# Migration Policy Making in Europe: Challenges and Opportunities for Civil Society

## A Short Review for the Social Change Initiative

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## Contents

## 1. Introduction

This paper sets out the findings of a short review of the role of civil society in policy making on migration in Europe. It considers in particular the role played by NGOs and perceptions of their strengths and limitations in relation to impact on policy. It focuses on national level policy making in five countries, France, Germany, Greece, Italy and the UK, and at EU level. 'Migration policy' is used in a broad sense to include 'integration policy,' but not policies relating to countries and regions of origin. The paper was commissioned by the Social Change Initiative within a programme of work funded by the Human Dignity Foundation. It arises from a perception that non-governmental organisations (NGOs) are finding it increasingly difficult to influence the direction of policy reforms at EU and member state level. In the context of the 'refugee crisis' and the rise in anti-migration feeling, it explores whether there is a greater detachment between NGOs and policy makers and if so where the cause lies.

The author was asked to explore the recent drivers of migration policy and what role civil society, and NGOs in particular, have played in shaping it. The study should focus on the opportunities and constraints on the extent to which NGO advocacy can be effective and explore whether additional capabilities could be beneficial to NGOs to enhance their future role. Following a search of relevant recent literature the author was asked to address these questions through a series of interviews in each of the five countries and in relation to EU policy.[1] All references to interviews in the report are anonymised. A convening of organisations in the UK and EU held to discuss these issues in London in October 2016 was a further source.[2] The study, conducted over 25 days in October - December 2016 was commissioned as a basis for discussion, not to provide a comprehensive overview of the issues concerned. The initial report was confidential to the funder. The author presented the findings to a conference in Brussels in February 2017 and this shortened version of the report, omitting sections on current policies which are quickly out-dated, has since been prepared.

The following section provides necessary contextual information on the recent drivers of migration policy making, on the policy making process and what is known from research on who is influential within it. The paper then addresses those questions in relation to policy making at EU level, and to the five EU countries which are its focus. The final section draws together the key findings and conclusions that can be drawn from them, and recommendations for funders of NGOs working in this field.

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[1] 24 interviews were conducted, in most cases by skype or telephone call of which 10 were with policy makers in the field (2 EU, 7 national, 1 city; of whom 1 politician; 6 civil servants and 3 current or recent special advisors to government Ministers). Four interviewees were academics who have formerly or remain engaged in policy making in the migration field, or NGO advocacy' and one academic who has written on the policy making system; 4 were from think-tanks; 3 from foundations funding NGOs in the field and 2 from NGOs (one until recently a government service provider in the field).
[2] The author acknowledges with thanks the contribution of those who gave their time to be interviewed for this report and of fellow participants at the London convening.

## 2. Migration policy making and the role of civil society

The policy making process differs between countries and at EU level, reflecting differing political systems and structures, distribution of power, tiers of governance, role played by the courts, plurality of interest groups, and political culture. In each case it is a complex, political process in which there are many internal and external actors. The stages in the policy cycle, from the way the issue is perceived through to decision and implementation, and the influence of key players, differ not only between countries but between Ministries and within them in relation to different issues. The process in relation to policies on border controls, integration or aspects of it may be subject to differing levels of parliamentary scrutiny; and the responsibility of Ministries with differing mandates and ways of working. Decisions taken within the bureaucracy can be more flexible in relation to migrants' rights than those exposed to the 'sunshine politics' of parliamentary and public debate;[3] and policy makers in one department more open than another to the evidence and ideas that civil society brings to the table. The impact of NGOs in relation to one issue may thus be quite different to impact on another.

There are many areas of policy that impact on migration but are not primarily about it – policies relating to the labour market, for instance, or higher education. In relation to integration, key issues include housing, health and education. This means that negotiation across government Ministries, which have differing agendas, providing differing opportunities for influence, and between tiers of government where regional and municipal tiers share responsibility, is part of the picture that needs to be understood.

### *Policy drivers*

To understand what is driving migration policy, however, we must look first not at that institutional framework but at the big picture. Advocacy may prove influential, but only within the economic and political constraints in which the government (or EU) is at that time operating. Over recent years in parts of Europe those have included the imperative of responding to the 'refugee crisis'; the public order and electoral risks in the rise of anti-immigrant sentiment and the far right; a security threat related to a small minority of Muslims; and austerity in public sector budgets. They have also included the longer term constraints of labour shortages, demographic ageing, binding EU laws and international human rights obligations; the combination of drivers differing in each country.[4]

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[3] Virginie Guiraudon (2004). 'Immigration Reform in Comparative Perspectives: Sunshine and Shadow Politics in the United States and Europe', in M. Levin and M. Shapiro, Eds. T*ransatlantic Policymaking in an Age of Austerity: Diversity and Drift.* 131-157. Washington DC: Georgetown University Press.

[4] For France, eg, see Catherine Wihtol de Wenden (2011). 'The case of France' in G.Zincone, R.Penninx and M.Borkert (Eds) *Migration Policymaking in Europe: The Dynamics of Actors and Contexts in Past and Present*. Amsterdam

Migration policy making is invariably a matter of trade-offs,[5] whether or not explicit, between competing pressures and constraints.[6] Policy makers, when making those choices, reflect differing priorities across Ministries and EU Directorates. They are also conditioned by values and norms, in turn shaped by historical and legal legacies and differing national philosophies on the appropriate relationship between citizens and non-citizens. Research on migration policies in Europe places differing emphasis on the extent to which, within those constraints, policy shifts are driven by a change in the political party or parties in power, ideas, events (whether providing cause or opportunity), individuals, groups or institutions.[7]

### *Civil society*

When civil society organisations seek to influence policy, it is that complex terrain in which they, along with other actors with competing agendas, are engaged. Civil society is itself diverse in roles played in relation to migrants and, if engaged in advocacy, in the nature of reforms sought. Faith based service providers play a significant role in many EU countries, as do trades unions and professional bodies, and NGOs for whom migrants are one focus of concern (as, for instance, for those who work on homelessness). These can be advocates in relation to migration policy reform alongside NGOs which focus exclusively on that issue. Among the foreign born in the then EU27, data from 2010 shows that 56% (26m) were Christians and 27% (13m) Muslims.[8] It is predominantly Christian, faith-based NGOs, many long established as welfare service providers, that engage in national level advocacy in relation to migrants and which are among the faith based organisations with at least one representative based in Brussels.[9]

Advocacy may take many forms, from close cooperation with policy makers in discussing reforms to litigation that forces policy change; or indirect influence via lower tiers of government. Where states delegate significant responsibility for welfare provision to NGOs, governments may expect a level of pressure from them for policy reform. Nevertheless, the fear of loss of funding can constrain their voice.[10]

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[5] James Hollifield (2008). 'The Politics of International Migration: How Can We Bring the State Back in?' in C.B. Brettel and J.F. Hollifield, Eds. *Migration Theory, Talking across Disciplines.* Routledge; Martin Ruhs. (2013). *The Price of Rights: Regulating International Labor Migration*. Princeton University Press.

[6] Elizabeth Collett (2015). 'The Development of EU Policy on Immigration and Asylum: Rethinking Coordination and Leadership'. MPI Policy Brief Series.

[7] Giovanna Zincone (2012). 'Comparing the Making of Migration Policies' in G. Zincone, R. Penninx and M.Borkert Eds. *Migration Policy Making in Europe.* Amsterdam University Press.

[8] Pew Research Centre (2012). *Faith on the Move. The Religious Affiliation of International Migrants. Appendix A: Spotlight on Destinations.* http://www.pewforum.org/2012/03/08/religious-migration-destination-spotlights/#europe .

[9] François Foret and Julia Mourão Permoser (2015). 'Between faith, expertise and advocacy: the role of religion in European Union policy-making on immigration'. *Journal of European Public Policy*. 22(8): 1089-1108.

[10] Giovanna Zincone (2012). 'Comparing the Making of Migration Policies' in G. Zincone, R. Penninx and M.Borkert Eds. *Migration Policy Making in Europe.* Amsterdam University Press; Nicola Delvino and Sarah Spencer (2014). *Irregular Migrants in Italy: Law and Policy on Entitlements to Services.* Oxford: COMPAS; Jonathan Price (2016) *Meeting the challenge: Voluntary sector services for destitute migrant children and families*. Oxford: COMPAS.

Literature on migration policy making in Europe suggests that civil society as a whole has had a limited role. While a major barrier is states' unwillingness or capacity to engage with them, civil society organisations can lack timely information about policy processes; may have insufficient capacity, professional skills or policy knowledge to engage; or lack a coalition of interests that can sustain the level of engagement necessary. 'A crucial part of success is developing 'professionalized' staff within the ranks of civil society who know how to obtain information policy makers need and deliver it at the opportune moments'.[11] However, there is also a danger if too close to government of being seen as part of the 'elite' and no longer representative of migrants' concerns. The dual desire to influence policy and to retain legitimacy can be in tension. Governments in turn may not know how or with whom to engage. It would be a mistake however to see the issue only as one of capacity in an otherwise symbiotic relationship. There are in many instances conflicting agendas, not least when policy restricts migrants' rights or jeopardises their safety.

One aspect of migration policy making that is well researched is the impact of research evidence. As one of the mainstays of NGO strategies is use of evidence, the findings are relevant here. The literature tells us, first, that there is a gap between the evidence that is produced and what policy makers need - in relation to timing; to epistemic uncertainty (experts do not always agree); and the form in which it is presented: 'Executive summaries by lunchtime is what is needed, not 100-page reports in three months'.[12] NGOs are less likely to fall into that trap than academics but like them face competition from alternative sources of knowledge which can have a 'more seductive discourse' – think tanks and consultants.[13] The literature also highlights the differing uses that migration policy makers can make of the evidence: not only an instrumental use to inform decisions but to add authority to a decision that was already on the cards or authority to the decision maker. Evidence can contribute to shaping a convincing policy narrative explaining the causes of a problem and how to address it, where competing narratives jostle for centre stage.[14] Evidence is more likely to be relied on where the decision relies heavily on facts, than where values come heavily into play.[15] Likewise it carries more weight when politically there is less at stake: 'Except in highly consensual political cultures, the only decisions that are made primarily on the basis of research findings are politically unimportant ones.'[16]

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[11] Natalia Banulescu-Bogdan (2011). *The Role of Civil Society in EU Migration Policy: Perspectives on the European Union's Engagement in its Neighbourhood.* Brussels: EUI/MPI. P5-6.

[12] David Coleman, former advisor to the UK government on migration policy, (1991). 'Policy Research – Who Needs It?' *Governance: An International Journal of Policy and Administration* 4(4): 420-455.p.426.

[13] Florence, E. and Martiniello, M (2005). 'The Links between Academic Research and Public Policies in the Field of Migration and Ethnic Relations: Selected National Case Studies – Thematic Introduction', Special issue *International Journal on Multicultural Societies* 7(1).

[14] Christina Boswell, Andrew Geddes and Peter Scholten (2011). 'The Role of Narratives in Migration Policy-Making: A Research Framework', *British Journal of Politics and International Relations*, 13(1): 1-11.

[15] Christina Boswell (2009). *The Political Uses of Expert Knowledge: Immigration Policy and Social Research*. Cambridge University Press.

[16] David Coleman (1991). 'Policy Research – Who Needs It?' *Governance: An International Journal of Policy and Administration* 4(4): 420-455. P420.

## 3. European Union

### *Policy making*

The European Council (Ministers from Member States) and European Parliament have co-decision making powers in relation to immigration and asylum policy, the European Commission having the power to propose but not decide. Responsibility in the Parliament is largely that of the Standing Committees for Civil Liberties, Justice and Home Affairs ('LIBE') and to a lesser extent that of Employment and Social Affairs.[17] Responsibility in the Commission is primarily that of DG Migration and Home Affairs (DG Home), DG Justice, and DG Employment and Social Affairs, with differing mandates and priorities. Coordination is improving but a comprehensive approach has not yet emerged.[18] The appointment of a Commissioner for Migration, Home Affairs and Citizenship, Dimitris Avramopoulos, and the launch of the Global Approach to Migration and Mobility (GAMM) indicate recent recognition of the need to do so across external and internal policy fields. Parts of the Commission and LIBE tend towards more humanitarian reforms than Member States are inclined to accept.

The balance of power between and within institutions changes with each Commission. Currently it is described as 'very top down', the President's Cabinet steering the direction of policy. Key decisions are taken at this highest level, closed to most outside opinion. Where ten years ago responsibility for policy development was also concentrated, now it is fragmented across Directorates with new players acting on diverse issues, from education to migrant entrepreneurs. Securing influence means knowing that detail. Even then the urgency of timing may preclude officials being open to external ideas.

In contrast, the Parliament is easier access. In the past it had little influence. That has changed with its enlarged competencies and the long experience of MEPs in key positions, one insider now judging it to have 'a massive role'. It can amend legislative proposals and the budget. Committees regularly subject Commissioners and the heads of agencies such as FRONTEX to questioning. 'Trialogues' are a means for Committee chairs and Rapporteurs to engage with the Commission and Council on key decisions.[19] Nevertheless, the Council remains most powerful. Contact with the permanent representatives of Member States, and at national level, may thus be deemed a more strategic target of scarce staff resources.[20]

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[17] For instance, recent reports on migrant and refugee women and the labour market integration of refugees. For further information on the relevant EU institutions, their mandate and activities see the relevant section on the European Website on Integration: https://ec.europa.eu/migrant-integration/main-menu/eus-work/actions .

[18] Elizabeth Collett (2015). 'The Development of EU Policy on Immigration and Asylum: Rethinking Coordination and Leadership'. MPI Policy Brief Series.

[19] Interviewee E1012. 'Trialogues' are informal tripartite meetings attended by representatives of the European Parliament, the Council and the Commission, ranging from technical to highly political discussions. The purpose is to get agreement on a package of amendments acceptable to the Council and the European Parliament prior to it entering the formal procedures.

[20] Interviewee E1022.

## *Opportunities and barriers in civil society engagement*

With the exception of consultation fora such as the recently strengthened European Migration Forum and any private meetings arranged, engagement between the Commission and civil society can be limited to consultation after a proposal is drafted, and again once the Council and Parliament have an agreed text. There is then limited scope for amendment. The Migration Forum last met in March 2017 to discuss channels of access to Europe and to rights and services, topics chosen in consultation with civil society. A further theme was the narrative in public and media discourse. The Commission invites organisations to put their names forward to attend, thus also providing access for non-Brussels' based NGOs to engage directly with Commission staff, representatives of Member States and the European Economic and Social Committee (EESC).[21]

To have direct influence on proposals it is necessary to know the content of Council discussions (taking place initially among officials in more than a dozen working groups and committees under the umbrella of the Justice and Home Affairs Council (JHA) alone), which are not made public. It can be difficult for NGOs even to discover which measures are being proposed.[22] Civil society may have an indirect influence through the bodies that have a formal consultative role in EU policy making: the Committee of the Regions, the voice of regional and local tiers of government, and the relevant committees of the EESC.

Civil society input is needed on monitoring and national implementation of EU policy ('patchy and inconsistent') as much as in relation to proposed reforms. Monitoring depends on reporting by Member States and by NGOs such as the Odysseus Network and European Migration Network. The use of such reports however is subject to 'deep political sensitivities': an example is the review of the Family Reunification Directive (2012) which the Commission, despite receiving 120 responses from Member States, NGOs and individual experts, did not pursue 'because the negative political climate surrounding family migration in many Member States would cloud the opportunity to improve the legislation through negotiation'.[23]

The Commission nevertheless is keen to receive evidence if EU law has been breached:

> 'Sometimes they criticise but we tell them to help collect evidence so the Commission can say it is an infringement of EU law. It is difficult sometimes on the basis of what they provide to see the difference between a complaint and actual breach of the law. We don't always get the detail we need.'[24]

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[21] See: http://www.eesc.europa.eu/?i=portal.en.events-and-activities-european-migration-forum-3 .
[22] Natalia Banulescu-Bogdan (2011). *The Role of Civil Society in EU Migration Policy: Perspectives on the European Union's Engagement in its Neighbourhood.* Brussels: EUI/MPI; Ann Singleton (2015). 'Speaking Truth to Power? Why Civil Society, Beyond Academia, Remains Marginal in EU Migration Policy', in P. Scholten, H. Entzinger, R. Penninx and V. Stijn Eds. *Integrating Immigrants in Europe*. Springer. P137.
[23] Elizabeth Collett (2015). 'The Development of EU Policy on Immigration and Asylum: Rethinking Coordination and Leadership'. MPI Policy Brief Series. P7-8.
[24] Interviewee E1033.

Ideas and analysis of proposals are also valued, where there is room for manoeuvre. Commentators suggest input which substantiates ideas already favoured, and the legitimacy that derives from being seen to have consulted experts, also play a part. The Commission in particular needs input in an area where it lacks formal policy making competence, integration, where it uses softer measures such as learning exchange to exert influence over practices at national and local level.[25] Securing influence at EU level thus requires expertise on the issues concerned:

> 'This work is highly technical, and requires a large amount of effort, expertise and resources, as well as very good networks'.[26]

It also requires a personal profile with policy-makers that engenders respect for expertise and confidence that the individual/organisation is one that they can do business with. That in turn requires a presence in Brussels. Advocacy at EU level is a specialist and resource intensive concern. It is, however, rarely covered by project funding. There is a gap between the staff resources and skills needed to engage effectively and the funding migration organisations are able to access.[27]

Many Brussels-based NGOs know how the system works and use it well. For those in the Commission that means they follow up their position papers with personal contact with a Commissioner or official. To be influential they go beyond saying with what they disagree:

> 'The organisations have their stance, often very critical, quite strong, but they also know to be influential they have to be constructive. It is a dilemma for them of which they are fully aware. They have to go beyond criticism, propose alternatives. We tell them we have political constraints and are happy to take proposals that are politically feasible. We can listen to other ideas but there is not much we can do. So they try to balance their position.'[28]

There are NGOs for whom the determination to press home their agenda can override any understanding of the needs of policy makers and opportunities in those agendas to exert influence. In those moments when Commission staff need NGO input, they can find that they are on the receiving end of demands way beyond what they can deliver rather than ideas that help them take one step towards it. There can be an unwillingness to engage on the difficult questions that policy makers have to address and hence to proffer solutions they can use.[29]

MEPs also need civil society to provide evidence that can be used to challenge proposals and to question those who report to the Parliament and its committees:

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[25] Andrew Geddes and Peter Scholten (2013). 'Policy Analysis and Europeanization: An Analysis of EU Migrant Integration Policymaking.' *Journal of Comparative Policy Analysis: Research and Practice*. 17(1).

[26] François Foret and Julia Mourão Permoser (2015). 'Between faith, expertise and advocacy: the role of religion in European Union policy-making on immigration'. *Journal of European Public Policy*. 22(8): 1089-1108.

[27] Interviewee E1022.

[28] Interviewee E 1033.

[29] Interviewee E1022.

'What we want is added value. I want NGOs that are on the spot giving actual testimony of what they have seen and then I quote it literally as they are very credible. That gives us an evidence base that is not anecdotal, with a timeline. Evidence from a presence on the ground is a big deal. We can google anything but if we have direct evidence from NGOs that's different.'[30]

Trialogues are closed to NGOs but MEPs are there and 'no longer a side show'. MEPs need, but often do not have, a good NGO to back them up. While some NGOs are a consistent presence, even small organisations taking every opportunity to brief MEPs, others are a surprising absence despite their issue being on the agenda. Some provide written briefs and have a media presence but not the regular one-to-one engagement that has most influence:

'They can tweet and send press releases but to complete the circle they need to get in to the committee, to brief the Members who are asking hard questions. It would also give them good information in return.'[31]

### *Non-governmental organisations (NGOs)*

Within civil society, a typology of NGOs working on migration relating to neighbouring countries is provided by a 2011 MPI report, highlighting the diversity of their roles. The categories it uses are equally relevant for NGOs in the broader migration field: primary roles in service provision; in advocacy (often focused on a specialised area like human rights); in policy formulation (as by think-tanks); in monitoring of implementation of law and policy; and umbrella groups giving voice to a network.[32]

Predominantly found among the service providers, faith-based organisations find that to be successful in the EU policy environment they:[33]

'have to adapt to secular norms and use the same strategies and repertoires of action as secular NGOs. They capitalize on their experience in the field in order to gain access and influence, and it is their reliance on technical expertise that legitimizes their participation in the eyes of secular actors, partially 'neutralizing' their religious identity.'

This process benefits long standing religious organisations from majority Christian faiths. Relying on the concept of human dignity rather than more overtly religious language facilitates alliances with secular actors. They do not seek to privilege their own religious community or its world view. Nevertheless their association with the major churches adds a legitimacy not available to small organisations of minority religions, including Islam, whose

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[30] Interviewee E1012, citing an instance where the Greek Immigration Minister had not been effectively challenged despite many NGOs being well informed on the Greek situation, because MEPs were not briefed.

[31] Interviewee E1012.

[32] Natalia Banulescu-Bogdan (2011). *The Role of Civil Society in EU Migration Policy: Perspectives on the European Union's Engagement in its Neighbourhood.* Brussels: EUI/MPI. P4.

[33] François Foret and Julia Mourão Permoser (2015). 'Between faith, expertise and advocacy: the role of religion in European Union policy-making on immigration'. *Journal of European Public Policy*. 22(8): 1089-1108.

credentials are less clear. Nor do Muslim organisations prioritise migration as a policy issue at EU level, any advocacy being undertaken via umbrella bodies such as ENAR or the European Social Platform. The Lisbon Treaty (s17) specifically provides for dialogue with faith organisations but those channels have reportedly not been used in relation to migration. Rather, in coalition with secular NGOs, they have been key players in advocacy through other channels such as in securing the establishment of the FRONTEX Consultative Forum.[34]

## Challenges in the sector

The organisations in the NGO sector have differing mandates and, for those with a network of national members, diverse views from which collective positions have been carefully crafted. This makes coordination and agreement across the sector difficult and time consuming, securing consensus militating against rapid response. Yet in the view of one interviewee, 'in Brussels the advocacy power of the migration NGOs is one tenth of what it could be if they worked together'.[35] A national member base can make it possible to mobilise action within Member States to influence their positions on EU policy. However, it can be difficult to persuade national NGOs to prioritise advocacy on an EU policy issue, and to provide them with the information they need to do so.

Those are not the only challenges the sector faces. After years of over-work and only small wins, there is some burn-out; while in organisations newly engaged because of the refugee crisis there is expertise on the issues but not necessarily familiarity with the peculiarities of EU policy making. In some NGOs there is a tendency to use considerable expertise on law and policy to do detailed, micro-critiques of the latest proposals rather than step back to consider whether that is the most strategic approach to achieve substantive change; including whether there are opportunities to make common ground with new allies to take a different tack.[36]

## 4. France

### *Policy making*

Policy making on immigration and integration, while under strong central control, is fragmented across ministries. Internal Affairs, the most powerful, covers border controls. The Ministry of Social Affairs is responsible for work, integration and nationality while the Ministry of Urban Affairs covers the urban and local dimension. The Office of Immigration and Integration (OFII) has responsibility for integration services and the 'Accommodation and Integration Contract' which new immigrants are obliged to sign.[37]

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[34] François Foret and Julia Mourão Permoser (2015). 'Between faith, expertise and advocacy: the role of religion in European Union policy-making on immigration'. *Journal of European Public Policy*. 22(8): 1089-1108.
[35] Interviewee I1088.
[36] Interviewee E 1022.
[37] http://www.ofii.fr/qui_sommes-nous_46/role_80.html .

The system of training of civil servants in elite institutes has a significant influence on the policy making process, said to militate in two ways against significant engagement with external sources of ideas: in its separation from those studying for other careers, and in its focus on law and economics to the exclusion of social issues. People who work in NGOs have a different training, their knowledge and world views do not overlap. Civil servants 'think they are much higher in the hierarchy than NGOs', and that NGOs are by nature opposed to any migration policy the government would propose.[38] Civil servants do not consider it necessary to consult them, except when negotiating for a service they will deliver. Opportunities for debate and negotiation on policy are limited, and NGOs get little feedback on any impact their recommendations may have had.

The decision making process on migration is top down, focused on France with little interest in approaches elsewhere, and lacking in transparency. For NGOs it is difficult to know who makes a decision and hence on whom to focus advocacy attention. Moreover, if they ask for a meeting they often receive no reply.[39] In the parliament it is likewise difficult to know who in practice is influential, to judge whom to approach. In social Ministries there is a greater degree of openness – recognition that health policy cannot be made without consulting doctors for instance.

## Civil society

The attitude of civil servants creates a counter-culture among NGOs that are excluded: a culture not of collaboration but of claims to be presented. It is often confrontational – they are not used to discussing the issues around a table. Some would be unwilling to meet policy makers even if asked.[40] The overall influence of civil society, including NGOs, human rights organisations and churches, as for other areas of French policy making, is considered 'very small'.[41] NGOs find it difficult to secure any funding for advocacy work 'in particular on the very sensitive issue of the rights of migrants (and) most often such supports are temporary and insufficient.' It is also often the large organisations active at international level which get the funding, contributing to 'a growing disconnection between grassroots and advocacy levels, and this is damaging for the effectiveness of advocacy.'[42]

There are NGOs that are service providers with whom officials do engage on operational issues. They are 'part of the system' in providing services to migrants, and bring individual cases to officials to be resolved:

> 'As they bring the good cases they get satisfaction and that is very important in reducing pressure for reform of the system. Of course they want to improve the

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[38] Interviewees F1020; F1214.
[39] Interviewee F1214.
[40] Interviewee s F1020; F1214.
[41] Catherine Wihtol de Wenden (2011). 'The case of France' in G.Zincone, R.Penninx and M.Borkert (Eds) *Migration Policymaking in Europe: The Dynamics of Actors and Contexts in Past and Present*. Amsterdam University Press. Chapter 2. P89-90.
[42] Interviewee F1213.

system, have some reforms, more legalisations or change the criteria for permanent residence; and there are some that want open borders. But the work on cases takes the pressure away. NGOs can claim success.'[43]

Senior civil servants, however, are said not to know the NGOs well. While civil society services to migrants are well established, the providers themselves do not have a strong culture of public engagement or a history of successful campaigns. Nor are they well-coordinated. An internal paper commissioned by the Social Change Initiative on civil society engagement in France reports 'a sense of both envy and suspicion in the attitudes in NGOs towards 'sophisticated' communication tools'.[44] With some significant exceptions they have not entirely adapted to using social media. Employers meanwhile have regained some influence over policy in the past decade as labour shortages have reopened the case for labour migration, but trades unions have not reclaimed the influence they held in earlier decades.

There have been successful campaigns. Civil society support for the 'sans papiers' including action by teachers and parents secured some success (during the Sarkozy Presidency 2007-2012) in relation to amnesties and in resisting deportations:

> 'The public wanted deportations but not when they knew the child, the buddy of their son. Then everyone was against it including the most conservative. It was extremely effective not only in preventing individual deportations but in changing policy. Why? Because it was about children.'[45]

A recent success was opposition to a proposal in 2015 to be able to deprive people of their French citizenship, a move with symbolic importance arousing strong public feelings. A huge mobilisation led to direct pressure on MPs not to support the constitutional reform required.

Immigrants have been influential in negotiating individual reforms, though they have focused more on discrimination and police practices than wider immigration or integration policies.[46] A consequence of the republican assimilationist approach, however, is that prominent former migrants are reluctant to identify themselves with that background, leaving few well known role models to counter negative perceptions. There are some key tenets of a positive narrative in France's self-perception as a land of human rights and of asylum, particularly among Catholics and on the left. The adherence to secularism ('laïcité) is not straightforward as also the grounds used to justify opposition to the hijab. The resistance to mobilisation around identity makes it difficult for Muslim organisations to play an advocacy role in relation to Muslim refugees.[47]

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[43] Interviewee F1019.
[44] Refugee and Migration Hub – France analysis'. (2016). Unpublished report to the Social Change Initiative.
[45] Interviewee F1019.
[46] Interviewee F1019.
[47]'Refugee and Migration Hub – France analysis'. (2016). Unpublished report to the Social Change Initiative.

## 5. Germany

### *Policy making*

As elsewhere, responsibility for migration and integration policies has been moved between departments: a cross-cutting issue for which there is no single home. The Ministry of Interior now has primary responsibility for immigration law and border controls (reflecting a European wide shift towards interior ministries and the security focus that entails),[48] administering asylum via the Federal Office for Migration and Refugees (BAMF). BAMF also has some responsibility for integration policy, issuing regulations for integration courses and coordinating with the many federal and local agencies delivering services. The Ministry of Family, Seniors, Women and Youth (BMFSFJ) is responsible for integration relating to children and young people. Responsibility for education and labour market integration, however, lies elsewhere; thus 'there is no centre for integration policies. A lot of actors – some work together, others not.'[49]

> 'The topic of integration has reached every Ministry now. Too many programmes and little coordination, but lots of interest. There is an appetite for information and ideas.'[50]

A Federal Commissioner for Immigration, Refugees and Integration located in the Chancellery facilitates policy debate and coordination between Ministries and other policy tiers, and can be a voice for civil society concerns at the heart of government. However, 'less a Ministry than a think-tank', it has no direct policy making responsibility. A taskforce in the Chancellery has coordinated the response to refugees and could lead to reform of the broader architecture on integration.[51] Länder (regional) authorities, which have their own interior ministries, decide the residence status of foreigners and administer the naturalisation process. Responsibility for education largely falls to the Länder which, as on other issues, resist national harmonisation but which can contribute to policy change at the federal level, as in relation to allowing education for children with irregular status, in 2011.

That complex structure poses a challenge for civil society – with whom to engage on which issue. Only the Commissioner's office has an overview but cannot decide the direction of policy. Policy making can also be less a response to evidence than 'debate driven,' so that capacity to engage via media debate is at a premium; and the pace of policy development can be very fast – as in three packages of asylum measures over four months in 2016, allowing little opportunity for civil society to be involved.

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[48] Maren Borkert and Wolfgang Bosswick (2011) 'The Case of Germany' in G.Zincone, R.Penninx and M.Borkert (Eds) *Migration Policymaking in Europe: The Dynamics of Actors and Contexts in Past and Present*. Amsterdam University Press. Chapter 3. P116.
[49] Interviewee G1010.
[50] Interviewee G1011.
[51] Interviewee G1010.

## Civil society

Civil society organisations play a major role in service provision, including filling gaps left by restrictive rules on access to services by irregular migrants. The large welfare providers, such as Caritas and Diakonie, are also active in advocating reforms at all levels, coordinating their work through a Federal working group and networks in relevant ministries. In relation to labour migration, employers and unions are the key players. On that issue and issues such as education, foundations (such as Bertelsmann and the Bosch Foundation), advised by their Expert Council on Migration (academics), make authoritative recommendations for reform and have access to policy makers at the highest level. Political parties also have their own foundations acting as research/think-tanks. On irregular migrants, the churches are key players in service provision and advocacy, cooperating on workers' rights with trades unions. Unions back litigation against exploitation to secure workers' rights.

Civil society is stronger in the West of Germany than in the East. Research suggests that overall 'the direct impact of civil society organisations on migration policymaking in Germany remains limited.'[52] That may be less true on integration issues for the major welfare providers:

> 'Most of the infrastructure on integration is run by them and churches; in every small town they have people engaged in this field so they have a lot of expertise and they know how to bring it to the government. The government has to work with them. You can't make an integration programme without them'.[53]

Chancellor Merkel has a biannual round table with the major welfare organisations, an Integration Summit. It includes Pro Asyl, but not smaller NGOs or regional refugee councils. There has also been a burgeoning of ad hoc policy fora over the past year, at Federal and Länder level, to which a broader range of organisations are invited to contribute:

> 'It feels like they really want this information and are pleased to have partners to help build an integration model. They understand that first arrival and long term integration cannot succeed without civil society support…But there are only a few long term mechanisms to organise that kind of exchange, and the danger as we return to routine is that this openness will diminish. But there is a window of opportunity.'[54]

Despite this greater engagement, the direction of policy has not generally reflected the thrust of civil society proposals. In part the evidence for that is in the outcome on refugees: 'the way that policies have been designed in the last year makes us believe that politicians are not listening to NGOs.'[55]  Resistance by the federal and state interior ministries, which

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[52] Maren Borkert and Wolfgang Bosswick (2011) 'The Case of Germany' in G.Zincone, R.Penninx and M.Borkert (Eds) *Migration Policymaking in Europe: The Dynamics of Actors and Contexts in Past and Present*. Amsterdam University Press. Chapter 3. P116.
[53] Interview G1010.
[54] Interviewee  G1011.
[55] Interviewee  G1077.

consistently retain a restrictive, control focus, is felt to be one cause. A further reason is that civil society is overwhelmed with the task of service provision, leaving little time for pulling evidence together for policy debates. The major welfare organisations and those such as Pro Asyl and Amnesty have the staff expertise on law and policy to be able to comment authoritatively on government plans. That contrasts with small migrant run organisations which can comment on proposals but do not have that capacity to engage.

There are also 'some activists who are amazing in the work they do but naïve in what they expect from government. So they are cooperated with in certain local situations but not invited in to develop new policy.'[56] Others are demoralised by the shift from the 'welcoming culture' in the past half year towards a more restrictive policy stance. Deportations have re-started to Afghanistan, for instance, and the law on support for asylum seekers, liberalised in 2015 after a successful test case (2012) in the (reluctant) constitutional court, now more restrictive in what is provided and where asylum seekers may reside. Thus civil society's gain was reversed in face of the scale of refugee flows. The political imperative now is to reduce numbers arriving and civil society, not offering help to reach that goal, is unlikely to be influential until that changes. As one non-government interviewee put it, 'If I have an agenda that helps do what they want then they will listen to me'. There are opportunities for influence on the anti-radicalisation agenda; and on access to jobs and skills, indeed 'every idea that promises that they will not end up on the street'.[57] On issues such as deportations, parts of the sector conflict with government, while those working on integration are closer to its thinking: 'overall there is less polarisation in the sector than before.'[58]

One side of civil society that has visibly had influence is at the neighbourhood level *opposing* provision of social housing for refugees, contrasting with the out-pouring of practical support witnessed at, for instance, railway stations. Using the language of 'integration' they argued against concentrations of refugees, thus making provision problematic. Within the pro-migrant part of the sector, migrant activists do not always share a common framing of the issues with other NGOs, leading to tensions. Meanwhile a perspective which galvanizes left wing activists can fail to resonate with migrants and alienate other potential support.[59] There are new migrant-led organisations on the scene which are occupation based: journalists, teachers and soldiers for instance, loosely coordinated through a network 'Neue Deutsche Organisationen.' Their influence is as yet limited but expected to grow as their expertise and lobbying skills develop and they have people able to engage in the high profile media debates:

> 'These organisations are not there on the Talk Shows, TV programmes. There is no original voice from the people who are living here as immigrants and no professional

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[56] Interviewee G1011.
[57] Interviewee G1077.
[58] Interviewee G1011.
[59] Simon Fadaee (2015). 'The Immigrant Rights Struggle, and the Paradoxes of Radical Activism in Europe'. *Social Movement Studies.*14(6): 733-739.

voice with that expertise. So the programmes are speaking *about* them and there is no really good voice *from* them.'[60]

At city level, reliance on civil society to manage the refugee arrivals has led to a new level of engagement as well as funding: 'They helped the municipalities cope, ensure no one was without a roof over their head in winter. So now the situation is that that help was appreciated and can be used to increase their influence in policy making'.[61] There is also a level of engagement in policy development, for instance consultation on city integration strategies. City administrations faced with the imperative of securing integration have proved more open to pragmatic, inclusive measures and sought individually and collectively to influence conflicting policies at regional and federal level. Among the new local players are groups engaged in social issues for decades for which migration has now become a central focus. Among them are cultural centres, influential because successful in bringing people together and seen to have public support and to be well networked on a cross-party basis.[62] Organisations with a long track record on migration can feel overwhelmed by this now more crowded field. The additional voices bring new challenges in forging alliances in an unfamiliar political space.[63]

A recent review of these new movements across Europe for the European Website on Integration identified:

> 'The great opportunity to be seized now is translating the new, positive acknowledgement of voluntary work into sustainable governance structures, giving due respect to the grassroots contribution. The related threat, however, is that policy-makers cannot live up to the new complexity and coordination needs in the integration field, and voluntary commitment declines as a consequence.'[64]

## 6. Greece

### *Policy making*

Responsibility for immigration, refugee and integration policy lies with the Ministry of Interior but some responsibilities are being relocated into a beefed-up Migration and Asylum Ministry. In relation to integration, the new department will take a strategic role in relation to mainstreaming across relevant departments rather than funding initiatives. The only funding available, the EU AMIF fund, has been transferred to the Economic Ministry for funding relating to refugees. Protection for unaccompanied children is a particular concern and a

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[60] http://www.neue-deutsche-organisationen.de/ ; Interviewee G1010.
[61] Interviewee G1011.
[62] Interviewee G1014.
[63] Interviewee G1011.
[64] EWSI analysis of volunteer initiatives: https://ec.europa.eu/migrant-integration/intdossier/comparative-analysis-voluntary-and-citizens-initiatives-before-and-after-2015 .

committee composed of the ministry, UNHCR, UNICEF and non-governmental organizations (NGOs) has been set up.

There is not the same level of expectation that NGOs will be engaged in discussion on policy proposals as in some other Member States. When new legislation is drafted it is posted online for two months before it is voted on in Parliament and comments may be taken into account; but that openness is not reflected in wider arrangements.[65] Meetings between government policy makers and NGOs are usually to disseminate information and often negative in tone. The government blames the NGOs for not delivering what was agreed, for highlighting the inefficiencies and the human consequences the NGOs have to deal with that are the result of the state's own handling of the crisis. Overall there is not a collaborative relationship, though some NGOs are more confrontational than others.[66]

## Civil society

Research in 2009 judged civil society actors including migrant NGOs to have a limited impact on policy, able to change details rather than shape the overall approach. Local and regional state actors also had a minimal role because of the centralised structure of the state, notwithstanding their responsibility in relation to regularisations.[67] NGOs can cite examples of successful campaigns, such as to secure citizenship for second generation migrant children, a provision included in the revised Migration Code (2014). The specificity of the NGO 'ask', the collaboration between migrant and human rights NGOs, and extent of the events held to raise awareness, are factors to which that success is attributed; but engagement overall is limited. NGOs disseminate to policy makers and invite them to events. At the municipal level, the legal requirement to have Councils for the Integration of Migrants as representative bodies in local communities, has ensured that they have voice, and a two way flow of information, at that level. Opportunities for influence are felt to be greater at local than national level, focusing on concrete needs such as access to education for refugee children.[68]

A vibrant civil society is still in its infancy. There has not been a tradition of challenge and critical engagement in national policy making familiar in some other parts of Europe[69] and this appears to be the case in relation to migration focused NGOs as for civil society as a whole. European funding for NGOs has been one factor in the growth of the sector. At the local level however a plethora of citizen-led groups are flourishing including groups providing services to meet migrants' basic needs.[70] The refugee crisis has opened up a substantial role for NGOs in

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[65] Interviewee GR1013.

[66] Interviewee GR1212.

[67] Anna Triandafyllidou (2009). 'Greek Immigration Policy at the Turn of the 21st Century. Lack of Political Will or Purposeful Mismanagement?' *European Journal of Migration and Law* 2(11):159–177.

[68] Interv iewee  GR1013.

[69] Sotiropoulos, D. A. (2013) 'Civil society in Greece in the wake of the economic crisis'. ELIAMEP/ Konrad Adenauer Foundation: www.kas.de/griechenland .

[70] Huliaras , A. (2014). 'The dynamics of civil society in Greece: creating civil engagement from the top'. University of the Peloponnese, 10/2014. https://www.uop.gr/images/files/huliaras.pdf ; Reimerink, L. (2015). 'How Greece's economic crisis produced an emerging civil society in Athens'. Citiscope. http://citiscope.org/story/2015/how-greeces-economic-crisis-produced-emerging-civil-society-athens .

meeting the need for shelter and care (eg UNHCR, Save the Children, Médécins du Monde and the Greek NGOs Praxis and Refugee Council) but also for many smaller organisations. There is even concern that it is a relationship of state dependency on the sector, replacing the appropriate role of a public sector, with insufficient accountability for the way in which funds are spent.[71] Before the refugee crisis, Greek NGOs ran some integration programmes, expanding their activities to meet emergency needs. New initiatives have been set up during the crisis but the international organisations have also become more significant, managing the finances and implementation of key programmes including accommodation provision. The churches are also involved in provision of services, but conservative in approach and not close to the current government.[72]

The key role of NGOs has given them a significant say in operational matters but little in policy development, at least not through any formal channels. Their core focus is provision, not advocacy for policy change.[73] There is a view that some of these organisations need to be more confrontational, not less, to expose the human consequences of failed policies: 'that might not get them at the same table but it could change things for the better for these people.'[74]

The scale of NGO responsibility for provision is not sustainable: 'There is a need to pull the authorities in, and to give NGOs some influence in return for their contribution, some reciprocity.'[75] There is currently no sign of that happening, and there are barriers to their establishing a stronger advocacy presence. In each refugee camp there can be a dozen organisations, their activity steered by what budget is available. Among them there are international organisations that are not familiar with Greek policy structures; and there is competition for resources. It is therefore difficult to get a common line.[76] There is also tension between the formal NGO sector which is seen to be too close (and beholden) to the system and organisations staffed by volunteers who are doing much of the work. As in other countries there is a need to build bridges across the sector; a disconnect to be repaired. The government is in the process of creating a register for NGOs involved in the camps because of its concerns about coordination and lack of information on the bona fides of all volunteers.

Few NGOs moreover are thinking ahead to the new situation – that many of the refugees are staying long term and need to be integrated into Greek society:

> 'NGO plans are for the former situation, the emergency, but now we need a different plan. Long term is more expensive but it is what we have to do. We are proposing to donors that we do integration not only with refugees but with the Greek population,

[71] Interviewee  GR 1099.
[72] News report April 2016: https://ec.europa.eu/migrant-integration/news/greece-tsipras-meets-islands-local-authorities-and-religious-leaders-over-refugee-crisis ; Interviewee 1055.
[73] Interviewee GR 1013.
[74] Interviewee GR1212.
[75] Interviewee  E1044.
[76] Interviewee  GR1055.

because they have the same needs. But this needs to be a government master plan, not an NGO plan. But I don't think they are very willing to do this.'[77]

The government perspective is that integration is a national competency less circumscribed by EU policy than on migration and refugees, so in principle it has more room for manoeuvre. In practice, lack of funds limits what it can do. The Ministry is preparing a national strategy on integration but has no plans to engage with civil society in that process. Nor, it says, do NGOs make formal representations to officials for policy reform. For government the relationship is complicated by demands from local authorities and NGOs for 'co-decision making' on refugee related issues, raising the prospect of local authorities, some of which are hostile to refugees, having a greater voice in policy. Most local authorities have not developed integration strategies and do insufficient to ensure migrants get access to services.[78] They also want central government funding, which is very constrained. NGOs are seen as having more to offer in relation to operational activity than in relation to strategy: 'it is difficult for them to come up with a political synthesis'.[79] NGOs confirm that although they have expertise in different aspects of integration and in the management of emergency situations, 'it is sometimes difficult to define clearly the problems in order to plan solutions'.[80] There appears to be a willingness to overcome the communication gap, but some way to go before the necessary bridges are in place:

> 'They criticise a lot. We could do the same [giving example of where an NGO had failed to deliver]. But that leads nowhere. We should find synergies, ways of cooperation, come together and see what we can do together. But we come from different cultures. The difficulty is to overcome the negative stereotypes that each has for the other and find the common space to cooperate to maximise results for integration of migrants and refugees in need. But it is easier for them to criticise, even when we are funding them! Many colleagues are suspicious about their role' [81]

## 7. Italy

### *Policy making*

Italian governments are invariably coalitions of parties which require negotiation across diverse views and can result in legislation embracing contrasting positions. Differing combinations of parties result in differing approaches. A significant feature is the presence on both sides of the political spectrum of Catholic parties with pro-migrant views, albeit not always a party within government. While public views are polarised as elsewhere, the need

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[77] Interviewee GR 1055.
[78] See report September 2016: https://ec.europa.eu/migrant-integration/news/greece-migrants-have-limited-access-to-local-social-services-study-finds
[79] Interviewee GR 1099.
[80] Interviewee GR 1013.
[81] Interviewee GR1099.

for each government to address the same persistent problems has led to some convergence in approach. On the centre-right, the impact of the Northern League is to an extent countered by the need to increase their coalition potential; whereas the centre-left, sensitive to public opinion, has been responsible for proposing some less liberal reforms. Politicians have to find a middle ground because of the polarised politics of demand for and opposition to labour migration, and regularisation in particular. The difficulty of responding to public demands to reduce immigration and increase removals may help to explain the centre-left's willingness to forego liberalisation of nationality laws and local voting rights.

Liberal proposals relating to integration of irregular migrants in particular have been driven bottom-up from some regions (legislative bodies), responsible for health care, and municipalities, reflecting their own imperatives and advocacy from civil society. The Italian experience demonstrates that 'legislative initiative can be taken bottom-up from the periphery to the centre, from informal to formal actors, from civil society to the public arena. It can shift from illegal practices to soft law, from soft law to decrees and eventually to laws.'[82] On the other hand, some municipalities take a restrictive approach and many remain resistant to accepting refugees, necessitating government financial incentives before agreement was reached in July 2016: 'Municipalities have a lot to lose by accepting'.[83] The courts have also played a significant role in both tempering the excesses of national law and endorsing regional initiatives to extend social rights.

As elsewhere, responsibility for immigration and integration policy has shifted between Ministries. Immigration is currently the responsibility of the Interior Ministry. The Ministry of Justice is responsible for some key stages of the asylum procedure and recently took through a Bill (now Act) for its reform.[84] Integration, and primary responsibility for unaccompanied asylum seekers, is with the Ministry of Labour. Beyond reception, however, interviewees report 'we don't see integration policy anywhere on the agenda'[85] and the Ministry of Interior has recently taken a step into that gap, citing the interconnection between reception and longer term integration, consulting NGOs with whom it engages on asylum to advise on a proposal for a National Integration Plan. There is a policy gap and a blurred line on where responsibility should lie.

The President of the Republic has some influence over measures with constitutional implications and has used this in relation to measures restricting migrants' rights. Centre-left policy-makers, and newly appointed Ministers, have in the past been more inclined to draw

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[82] Giovanna Zincone (2011) 'The Case of Italy' in G.Zincone, R.Penninx and M.Borkert (Eds) *Migration Policymaking in Europe: The Dynamics of Actors and Contexts in Past and Present*. Amsterdam University Press. Chapter 7, P266; Nicola Delvino and Sarah Spencer (2014). *Irregular Migrants in Italy: Law and Policy on Entitlements to Services.* Oxford: COMPAS.

[83] Interviewee I 1088.

[84] Enacted since completion of this paper, in April 2017 http://www.breitbart.com/london/2017/04/14/italy-reacts-to-migrant-crisis-by-accelerating-asylum-deportations/.

[85] Interviewee I1088.

on external experts (sometimes taking them in as advisors) and on senior civil servants to shape their policy proposals while the centre-right relies more on party staff.[86]

Across Ministries the policy making process varies, as elsewhere, but is arguably less efficient than in other countries and slow. Chains of decision making can be unclear and personal meetings needed with colleagues and counterparts to make things happen: 'In Italy, the more a topic needs to be addressed through coordination of various Ministries the more the action becomes inefficient". The system works best when the issue can be addressed within one Ministry or unit within it.[87]

## Civil society

Research (2011) suggests that external voices have been more influential than in some other Member States: 'Policies are continuously moulded by a combination of factors and by the action of very different agents, many of them located outside formal law-making processes. This is why politics always matters, but does not always lead the race.'[88] There are indeed instances where proposals have been dropped, and progressive measures adopted, where civil society advocacy has played a significant role. The role of the medical profession in resisting reporting on irregular migrant patients in 2008 is one notable example.[89]

The lobby has focused on securing stronger welfare rights for migrants, on nationality and political rights and, with employers, on securing larger legal entry channels.[90] At the current time employers are not a strong active voice. A humanitarian approach is reinforced by the strong presence of the Catholic Church as a player in this field, in coalition with other pro-immigrant advocacy groups. Pressure for regularisations comes not only from trade unions but, in a striking feature of the Italian situation, from families which depend on this source of domestic labour. Civil society groups speaking on behalf of migrants tend to have greater influence than those of migrants themselves. The sector is fragmented and politically heterogeneous, with some level of consensus that the government currently has limited margins of manoeuvre. Antagonism is less with the Rome government than with the EU, in relation to funding and to the lack of solidarity from Member States. There is criticism from the left on repatriations, externalisation of border controls and private sector practices, but in relation to search and rescue and the emergency reception there has been, at the time of writing, a low level of antagonism.

Interviewees close to the policy making process say of civil society organisations in the recent past that 'they were ineffective and government closed to their expertise. Now they are

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[86] G.Zincone (2011) 'The Case of Italy' in G.Zincone, R.Penninx and M.Borkert (Eds) *Migration Policymaking in Europe: The Dynamics of Actors and Contexts in Past and Present*. Amsterdam University Press.

[87] Interviewee I 1088.

[88] G.Zincone (2011) 'The Case of Italy' in G.Zincone, R.Penninx and M.Borkert (Eds) *Migration Policymaking in Europe: The Dynamics of Actors and Contexts in Past and Present*. Amsterdam University Press. Ch. 7. P279.

[89] Nicola Delvino and Sarah Spencer (2014). *Irregular Migrants in Italy: Law and Policy on Entitlements to Services.* Oxford: COMPAS.

[90] G.Zincone (2011) 'The Case of Italy' in G.Zincone, R.Penninx and M.Borkert (Eds) *Migration Policymaking in Europe: The Dynamics of Actors and Contexts in Past and Present*. Amsterdam University Press. Ch. 7. P260-62.

slightly more organised and push slightly more'[91] particularly in relation to the Interior Ministry. It has a consultative 'Asylum Table' on which civil society service providers are strongly represented, and from which two NGOs are appointed to an inter-departmental body with a more formal, statutory role to organise the reception system. There is no equivalent for broader migration policy although NGOs regularly engage on an individual basis: 'They should be listened to more. They should feel empowered but in this crisis they don't', in the view of one policy maker.[92] In the Justice Ministry, the recently enacted reform of the asylum judicial procedure was fully drafted before any consultation was undertaken.

Explanations for the varying influence of civil society over time and between departments include the history of an issue within a department: a long term responsibility thought to contribute both to greater focus by NGOs and openness by the Ministry. Conversely a new area of responsibility or topic is likely to attract less external engagement and the Ministry be less open to it. A further reason proffered is that NGOs are in a period of transition from older style service providers funded by the state to alleviate poverty, which are not primarily geared towards visible advocacy, and newer organisations funded by private philanthropy (such as ARCI), in which advocacy is a primary role and which tend to be more vocal. Others, (such as Save the Children) combine service provision and advocacy. There is as yet limited coordination across this sector divide.

It is, further, a question of campaigning style.

> 'Some are more keen to talk to government and have more lobby skills; people who have professionalised in that way, and increasingly so. They know how government works, address the right people with the right set of arguments'.[93]

The 'right people' includes parliamentarians, particularly of the ruling parties, as policy makers take note when representations come through them: their ideas have already been tested against the MP's views and that carries weight.

With some exceptions, the communication skills of NGOs are as yet considered insufficiently strong either 'to influence or scare off civil servants.'[94] Their main grounds for influence are their expertise, although policy makers can be slow to recognise either that NGOs have it or that they could benefit from it. NGOs need to get across how knowledgeable they are, and to build trust and personal communication with policy makers. There are NGOs that, reflecting historic experience with previous administrations, feel they cannot trust policy makers and advocate only from a distance, missing out on influence which they could have with those running the department.  There are also globally known and respected service providers, heavily relied on in the refugee crisis, which do not use their expertise to wield the influence they could have. Some suggest that the traditional NGOs could themselves be more

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[91] Interviewee I1088.
[92] Interviewee I1066.
[93] Interviewee I1066.
[94] Interviewee I1088.

influential if they had a more overt advocacy role, but the contrary view is that their quieter cooperative stance is the path *to* influence.

> 'A key factor is attitude. [x] is a good example. It has a political agenda, is not just a service provider. It is defending an idea. Their attitude is not always cooperative. It is argumentative. They feel they have to fight for attention to get what they want. That isn't the best way to talk to this office. A cooperative approach is the best one. [y] has a clear mission and can be argumentative, but they are more politically savvy. An NGO is more influential if it is proven trustworthy, a credible counterpart, is looking how to work for a win-win position – if its attitude is not more for a fight, to prove government is doing the wrong thing'.[95]

Policy makers want something from NGOs and this can help to open the door. There is a significant reliance (even over-dependency) on their delivery of reception services (and indeed of the search and rescue system) and respect for their contribution,[96] if not a concomitant willingness to engage them in dialogue on policy matters. It is acknowledged that NGOs help them 'to get a better understanding of what is going on; and to get a different perspective. In the bureaucracy we don't always get the most accurate description of reality. Not so much facts, we are surrounded by facts, but their perspective'. Elected representatives and their advisors can also be looking to NGOs for recognition, that it is the politically appointed parts of government who are responsible and make decisions: 'We want them to speak to us, and the most experienced NGOs recognise that now'.[97] The Open Society Foundation has played a role in strengthening NGO capacity to engage and in building bridges between them and policy makers (for instance a joint trip with Interior Ministry staff to see reception camps in Greece). Italian philanthropy in contrast tends to fund projects.

## 8. UK

### *Policy making*

Policy making on migration is highly centralised, dominated by the Home Office which has responsibility for immigration and nationality policy and for integration of refugees. The Communities and Local Government Department (CLG) is responsible for community cohesion, leaving ambiguous responsibility for integration of migrants per se. On labour migration the Home Office is advised by the expert Migration Advisory Committee which is in turn informed by official data and research evidence. At times of high controversy, the Prime Minister intervenes. While crucial in relation to key services, the Departments of Health and Education have not been visible players.  In England and Wales, Home Office funded Regional Strategic Migration Partnerships provide a forum for sharing information and practice among

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[95] Interviewee I1066.
[96] Interviewee I1090.
[97] Interviewee I 1066.

agencies, but not policy making. The courts have played a significant role in ruling out some of the more extreme measures, notably to prevent destitution.

The UK's policy making process is relatively open to external input, through government sponsored commissions, inquiries and reviews; through parliamentary inquiries; and contact with civil servants on an ad hoc basis. The key actors differ according to the issue, with employer voices on labour migration and universities on international students; NGOs on asylum policy and fewer players on issues such as family reunion. Immigration lawyers have been a consistently authoritative voice. The extent to which this influences policy is more difficult to measure. There are instances where governments have responded positively to proposals: the concession in 2012 that enabled victims of domestic violence with 'no recourse to public funds' to access public support and thus escape a violent home is one example. The conclusion of an expert advisor to the Home Office in the 1980s that the impact of evidence on migration policy making is probably in inverse proportion to the importance of the decision or its controversy is, however, likely to remain true today.[98] On an issue with highly electoral saliency, evidence, whether from research or NGO cases, is not the primary consideration.

## Civil society

Policy maker interviewees say the extent of engagement with civil society, in the Home Office as elsewhere in government, is a perennial issue and no different now from before:

> 'all organisations on the fringe of policy making worry about their influence. That's not specific to NGOs. There are a lot of people trying to get time with government to make a pitch. No one has regular access, no one has cracked it; it depends on the issue'.[99]

Some NGOs do have regular interaction with the Home Office. Those involved operationally, contracted to deliver a service, may be engaged in meetings and exchange of information, albeit mostly on operational issues. There are many consultation exercises which are an opportunity to input, some comments carrying more sway than others according to the weight of the argument, strength of evidence, and if they appear to be 'on the government's side'. That is a matter of tone and content. Even within one department there are sections more or less open to dialogue – different traditions and networks. On an issue where there are few stakeholders, communication may be more frequent and closer than where there are hundreds of players with a viewpoint to get across. It can be daunting to initiate consultation when there are so many. There is always a fear that it will take too much time to consult. If stakeholders group together into an agreed position it can be easier but can also look like an organised lobby. Setting up the Syrian Refugee Settlement Scheme was once instance that required fresh ideas. A conference of 120 people was arranged to discuss it rather than invite

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[98] David Coleman (1991) op cit. p446.
[99] Interviewee U1018.

written submissions: 'it was richer to have them in the room, more vibrant and more time effective'.[100]

If an NGO has a strong issue a Minister is interested to discuss it can get a meeting. Ministers receive volumes of reports, occasionally useful, but generally unlikely to be read. 'Evidence is definitely influential but it needs to be relevant. One critical fact more than 20 pages of statistics. And it must seem real, not propaganda'.

> 'The first thing Ministers want is to talk to friends, on side, to help them achieve their objectives. On side means they can be trusted, they won't attack the Minister in public the next day. It doesn't mean they agree with everything the Minister does. So tone is important. They are more receptive to a friend, like a Member of the House of Lords who brings an NGO's proposal to them, than when they hear from the NGO itself'.[101]

Who is influential differs for different governments, and within them. At the present time not trades unions, for instance, and the church will have more sway with some Ministers than others: 'A letter from an Archbishop for instance - that catches attention'. If through local authorities, the advice is to choose Conservative ones, not Labour.[102] Employers play a role but in the experience of the Labour government were not seen as reliable partners, pressing for greater liberalisation of access but providing no political cover when that later came under fire.[103]

In CLG, engagement is notably with faith organisations through advisory groups, as on anti-Semitism and Islamophobia, and ad hoc on other issues. Occasionally NGOs are approached on a fresh issue if the department wants their views. Otherwise it may respond to requests to meet. There is regular communication with public and voluntary service providers in relation to the department's key intervention, English language provision[104] but more on operational issues than policy. A lack of clarity on the department's broader role in relation to integration limits wider engagement.  Access is in two stages: who gets into the room and then who has influence. For an advisory group, representation across the relevant community is a key criterion. In other respects, service providers are most likely to get access:

> 'we value service providers that have experience, can provide concrete examples, have anecdotal cases that illustrate, and who can facilitate us getting access to that so that we can see for ourselves. Evidence is something we want from them, on what they are doing and the rationale'.[105]

Others who get through the door are organisations that have been seen to be well received at events ('presented well, dynamic, with awareness that what matters is outcomes'), and on

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[100] Interviewee U1018.
[101] Interviewee  U1018.
[102] Interviewee U1018.
[103] Interviewee  U1016.
[104] For those lacking English language skills but ineligible for mainstream courses.
[105] Interviewee U 1211.

topics relevant to the department's current agendas: 'If you want to be listened to you need to help the government achieve what it wants to achieve.'[106]

Civil society organisations play a key role in advice and service provision, particularly in relation to destitution but also where services are contracted out from the public sector. Capacity constraints, and a fear that advocacy could bring them into conflict with their public sector funder, limit the extent to which these organisations feel able to contribute to advocacy to address the underlying policy causes of the welfare needs they address.[107]

Where engaged in advocacy, NGOs can be contrasted unfavourably with those in the development sector, perceived to have greater influence (in retaining the 0.7% of GDP commitment, for instance). That is attributed to a number of factors:

- NGOs in the development sector act in concert despite differing views, and are tactical in selectively prioritising achievable 'asks', identifying agendas to which they can attach their cause and the right moment to press their case; and used their patrons to get access to No 10 (Prime Minister's office)
- They have expertise from their work on the ground and, in some cases also from their church base, a moral authority from that contribution
- Their work is mostly abroad so they know more about the issue than policy makers who need to know what is happening
- They have a national presence but also cross-national reach: through local branches and charity shops they have a hinterland that gives them visibility, public name recognition, funds, and engagement of local activists with their MP – 'not astro-turf with nothing behind them.'[108]
- Their funding base means they can afford policy staff and communications capacity

  'Their clarity of objectives, leverage of moral capital, spend on communications, mobilisation from bottom up and holding fast in face of attacks in particular make them stand out. They use high politics as well as public politics, radicals as well as insiders. There is nothing comparable in the migration sector. It is more oppositional, weaker. They are less able to contain their differences and diffuse in their objectives. They have less infrastructure around the country. So there is less organisational heft, weaker links to society.'[109]

Development issues are not, however, as contentious as migration; and its advocates can engage primarily with one department whereas Whitehall responsibility for migration and integration is diffuse. Civil society can work through those departments, as HIV AIDS

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[106] Interviewee U 1017.

[107] Jonathan Price (2016). *Meeting the challenge: Voluntary sector services for destitute migrant children and families.* Oxford: COMPAS.

[108] Interviewee U1016.

[109] Interviewee U1016.

organisations did in 2012 through the Department of Health on healthcare for irregular migrants, but that success against Home Office opposition is the exception not the rule.

## Narrative and positioning

Criticism that civil society can appear more oppositional than constructive, and that it has been unsuccessful in countering the negative narrative on migrants, has led to change in the sector. There is recognition of the need to strengthen communication skills, if arguably in some cases to relay existing messages more effectively rather than adapt the message to reach new audiences. Loyalty to their client base and commitment to long held, rights based advocacy can mean resistance to compromise on positions which might have broader appeal.

The current Prime Minister's team thinks her role is to take on vested interests and they see the migration sector (including business and universities) in that light, as 'hugely resistant' to her agenda. Their contribution to services for migrants is welcome 'but they have gone into the space of campaigning and, while they say they accept the need for some forms of [immigration] control, deep down they are resistant at least in the area they are working on and do not offer any practical solution'.[110]

While the Brexit vote has led some to feel an ever greater need to challenge anti-migrant sentiment, others insist the vote demonstrates the urgency of engaging constructively with the views it reflects, to reach the 'anxious but engageable public'. Civil society needs to get out of its 'comfort space' and talk to those with whom it profoundly disagrees.[111] The 'Hope not Hate' agenda, working to keep poisonous ideas out of the mainstream, should it is argued be a priority, using communications skills more effectively to achieve that goal:

> 'Social media has played a key role in mainstreaming those ideas. Political identities are increasingly formed in those areas, as with Trump in the US. There needs to be reflection on how the refugee migration sector has used these new media and how they could do in future'.[112]

To be effective it is argued that there is a need for a strategic realignment across the sector, to develop a shared narrative and agenda. It is not only divergent views, however, that make this difficult to achieve. There is a structural imbalance in the sector with significantly greater (if insufficient) capacity in relation to asylum seekers and refugees than in relation to EU, labour and family migrants or those with irregular status. Many organisations are small and under-resourced, lacking capacity to engage in policy or allocate resources to communications work. Those providing advice and services are hard pressed simply meeting basic needs. Nevertheless it is at the local level where community based initiatives such as Cities of Sanctuary and Citizens UK's Living Wage campaign are demonstrating that it is possible to find new ways to secure public support for campaigns that support rights and inclusion, and to partner with organisations which have not previously been prominent on

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[110] Interviewee U1017.
[111] Participant at London convening October 2016.
[112] Interviewee U 1016.

migration issues. At national level too there is a need to forge new alliances: 'If they can align with voices that are respected on the centre right, that is quite effective. And the only route is not press releases but private relationships with those who have influence in departments other than the Home Office and No.10.'[113]

NGOs need to understand where policy makers and the public are coming from, what they need and what they react against, if they are to be effective in influencing them. Their agendas, it is argued, needs to include a focus on migrants' contribution to society, not just their rights, and on how we can live together well. There is a need for migrants to identify what will reassure the public, and where feasible provide that reassurance. With that approach it will be possible to build alliances with those sympathetic to improving the lives of migrants in the UK (in the churches, health and education sectors for instance) but who may not be comfortable advocating for a more liberal migration (ie entry) agenda.[114] Tactically, the sector needs to agree common demands, a clear ask; and to pick some winnable battles. NGOs need to be clear not only what they want but what they will settle for. In a post-facts political world it is still relevant to cite evidence to strengthen their case, but alone it will not win the argument. For the Brexit negotiations, a 'reset moment', NGOs need to be clear what their goals are, not just for existing EU residents who will likely be allowed to stay but for other categories affected by withdrawal from EU law.[115] Identifying short term policy gains, however, does not mean NGOs should abandon cherished long term goals. There is also still a need for radical arguments, which create space for others to achieve a shift in the agenda in that direction.

> 'We need some issues on which people try to get lots of public support and others where a wing is arguing from a different perspective and having them there keeps us honest. We need to have people who insist on human rights; express moral outrage.'[116]

## 9. Conclusions and recommendations

This paper sets out the findings of a short review of the role of non-governmental organisations (NGOs) in policy making on migration in Europe, focusing on policy at EU level and in France, Germany, Greece, Italy and the UK. In each case it has explored the current role of NGOs in the context of the differing policy making processes and traditions in each setting. The source material was a review of relevant literature, 24 interviews with policy makers and others closely associated with the policy making process, and a convening in London to discuss the issues the sector faces in the UK and other parts of the EU.

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[113] Interviewee U1017.
[114] London convening October 2016.
[115] Interviewee U 1016; London Convening October 2016.
[116] Interviewee U 1016.

In this review, some clear themes have emerged. They relate to the drivers of policy change; the openness of the policy making process to engaging with civil society; to reasons why NGOs may not engage in that process; and finally to the influence of the NGOs that do.

## *Drivers of policy change*

The scale of the need to rescue and meet the immediate welfare needs of refugees at Europe's borders has been a major driver, now accompanied by the longer term question of their integration or return. That has been coupled with the need to avoid exacerbating the public concern which has fuelled electoral support for the far right and an upsurge in hate crime. Migration is not an isolated issue but an exemplar of a disconnect between parties of the left and their former core voters who, to differing extents, no longer trust them to support their interests. Major terrorist incidents have compounded public concern, and contributed to a heightened focus on long term integration measures. A selective need for labour migration, and the need to be seen to manage irregular migrants, remain among the drivers at EU and national levels. Austerity impacts on public perceptions of migrants as a threat, and on public sector capacity to fund services. EU policy has been a major driver in some countries, not least in relation to management of refugee arrivals in southern Europe. There is a significant degree of uncertainty about future levels of refugees; and in the political control of countries facing elections this year. There is also the uncertainty of the outcomes of the Brexit negotiations. We need to recognise the magnitude of these drivers and constraints relative to any influence that civil society can bring to bear.

## *Openness of the policy making process*

Some key themes that emerge in this context are:

**The policy making process, and its openness to external influence, differ not only between countries but across and within departments**, and in relation to the issues being addressed; reflecting a range of factors from differing governance systems and cultures within departments to the urgency of the need for a policy response. Policy making is a complex process of trade-offs between competing pressures and constraints, engaging many actors within and external to government. Those NGOs that seek to influence the process are competing with other, sometimes powerful, voices. **The extent to which NGOs can secure influence is thus by no means only dependent on the NGOs themselves.**

**In some countries there is a greater expectation that civil society will engage in the policy making process than in others**: expectation within government (or particular departments) and among NGOs themselves. While in some countries (Germany, UK) policy makers and NGOs see it as normal and expected to engage directly in meetings and consultation fora on future policy, this is not always the case (as in France and Greece).

**It is not necessarily the case that NGOs have less influence than in the past. It has always, with exceptions, been limited.** Access varies across the EU. Resulting influence is difficult to measure. Key decisions have been taken at EU and national level in which NGOs, as in the past, had little say - because the political imperatives overrode their concerns or because of

the speed of the process. In other respects access has grown in some countries because of the key role NGOs are playing in relation to refugee arrivals. The barriers to greater influence, within the policy making process and in the NGO sector, were present before the current crisis and may be more rather than less possible to address as a consequence of the dependency on NGOs it has created.

**Policy makers, particularly but not only at EU level, acknowledge they need certain things which civil society can provide**: credible evidence to win a policy debate; ideas, when an issue emerges or new activity is planned on which there is uncertainty which course to take; and the recognition or legitimacy that being seen to engage provides. In some instances policy makers receive what they need and this strengthens their hand and can influence outcomes.

**Policy makers also acknowledge that there are times when they do not want civil society input**, as when the political imperatives to take a particular course of action leave little room for manoeuvre, or they have no time or capacity to deal with it.

**Governments rely on NGOs playing a hugely significant role in provision of services** to migrants and refugees; a role on which some are utterly dependent in the current crisis. That contribution gives the NGOs credibility, resources, respect for their expertise, and a voice in operational matters. It has not, by and large, brought them a role around the table when policy proposals are discussed. That is in part because policy makers have not sought to bring them in, but is also because some have not sought to play that role.

### *Impact of civil society*

**Civil society is diverse and fragmented with differing functions, aims and perspectives.** Organisations and groups operate at different levels, from international to local (and virtual), with differing cultures of engagement, funding constraints and capacities.

**Where NGOs have not sought to influence policy, there are a number of reasons**. Some traditional service providers do not see that as their role. Their aim is to alleviate suffering and meet basic needs, rather than to engage in policy advocacy. From their service provision work they have a wealth of expertise and evidence. Even if interested to engage in policy, some do not have the staff resources and advocacy skills in-house to develop that role. They are fully stretched meeting needs without taking on further tasks. Some find it difficult to see beyond immediate needs to policy solutions. Among the international NGOs working in the refugee camps, there is not always knowledge of the policy making system in that country or a mandate to engage that would make policy advocacy an option.

**When NGOs do engage, there is some consistency in the views of policy makers and those close to policy making on what helps them secure access, and influence:**

- **Fit with the government's agenda**: the extent to which their agenda contributes towards (or runs counter to) the government/department's goals and thus helps policy makers fulfil their commitments. NGOs recognise that if their agenda coincides with that of policy

makers they are more likely to be heard, and tactically may emphasise short term goals which at least do not conflict. Others do not want to enter that political space, or do not recognise they face that choice. Radical demands can nevertheless create space for others to secure more modest goals. There are also fundamental principles which cannot be compromised; and key support that would be lost to the organisation if they were. The extent to which an NGO shifts its position in order to maximise its influence on this criteria is one of the most challenging question it has to address.

- **Credibility:** which comes from a range of factors, many listed below – expertise, the extent to which they can back their argument with evidence, their positioning in relation to others who have influence, and their direct experience of the issues on which they are engaging, whether experience as service providers or having the authenticity of speaking from a personal migration experience.

- **Inside knowledge:** of the politics and processes of the policy making system, its key players and most recent developments. Strategic use of advocacy resources is a matter of knowing when and where to exert influence, through whom and with what argument. This is a specialist task that is resource and skill intensive.

- **Strategy and tactics**: the strategy chosen, given the range of opportunities and constraints, and the tactics used to achieve it: whether external pressure or internal discussions, public interest litigation, detailed critique of legislative proposals or mobilisation of public protest. NGOs may stay in their comfort zone, using well-honed skills but not necessarily the tactics most likely to achieve their objective. Uses of social media are just one case in point.

- **Evidence:** the strength and added value of the evidence they present. Evidence from service provision to migrants is particularly valued, as well as legal, policy and research expertise. Those with the former expertise do not always have the latter; and vice versa (if not a service provider). Service providers can develop an advocacy arm if they see that as a valid extension of their role, and if resourced to do so.

- **Tone:** the tone of their approach, friendly or confrontational. Confrontation may be a tactic, but can also arise from distrust of policy makers, whether on the basis of perceptions or experience. Face to face contact with policy makers, through learning-exchange initiatives for mutual benefit, can help to address the former and build relationships.

- **Trust:** Whether the NGO can be trusted - not to reveal to the media information that has been shared, for instance, or for the accuracy of information provided.

- **Capacity:** to be able to engage effectively in the forms of advocacy they have chosen, especially where it requires evidence, expertise, extensive networking and feet on the ground in the diverse venues where influence can be exerted.

- **Coordination**: between NGOs presenting a shared view on what they are asking for, so that it is easier and less time consuming to engage. That can be difficult where NGOs' views are diverse, positions are mandated by members, or if mandates do not include a strong advocacy role.

## *Potential funder strategies to enhance NGO impact*

Those findings point to some potential options, each of which will necessarily have greater resonance in some of the countries covered than others.

1. **Unlock untapped potential**

There are three categories of NGOs currently engaged in the migration/refugee field which, to differing degrees, are not engaging in or prioritising advocacy on migration/integration policy: some traditional welfare service providers; mainstream NGOs for whom migrants are among their beneficiaries (those working on homelessness or children for instance); and international organisations (providing health care and other services).  In each country of interest it would be necessary to explore the particular range of reasons why they are not currently able or choosing to prioritise advocacy and identify what would most help to unlock that potential.

2. **Build personal relationships and trust between policy makers and NGOs**

Whether policy makers and NGOs are pursuing conflicting agendas or there is an opportunity for synergies, personal networks that foster understanding and trust are important. Those can be brokered by providing spaces for learning-exchange, from convenings to visits – if organised to be of benefit to both sides. Time is a limited resource and policy makers in particular have to justify time spent away from the office. Dissemination events, while providing some limited opportunity for contact, do not fulfil this function. Organising an initiative which will attract policy makers requires personal knowledge of their current needs.

3. **Encourage policy makers to learn from their counterparts abroad, on policy approaches and on the value of models of regular engagement**

Learning exchange, if sufficiently attractive to secure participation, could open policy makers to alternative policy approaches. To address the lack of a tradition of engagement, and more widespread concerns about its implications, learning exchange between policy makers from different countries could focus on that issue directly: comparing differing models of engagement and the advantages and challenges they pose.

4. **Foster cooperation and realignment across the sector**

Policy makers find it easier and less time consuming to engage with NGOs with a common agenda. For NGOs this can also be more strategic in terms of resource and skill allocation. Yet there are barriers to this happening, from the constraints on member-mandated coalitions and conflicting policy goals to the structural divide in the sector between migrant and refugee organisations, and the need to take account of the new breed of volunteer based organisations and social entrepreneurs. Cooperation cannot be imposed top down, but there may be incentives in terms of resources or convenings that could help to facilitate it.

5. **Build advocacy skills**

Advocacy skills span capacity (and willingness) to think strategically and identify tactics which have the potential to be effective, through to communication skills. It is not only communication. Building the capacity of the sector would involve overcoming the unease in some organisations that professionalization of advocacy skills means departing from principled policy positions. Where specialised inside knowledge of current developments in policy making and of the key players involved is one constraint on advocacy, providing access to that knowledge and personnel through targeted convenings would be one of the ways to enhance engagement of individual NGOs as well as their networking on that issue. To address the lack of transparency in France in particular, an authoritative paper on the detailed internal working of the system and its key players, including the role of parliament, could be commissioned as a resource for NGOs.

6. **Strengthen the evidence base**

The value policy makers place on evidence that can be used to strengthen the case for progressive measures suggests there would be value in exploring the constraints NGOs face in compiling evidence from their service provision; and in wider evidence gathering. Reports from NGOs, while containing invaluable information, are sometimes not sufficiently robust in their methods and analysis to make the authoritative case their material would otherwise merit. Resourcing guidance from experienced academics who have empirical research skills, to advise on methodology, on use of national data sources, and on presentation of data, would be one way to address this.

7. **Strengthen the voice of migrant based organisations in media debates**

The impact of the voices of those with a migrant background, including those of the new profession-based organisations in Germany, is a source of advocacy which could be strengthened – by establishing what support would be most valuable to enable individuals to emerge who can engage, authoritatively and persuasively, in high profile media debates.

8. **Resource NGOs to engage in advocacy**

Engaging at national or EU level is resource intensive: to have the specialist knowledge and skills but also simply for travel and accommodation. At one end of the scale, resourcing this role may mean enabling a major service provider to use its evidence to prepare expert policy

briefs and engage in advocacy at all levels of government. At the other end it may mean funding a national NGO to attend the Migration Forum in Brussels, for instance, or for a local/regional NGO to do likewise in the capital. A targeted fund for that purpose could be considered, where an NGO has the evidence and skills to advocate effectively but lacks the means to do so.

9. **Enable NGOs to learn from their counterparts abroad**

NGOs are in some cases facing similar issues but have little opportunity to learn from each other. That could be on policy substance, or on advocacy. Where that learning could strengthen their hand, and potentially lead to longer term collaboration, resourcing it could be worthwhile.

10. **Identify what advocacy has worked in the migration field**

There is not a body of evidence and analysis on recent campaigns that have been successful, beyond the observation that campaigns focusing on children, involving individuals known in local communities, or touching on strongly held public sentiments, for instance, can attract sufficient leverage. An exercise to capture that learning and draw out key lessons could be valuable and form the focus of a discussion amongst NGOs on the strategic options they face.

11. **Consider cities and regions as potential allies for securing national and EU policy change**

It is at the local level that the consequences of exclusion are felt. Local authorities can find they are constrained by national (and regional) policies which they, like NGOs, want to challenge. Regional (and national governments such as Scotland) with legislative powers can be open to adopting alternative approaches. Among strategies and alliances that NGOs have adopted and could consider for the future are those engaging city and regional authorities, to shift practices locally and influence national developments; an approach which a funder seeking to optimise influence might want to explore.

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