



## Online Consultation on the Integration and Inclusion of Migrants and People with a Migrant Background

### Submission by ICMC Europe and the SHARE Network

The [SHARE Network](#) and the **International Catholic Migration Commission (ICMC) Europe** thank the European Commission for the opportunity to participate in this online consultation on the forthcoming Action Plan on Integration and Inclusion.

In our view, the new Plan represents a welcome opportunity to renew the framework for action on integration and inclusion at EU level, and ensure that its priorities address the needs and situations of newcomers to the EU and of the communities in which they are received. Rather than offering a patchwork of individual actions, we hope that the Plan will employ **strategic vision and choices**, set out roadmaps detailing how the vision will be achieved, and ensure impact monitoring and evaluation.

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#### **The SHARE Network: an evidence base for successful integration practice**

Our recommendations for the forthcoming Action Plan draw on the experiences of the [SHARE Network](#), established by ICMC Europe in 2012 to provide a platform for peer learning and support, knowledge exchange and advocacy for regional and local actors working on integration and inclusion. SHARE has engaged with several thousand practitioners and policymakers across the EU, including regional and local authorities, service providers, NGOs, citizen and volunteer groups, faith communities and institutions, schools, universities, employers, training institutes, and of course refugees and migrants themselves.

Much of our experience rests on our extensive work on refugee resettlement<sup>1</sup> in the framework of the [European Resettlement Network \(ERN\)](#) and [SHARE Network](#), focused on ensuring pre and post arrival orientation, reception and settlement support for refugees, and more recently on supporting complementary pathways of admission for refugees. **Links to relevant ERN and SHARE Network resources and publications are included as footnotes throughout.**

All SHARE Network activities are undertaken in the framework of promoting and supporting **welcoming communities across the EU**,<sup>2</sup> and our contribution to this

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1 For a summary of Member State resettlement and relocation activities during 2018-19 (with a specific focus on the implementation of the EU programme to receive 50,000 resettled refugees, please see the [SHARE Network graphic display series](#)

2 See for example the SHARE short film '[Small Places, Great Hearts](#)', which showcases welcome and inclusion for refugees in eight smaller communities across Europe

consultation focuses on our recommendations for actions at EU level that can contribute to achieving this vision.

### **A strategic vision for integration and inclusion**

We consider that the Plan should maintain a vision of **integration as a two-way process, offering opportunities and frameworks to newcomers, and building inclusive and cohesive societies that foster active participation of newcomers and other community members alike**. We would also recommend that the Plan set out a clear vision for how the integration actions and measures it contains will contribute to the overall intended outcome of welcome and social inclusion, at national, regional and local level.

Integration should also be understood not only in relation to the needs of refugees and migrants but - via **a rights-based approach** - as a mechanism to ensure they can access the entitlements afforded to them by their legal status. Within this framework, we urge a continued focus in the Plan on reception and settlement measures for newcomers, including specific measures for those arriving via protection programmes and for vulnerable migrant groups. For refugees, unaccompanied children and victims of torture and/or trafficking, the purpose of integration support and services must be clearly understood as ensuring durable protection, with dedicated support made available for these groups in order to realise this aim.

**Access to secure legal residency and to eventual citizenship** are centrally important components of longer term integration and inclusion. While we welcome the proposal included in the New Pact on Asylum and Migration for refugees to access EU long-term residence status within three years (instead of the current five), we would urge that the Action Plan also address access to citizenship for refugees and other vulnerable groups for whom a return to their country of origin is impossible.

### **Territorial approaches**

Since 2015, it has become even more clear that integration must take account of the **multi-level governance character** of migration and asylum, as well as **dispersal policies** that seek to ensure a more equal distribution of asylum seekers, resettled and other refugees and unaccompanied minors across national territories. The SHARE Network has extensively researched the links between where refugees are placed and the corresponding need to develop **welcome and integration partnerships across territories**.<sup>3</sup> We would recommend that the Plan take into account the range of locations where people are settled and will live and work, and develop targeted approaches and interventions that address these different contexts.

While reception and integration frameworks are often more developed in bigger cities, experiences in the SHARE Network have shown that there is a continued need to strengthen and expand welcome, reception and integration capacities and infrastructure more equally across national and regional territories. There is particular need to strengthen frameworks and measures in smaller and rural communities and territories, which have long hosted migrant labourers and since 2015 have played an increasingly important role in receiving refugees, unaccompanied minors and other vulnerable groups.<sup>4</sup>

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<sup>3</sup> See for example the SHARE Network animated infographic [Refugee placement policies and approaches in the EU](#)

<sup>4</sup> For more information on the benefits and challenges of hosting refugees and other groups in smaller and rural communities, please see the 2019 joint SHARE-IFRI publication [‘Another Story from the Refugee Crisis’: Resettlement in Small Towns and Rural Areas in France](#)

Since the onset of COVID-19, the importance of labour migrants for local economies, health services and - via agricultural labour - for ensuring food supplies, has become increasingly apparent. The pandemic has also highlighted disparities between rural and urban areas: housing and living conditions, access to health and other mainstream services, unemployment, and available integration capacities and infrastructures. We recommend that the Plan prioritises measures to address these issues, both within and across national territories, with the explicit aim of fostering inclusive territories that offer equal opportunities and combat discrimination.

To support territorial approaches and solutions and broaden welcome and integration partnerships and capacities within defined territories<sup>5</sup>, the Plan should include measures to foster **multistakeholder cooperation and engagement**. Fostering partnerships, rather than addressing individual actors via a 'silo' approach, maximises the resources and competences of actors at different levels. This approach also brings together actors in core integration areas (such as housing, education, employment and specialist services) as well as employers, local community associations/institutions and individual volunteers, and ensures a holistic, person-centred approach to supporting integration and inclusion. In our view, the Plan should promote cooperation of this kind by supporting the establishment of multistakeholder platforms involving all relevant actors and stakeholders.

### **A comprehensive approach**

Although different groups of third country nationals in the EU have differing rights and entitlements, we would urge that the Plan sets out a comprehensive approach for the provision of **integration services and support for all newcomers**. Linked to territorial approaches, a comprehensive approach ensures services are responsive to the needs of all newcomers, and are more cost-effective and efficient.

There is currently no structured, comprehensive approach to integration and inclusion in place within the EU, and although some promising practices such as one-stop shops and municipal integration centres have been developed, they are often limited in the services they provide and/or the beneficiaries they target. We would recommend that the Plan draw on practices developed in third countries, such as the network of [Immigrant Service Organisations](#) in place across Canada that provide a range of individualised orientation and integration support for newcomers, tailored to the specific needs of the communities with whom and in which they work.

Refugees and migrants themselves consistently identify changes in **rights and entitlements to services and support** brought about by changes in legal status as a key integration challenge. A comprehensive approach can mitigate this key issue by ensuring effective cooperation and coordination between all relevant actors. We would therefore recommend the Plan highlight this approach, and clearly outline its benefits for the target beneficiaries of integration actions.

### **Target beneficiaries**

The Action Plan should provide clarity in terms of the intended beneficiaries of the priorities and actions it includes. The current consultation's references to 'migrants and people with a migrant background' is as yet not fully defined or understood by all stakeholders, and

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<sup>5</sup> Territories can be administrative or functional areas, including regions, provinces and departments.

does not deal explicitly with the specific needs and entitlements of particular ‘migrant’ groups such as refugees, unaccompanied minors and victims of torture and/or trafficking.

Additionally, it is our strong belief that the inclusion of **‘people with a migrant background’** (in the sense of the descendants of refugees and migrants) in the Plan’s target beneficiaries is potentially discriminatory. Second and subsequent refugee/migrant generations are EU nationals, with legal residency and the same rights and entitlements as other EU nationals. As such, they should not be obligated to participate in integration measures or achieve individual integration ‘outcomes’.

On the other hand, **newcomers from other EU countries often do not receive the integration support they need** (such as language courses, social orientation and support for labour market integration), since EU funds designed to support integration and inclusion do not include EU nationals within their target beneficiaries. We recommend that the Plan acknowledge this gap, and include guidance for Member State authorities as to other EU funds that can support integration and inclusion for EU nationals.

### **Co-design**

Offering multiple actors, including citizens, refugees and migrants, the opportunity to contribute to the development, implementation and evaluation of integration and inclusion measures helps local communities to become more cohesive and participatory.

**‘Co-design’ (or ‘co-production’) approaches** offer a number of different participatory methods for involving stakeholders in needs assessments and service design and evaluation, ensuring better-informed and more effective interventions and building beneficiaries’ ownership of the actions and services designed to support them. In the context of integration and inclusion, refugees and migrants are ‘experts of their own experience’, with a central role to play in articulating needs and developing solutions to address them.

We would urge that the Plan recommend the use of **co-design approaches for welcome and integration**, and include guidance, best practice examples and measures to build capacity to implement practices of this kind. As in ‘territorial approaches’, above, we believe the Plan should promote the establishment of multistakeholder cooperation platforms for welcome and integration. Including refugees and migrants as core participants in structures of this kind will as a minimum ensure ongoing consultation on regional and local integration strategies, plans and actions, and more broadly offer the possibility to support collaboration for co-design.

The SHARE Network is currently beginning a new programme of work to pilot and evaluate co-design approaches for integration and inclusion, and we would be most happy to support the expansion of such practices within the EU by contributing knowledge and experiences as our work progresses.

### **Community-based sponsorship**

Community-based sponsorship<sup>6</sup> offers a unique way to combine **legal pathways to**

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<sup>6</sup> For more information on sponsorship and higher education, please see the ERN publication [Student Scholarships for Refugees: Expanding complementary pathways for refugee resettlement](#). To find out more about the development of community-based sponsorship programmes and practice across the EU, see the ERN publication [Fostering Community Sponsorships across Europe](#) and the SHARE Network’s [Private Sponsorship in Europe: Expanding complementary pathways for refugee resettlement](#)

## **protection for refugees with community support and engagement to foster settlement and integration.**

While a diverse range of community sponsorship models currently exist and will continue to exist in Europe, the SHARE Network applauds the European Commission's efforts to date to further promote community sponsorship. While we urge that the Commission continue to seek to explore various different sponsorship frameworks, we recommend that provisions of the forthcoming Plan in this area focus on supporting civil society efforts to work towards **sustainable models for community sponsorship for refugees**, in particular their ongoing efforts to structure partnerships and responsibilities between state and civil society actors.

While most current sponsorships are undertaken by churches and faith-based organisations, **the potential of other actors (such as universities and diaspora organisations) is not yet being fully maximised**. We would recommend that the forthcoming Plan include measures to build sponsorship networks, provide training, coordinate the work of community members acting as volunteers, pilot new sponsorship models, scale up successful practices, and strengthen the capacity of sponsoring groups to monitor and evaluate their work. To ensure continued engagement from citizens and communities, we would additionally recommend that the Plan include measures to **celebrate and promote the voluntary contributions of local citizens and communities to the growth and quality of sponsorship efforts across the EU**, at local, regional, national and EU level.

### **Coherence with EU funds**

To build infrastructure and ensure more equal capacities across territories, communities and territorial actors must be adequately resourced and supported, not only by annual project funding but also by medium and longer term investments.

We urge that the Plan's implementation will be supported through **coherence with the planned Asylum & Migration Fund (AMF) for 2021-27**, both at EU level and in the development of national programmes in conjunction with Member States. In a context of limited funding, we strongly recommend that the Plan include as a priority funding support for first reception and settlement services for newly arrived refugees and migrants, ensuring core integration services and support.

To ensure the effectiveness of EU support, the Plan should include measures for **capacity-building assistance for local and regional actors to access and manage EU funds**.<sup>7</sup> We would additionally recommend that evaluations of EU funds for integration and inclusion (primarily the proposed AMF and European Social Fund Plus) assess how far they have contributed to the intended outcomes of the forthcoming Plan, both at EU and national level. Specifically in relation to rural areas, more synergies should be created with EU funds such as the European Fund for Agricultural & Rural Development (EAFRD) and the LEADER programme, that can support mobility, digital access, training and higher education and the provision of mainstream services.

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<sup>7</sup> Organisation for Economic Cooperation & Development (2018) *Working Together for Local Integration of Migrants and Refugees*, p103