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# Responses to Migrants with Precarious Status in Frankfurt: Frames, Strategies and Evolving Practices

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## Introduction

This report summarises the findings of a research project on the situation of migrants with precarious access to social services due to their residence status and social welfare entitlements in the city of Frankfurt am Main. It is part of an 18-month comparative study, Local Responses to Precarious Migrants: Frames, Strategies and Evolving Practices in Europe (LoReMi), which also includes reports on the cities of Vienna and Cardiff. The results of the comparative project will be published in a final report as well as policy recommendations will be developed. All documents can be accessed online October 2022.<sup>1</sup>

### The LoReMi research project

The aims of the LoReMi project are to investigate the ways in which local authorities provide access to municipal services for migrants who live in precarious situations and have de jure or de facto difficulties in accessing social services due to residence or social legislation, and how governmental and civil society organisations cooperate in the provision of services. It includes a particular focus on issues relating to women. The research sets out to consider the ways in which each local authority justifies its approaches in the context of the authority's overall framing of its

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<sup>1</sup> Under: <https://www.hs-fulda.de/sozialwesen/forschung/sozialer-raum-sozialstrukturanalyse/loremi> and <https://www.compas.ox.ac.uk/project/loremi/>

mission; and to look at the actual policies and practices in place which facilitate the inclusion of migrants with precarious status within key services such as health, education and accommodation. The study has also considered the legal, political and practical barriers to inclusion of this section of the local population. In addition, the forms of communication, cooperation and co-responsibility between local authorities and civil society actors and non-governmental organizations (NGOs) were investigated.

The Frankfurt sub-study is funded by the German Federal Ministry of Education and Research (BMBF). The funding is provided within the framework of the EU Horizon 2020 program in the program line JPI Urban Europe, the 'knowledge hub for urban transitions'. The aim has thus not only been to conduct research but to consider, in the light of the findings and of dialogue with local stakeholders, the scope for policy and practice reforms. Comparative analysis of the contrasting legal frameworks, policies and practices in Cardiff, Frankfurt am Main and Vienna, and knowledge-exchange facilitated between them and a wider group of European cities, is intended to strengthen transnational networking to inform and enhance future practice.

The LoReMi project was carried out by three research teams working closely together during the 18-month duration of the project: in Germany, Professor Dr. Ilker Ataç and Dr. Maren Kirchhoff at the Department of Social Work, Fulda University of Applied Sciences; in the UK, Dr. Sarah Spencer, Dr. Marie Mallet and Dr. Zach Bastick at the Centre on Migration, Policy and Society (COMPAS), University of Oxford; in Austria, Professor Dr. Simon Güntner and Adrienne Homberger at the Faculty of Architecture and Planning, Centre for Sociology, Vienna University of Technology.

## **Migrants with precarious status in Europe**

Migrants face restrictions in accessing public services in many European countries. Third-country nationals who do not have a regular residence status (e.g. because their visa has expired or they entered the country without permission) have legally and practically limited rights to benefits. They are often denied access to numerous social services because they are afraid of deportation and do not even ask for the services to which they would be entitled. The LoReMi study focuses on this group of people and, in a broader sense, on people with a "precarious" legal status. Our aim was to include in the study those who are at risk of losing their residence status, e.g. spouses who would lose their right of residence if they leave the marriage due to domestic violence. The precarious legal status thus has a direct or indirect impact on access to social benefits and thus on the living situation of those affected. This applies vice versa to EU citizens without social entitlements. During the first five years of residence, they have the right to freedom of movement

and thus to residence, but only to social benefits under certain conditions. Attempts to receive social benefits can lead to a review or withdrawal of the right to freedom of movement (see chapter 2 for more details). We briefly refer to this group as migrants with precarious status (to whom we also in short refer to as precarious migrants in the following). A „migrant with precarious status“, in this study, is in short defined as:

*“a person who lacks regular immigration or residence status or, having a conditional or temporary status, is vulnerable to the loss of that status, and is therefore deprived off, or runs the risk of losing most basic social rights and access to services.”* (Homberger et al. 2022: 7)

The paths to precarity are fluid and multi directional. Due to de jure or de facto exclusions, these individuals often find themselves in precarious living situations. At the same time, precarious working conditions such as a lack of opportunities to be formally employed are the starting point for legal precarity. The people who fall within this definition and any entitlements they have to access services vary between countries. In essence, we include the following groups:

- I. Third-country nationals without regular residence status (irregular or "undocumented" migrants)
- II. EU citizens without entitlement to social benefits
- III. Third-country nationals who have a protection status in another EU state (or in the UK)
- IV. Third-country nationals with temporary residence status subject to conditions they no longer meet or are in danger of losing
- V. Rejected asylum seekers

In our research on the situation in Frankfurt am Main, we mainly consider the first three groups of people.

## **Research questions**

Research has established that, for local authorities in Europe, the exclusion of precarious migrants from public services can pose challenges in relation to achieving their policy goals, such as in relation to homelessness, public health, crime prevention, addressing domestic violence and child protection. Some local authorities have responded with initiatives designed to ensure that basic service needs are met, whether by municipal services directly or through partnering with a non-governmental organisation that can do so. In some cases, the authority has developed a

corporate strategy setting out its approach; more commonly, there are ad hoc initiatives, which may not be consistent across the local authority as a whole.

With this in mind, the LoReMi study set out to explore the approach of three city authorities in some depth, focusing in essence on the following three research questions:

1. What is the city's approach to inclusion of precarious migrants within municipal services, and individual services in particular? Is there an awareness of the particular challenges facing women? How does it frame the reasons for its approach and is there a connection or disconnect with the overall city framing of its mission?
2. What actual measures are in place to include precarious migrants in key services provided by the municipality, by related public agencies and NGOs, including measures of particular relevance to women? What are the legal, political and practical barriers to inclusion and rights protection for this section of the population?
3. How and why do governmental and non-governmental bodies cooperate in this context? Which governance mechanisms exist? Which processes of cooperation and conflict emerge in these interactions?

## **Research methods**

In each city, the study has been facilitated by an official within the city council, a formal partner in the project. They have briefed the researchers, facilitated communication with relevant staff from departments across the authority and among external partners; and provided insights in relation to the research questions.

The method of the study has been three fold:

- Background research on the national legal and policy frameworks, on the city's remit, structure and approach, and on what is known about its residents with precarious status
- Convening of public and non-governmental stakeholders on three occasions: before the fieldwork began; later to consider emerging findings; and finally to consider potential implications for policy and practice
- 20-25 interviews with local authority and other public sector staff; with non-governmental organisations; and where possible with migrants with a precarious status.

In the case of this study the breakdown of interviews was:

- 14 interviews with staff of NGOs and other civil society actors

- 9 interviews with employees of local authorities and other public institutions
- 5 interviews with migrants with precarious status

## Context

Despite its late official recognition as "immigration country" in the early 2000s, the Federal Republic of Germany has been shaped by migration since its beginnings. The intense political debates on migration were mirrored in legal regulations characterised by an ambivalence of exclusionary and inclusive measures (for detail cf. Kirchhoff & Lorenz 2018). Especially in the 1960s and 1970s, numerous so-called guest workers ("Gastarbeiter\*innen") came to Germany, including many migrants from Turkey, Italy and Greece. Even though they themselves as well as politicians initially thought of their presence as only temporary, many remained in Germany and left their mark in particular on large cities such as Frankfurt am Main<sup>2</sup>. Following controversial political debates in the 1980s and early 1990s, German asylum law was severely restricted in 1993 by the so-called "asylum compromise" (Karakayalı 2008). At the same time, the Asylum Seekers' Benefits Act ("Asylbewerberleistungsgesetz", AsylbLG) was passed, which excluded asylum seekers from the regular social welfare system.

Since the 1980s, both the political debates around migration as well as the legal framework governing the conditions under which people without German citizenship can live and apply for asylum in Germany have been increasingly shaped by European integration as well (Kirchhoff & Lorenz 2018). The EU Eastern enlargements of the 2000s and 2010s led to an increase in official immigration, especially of EU citizens from the new Southeast and Eastern European EU member states, whose freedom of movement was restricted for a transitional period of up to 7 years after accession<sup>3</sup>. This development was flanked by discussions on "poverty-driven migration" and "benefit fraud", resulting in amendments to the Free Movement Directive (2014/2015) as well as the Act on the Regulation of Claims of Foreign Persons in Basic Support for Job Seekers (Friedrich & Zimmermann 2014; Künkel 2018). This law, which entered into force in late 2016, restricted access to social benefits for EU citizens (see below).

In 2015/2016, immigration to Germany was shaped in particular by the refugee movements from Syria, Afghanistan and Iraq. In response, the Act on the Acceleration of Asylum Procedures

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<sup>2</sup> At the end of 2021, the population with a migration background comprised around 22.3 million people, i.e. slightly more than a quarter of the total population. Around 53% of this group has German citizenship (DESTATIS 2022b).

<sup>3</sup> Romanian and Bulgarian nationals have had full labour market access since 2014.



("Asylverfahrensbeschleunigungsgesetz" was passed in autumn 2015<sup>4</sup>. Since February 2022, the war in Ukraine has led to a renewed increase in the number of migrants without EU citizenship.

### **Number of migrants with precarious status**

According to the Federal Statistical Office, at the end of 2021 there were around 11.8 million people living in Germany without German citizenship – about 14% of the population. Almost 5 million of these individuals originate from EU states, with a steadily growing share from the EU member states that have joined since 2004 (DESTATIS 2022a). According to the federal government's current migration report, 69.1% of all persons who moved to Germany in 2020 came from another European country (2019: 66.4%); of these, 54.6% came from EU states (including the United Kingdom) (BMI 2021: 44). As in the previous year, the main countries of origin were Romania (15.7% of all arrivals), Poland (8.7% of all arrivals) and Bulgaria (6.1% of all arrivals) (ibid. 27). It is difficult to estimate how many of these people may be considered migrants with precarious status, as pathways to welfare and residency precariousness are fluid and are not reflected in official statistics (for more details and in relation to Frankfurt am Main, see Chapter 6). One of the most recent estimates available suggests that in 2014 at least 180,000 and up to 520,000 migrants were staying in Germany irregularly (Vogel 2015). Despite the sharp increase in requests for protection since 2015, it is assumed that the number of migrants staying in Germany without residence status has increased only moderately after 2015 due to relatively high recognition rates (von Manteuffel 2018).

### **Federal Legislation**

The situation of precarious migrants is affected by numerous legal regulations that cannot be comprehensively presented here. In the following description, we focus on those regulations that determine or directly influence access to or exclusion from social benefits for the group of people we refer to as migrants with precarious status. On the one hand, this includes asylum and residence regulations according to the Asylum Act ("Asylgesetz", AsylG) and the Residence Act ("Aufenthaltsgesetz", AufenthG), and social regulations according to the Social Welfare Code ("Sozialgesetzbuch", SGB) and the Asylum Seekers' Benefits Act ("Asylbewerberleistungsgesetz", AsylbLG) on the other.

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<sup>4</sup> Apart from an extensive tightening of the Asylum and Residence Act, this also provides for the introduction of a health card for asylum seekers and refugees in order to improve their access to health care and thus meet the obligations of the EU Reception Directive 2013/33/EU.

Third-country nationals "who do not have a right of residence or whose right of residence results solely from the purpose of seeking employment" are excluded from basic support for job seekers according to Book II of the Social Welfare Code (§7 I 2 SGB II<sup>5</sup>). In addition, the majority of EU citizens were excluded from benefits under SGB XII at the end of 2016 with the Act on the Regulation of Claims of Foreign Persons in Basic Support for Job Seekers (§23 SGB XII). This exclusion applies, among others, to non-employed persons if their right of residence rests solely on seeking employment. Also excluded are Union citizens without a substantive right of residence. In addition to their respective national citizenship, EU citizens possess Union citizenship (§20 I AEUV). Accordingly, they have the right to freedom of movement within the Union territory (§20 IIa AEUV). The right to freedom of movement was modified in 2014 to the effect that the right of residence for the purpose of seeking employment is limited to 6 months if Union citizens "cannot prove that they are still seeking employment and have a justifiable prospect of being employed"<sup>6</sup> (§2 II 1a FreizügG/EU). In this case, the individual no longer has a substantive right of residence. However, their residence remains formally legal until the Foreigners Authority revokes their freedom of movement<sup>6</sup>. In these cases, until the person leaves the country transition benefits are granted once for a maximum of one month. The exclusion from social benefits ends after five years of habitual residence on German territory if no loss of freedom of movement has been established during this time.<sup>7</sup>

In addition, migrants without a legal residence permit as well as third-country nationals with protection status in another EU member state are excluded from the respective benefits under the Social Welfare Code. Third-country nationals with protection status in another EU member state are explicitly excluded from benefits under the AsylbLG for the duration of their protection<sup>8</sup>. Migrants without a legal residence permit are theoretically entitled to social benefits under the AsylbLG until their obligation to leave the country expires, just like rejected asylum seekers (§1 I AsylbLG). In practice, however, they are often unable to access even services like these. This is because most authorities, according to the so-called reporting obligation

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<sup>5</sup> This report was translated from German into English by Karl Heyer. All direct quotations from literature, legal texts and interviews originally in German are marked with a ° to indicate that they have been translated.

<sup>6</sup> This may only be done under the conditions formulated in §6 III-V FreizügG/EU. However, these are not sufficiently defined and thus leave room for discretion.

<sup>7</sup> An interviewed counsellor pointed out that due to the wording of "habitual residence", in principle there is the possibility that this is proven by a certificate from a registration office. However, people who applied for benefits on this basis without being able to prove regular employment were at risk of a retroactive determination of loss of freedom of movement, which in turn could lead to a denial of benefit claims.

<sup>8</sup> In acute cases of need, they are entitled to transitional benefits for a period of two weeks and once in two years (§1 IV AsylbLG).

(“Übermittlungspflicht”) of §87 of the Residence Act (AufenthG), are obliged to notify the Foreigners Authority if – while performing their duties – they become aware of persons who do not possess a valid residence title. This also applies to EU citizens who no longer have a substantive right of residence (see above). This obligation does not only apply to police and public authorities, but to social welfare offices as well. In practice, this means that people with precarious residence status cannot claim even basic benefits without risking deportation (for more details, see chapters 5 and 6 and von Manteuffel 2018). In this regard, there were some improvements in 2009 and 2011. For one, it was established that humanitarian assistance to persons without a valid residence permit is not punishable. In addition, educational institutions were excluded from the reporting obligation under §87 II and medical emergency treatments with subsequent reimbursement by the social welfare office were provided for (von Manteuffel 2018: 35). In 2011, an amendment to §87 of the Residence Act exempted educational institutions from the reporting obligation. In Hesse, a corresponding regulation had already been enacted in 2009 within the framework of school legislation (Steffens 2011: 283; see chapter 7 for more details).

## The city of Frankfurt am Main

For the reference date 31. December 2021, the city of Frankfurt reported just over 753,000 inhabitants, making it the fifth largest city in Germany and the largest city in the federal state of Hessen<sup>9</sup>. The share of the population without German citizenship was 29.9%, the share of residents with German citizenship and migration background 24.6% and without migration background 45.5% (Stadt Frankfurt am Main 2022 a). Frankfurt is considered a "super diverse city": in 2016, Frankfurt am Main became the first major German city to be home to more than 50 percent of people with a migration history (Schneider 2020). In 2020, people from 177 countries lived in Frankfurt. Around 2/3 of the city's officially registered population without German citizenship comes from Europe: in 2021, 42.7% of the total of approximately 225,000 people were from EU member states and a further 24.7% from the rest of Europe. Around 20% of the migrant population are from an Asian country, and a further approx. 8.5% are nationals of an African state (Stadt Frankfurt am Main 2022c: 2). In 2015, around 80% of the official population with foreign citizenship had a longer-term right of residence – either because of overarching EU freedom of movement regulations or because they held a settlement permit (AmkA 2017: 49).

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<sup>9</sup> At the end of 2020, 2.4 million people lived in the Frankfurt agglomeration and 5.8 million in the Rhine/Main metropolitan region (Regionalverband Frankfurt am Main 2022).

## Municipal Self-Government

Frankfurt am Main is an independent urban district ("Kreisfreie Stadt"). In accordance with the principle of local self-government enshrined in the German Basic Law ("Grundgesetz", GG), as a municipality it has the competence to "regulate all local affairs on their own responsibility within the limits prescribed by the laws" (§28 II 1 GG). This includes "tasks that are rooted in the local community or have a specific reference to the local community and can be handled by this local community on its own responsibility and independently" (Bundesverfassungsgericht cited in Heuser 2017<sup>9</sup>). The municipality also acts as a sub-state administrative authority for the execution of "tasks in the sectors of internal administration and general state tasks, social affairs, health care, economic development, transport and public institutions"<sup>10</sup> (Bogumil & Jann 2009: 104<sup>o</sup>).

The highest political decision-making body of the city is the City Council ("Stadtverordnetenversammlung"). It is currently composed of 93 members (city councillors) who serve in an honorary capacity and are elected in municipal elections for a period of 5 years. The last election was held in March 2021. Since then, the resulting government coalition of SPD (Social Democrats), The Greens, FDP (Liberal Democrats) and Volt provides the full-time department heads and members of the Municipal Administration ("Magistrat"). It replaced the previous coalition of SPD, CDU (Christian Democrats) and The Greens. As administrative and executive body, the Municipal Administration prepares and implements resolutions of the City Council and makes decisions on current administrative matters. In the legislative period 2021-2026, it consists of Lord Mayor Feldmann (SPD), Mayor Dr. Eskandari-Grünberg (The Greens), City Treasurer Dr. Bergerhoff (The Greens) and 9 other full-time and 14 honorary city councillors. The municipal offices and enterprises – like the Local Health Authority or the Youth and Social Welfare Office – are subordinate to the Municipal Administration and support it in the fulfilment of its duties. (Stadt Frankfurt am Main 2022b).

## Frankfurt's self-image as cosmopolitan "international civic city"

Frankfurt sees itself as a "diverse and cosmopolitan metropolis with people from a wide range of cultures and ways of life" (Stadt Frankfurt am Main 2022d<sup>o</sup>). This self-image as "global city" is also related to its role as an international financial metropolis (Stadt Frankfurt am Main Integrationsdezernat 2011: 13). To take the diversity of its population into account and to promote

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<sup>10</sup> At the same time, it is subject to the supervision and instruction of the Federal State of Hessen (cf. Bogumil und Jann 2009: 103).

equality and social participation, the Office for Multicultural Affairs ("Amt für multikulturelle Angelegenheiten", AmkA) was founded in 1989; it is attached to the Department for Integration, which was established in 2000. In the commemorative publication for the AmkA's 20th anniversary in 2009, Dr. Eskandari-Grünberg, then and now head of the Department of Integration, emphasised: "The fact that today we in Frankfurt quite naturally see ourselves as an 'international civic city' [...] is also a result of the work honoured in this commemorative publication" (AmkA 2009: 9°).

With the integration and diversity concept adopted in 2010, the city aimed to "ensure that people of different origins, religions and world views as well as different biographies and circumstances in life have equal opportunities to participate in public life" (Stadt Frankfurt am Main Integrationsdezernat 2011: 58°). Facilitating social participation for all would be a "cross-sectional task for the whole city" (ibid. 16°), which could only be implemented through close cooperation between the various municipal offices, other institutions and the entire population (ibid. 16-18). The concept also refers to the state's obligation "to prevent foreigners from being forced into illegality both by avoiding regulatory gaps and by avoiding overly restrictive regulations" (ibid. 78°). Moreover, it would be "no less a public task to mitigate social problems arising from illegality and to ensure the adherence to human rights" (ibid.°). In addition to the expansion of medical services, efforts should therefore be taken in coordination with state and federal authorities to "find viable solutions to questions of residence rights and work permits" (ibid.°). Because "the legal equality of persons with German and foreign citizenship constitutes [...] an essential prerequisite for comprehensive participation and equal rights" (AmkA 2017: 50°).

### **A city for everyone?**

The extent to which the city meets this goal of being a "city of diversity" or a "city for everyone" is disputed within Frankfurt's urban society (cf. Betz et al. 2021: 13-14). Due to the growing presence of EU citizens without entitlement to benefits and the impoverishment associated with this, which also becomes apparent on Frankfurt's streets, in recent years the situation of migrants with precarious status in Frankfurt has been discussed in particular in relation to homeless EU citizens (see also Chapter 8). The "Needs Assessment on the Situation of Homeless EU Citizens" (Rieder & Haj-Ahmad 2020) commissioned by the AmkA also led to controversial discussions.

Against this background, in the following chapters we will present the results of the empirical study on local responses to the presence of precarious migrants.

## Migrants with precarious status in Frankfurt am Main and the city's approach to them

Despite the city's inclusive self-image, expressed among other things in the diversity and integration concept adopted in 2010, there is no comprehensively inclusive approach to migrants with precarious status in Frankfurt am Main. While there are positive examples in the area of basic health care or good access to primary schools, there are also high access barriers, for example in the area of housing. Overall, both inclusive and exclusive responses can be identified in Frankfurt, some of which mitigate, some of which co-produce the precarious living conditions associated with precarious or lacking residence status or entitlements to social benefits. We will present this in detail in the following chapters on health (chapter 5), accommodation/housing (chapter 6), education (chapter 7) and protection against violence (chapter 8). First, however, we provide a brief assessment of the extent of precariousness under residence and social welfare law and the profile of those affected in Frankfurt, as well as some general findings on how the city deals with this group of people.

### Estimating the number of migrants with precarious status in Frankfurt

It is difficult to say how many migrants with precarious status currently live in Frankfurt am Main, as there is no statistical data available on this. This is also due to the fluidity of the pathways leading into precariousness under residence and social welfare law, and that the relevant transitions are not recorded in official statistics. In the case of EU citizens without German citizenship, whose number in Frankfurt has been estimated at around 155,000 for 2020 (Stadt Frankfurt am Main 2022c: 2), simply losing one's job can lead to losing the entitlement to social benefits if they have been in Germany for less than 5 years – a fate that especially during the pandemic was not uncommon (see chapters 2 & 6 as well as Böhm 2021). In the case of migrants without residence status, based on the literature and the statements in the interviews we assume that most of them are so-called "overstayers", i.e. people who entered the country regularly with a visa and had a residence title or a residence permit at an earlier point in time, but lost it for one reason or another<sup>11</sup>. These reasons may include, for example, the expiry of a tourist visa or visa for study purposes, separation from a spouse prior to the expiry of the required two-year period for independent residence, or the rejection of an asylum application (Krieger et al. 2006: 74). Estimates for 2004/2005 range from 25,000 to 50,000 persons without residence status in

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<sup>11</sup> In the EU, "overstayers" form the largest group of migrants residing illegally (Hinterberger 2020).

Frankfurt am Main (ibid. 71-72). In their 2006 study "Lebenslage 'illegal': Menschen ohne Aufenthaltsstatus in Frankfurt am Main", Wolfgang Krieger, Monika Ludwig, Patrick Schupp and Annegret Will state, "for people without status (as for migrants in general) there are obviously many 'good reasons' to stay". Firstly, there is the great potential for jobs both in the commercial sector, which is characterised by strong competition and dumping wages, and in the private sector<sup>12</sup>. Secondly, the danger of detection is lower than in smaller cities due to the high number of migrants. Thirdly, there are numerous support structures such as ethnic communities, family networks and activist groups that "offer some degree of social support in everyday life" to precarious migrants (ibid. 74°). The exact number of migrants with precarious status is difficult to quantify based on the existing data. Based on the available estimates and figures, we assume that the number of people with precarious residence status is a relevant proportion of the urban population. In several interviews with employees of institutions that offer services for migrants with precarious status or more generally for people in precarious living situations, it became clear that they consider the inclusion of this group in the urban society to be feasible - provided better financial and personnel resources are available.

### **Profile of migrants with precarious status in Frankfurt**

Based on the interviews and reports of these institutions, it can also be concluded that this is a heterogeneous group. There are people with different professional backgrounds who have only been in Frankfurt for a short time and are looking for work or have no access to health insurance in Germany due to a lack of or informal employment situations, as well as people residing illegally, who have often been living and working in Frankfurt for decades. They are children and young people, people of working age and older people. The composition in terms of gender and country of origin varies greatly depending on the focus or offers of the respective institutions<sup>13</sup>. In recent years, many sectors have seen an increase in the proportion of EU citizens. According to various interview partners, these come mainly from Bulgaria, Romania and Poland, but also from Spain, Croatia and Italy. Nevertheless, the proportion of persons without residence status remains high, especially in health care facilities. These come from various African countries (including Somalia,

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<sup>12</sup> Especially in households of dual-income earners, there is hardly any time to handle the care work themselves. Due to the high cost of living, average earners can hardly afford to employ people legally as cleaners and/or care workers (Krieger et al. 2006: 73).

<sup>13</sup> While young women make up a large share of patients in the health sector (Schade et al. 2015: 472), services in the field of homelessness are predominantly demanded by men (e.g. WESER5 2021: 9) The Multinational Information and Contact Point for EU Citizens (MIA) reports a relatively balanced proportion of women and men for 2020 (MIA 2021: 2). Especially in counselling centres that also advise sex workers, there is a comparatively higher proportion of trans people.

Ghana, Eritrea and Ethiopia) and the Philippines. In addition, there are third-country nationals with protection status in another European member state who are also excluded from social benefits.

Many of them work<sup>14</sup> on construction sites and in the cleaning industry and fall ill due to the precarious working conditions there, as the staff of a counselling centre for EU migrants emphasised. Others work in restaurants or are employed informally in private households as cleaners or caregivers. Others again are in prostitution. An interview partner with a protection status in Italy, who migrated to Frankfurt a few years ago, emphasised the central importance of regular employment in order to overcome precariousness. Since she has not been granted a work permit by the Job Centre, she can neither work nor claim social benefits. For this reason, she had thought about returning to Italy, but her children, who both go to school in Frankfurt, wanted to stay. Overall, especially the interviews with migrants with uncertain residence status and/or without entitlement to social benefits showed clearly that they are exposed to a wide range of different precarious living situations and problem areas. The reason that many of them stay in Frankfurt in spite of the poor conditions is often due to the fact that, among other things and for the time being, they have little hope for a better future elsewhere.

### **General findings on the municipal approach to precarious migrants**

While some of the services aimed at (precarious) migrants or people in need of assistance, regardless of their residence status and/or entitlement to social benefits, are explicitly offered by municipal institutions in Frankfurt, the majority of support services are provided by non-municipal organisations<sup>15</sup>. Some of the facilities receive financial support for their services from the City of Frankfurt or from other public bodies (European, federal, state ("Land")); others are financed by the providers' own funds and private donations; and often there are mixed forms of funding. The city of Frankfurt supports various facilities that offer social (legal) counselling for migrants. In addition, the Women's Department funds counselling services for women\* who have experienced violence which are open to women\* regardless of their residence status. Various organisations providing counselling to migrants received state funding through the WIR

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<sup>14</sup> Several interview partners reported that they had lost their jobs during the Corona pandemic. Many people who were otherwise able to survive on their own were therefore dependent on food donations.

<sup>15</sup> For people seeking support, this has the advantage that - unlike most government agencies - the corresponding organisations are not subject to the reporting obligation under §87 of the Residence Act. Nevertheless, the reporting obligation restricts access to some basic social rights, as will become clear in the following chapters.



programme, through which the Hessian state government supports innovative projects "for a culture of welcome and recognition and diversity-oriented opening of municipal services" (Hessen 2022°). Between 2015 and 2018, three projects also received funding under the Fund for European Aid to the Most Deprived (FEAD). All three projects did not have their funding extended, which became known only shortly before the planned extension. In the case of the counselling centre *Frauenrecht ist Menschenrecht* (FiM, "Womens' Rights are Human Rights"), this meant that the social worker funded through the project could not be employed any longer. In the case of the newly founded Multinational Information and Contact Point for EU Citizens (MIA), Caritas and Diakonie managed to negotiate with the city to continue financing the counselling services with city funds. Here, too, were cutbacks for the three staff members, who since then are employed part-time rather than full-time. However, the counselling centre's work could be continued because of the extended cooperation with the city. This short-term decision to continue funding and the resulting uncertainty is not an isolated case. A considerable part of the funding for services aimed at precarious migrants are temporary project funds, the extension of which usually takes place only shortly before the end of the funding period. Various interview partners both from NGOs and from the city administration pointed out the problems resulting from this. On the one hand, the financial uncertainty makes long-term planning difficult. On the other hand, some grants may entail a focus on certain topics that does not make sense in practice, but which has to be followed in order to comply with funding criteria. Overall, numerous interviews indicated that there was a lack of sufficient and, above all, permanent resources to meet all needs and to sustainably improve the situation of those affected. Beyond funds for specific services, this statement referred in particular to insufficient resources for legal and social counselling as well as language mediation.

### **Legal and social counselling and language mediation.**

Legal and social counselling services are indispensable for accessing social rights due to the complexity of asylum, residence and social welfare law, the complicated language of official notices and, at times, bureaucratic obstacles. This applies in particular to access to social benefits, which in turn form the basis for longer-term accommodation in facilities provided by homeless assistance services, but also with regard to access to health insurance. The staff members interviewed at various counselling centres reported that because of the Corona pandemic and the associated restrictions, the demand for counselling had increased so much that not all requests could be dealt with. The demand has grown mainly because authorities such as the social welfare office and the job centre have switched to telephone and email communication. Many people were unable to deal with this kind of communication on their own due to language

difficulties, so they had to rely on the support of counsellors who could translate for them. This situation repeatedly gave rise to problems, as was pointed out in particular during a group discussion on the presentation of this study's preliminary results. Several participants reported that various caseworkers from public authorities such as the Job Centre – contrary to official statements – did not accept language mediation by telephone. Privacy issues were cited as the reason for this, although this had never been a problem in the case of face-to-face appointments<sup>16</sup>.

Beyond these immediate issues, several staff members of civil society institutions referred to the lack of language mediation as a key barrier to accessing services for precarious migrants. Both public authorities and health insurance companies hardly provide any option for communicating in a language other than German. Many problems could be solved more quickly "if all the offices had language mediation"<sup>17</sup>, according to a counsellor who mainly advises Romanian-speaking workers on labour and social welfare law issues.

## Health

Although Germany has ratified various international agreements that provide for a right to health regardless of residence status (e.g. §12 International Covenant on Economic, Social and Cultural Rights), people staying in Germany without residence status and people without health insurance are eligible for medical treatment in exceptional cases only (emergency care or benefits under the Asylum Seekers' Benefits Act). Precarious migrants are thus almost completely denied access to the regular health system. In order to counteract this exclusion and provide access to health care for precarious migrants, various municipal and civil society actors in Frankfurt offer complementary free and confidential services.

### Humanitarian consultation hours

Unique to the city of Frankfurt are the humanitarian consultation hours, which are recognised also internationally as a best-practice model (cf. Spencer & Delvino 2019: 51). This is carried out by staff of the local health authority in cooperation with *Maisha – Association for African women in Germany*. Twice a week there is a general medical consultation and once a week a paediatric and gynaecological consultation for migrants who are not insured or undocumented. The treatment

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<sup>16</sup> Unfortunately, it was not possible for us to conduct an interview with a person from the job centre, as several interview requests were refused.

is free of charge and confidential. In addition to medical treatment, social counselling by Maisha makes up an essential part of the service. The cooperation began in 2001 after Maisha reached out first to the Frankfurt women's department and then to the local health authority, drawing attention to problems African women face in accessing health care. Since then, the municipal budget has included funds for basic care treatment costs. Medicines, vaccines, diagnostics and therapy are financed by the Youth and Social Welfare Office on a lump sum basis. Premises and staff<sup>17</sup> are provided by the local health authority. In response to the EU's eastward expansion and the diversification of patients, the service previously known as "Africa consultation hours" was expanded in 2009 to become the "humanitarian consultation hours". In the following years, a paediatric consultation and gynaecological consultations were added.

In their work, the employees of the local health authority refer to §7 I of the Hessian Law on the Public Health Service (HGöGD). It states that the task of health offices is to inform and advise the population on how to promote health, avoid hazards and prevent diseases. This applies "in particular to socially disadvantaged or particularly vulnerable or endangered persons who do not have sufficient access to health care; for this group of persons, the health offices can provide outpatient treatment on a case-by-case basis" (§7 I 3 HGöGD<sup>o</sup>). Accordingly, the health authority's staff consider the provision of health care to people without health insurance as a task for the public health service. While the humanitarian consultation hours were quite marginal in the early days, they now enjoy broad support within the local health authority as well as the municipality as a whole (F 1 & F3<sup>18</sup>).

Surveys by the local health authority show that the need for free treatment more than doubled between 2008 and 2013. Many of the patients come more than once (Schade et al. 2015). Between 2015 and 2019, the number of patients attending the humanitarian hours and the children's consultation, which has been running since 2015, has stabilised at an average of around 650 per year, with approximately 1700 consultations<sup>19</sup>. In addition, there are patients of the gynaecological consultation that has been held since 2018, which is accessed by women without health

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<sup>17</sup> Currently, there are two medical officers, two medical assistants and one coordinator.

<sup>18</sup> The interviews conducted in Frankfurt for the LoReMi project are all abbreviated in the following with the abbreviation F and a number. An anonymized list of the interviews can be found in the appendix.

<sup>19</sup> Due to the pandemic, the numbers declined somewhat in 2020 and 2021. Most likely, this can be attributed to various reasons, including the limited office hours of the humanitarian consultation hours and the connotation of the local health authority as a control institution that prescribes quarantine, as well as the fact that especially persons in illegal residence could rely less on the protection of anonymity on the sometimes hardly frequented shopping street Zeil.

insurance, often also in the case of pregnancy<sup>20</sup> (2019: 271 patients with 658 consultations). In cases where adequate treatment cannot be provided locally, attempts are made to refer patients either to cooperating specialists or other low-threshold outpatient clinics that provide free services for migrants and people without health insurance. However, especially when inpatient treatment is required, it often happens that no solution can be found for the patient (see also section on limitations and problems).

### **Further offers: Elisabeth streetwork health centre ("Elisabeth-Straßenambulanz"), Malteser and StuPoli**

In addition to the specific municipal health services, numerous other facilities in Frankfurt are committed to the goal of "health for all" (cf. ESA Jahresbericht 2020: 1) and offer health services for people without health insurance regardless of their residence status. These include the *Elisabeth streetwork health centre* ("Elisabeth-Straßenambulanz", ESA), the *Malteser Medicine for People without Health Insurance* as well as the *student polyclinic*. These offers are only partially funded by the city. To varying degrees, the facilities are dependent on donations from civil society that have to be raised constantly<sup>21</sup>. They differ on the one hand in terms of their (original) target groups, and on the other hand, in terms of the services they can offer.

ESA, a facility run by Caritas, has been providing medical care for homeless people and people without health insurance for over 25 years. Around half of ESA's patients are homeless and uninsured. Two thirds of it are covered by municipal funds and the rest by Caritas' own funds, i.e. donations. Every morning there is a general medical consultation. In addition, there are dental and psychiatric consultations twice a week and a women's consultation once a week. People in precarious situations under residence and social welfare law make up the majority of patients. For their access to health care, linguistic understanding plays a central role, as one interviewed staff member summed up: "We want to understand because we believe that professional medical treatment really requires understanding, a mutual understanding. That's why we try, if we notice that German is not understood, [...] to work with translation. This means that we, our team, is equipped to be genuinely multilingual. New hires to the team were also recruited with language skills. Medical training alone wouldn't have been enough in this case."<sup>o</sup>

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<sup>20</sup> Between 2008 and 2013, 14.1% of diagnoses at the humanitarian consultation hours were pregnancies (Schade et al. 2015: 469).

<sup>21</sup> The associated workload and financial insecurity were described as a problem by several interview partners.

The Malteser Medicine for People without Health Insurance ("Malteser Medizin für Menschen ohne Krankenversicherung"), formerly known nationwide as Malteser Migrant Medicine ("Malteser Migranten Medizin") until 2018, offers a weekly consultation in the medical centre of the Markus Hospital in Frankfurt; it is carried out by two volunteer doctors and two assistants. Medicines and, to a limited extent, outpatient and inpatient operations are funded by donations. According to an interview partner, the majority of patients are people in precarious residence situations, many of them employed but without access to health insurance. They are examined and treated in the open consultations and referred onwards if necessary. Thanks to the cooperation with a laboratory and an X-ray practice, free diagnostic examinations are possible. For follow-up treatments, there is also a network of around 80 medical specialists who provide treatments either free of charge, per invoice at a simple rate or on a donation basis. In addition, the Malteser have access to lawyers who provide pro bono counselling for patients who may be able to gain regular access to the health system. Fundraising and the maintenance of these networks continuously requires a high level of coordination, which is provided on a voluntary basis by the management of the Malteser Hilfsdienst in Frankfurt as well.

The Student Polyclinic (StuPoli), founded in 2014, is a teaching project of the Goethe University. There is particularly close cooperation between the StuPoli and the humanitarian consultation hours, which is also reflected spatially: The StuPoli consultation hour takes place twice a week in the premises of the humanitarian consultation hours. The examination and treatment are carried out by medical students taking the elective course StuPoli together with students from higher semesters (so-called "seniors") and supervised by a doctor. Every year, around 40 students (so-called "juniors") enrol in the elective course. Some of them subsequently become part of the volunteer pool of seniors, which is comprised of about 30 people. The organisational tasks are carried out by five to eight senior students, some of whom are employed as student assistants at Goethe University for the teaching project, and some of whom work for StuPoli on a voluntary basis. The services include ultrasound and laboratory examinations as well as ECGs, which are also regularly carried out for patients at the nearby ESA.

### **Outpatient childbirth programme**

In addition, worthy of mention is the outpatient childbirth programme. In order to provide a risk-free delivery, the local health authority and several Frankfurt clinics agreed in 2007 that the latter would carry out outpatient births for patients of the humanitarian consultation hours for 700€. This ensures that women can regularly register for childbirth at a clinic and give birth there

without having their data passed on to the foreigners' authority<sup>22</sup>. As various interview partners informed us, this sum is either paid by patients in instalments or financed or at least subsidised by emergency funds of civil society organisations. While the outpatient childbirth programme is generally regarded as positive, it is not possible to ensure sufficient follow-up care for women and new-born children. In addition, there are problems if complications arise during the birth and an inpatient stay becomes necessary, since this is not covered by the agreements and results in high additional costs.

### **Interim conclusion: Basic services through complementary offers by the municipality and NGOs**

The services offered by non-governmental organisations and the local health authority are explicitly open to all persons without health insurance, regardless of their status<sup>23</sup>. Confidential treatment is guaranteed by all providers. They take strict care to collect as little data as possible and not to pass on any data to public authorities. Low-threshold access is understood as "the foundation" (F1°). All facilities explicitly offer open consultation hours; it is not necessary to make an appointment. Some facilities also pay special attention to the reduction of language barriers through multilingual staff or the use of interpretation if no one in the facility has the necessary language skills (F3; F4). Over the years, a good division of labour has developed between the local health authority and the non-governmental institutions. All participants emphasised the good, hierarchy-free collaboration, which is based less on formalised meetings and more on informal exchange. There is a lot of everyday communication. Patients are referred and transferred to the respective other facilities. The high level of (voluntary) commitment of the people working in this field and the close cooperation between them make it possible to provide basic care for people without health insurance in Frankfurt, regardless of their residence status. As already mentioned, further cooperation with individual specialists and hospitals is central to this. In the first two years of the Corona pandemic, the aid network also played a central role in providing health care to people without health insurance, regardless of their residence status. The existing structures were used to provide care in case of infections and vaccinations against Covid, which in turn was

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<sup>22</sup> The fear of deportation is nevertheless present for women during childbirth. An interview partner who frequently attends births told of a woman who, while in labour, repeatedly asked the medical staff not to call the police.

<sup>23</sup> ESA only provides care for homeless people, but also regardless of their residence status.

managed by the additional, largely voluntary commitment of the staff. Overall, the services only had to be slightly reduced<sup>24</sup> and have been fully available again since the beginning of 2022.

## Clearinghouse

The clearinghouse, which started its work in 2021 after delays due to the Corona pandemic, aims to increase access to the regular health system. Once a week, psychosocial counselling with a focus on health and social security issues takes place in cooperation with the Department of Social Work and Health at the Frankfurt University of Applied Sciences. The costs for the rooms and most of the personnel costs are covered by the local health authority, while the costs for the two external counsellors are covered by the youth and social welfare office. It is a pilot project that will end at the end of November 2022, but is planned to be made a permanent part of the local health authority. The aim of the clearinghouse is to advise and support people in order to obtain long-term health insurance coverage and thus access to the regular health care system. Counselling includes, among other things, the clarification of insurance coverage, support with applications, as well as the determination and, if necessary, enforcement of claims for social benefits. Translation to Spanish, English, Bulgarian, Romanian and German is available by the counsellors, as well as six other languages via a fee-based telephone interpreting service. Between February 2021 and February 2022, 118 people received counselling, 39% of whom were third-country nationals, 32% non-German EU citizens and 27% German citizens (2% unknown). A total of 45% of those seeking advice who came to the clearinghouse for the first time between February 2021 and March 2022 have so far been successfully placed in health insurance.

However, according to the local health authority staff in charge, the actual need for counselling exceeds the available staff resources. The process of obtaining insurance coverage often takes a long time. As a result, the clarification often does not come in time for the persons affected to cover their acute treatment needs. At first contact, about half of the people seeking advice stated that they were in urgent need of treatment (31%) or pregnant (20%) as the reason for going to the clearinghouses.<sup>25</sup> The clearinghouse is also not able to deal with some of the barriers to accessing health insurance, for example due to problems with residence rights.

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<sup>24</sup> For example, the humanitarian consultation hours could not be carried out jointly by the local health authority and Maisha for a while and the consultation hours were somewhat reduced. In addition, the Malteser for instance had to make do without the help of some volunteer supporters.

<sup>25</sup> One of the staff members in charge emphasised in an interview that this in particular is why alternative support is needed, for example in the form of a treatment fund to finance urgently needed interventions.

## Limitations and problems

The interviews revealed numerous other limitations and problems related to health care. The comparatively good basic care is strongly dependent on the commitment of individual full-time and voluntary actors and their private networks. Moreover, these are parallel structures; so far, transitions into the regular system have only taken place in individual cases and have only become systematic since the establishment of the clearinghouse. Several interviewees also emphasised that for fear of deportation, patients with precarious status often come very late, when the illness is already far advanced. They then often have multiple illnesses that can hardly be treated on an outpatient basis. The assistance system regularly reaches its limits, for example in cases of complicated, costly operations, chronic or mental illnesses, palliative care or rehabilitation therapy after operations, or if long-term care is needed.

Due to the insufficient or uncertain funding resulting from temporary project funding and reliance on donations, as numerous interview partners mentioned was a problem, it is hardly possible to finance longer-term or cost-intensive treatments. Since entitlement to treatment only exists for emergencies, there frequently are complications with recovering fully after interventions. This is due to the fact that no accommodation is possible beyond the emergency itself, or that there are hardly any adequate beds in facilities for homeless people. This problem is exacerbated by too early discharges on the part of the clinics, which especially in the case of homeless people often lead to a vicious circle of repeated short-term hospital stays. Overall, the interview partners pointed out the problematic effects of poor or insufficient accommodation on the state of health – a connection that exists in general, but was highlighted even more drastically by the Corona pandemic. The staff member of a counselling centre stressed that Romani people were hit particularly hard by the pandemic due to their often problematic housing situations and that many deaths had to be mourned.

In addition, there are two central problems related to applications for reimbursement of costs at the social welfare office. Firstly, persons with unresolved residence status in Germany run the risk of their data being passed on by the social welfare office to the foreigners' authority, as has been observed in previous studies (see Mylius 2016, von Manteuffel 2018). It could not be determined conclusively whether data is being passed on in Frankfurt as well. However, of key importance is the fact that there is no legal certainty in this regard and therefore patients cannot be certain of



risk-free treatment, even in emergencies<sup>26</sup>. Secondly, there are financial losses for hospitals if the social welfare office rejects applications for the reimbursement of costs, including for emergency treatment that has already been provided, because the documentation of the indigence of the treated patients is not accepted (F3 & F21). In addition, a staff member of the youth and social welfare office mentioned the lack of proof of identity as a reason why applications for the reimbursement of costs are often rejected. In this case, the hospitals are left with the costs of treatment. In 2019, according to a survey by the local health authority, treatment costs for inpatient treatments without payers amounted to more than 1.5 million € (Gesundheitsamt Frankfurt am Main 2020). Several interview partners reported that due to this decision-making practice by the youth and social welfare office and the increasing privatisation of hospitals, it has become more difficult to accommodate patients. In recent years, patients referred by them to the central emergency room have increasingly been turned away without treatment.

## Accommodation/ Housing<sup>27</sup>

The right to housing is part of the right to an adequate standard of living, as urged by Article 11 of the International Covenant on Economic, Social and Cultural Rights. The Covenant provides that the right shall apply regardless of nationality or residence status, but does not create legally enforceable rights. However, it follows from the guarantee of human dignity under the German Basic Law that the state must ensure the basic conditions for a dignified existence. Corresponding entitlements are defined and specified in social welfare law (Kennerich 2018). However, a right to housing is not explicitly provided for.

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<sup>26</sup> It is true that medical and other staff in the health sector are subject to a medical confidentiality obligation, which, according to the general administrative regulation of the Federal Government on the Residence Act, extends to public authorities (Drucksache 669/09). However, according to the Federal Medical Association, there is legal uncertainty as to whether social welfare offices are obliged to maintain the confidentiality of data received from doctors and hospitals vis-à-vis foreigners authorities (Bundesärztekammer 2013). Accordingly, Mylius (2016) states in a study on the practice of local health authorities and hospitals that in 8.5% of the cases investigated, hospitals regularly inform the police when migrants in illegal residence appear for emergency treatment (ibid. 275). In May 2022, a Kosovar living in Germany since 1997 and staying in Frankfurt without residence status since 2017 filed a strategic complaint with the Frankfurt Administrative Court. Supported by the Society for Freedom Rights and the organisation Doctors of the World, it argues that the reporting obligation under §87 restricts his right to health. The overarching goal of the lawsuit is to have the reporting obligation reviewed by the Federal Constitutional Court (GFF 2022).

<sup>27</sup> Reference should also be made to the needs analysis of homeless EU citizens and in particular, the recommendations for action formulated there, which was written by Lisa Riedner and Marie-Therese Haj Ahmad (2020). Based on our research, we consider the findings on the situation of homeless EU citizens and the need for action, which are described there in great detail, to be largely up-to-date, even if the situation has changed somewhat in the course of the Corona pandemic.

## **Lack of affordable housing and insufficient social housing**

In many cities, adequate housing is unaffordable even for the middle class. Homelessness has become an increasing problem in recent years (for details see: Sonderberichterstattung für angemessenes Wohnen 2018). In Frankfurt am Main as well, affordable housing is scarce. Especially after 2009, property prices and rents in Frankfurt am Main have risen rapidly. At the same time, the number of social housing units has decreased sharply<sup>28</sup>, all the while the number of people who are registered as looking for housing while entitled to a social housing unit increased by almost half between 2009 and 2017 to almost 24,000 (Schipper & Heeg 2021: 54-55). According to the Housing Office (Amt für Wohnungswesen 2019: 48), 46.1% of people seeking housing in 2018 were acutely homeless. The generally strained state of Frankfurt's housing market is not alleviated by the numerous construction projects, as the flats created here mainly serve as capital investments (Betz et al. 2021: 10). Therefore, there has only been little positive change in terms of affordable housing for lower income groups so far (Belina 2021: 75).

Only persons who can prove permanent residence in Germany (§27 WoFG), either through a permanent residence in Germany or the possession of a valid residence permit for at least one year, are entitled to social housing. In Frankfurt, there is an additional barrier: applicants must have been registered in Frankfurt for at least one year (Amt für Wohnungswesen 2021). The majority of precarious migrants are therefore excluded from applying for social housing. At the same time, the lack of (subsidised) affordable housing affects the availability of housing and the general situation in facilities providing support to the homeless and in women's shelters.

## **Private accommodations**

For people with low financial means and/or language difficulties, it is particularly challenging to find adequate and affordable housing. It is not uncommon for precarious migrants in Frankfurt to live in unacceptable accommodation that is tied to informal work arrangements. Frequently, the sometimes horrendous rents are subtracted straight from the wages without any official record, i.e. they are not noted in the salary statement. These accommodations often are of poor quality. This finding from various previous studies, which mainly referred to the situation of Eastern European EU citizens in Frankfurt am Main (see Aliche et al. 2014; Künkel 2018; Riedner & Haj Ahmad 2020), was also shared by several of our interview partners when referring to the

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<sup>28</sup> Since the early 1990s, the number of publicly subsidised social housing units in Frankfurt has fallen from almost 70,000 (= approx. 20 % of the housing stock) to 25,000 units (= 6.3 % of the housing stock) in 2018 (Schipper & Heeg 2021: 55).

current situation. For persons with irregular residence status, the low availability of housing is exacerbated by the fact that landlords are liable to prosecution if they provide housing to people without residence status (see Deutscher Caritasverband & Deutsches Rotes Kreuz 2017: 67). Therefore, the degree of exploitation is very high, as was pointed out by an interview partner who mainly supports precarious migrants in their search for housing. Due to the low supply of housing, widespread discrimination on the housing market, lack of social protection (cf. Künkel 2018: 289; Riedner & Haj Ahmad 2020: 51) and, in the case of people without a valid residence status the permanent threat of being reported to the authorities in case of conflicts (F7), precarious migrants submit to sometimes unacceptable conditions.

Several interviewees also described specific forms of precariousness resulting from private arrangements, stating that they shared a room with other people or slept in friends' living rooms for as long as possible only to move on to the next temporary sleeping place (F26, F27). This is problematic, sometimes difficult to organise and mentally stressful, according to one interviewee, but, "You have no other choice!" (F27).

Due to these dependencies, (work) conflicts or the abrupt end of (work) relationships can directly cause the loss of one's place to stay. The latter regularly affects women who work informally in private households and care for older people or people with disabilities when these die or move to a care facility. Even for those with regular housing, losing their job can quickly lead to a loss of their home if there is no entitlement to social benefits.

### **Support services for homeless people in Frankfurt**

In Frankfurt, there are various support services for people affected by homelessness. The largest providers are the Frankfurter Verein Soziale Heimstätten ("Frankfurt Association Social Homes"), which is closely linked to the municipality, and the two denominational charities Diakonie and Caritas. Accommodation in facilities for the homeless is based on two legal foundations:

(1) The entitlement to support for "persons whose special living conditions are linked to social difficulties" is laid down in the Federal Social Welfare Code (§67 SGB XII<sup>9</sup>). However, this assistance, like almost all other benefits under the Social Welfare Code, is not (or no longer) legally available to most foreign homeless persons, including EU citizens (see Chapter 4). This means that precarious migrants cannot access large parts of the services offered by the homeless assistance system. According to several interview partners working in this field, the institutions themselves have little leeway to accommodate people who are not entitled to social benefits, as they would have to bear the costs themselves.

(2) The second legal basis for housing homeless people are the federal states' security and public order laws. In the case of Frankfurt, this is the Hessian Law on Public Security and Order ("Hessisches Gesetz über die öffentliche Sicherheit und Ordnung", HSOG). It obliges municipalities, in their function as lower security authorities, to prevent acute risks such as homelessness. For this purpose, they have to provide accommodation to involuntarily homeless persons. The obligation under public order law applies irrespective of the nationality or residence status of the person concerned (Ruder 2015: 56). This assessment is also shared by the staff of Frankfurt's social welfare office. According to the authors, however, they interpret the city's obligation restrictively (see also Riedner & Haj Ahmad 2020: 28; Böhm 2021: 91).

One interview partner working at the social welfare office summed up her assessment of the legal obligation as follows: "We have to prevent homelessness [...] whenever someone cannot help themselves. [...] If someone still has a shelter somewhere else, then I don't have to provide for them here" (F18<sup>o</sup>). This interpretation also underpins the social welfare office's practice of offering a ticket to EU citizens who are not entitled to benefits, if it is assumed that they have the option of ending their homelessness somewhere else. Because in this case, they could avoid being homeless themselves, and the social welfare office would no longer be obliged to provide accommodation<sup>29</sup>. However, as Karl-Heinz Ruder points out in a legal opinion prepared for the national conference of the Federal Working Group on Assistance to the Homeless ("BAG Wohnungslosenhilfe"), rejecting this course of action does not release the competent municipality from its obligation to provide accommodation (Ruder 2015: 29). Most recently, these diverging legal opinions caused controversy with regard to the needs assessment of the situation of homeless EU citizens in Frankfurt. A clarification of the view taken by the City Council of Frankfurt still seems urgently needed.

## Emergency Shelters

Due to the legal regulations described above and their current interpretation by the Youth and Social Welfare Office, homeless EU citizens without entitlement to benefits generally only have short-term emergency access to homeless shelters. These are also occasionally used by persons without residence status, but this is "a rather marginal phenomenon" (F17<sup>o</sup>). The legal basis for emergency accommodation is public order law; it is provided in various facilities and, depending

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<sup>29</sup> The following note on the information page of the City of Frankfurt on emergency sleeping facilities also points in this direction: "Before using the emergency sleeping facilities, all self-help options (locally unlimited) must be exhausted." (City of Frankfurt 2022b<sup>o</sup>)

on the facility, is limited to a maximum of 10 days. People staying in an emergency shelter usually have to see the Special Service 3 of the Youth and Social Welfare Office (“Besonderer Dienst 3 des Jugend- und Sozialamts”, BD3) within three days, in order to check whether they are entitled to accommodation according to SGB II and XII or under public order law. If the Youth and Social Welfare Office does not cover the costs, individuals may only stay under special conditions (see section on Liste vital). The main organisations offering accommodation in Frankfurt am Main are the Frankfurter Verein, Diakonie and Caritas.

The Frankfurter Verein is, among other things, the responsible body for the Ostpark emergency shelter (“Notschlafstätte Ostpark”). With 200 to 220 places, it is Frankfurt’s largest facility and contact point for homeless people. The municipality provides full lump sum funding for the Ostpark emergency shelter. This allows the staff a certain flexibility with regard to admissions. Admission takes place when free places are available, without prior application and regardless of residence status, as a staff member of the Frankfurter Verein emphasises, “Of course we ask whether [the person] has an identity document. If he doesn't have one and he is standing there freezing and we have a bed, [...] then we take him in anyway, [...] and try to sort it out afterwards, so he will be accommodated for the time being”<sup>30</sup>. At the same time, the Frankfurter Verein is closely connected with the Youth and Social Welfare Office, the head of which is part of the association's supervisory board (F12). People staying in the Ostpark emergency shelter usually<sup>30</sup> have to go see the BD3 the following day for an assessment of their entitlement to accommodation. Some of the interview partners working in counselling criticised the fact that at Ostpark, accommodation without having any entitlements is usually only possible for a maximum of three days<sup>31</sup>.

There are other emergency shelters with lump sum funding from the city where people can stay for a maximum of ten days; these include the Diakonie centre WESER 5<sup>32</sup> and Haus Hannah – Wohnen für Frauen (Diakonie). Accommodation is offered separately according to gender and usually in 2 to 4-bedrooms. Families are accommodated on behalf of the City of Frankfurt by the

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<sup>30</sup> This has been delayed somewhat due to the pandemic, as it was/is possible to come by appointment only.

<sup>31</sup> With reference to the addresses given on the identity cards, the social welfare office regularly determines that applicants could be accommodated at the place of residence where they were officially registered last. If they refuse the tickets offered to them there, homelessness is no longer considered involuntary and the municipality does not feel obliged to extend the accommodation.

<sup>32</sup> Compared to 2016, the proportion of EU citizens among those using WESER 5's emergency overnight accommodation almost doubled in 2017. Between 2018 and 2020, the proportion was around 30%; around 23% came from other third countries and 47% were of German nationality. (WESER 5 2019: 26).

Protestant Association for Housing Aid ("Evangelischer Verein für Wohnraumhilfe"), mainly in boarding houses or hotels. These are located throughout the city, many of them close to the railway station<sup>33</sup>. In response to the pandemic, the ten-day limit was lifted between April and June 2020 and over the 2020/2021 New Year holidays.

Staying in homeless assistance facilities for a longer period requires an application to the social welfare office. Beyond short-term emergency accommodation, EU citizens who have been in Germany for less than five years are only accommodated if they are entitled to unemployment benefit II (ALG II) as top-up recipients ("Aufstocker\*in"), for example due to working in a mini-job only or because their income is too low to cover their needs due to part-time employment. Also in these circumstances, losing one's job can ultimately lead to (renewed) homelessness, as various interview partners pointed out with regard to the effects of the Corona pandemic (Böhm 2021: 95-96). As the staff of one counselling centre pointed out, the practice of checking eligibility often causes homeless EU citizens not to make use of emergency services they are entitled to, fearing that this could lead to a future revocation of their right to freedom of movement (F10).

As such, the legal regulations obstruct access even to those services that the city is obliged to provide. For people residing illegally, a deterrent effect can be observed similar to that in the health sector due to §87 of the Residence Act. It must be assumed that they avoid these offers in order not to risk deportation.

### **Winter Emergency Program**

Overnight accommodation in the winter emergency programme is available at low thresholds to all persons who acutely need a place to sleep. The low-threshold seasonal offer, which aims to prevent cold-related deaths, is open between 15 November and 31 March. This is an overnight-only service, available between 8pm to 10pm and 6am or 8am. One of these is the B-level of the subway station Eschenheimer Tor, which is managed by the Frankfurter Verein. If necessary, people will be provided with a sleeping mat and a sleeping bag. It is accessible irrespective of residence status. According to an estimate by the staff interviewed, every night around 140-150 people stay at Eschenheimer Tor, 50-60% of them from Eastern or South-Eastern Europe. Due to the Corona pandemic, the overnight accommodation at Eschenheimer Tor was opened all year round for the first time in 2020. For 2021 and 2022 as well, the social department decided to keep

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<sup>33</sup> As a neighbourhood where drug use is a visible part of everyday life, it was described by various interviewees as unsuitable for housing families.

the seasonal emergency shelter open all year (Stadt Frankfurt 08.04.2022). The offer is supplemented by a winter café where warm drinks and pastries are served between 6 am and 10.30 am. The opening hours are extended during particularly cold periods.

While there has been noted an overall improvement in the situation compared to the B-level of the Hauptwache<sup>34</sup>, which was used until 2018 (WESER 5 2019: 11), the winter shelter at Eschenheimer Tor still receives repeated criticism. One interview partner described it as mere "protection against freezing"<sup>35</sup>, which still does not comply with the requirements of accommodation under public order law (F10). Furthermore, the municipality has been funding additional places under the winter emergency programme in homeless assistance facilities since 2017. These include the WESER 5 day centre, where prior to the pandemic 30 places were available as winter emergency night shelters. In order to maintain minimum distances, these were reduced to 20 places (15 men and 5 women) in the winters of 2020/2021 and 2021/2022. In order to use these services, people staying overnight must register with the respective facility in advance<sup>35</sup>. The percentage of migrants was 93% in 2019/2020 and 85% in 2020/2021 (WESER 5 2020; 2021). Places in the night shelters under the winter emergency programme can be used for a longer period, regardless of entitlement to benefits.

### Liste Vital

In addition, there is another humanitarian exemption for exceptional health emergencies: if facilities encounter people for whom remaining on the street would endanger their life, they can be placed on the Liste Vital at one of the monthly meetings of the streets working group ("Arbeitskreis Straße"). This list is maintained by the Frankfurter Verein. The streets working group is made up of the various institutions providing assistance to the homeless as well as the social welfare office. In this case, the social welfare office covers the costs of accommodation. While various interview partners are grateful for this agreement with the municipality, some pointed out that these are only individual solutions that do nothing to change the underlying problem of scarce accommodation in Frankfurt. A staff member of a counselling organisation criticised that, cynically speaking, one has to wait until the physical condition of people who live on the street

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<sup>34</sup> This overnight accommodation was initially provided by the transport company for almost two decades, with no social service provider accompanying the overnight stays (F12).

<sup>35</sup> In winter 2019/2020, an average of 29 people per night registered for the winter places at WESER 5. Of these, 18 people actually made use of the sleeping place (WESER 5 2020).

due to a lack of entitlement to accommodation is so bad that accommodation through the vital list becomes possible (2. Runder Tisch 30.03.2022).

### **Alternative offers**

In addition to private solutions, various actors are trying to fill the gaps left by the offers described so far. These include local churches providing temporary accommodation<sup>36</sup> and activist self-organised projects such as Project Shelter. The latter is an initiative founded in 2014 in which, according to its own statement, "people with and without experiences of migration and flight work together against homelessness and racism" (Project Shelter 2021: 309<sup>o</sup>). The activists organise private sleeping places for migrants who are excluded from accommodation in state-funded facilities and campaign politically for longer-term changes at the same time. They also advocate for a self-managed migrant centre where people can arrive in a calm and safe environment and organise their lives (ibid.). A similar demand is also made by the Roma support association ("Förderverein Roma"), which has been campaigning for a house for Romani people for a long time. This is conceived as an integrated housing project where residents are accommodated according to their needs and receive social counselling as well.

### **Problems**

Overall, it can be concluded that the accommodation options for precarious migrants in Frankfurt are limited. Several counsellors interviewed stressed that due to the scarcity of affordable housing, wide-ranging exclusions from benefits and restrictive procedures by the social welfare office; they can offer little support in most cases. Problems identified by the majority of interview partners included the quality of the different types of accommodation and the dependencies in the field of private accommodation. However, the main concern was that there are no adequate and low-threshold accommodation options available all year independent of entitlement to benefits. Especially in the case of homelessness, there is a long-term need for counselling that does not match the short-term nature of the services available. "Well, these [...] 10 days are not enough to somehow sort things out with the authorities", as one counsellor emphasised (2nd Round Table<sup>o</sup>). In the case of violence, there are accommodation options for women (see chapter 10). However, it is irresponsible that there are hardly any housing options available beforehand, which increases the likelihood of experiencing violence on the streets or in private homes. In

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<sup>36</sup> This includes accommodation within the framework of so-called church asylum. Its aim is to help people who are threatened with deportation under the Dublin Regulation to take up asylum proceedings in Germany (on debates about Dublin deportations, see Hinger et al. 2018).



addition, several interview partners pointed towards occasions or announcements of taking children into custody when women are homeless – instead of accommodating them together with their children, even if they are not entitled to social benefits (see also Riedner & Haj Ahmad 2020: 39-40).

The Corona pandemic made it all the more obvious that it is not only important "to provide accommodation, but also [...] to provide adequate accommodation", as one interview partner put it (F9°). Numerous interview partners emphasised that it is difficult to find formal employment without adequate housing. Housing insecurity also has a negative impact on access to health (see Chapter 7) and education (see Chapter 9). From early 2021 until autumn 2021, entitlement-free accommodation beyond immediate emergency situations was available for single men in the Henriette-Führt-Haus, which is run by Caritas. In response to the pandemic and the demands of the Förderverein Roma, 20 places were created that can be assigned without having to check formal entitlements. Since autumn 2021, these places – which are financed by the social welfare office on a lump sum basis – will no longer be filled when they become available. The discontinuation of the service was criticised by several interview partners. At the round table in late March 2022, where the preliminary results of this study were presented, several participants stated that under the new "Magistrat" provided by the Greens, SPD, FPD and Volt they were confronted with the same restrictive accommodation policy as under the previous municipal government of Social Democrats, Conservatives and Greens – even if the coalition agreement pointed towards a different direction. The plans formulated in the coalition agreement "to offer a sleeping place for humanitarian reasons in a kind of boarding house based on the Cologne model" (Grüne, SPD, FDP, Volt 2021: 114°) and to examine the possibility of establishing a "House for Roma" based on the Berlin model (ibid. 94) were welcomed accordingly.

## Education

Overall, there is a mixed picture with regard to access to the right to education for precarious migrants in Frankfurt am Main. In the field of primary education, there is comparatively good access for children in precarious residency situations. This is partially due to inclusive legal regulations at the state and federal level. Barriers exist especially around access to places in day-care centres and to further education.

## **Legal basis: Abolition of the reporting obligation for educational institutions at federal level and school access law at state level**

Following years of mobilisation by church and human rights organisations as well as the Trade Union for Education and Science (GEW), schools as well as educational and training institutions in Germany were exempted from the reporting obligation under section §87, which in principle applies to all public authorities in 2011 (§87 I AufenthG). In December 2009, the state of Hessen was one of the first federal states that decided to abolish the reporting obligation with regards to education in its School Act (Steffens 2011: 238). In several of the interviews conducted for this case study, it was expressed that this has resulted in positive changes concerning access to education for precarious migrants. Unlike before the law was changed, there have been no known problems in recent years, according to one trade union interviewee (F23). However, merely abolishing the reporting obligation does not automatically lead to the removal of all barriers in access to education, as Barbara J. Funck, Yasemin Karakaşoğlu and Dita Vogel (2015) found in a nationwide comparative study commissioned by the GEW. The authors emphasise that the likelihood of risk-free school attendance strongly depends on whether compulsory schooling or a right of access to school for all children and adolescents, regardless of residence status, is enshrined in the respective state constitution. Enshrining the right to attend school in national law, as also recommended by the Council of Europe (Council of Europe 2011: 8), would clearly have a positive impact (Funck et al. 2015: 35-37). In Hessia, the right of access to school is explicitly provided for children who are residing illegally (§46 III VOGSV). School attendance is free of charge<sup>37</sup>. This means that at federal and state level, explicitly inclusive regulations irrespective of residence status are provided for in order to uphold the right to education. Furthermore, through its Integration and Diversity Concept 2010, the City of Frankfurt acknowledged "the humanitarian obligation to enable refugees and children of parents without official residence status to participate in regular schooling" (Stadt Frankfurt am Main Integrationsdezernat 2011: 68°).

## **Few difficulties in access to primary schools, problems with places in day-care centres**

The authors of the GEW study point out that in addition to the legal basis, it is crucial that relevant information is available and disseminated. Key to (risk-free) access to education is that both schools' headmasters and administrators, as well as persons in precarious residency situations, are informed about the right to education and the suspension of the reporting obligation (Funck

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<sup>37</sup> However, this only includes costs for tuition itself. Costs for events such as class trips or excursions must be paid privately (Deutscher Caritasverband & Deutsches Rotes Kreuz 2017: 20).

et al. 2015: 11-12).<sup>38</sup> The interviews conducted for this study on the situation of precarious migrants in Frankfurt am Main indicate that there have been no public information events or campaigns neither by the state education authority nor by the GEW's Frankfurt chapter after the legal changes in 2011<sup>39</sup>. The head of the education department in charge emphasised that she "assumed" that the schools had been informed by the state education authority. The knowledge about the right to education and the abolition of the reporting obligation seems to be widespread among heads of school. This most likely is also because students in precarious residency situations are not an exception in Frankfurt's post-migrant society<sup>40</sup>. Overall, the schools in Frankfurt are quite "courageous and determined" to enable inclusion regardless of residence status, according to one interview partner (F25°). Another interview partner stressed the continuous need to disseminate information on the right to education in order to ensure that it can be exercised.

While access to primary schools was described as generally unproblematic, difficulties due to exclusion within schools were also reported. Romani children, for example, tend to be transferred very quickly from the regular schooling system to the system for children with special needs ("Fördersystem"), according to an employee of a counselling centre. One response to this is the "Schaworalle" day-care centre, which is a national pilot project that prepares Romani children for school and subsequently provides them with a school education. After the Förderverein Roma started working with children and young people in 1996, it was possible to rent suitable premises in 1999 with the help of the youth welfare office, the AmkA and the municipal education authority (Förderverein Roma e.V. 2022: 5). Next to kindergarten places, the Schaworalle also includes a school project where Rom\*nija can attend regular school up to the age of 15 and obtain a lower secondary school qualification ("Hauptschulabschluss"). The offer is well received.

More difficulties exist in terms of access to places in day-care centres, as was underlined at the presentation of the preliminary project results (2<sup>nd</sup> round table). While the 2018 decision to abolish day-care fees in Hesse does facilitate access, families still have to pay additional fees, for example for meals. For precarious migrants, this often can be difficult to afford. In accordance with the

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<sup>38</sup> Following the study, the GEW developed a flyer to inform employees in schools and day-care centres so that they can support children and young people in illegal residence in accessing the right to education (GEW 2017).

<sup>39</sup> Unfortunately, the state education authority itself could not provide any information on this due to a lack of documentation.

<sup>40</sup> Funck et al. (2015: 38°) emphasise that "the public discussion of the situation of people in illegal residence may lead to more frequent identification of viable ways to enrol in school".

federal education and participation package, it is possible to apply for the payment of meal costs. However, these are in turn linked to entitlement to benefits under the Social Welfare Code or the Asylum Seekers' Benefits Act (BMAS 2022). It was also pointed out that there were too few day-care places available in Frankfurt, just as on a statewide and national level. For the kindergarten places at the Schaworalle, too, there is a long waiting list (Förderverein Roma e.V. 2022: 7).

### **Further education and training**

As the study showed, the most serious access barriers were in the field of further education and training. One interview partner emphasised that precarious migrants rarely have opportunities to do internships because they are often subject to discrimination. For migrants without residence status, there are virtually no opportunities to get apprenticeships or to participate in training programmes. They are explicitly excluded from German language courses and integration courses<sup>41</sup> funded by the Federal Office for Migration and Refugees. They are also not entitled to alternative services provided by local organisations that are funded by the Frankfurt women's department.

In contrast, German courses are generally open to EU citizens. Since 2013, Förderverein Roma has also been offering a vocational training project for young people between 14 and 27, as well as for adults, to members of the Romani minority. These are EU-funded projects in which participants are supported, among other things, in obtaining a lower secondary school certificate and vocational orientation, and in finding employment. However, one of our interview partners, who was able to obtain her lower secondary school qualification this way, described difficulties in completing an apprenticeship afterwards. The job centre had told her that she had to work, otherwise she would lose her right to freedom of movement: "I am not allowed to stay here and go to school and study. If I want to stay here, I have to work properly". (F15°) Instead of doing an apprenticeship, the interview partner started working as a cleaner.

Therefore, there is still room for improvement in terms of access to education for precarious migrants – despite the improvements that have been noted as a result of abolishing the reporting obligation for educational institutions. The Corona pandemic has once again highlighted the

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<sup>41</sup> Participation in integration courses is explicitly provided for the following groups only: "asylum seekers with good prospects of remaining ("mit guter Bleibeperspektive": Eritrea, Syria, Somalia, Afghanistan), asylum seekers with a good chance of finding employment and who entered Germany before 01.08.2019, tolerated persons with a toleration permit pursuant to §60a II 3 AufenthG or holders of a residence permit pursuant to §25 V AufenthG" (BAMF 2018°).

extent to which educational success also depends on home conditions. Pupils in precarious situations had a particularly hard time during the school closures and the times of home-schooling associated with them, according to an interview partner from the GEW. In this respect, access to education – similar to access to health care (see chapter 5) – is closely linked to the housing situation (see chapter 6).

## Protection against violence

Under the Istanbul Convention<sup>42</sup>, which entered into force on 1 February 2018, Germany has committed itself to preventing and combating violence against women and to providing protection for victims of domestic violence. These obligations apply to all government bodies such as administrations, legislatures and courts at all levels of government. They explicitly include the protection of all women regardless of nationality or residence status (Art. 4). The tasks associated with the Istanbul Convention are the responsibility of the Länder or are delegated by them to the municipalities. However, also in Frankfurt, protection against violence is difficult for migrant women\* with precarious status. This is due to various reasons, as various interview partners working in counselling reported.

### **Few options for protection against violence for migrant women\* with precarious status**

Women in precarious residence situations are particularly exposed to the risk of experiencing violence due to precarious housing situations; these are often linked to personal dependencies and informal work arrangements (see chapter 6). An effective prevention of violence is obstructed by exclusions under residence and social welfare law. Women\* living in precarious housing conditions or on the street were more likely to be affected by violence, according to a participant at the presentation of this study's preliminary results. It was cynical that women\* were only entitled to appropriate accommodation when they had become victims of violence. In addition, migrant women\* with precarious status often remain in violent relationships if their residence status is not independent but linked to their partnership. The same is true for women\* without residence status, who often do not dare to speak out and seek support for fear of deportation (Dinkelaker & Schwenken 2020: 163; Atmaca & Dinkelaker 2020: 168). Feminist researchers have pointed out that for precarious migrants, the possibility of receiving protection from violence is "undermined by restrictive asylum and residence policies" (Dinkelaker & Schwenken 2020: 60°).

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<sup>42</sup> Germany signed the "Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence", known as the Istanbul Convention for short, in 2011 and ratified it in 2017.

These barriers are both codified at the federal level and internalised at the same time. In addition, access to protection against violence is hampered not only by the overall lack of places in women's shelters, but in particular by the fact that there are too few places with lump sum funding. This was mentioned by several of the interviewees, also with regard to Frankfurt.

### **Impeded access to women's shelters**

In Frankfurt, the majority of places in women's shelters are currently funded through daily rates instead of fixed amounts, which means that staff and material costs are apportioned to the available places. For women\* who are entitled to social benefits, the job centre or the social welfare office pay daily rates to the respective women's shelter (Dinkelaker & Schwenken 2020: 163). As described above, precarious migrants are excluded from social benefits for various reasons (see chapters 4 & 8). For women's shelters, this means that they might be left with the costs if they take in women\* with a precarious status who are not entitled to have their costs covered. Several counsellors interviewed for this study reported that it is difficult to find places for women\* with precarious status who have experienced violence.

The difficult access to women's shelters for migrant women\* with precarious status is exacerbated by the fact that both in Frankfurt and in Hesse as a whole there is an overall shortage of places in women's shelters. According to data provided by the Hessian state government, there were 128 places available in Frankfurt and 727 in Hesse as a whole in 2018 (Drucksache 19/6088). This means that there is a shortage of around 800 places in women's shelters<sup>43</sup> throughout Hesse, as a study commissioned by the Frankfurter Rundschau found at the beginning of 2021. With the available places, Frankfurt does fulfil the formal requirements of the Convention. Nevertheless, requests had to be turned away again and again, as a staff member of the autonomous women's shelter explained (FR 09.02.2021). Due to the strained situation on the Frankfurt housing market (see Chapter 6), women often have to wait a long time before moving

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<sup>43</sup> The federal government has provided €30 million annually for women's shelters, women's counselling centres and women's emergency centres since 2020 with the programme "Together against Violence against Women" ("Gemeinsam gegen Gewalt an Frauen") for the implementation of the Istanbul Convention. Hessian facilities are entitled to about 2.2 million. So far, however, only about 618,000 € have been claimed. According to the Hessian Minister of Social Affairs, this is due to the "immense effort and lengthy administrative procedures" and the "complexity of the application procedure", which poses a challenge to the organisations applying for funds. The need for improvement had been communicated to the federal government (Hessischer Landtag 2021: 1<sup>o</sup>). In response to the Corona pandemic and the increased need for protection, the State of Hesse has made an additional 4 million euros available in the programme "Preventing and Combating Domestic Violence" (Hessisches Ministerium für Soziales und Integration 2022).

out of the women's shelter into their own flat. As a result, places remain occupied longer than expected. While there are some additional alternative accommodation options, such as the night café for women\*, capacities are also limited: "if there's no room, there's no room, but at least there you don't have to be entitled to benefits" (F10°). Another interview partner who works in a counselling centre for women\* emphasised that these places are actually not suitable for women\* who have just experienced violence, as these facilities neither have appropriately trained specialist staff nor an adequate protection structure.

### **(Expected) improvements through the municipal implementation of the Istanbul Convention**

In 2020, the City of Frankfurt decided to create a coordination unit with the purpose of implementing the Istanbul Convention. It has been part of the women's department since autumn 2021. For this purpose, the municipal administration has allocated permanent funding of €50,000 for a coordinating position, a speaker position (which is currently shared by two people) and an assistant position in the budget. Following the example of the Darmstadt model for the implementation of the Istanbul Convention (see Darmstadt 2021; Deutscher Städtetag 2021: 14-15), the tasks of the coordination unit include an assessment of the current situation based on the requirements of the Istanbul Convention and to both identify needs for action and work towards their implementation (Magistrat der Stadt Frankfurt am Main 2020b). The implementation of the Convention is understood as a joint effort that can only succeed if all responsible departments and offices, the judiciary and police authorities as well as civil society institutions work together. The speakers are very confident that this cooperation will succeed since they can build on existing structures such as the Working Group on Violence against Women ("Arbeitskreis Gewalt gegen Frauen"), where representatives from the Youth and Social Welfare Office, the police and the judiciary and various NGOs have been together, in some cases since the 1980s: "Structures that in other municipalities still have to be set up for the Convention already exist here"<sup>44</sup>. In addition, these structures are very sensitive to multiple discrimination, given that migration is normal in Frankfurt.

Nonetheless, there was – and still is – room for improvement in Frankfurt as well<sup>44</sup>. This was also recognised by Frankfurt's municipal administration as well as the city council. In parallel to the

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<sup>44</sup> The exact needs are to be determined through an assessment provided for in the budget proposal for the establishment of the coordination unit. A first interim report is currently being prepared by the advisors.

creation of the coordination unit, a number of other budget proposals were passed in February 2020 with reference to the convention. The funds provided are intended to create 37 lump sum financed places in women's shelters for women\* who are not entitled to ALG II unemployment benefits (Magistrat der Stadt Frankfurt am Main 2020c). The autonomous women's shelter "Frauen helfen Frauen" (Women Helping Women) has been offering two lump sum funded places for women in need out of the 60 places since December 2020. According to a report by the municipal administration, the Frankfurter Verein has been providing an additional 20 lump sum funded places since April 2021<sup>45</sup> (Magistrat der Stadt Frankfurt am Main 2022). It is planned to "change the procedure completely to lump sum funding" (Magistrat der Stadt Frankfurt am Main 2020c°). In addition, funds for language mediation were approved. Improvements that should also benefit women\* with precarious status. However, this does not yet fully cover the current demand for places, as several interview partners emphasised. Furthermore, the places were created in response to the Corona pandemic and thus temporary. There is still a need for more "lump sum financed places" in women's shelters and "lump sum financed counselling" (F22°).

In addition, comprehensive and sustainable improvements in the protection against violence for migrant women\* with precarious status will be very difficult to realise at the municipal level alone. This is because the Federal Republic of Germany has ratified the Istanbul Convention with reservation only. The reservation concerns §59 II and III, which provide that deportation proceedings for victims of human trafficking or violence in partner relationships shall be suspended, and that they shall be granted a residence status if this is necessary on account of their personal situation or for legal proceedings<sup>46</sup>. At the moment, they are trying to find possible small-scale solutions in the hope that they can serve as groundwork for a future state-wide coordination unit and the federal coordination unit, according to the speakers of the coordination unit. To this end, they are also in dialogue with colleagues from Darmstadt, Marburg and Mannheim. A coordinated approach between the federal government, the state and the local

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<sup>45</sup> In contrast, a counsellor from a women's counselling centre commented at the expert meeting organised by the AmkA on 9 June 2022 that she only knew about the two places in the autonomous women's shelter.

<sup>46</sup> The Convention also provides that women\* affected by intimate partner violence should be granted an independent residence status if their own status depends on that of their partner (§59 I). According to the German Women Lawyers' Association, this article is also not sufficiently established in German law. In practice, it is being undermined by placing too high a burden of proof on the victims (DJB 2020). The Istanbul Convention Alliance (2021) states in its alternative report on the implementation of the Convention that victims of domestic violence are denied effective protection due to arbitrary treatment by immigration authorities and police (ibid. 177).



authorities is needed. Even though it is positive that municipalities like Frankfurt are trying to find inclusive responses at the local level, it remains problematic if "there are local differences"° in whether women\* have access to protection against violence. The current government coalition of SPD, Greens and FDP has announced in the coalition agreement that the convention shall be implemented unconditionally in the future. So far, this announcement has not been followed by an official withdrawal of the reservation (as of August 2022).

## Discussion

With the LoReMi research project, we studied local responses to the presence of people whose access to social rights and services is precarious due to residence and social welfare regulations at the national level. The sub study on the situation in Frankfurt am Main focused on the one hand on the everyday living conditions and challenges of this group of people. On the other hand, we analysed the local support services and the cooperation of municipal and civil society actors who are involved in negotiating the extent to which this precarious part of Frankfurt's urban population has access to or is being denied basic services in the areas of health, housing/accommodation, education and protection against violence. The analysis of the legal and political framework as well as the evaluation of two round tables with local stakeholders and interviews with staff members from the city administration and NGOs as well as with affected people themselves revealed some overarching issues and problems. These are presented below, along with some suggestions for possible steps to address the challenges identified. Further possibilities for improvement at regional, national and supranational levels will be presented in the coming months in a final policy paper, taking into account the results of the three case studies.

### **Different responses to migrants with precarious status**

With regards to the explicitly urban responses, there was a mixed picture concerning the different areas. To begin with, it is important to mention that even in the areas where we identified inclusive responses, there is potential for improvement, which we elaborate on below.

The strongest approaches to an inclusive urban response so far are in the area of health care. The humanitarian consultation hours offered by the local health authority in cooperation with Maisha since 2001 play a central role here. A more recent component is the clearinghouse, which has yet to be established as a permanent part of the local health authority. The municipal offer of basic medical care is internationally regarded as a best-practice model. The local health authority and

the municipality consider the provision of health care to people without health insurance as a task for the public health service. Other offices such as the Youth and Social Welfare Office support these efforts by providing financial resources.

For the provision of health care to people without health insurance, regardless of their residence status and social welfare entitlements, additional services offered by non-governmental actors are crucial: these include the Elisabeth streetwork health centre ("Elisabeth-Straßenambulanz"), the Malteser Medicine for People without Health Insurance and the student policlinic ("StuPoli"), as well as the informal networks with specialists and hospitals that have been built up and maintained over many years. These are largely built on the dedicated work of volunteers and full-time staff and are only partially funded by the city. The well-functioning division of labour and close cooperation between the local health authority and the aforementioned civil society organisations strengthens the municipality's capacity to achieve the goal of comprehensive access to health care for people without health insurance.

The responses in the area of education are mixed. Since 2010, the city of Frankfurt has explicitly committed itself to providing access to regular schooling for all children, regardless of their residence status. With the abolition of day-care fees, inclusive measures have been taken in recent years, but these are not sufficient to reduce the barriers for children with precarious status. Further barriers arise from an overall lack of places, as well as other fees that must be paid. With regard to further education, there is a lack of inclusive measures, so that precarious migrants are confronted with high access barriers. In the area of protection against violence, the city of Frankfurt am Main has been pursuing an increasingly inclusive approach in accordance with the Istanbul Convention at least since 2020. The creation of 37 places in women's shelters financed by the municipality on a lump sum basis, which is currently still being implemented with some delay, can help to enable migrant women\* with precarious status to have more effective access to protection against violence. The proposed switch to full lump sum funding mentioned in the budget proposal of February 2020 is another sensible improvement that can contribute to an inclusive approach.

Responses that are much more exclusive were revealed with regards to housing and accommodation. The city only funds short-term emergency accommodation for people without entitlements under the Social Welfare Code. Medium- and long-term accommodation options are therefore denied to the majority of precarious migrants. The Corona pandemic saw the implementation, at least temporarily, of more inclusive measures, although some of these already

have been cancelled again. The coalition agreement of 2021 also provides for some inclusive measures, but these have not yet been implemented (as of July 2022).

Overall, the study showed that the contribution of civil society organisations and activist groups, volunteers as well as individual supporters from personal contexts is of crucial importance in overcoming the numerous challenges that persons with precarious status are confronted with in the various areas in Frankfurt am Main. In addition, there is the special commitment of numerous full-time employees who support people in precarious situations beyond their formal employment.

## **Recommendations**

Previous studies have pointed out that precarious residence status and limited entitlement to social welfare benefits have serious impacts on the living conditions of third-country nationals and EU migrants who cannot prove economic independence (Riedner & Haj Ahmad 2020; Dinkelaker & Schwenken 2020). The present study on the situation of migrants with precarious residence and social welfare status in Frankfurt am Main confirmed this impression as well: interview partners working in the health sector reported that patients often only seek out the low-threshold services available when illnesses are far advanced. Interviewees working in legal aid and social counselling as well as migrants with precarious status described that the latter sometimes remain in precarious, and at times exploitative, conditions for years due to a lack of alternative accommodation. In addition, it became clear that exclusion is detrimental to the possibilities of violence prevention and effective protection in cases of violence. These are only some of the problems that were presented in more detail in the previous chapters.

The limitations arise on the one hand from explicit exclusions from regular social welfare entitlements. To some extent, the city could counteract these exclusions by pursuing a more extensive interpretation of public order law in the area of accommodation/housing than it has done so far. On the other hand, implicit barriers impede access even to the kind of benefits to which people are entitled. Primarily, in this regard is the fear of being found out. People fear that claiming certain benefits may lead to deportation; the loss of freedom of movement or that children will be taken into care. Where such options for inclusive access already exist or are being created, they must always be explicitly communicated in order to dispel unnecessary fears and create clarity for migrants and the institutions that support them.

In its integration and diversity concept of 2010, the city of Frankfurt commits itself to the goal of enabling social participation for all residents of the city. In this regard, it is seen as a public task to

mitigate the social problems arising from precarious residence statuses and to ensure the adherence to human rights. Against the background of our study, a mixed conclusion can be drawn related to the fulfilment of these self-proclaimed tasks. In accordance with the integration and diversity concept, it should be identified and legally clarified which local measures can be taken to ensure that services intended to fulfil the basic social rights of persons irrespective of status can be accessed without fear of deportation or of children being taken into care.

Finally, it seems important to us to follow an integrated urban approach to inclusion, i.e. not to think of services as separate from each other, but also to consider the links between access to housing, health care, education and protection against violence, and to involve key actors in all these areas. This requires an approach encompassing all offices and departments, as is currently envisaged with respect to the implementation of the Istanbul Convention.

The analysis of the context and the interviews also revealed various concrete ways of improving the situation in the individual areas.<sup>47</sup>

## **General possible improvements**

### ***Better and permanent funding of existing counselling services***

Most of the organisations that provide counselling services are partially funded by the city. In order to carry out their tasks fully, however, they also depend on additional donations, which in some cases entails an enormous amount of extra work for the organisations. In addition, the often short-term nature of project funding makes it difficult for many counsellors to carry out the continuous and long-term work that is necessary to solve problems effectively. As part of an explicitly inclusive response, the existing counselling services should receive better funding and longer-term resources from the city in order to support people in finding ways out of precariousness and to achieve a maximum of social benefits, health services, education and protection from violence and exploitative housing and employment relationships despite their precarious legal status.

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<sup>47</sup> At this point, we are not able to address all the suggestions mentioned. However, they will be taken into account for the recommended actions that are yet to be formulated.

### ***Funding for language mediation and multilingual offers by public authorities***

Language barriers are another key obstacle in accessing basic services. Many of the problems migrants face in accessing counselling services are not due to legal difficulties alone, but to language barriers. Multilingual approaches and the use of simple language in authorities as well as the provision of a full-time pool of language mediators would help here. A greater willingness for multilingualism within public authorities or additional resources for language mediation would be beneficial. In this respect, it would also make sense to provide non-governmental institutions working with people who are not (yet) able to communicate confidently in German with more and permanent funding for the development of greater multilingualism.

### ***Providing information about rights that apply regardless of residence status***

Both the persons concerned themselves and relevant bodies (such as school administrations) must be continuously informed about rights that apply regardless of residence status. Where legal certainty exists as with regards to the right to education, for example, this information must include the fact that no data is to be passed on or that there is a fear that this right will be exercised.

### ***Better communication structures between counselling centres, institutions, and municipal offices***

Finally, various interview partners emphasised that there is room for improvement in the communication between counselling centres and clients on the one hand and the youth and welfare office and the job centre on the other. In this regard, thought should be given as to how better communication structures can be created, for example through designated contact persons.

### **Possibilities for improvement in the health sector**

#### ***Ensuring adequate and sustainable funding for health services for people in precarious situations***

As explained above, the provision of medical care of migrants with precarious status but also homeless persons with German citizenship, who also often have difficulties in accessing the regular health care system, is based on a cooperation between the local health authority and non-governmental institutions. The latter receive only partial funding from the city and are largely dependent on donations and voluntary work. In order to ensure appropriate medical care, it

would make sense for the city to provide adequate and sustainable funding for these structures. Furthermore, it should be discussed how the existing informal networks can be made more permanent in order to guarantee these services in the long term and to make them independent of committed individuals.

### ***Consolidation and expansion of the staffing and funding of the clearinghouse***

The "Clearinghouse 1.0" was initially launched in Frankfurt as a two-year pilot project of the local health authority. So far, mainly EU citizens and German nationals with unclear health insurance status have been successfully placed in the regular medical system. In the interest of inclusive health care, the offer should be made permanent and in particular extended to other migrants with precarious status. Furthermore, it would make sense to expand the staffing and funding of the existing clearinghouse to be able to better address residence law issues. Looking at other cities, it seems sensible to integrate the treatment fund mentioned above into the clearinghouse (see Anonymer Krankenschein Bonn 2022).

### ***Regulation for emergency treatments between hospitals and the Youth and Social Welfare Office***

Throughout the interviews, it was emphasised that applications for cost reimbursement in emergencies are made more difficult by complex forms and procedures, or have been rejected. In order to create security regarding the reimbursement of costs for the hospitals and to improve the provision of care, it is necessary to create a basis for a binding agreement on the billing of emergency treatments, instead of examining each case individually in retrospect and thus creating legal uncertainty.

### ***Introduction of a treatment fund at municipal or state level***

The introduction of a treatment fund at the municipal or preferably at the state level, which could be used to pay for urgently needed specialist and inpatient treatment, was mentioned by numerous interview partners as a concrete measure to improve the provision of health care in Frankfurt am Main<sup>48</sup>. Such a fund is already envisaged in the conservative-green state

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<sup>48</sup> In order to ensure medical care for people in housing-related emergency situations, the Federal Working Group on Housing ("Bundesarbeitsgemeinschaft Wohnen") advocates for a hardship fund at the federal level funded by the National Association of Statutory Health Insurance Physicians ("Kassenärztliche Bundesvereinigung") and the public sector (BAG W 2018).

government's coalition agreement of 2019. So far, concrete measures for its implementation are missing (as of July 2022).

### ***Abolition of the reporting obligation §87 AufenthG in the health care sector***

In addition, it was repeatedly pointed out that the reporting obligation under §87 of the Residence Act should be abolished in the area of health care in order to ensure risk-free access to health for all patients, regardless of their residence status. Reforming residence and social welfare law to remove formal entitlement restrictions and informal barriers – for example, by abolishing the reporting obligation for other areas as well, as is currently being discussed in relation to health care – cannot be achieved at the local level alone. However, the city of Frankfurt could join forces with other municipalities within the framework of the German Association of Cities and Towns ("Deutscher Städtetag") to push for such changes. In addition, and independently of a legislative change at the federal level, it could clarify whether it would be legally permissible to issue an official instruction to the social welfare office that no data collected in connection with health care services be forwarded to the foreigners' authority.

### **Possibilities for improvement in the area of education**

#### ***Increase in day-care places***

According to our interview partners, improvements in the area of education could be made with regard to access to day-care centres. Access could be facilitated by a general expansion of day-care places as well as a non-bureaucratic exemption from meal fees.

#### ***Measures in the area of secondary education through decoupling freedom of movement from employment status***

The difficulties in the area of secondary education could be solved by decoupling freedom of movement from employment status and recognising apprenticeships as a reason for continued freedom of movement. Again, the city of Frankfurt could advocate for this in the context of the German Association of Cities, especially in view of the ongoing severe shortage of skilled workers. In addition, it could request a legal review to determine the extent to which a corresponding interpretation is already consistent with the existing legal framework and may be implemented at the municipal level.

## **Possibilities for improvement in the area of accommodation**

### ***Expand medium- and long-term options for entitlement-free accommodation***

According to numerous respondents, key to improving the accommodation situation in Frankfurt is to expand the capacities for entitlement-free emergency accommodation. It was also stated that the maximum lengths of stay should be extended in order to meet the need for longer-term counselling that many people require in order to clarify their situation. This would be conceivable within the framework of an extensive interpretation of Hessian public order law.

### ***Create adequate, medium-term accommodation to ensure recovery***

Since migrants with precarious status are only entitled to treatment in emergencies and there is no provision for accommodation beyond the emergency situation, there are also recurring difficulties regarding full recovery after interventions. This applies to homeless people in general, as there are hardly any adequate beds in facilities for homeless people. This problem is exacerbated by too early discharges on the part of the clinics, which in particular in the case of homeless people often lead to a vicious circle of repeated short-term stays in hospital. To break this cycle, medium-term accommodation facilities that are suitable for sick people and allow for a sustainable recovery should be made available. Overall, the interview partners pointed out the problematic effects of poor or insufficient accommodation on the state of health – a connection that exists in general, but was highlighted even more drastically by the Corona pandemic.

### ***Expansion of emergency shelters for undocumented migrants***

Migrants residing illegally refrain from accessing emergency shelters for fear of deportation and remain either on the streets or in precarious private arrangements. Not only EU migrants without social welfare entitlements but also third-country nationals without residence status should be included in the considerations more than before. The city of Utrecht, which also belongs to the C-MISE network, could serve as a model for this. In order to combat the negative consequences of homelessness, Utrecht also allows migrants without a residence permit to access facilities for the homeless (Delvino & Spencer 2019: 42).

### ***More lump sum funded emergency sleeping places***

The accommodation situation could be improved by more emergency sleeping places funded on a lump sum basis. In order to ensure needs-based accommodation, it would make sense to grant more leeway to the homeless assistance facilities. This would allow them to decide



independently who is allowed to stay in the accommodation in the medium term, without having to consult with the Youth and Social Welfare Office on short notice. General guidelines could be established for this purpose, based on which the facilities of the homeless assistance could decide.

### ***Establish boarding houses and a house for Romani people***

The plan formulated in Frankfurt's coalition agreement to offer sleeping places in a kind of boarding house that can be used independently of benefit claims was welcomed by many interview partners. According to the problem analysis of the present study, this seems to be a sensible measure that would improve the situation especially for EU citizens without benefit entitlements. The same applies to creating a "House for Romani people". So far (as of July 2022), no concrete steps have been taken in this direction.

### **Possibilities for improvement in the area of protection against violence**

#### ***Need for more lump sum funded women's shelter places and lump sum funded counselling***

The consultants of the Coordination Unit for the Implementation of the Istanbul Convention are currently preparing an assessment of the exact needs in this area. Our far less comprehensive survey gave us the impression that in the area of violence prevention and protection, there is still a need for places and counselling funded on a lump sum basis. Accordingly, the establishment of 37 lump sum funded places decided in the budget proposal of February 2020 and the planned conversion to full lump sum funding mentioned above seem to be a sensible improvement measure. In this regard, it should be clarified what is needed for the concrete implementation of these measures.

#### ***Better access to facilities providing assistance to the homeless***

In addition, more places should be created in homeless shelters that are available and suitable for women\* and children regardless of their residence status. Available and suitable accommodation is central to the effective prevention of violence.

#### ***Create residency options for victims of violence***

To ensure effective protection against violence in accordance with Art. 4 of the Istanbul Convention, it is also necessary to create the possibility for victims of violence to obtain an independent residence status. The city of Frankfurt should ascertain to what extent this is already

possible under current residence law and the ratified version of the Istanbul Convention. Moreover, the city could join forces with other municipalities to advocate for the necessary changes at the federal level.

## Conclusion

This study has made clear that parts of Frankfurt's population encounter various problems in accessing social services and thus realising basic social rights due to precarious residence and social welfare situations. In spite of the integration and diversity concept adopted in 2010 and inclusive approaches in the areas of health, protection against violence and education, the city of Frankfurt has not yet taken a comprehensively inclusive approach to respond to these problems. In particular, but not only in the area of housing changes are needed to prevent homelessness and precarious housing situations, as explained above. In addition to this, the already existing inclusive approaches concerning health, education and protection against violence and the counselling structures in these fields, which are mainly provided by civil society institutions and initiatives, should be strengthened through better and more long-term public funding.

The Corona pandemic in particular has underlined that inclusive approaches not only make sense in order to fulfil human rights obligations as a city. In terms of public health and safety as well, an inclusive policy that considers all residents of the city is crucial. Especially in the interviews with migrants themselves, it became clear that for years and sometimes decades they have been living and working in Frankfurt under precarious conditions because they do not see any better prospects elsewhere. These people must be considered and included explicitly in urban policies to shape the conditions they live under in Frankfurt. In order to not only commit to a comprehensive inclusive approach, but also to implement it, targeted measures are needed, some of which we have outlined in this report.

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**Appendix: Interview list**

	Date		Interviewee(s) (anonymized)	Interviewer	Language	Transcription
F1	12.10.2021	online	Health Department	IA	German	AH
F2	12.10.2021	online	Health Care for without Insurance	IA	German	AH
F3	20.10.2021	FFM	Health Department	MK	German	AH
F4	20.10.2021	FFM	Health Care for Homeless	MK	German	LG
F5	21.10.2021	FFM	Health Care for People without Insurance	IA + MK	German	LG
F6	21.10.2021	FFM	Welfare association of the protestant church	MK	German	AH
F7	26.10.2021	FFM	NGO for African Migrants	MK	German	SB
F8	27.10.2021	FFM	Health Care for without Insurance	IA	German	LG
F9	28.10.2021	FFM	Roma support association	MK	German	AH
F10	23.11.2021	FFM	Advisory service for EU Citizens	MK	German	SB
F11	23.11.2021	FFM	Women's Rights Organisation	MK	German	SB
F12	24.11.2021	FFM	Social Work/ Shelter for Homeless People	MK	German	SB
F13	24.11.2021	phone	Education Union	MK	German	SB
F14	01.12.2021	online	Shelter for Homeless People	MK	German	SB
F15	01.12.2021	phone	EU Migrant	MK	German	LG
F16	01.12.2021	FFM	Third-country national with protection status	IA	English	AH
F17	01.12.2021	FFM	Shelter for Homeless People	IA	German	LG
F18	09.12.2021	online	Social Office	IA	German	SB
F19	16.12.2021	online	Women's Department	MK	German	SB
F20	17.12.2021	online	Department for Multicultural Affairs	IA	German	LG
F21	13.01.2022	online	Social Office	IA	German	AH
F22	20.01.2022	online	Women's Department	MK	German	SB
F23	25.01.2022	online	Education Union (Local Level)	MK	German	SB
F24	27.01.2022	online	Immigration Department	IA	German	AH
F25	16.03.2022	online	Education Department	MK	German	LG
F26	30.03.2022	FFM	Undocumented Migrant	MK	English	no record
F27	30.03.2022	FFM	Undocumented Migrant	MK	English	AH
F28	30.03.2022	FFM	Undocumented Migrant	IA	English	AH

## LOCAL RESPONSES TO PRECARIOUS MIGRANTS: FRAMES, STRATEGIES AND EVOLVING PRACTICES IN EUROPE (LOREMI)

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