.W. Project reported having suffered discrimination by banking institutions. Furthermore, in the period between March 2022 and March 2023, ASGI's anti-discrimination helpdesk received 115 reports of foreigners who had been denied access to financial services by banking or postal institutions. Such refusals - variously motivated - constitute a serious violation of the rights of foreigners, who in the absence of a bank account often lose employment opportunities or cannot receive a salary for long periods.

In light of the pervasiveness of the problem, which occurs in all regions of Italy and involves numerous banking institutions and the Italian postal service, there is a need for accountability on the part of the Management of these institutions, as well as the public authorities. Any procedural or technical obstacles (e.g. the impossibility of entering a numerical tax code in the IT system in order to finalise the opening of the account) must be removed immediately; it is also essential to train the staff employed in the branches on the documentation required to open a basic account.

4. Equal treatment in access to healthcare

30% of the people interviewed by Centro Studi Medí stated that they had experienced discrimination in the field of health care.

It is necessary for all the Regions to transpose and fully implement the State-Regions agreement on the access of foreigners to the National Health Service (SSN) by adopting all the necessary measures to this end and, in particular:

I. to ensure that minors whose parents lack a residence permit have access to the paediatric service and then to basic medical care under the same conditions as persons with Italian nationality;

II. to ensure the possibility of free registration with the SSN by people aged over 65 who were reunified with their family members;

III. to define at national level the essential services that must be consistently guaranteed to foreigners without a residence permit;

IV. to ensure that persons who are EU nationals not registered with the civil registry office receive benefits under the same conditions as foreigners without residence permits.

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5. Combating discrimination against stateless persons

In the area of statelessness, it is necessary to enact appropriate provisions to remedy de facto statelessness by fully implementing the International Convention on Stateless Persons, signed in New York in 1967 and ratified by Italy.

It is also necessary to address the issue of the unreasonably long and unlawful time required to complete the procedure for recognising statelessness administratively.

The person applying for statelessness must be guaranteed the possibility of remaining legally on the territory until the procedure to recognise their status is concluded, regardless of the previous regularity of residence at the time when the application is initiated. At the same time, it must be clarified that, also in consideration of a realistic forecast of the time required to ascertain the status, the residence permit for pending statelessness must be valid for at least two years as is the case for the other permits.

6. Countering discrimination against Roma and Sinti peoples

The members of the Roma and Sinti minority in Italy are in a very peculiar legal and social condition, which objectively distinguishes them from any other minority: they are in fact the only minority not concentrated in certain areas of the country, but spread throughout the territory and composed of people with a heterogeneous legal status (Italian persons, citizens of other EU states, citizens of non-EU states, stateless persons, refugees).

It is therefore necessary to provide appropriate regulatory instruments to ensure protection and equal opportunities, in accordance with constitutional, international and EU standards and the recommendations of the Council of Europe, the European Commission and the OECD.

7. On residence

Many of the initiatives - local or national - aimed at excluding people from exercising their rights are implemented through policies of non-registration of residence. In fact, without civil registration in Italy it is very difficult - often impossible - to access a long list of rights. The link between residency and the exercise of rights is sometimes defined by law; more often it is the administrative practices of multiple public actors that consider residency the logical prerequisite for access to rights.

It is an established and frequently proven fact that the usual, often illicit, requests to show proof of civil registration in order to carry out most immigration procedures, or in its place proof of hospitality and/or domicile, are practices that are likely to lead to the invisibility of people from the system and their exclusion from rights.

In light of this stratification, it is necessary to intervene on two different levels. First of all, there is a need to overcome all illegitimate practices concerning the request for registry office registration for the purpose of exercising rights, where the law already does not mention the residence requirement. Moreover, again from the point of view of the link between residence and the exercise

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of rights, it is essential to imagine a medium-term path within which even access to rights currently bound by law to residence can take place on the basis of a mere self-declaration of domicile.

Still from the point of view of registry office procedures, it is essential that the procedures for registering the residence of homeless persons be brought back into line with the law. As things stand, many Italian municipalities do not allow such registration: it is essential to take action to ensure that all municipalities throughout the country implement this measure. Furthermore, it is imperative that municipalities that implement practices that do not comply with the law - e.g. providing for preliminary filters by the social services and/or delaying such registrations for more than the 48 hours stipulated by law - promptly bring their procedures into line with the content of the law. Lastly - but this is a crucial issue - it is necessary that all persons who habitually reside in a property, who are not squatters but who do not possess a title to enjoy the property, be registered in the registry office because, consistently with the content of the civil code, residence is simply where one habitually lives, regardless of the formalisation of lawful possession and the characteristics of the property itself.

As far as registry office regulations are concerned, it is essential to delete Article 5 of Law Decree No. 47/2014 (the so-called Lupi Decree). This rule, which excludes from residency those who live in occupied buildings, deprives people - very often of foreign origin - who are forced to live in occupied places because of their living conditions, of their fundamental rights. Pending this cancellation, it is necessary to ensure that the mayors, consistently with the content of the law, waive the ban on civil registration for people living in occupied buildings.

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