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COMMENTS ON THE EU ACTION PLAN ON THE INTEGRATION OF THIRD COUNTRY NATIONALS

Brussels, 9th February 2017

As Christian organisations providing services for the integration of the most vulnerable across the European Union and beyond, we want to share some opinions and proposals on the EU Action Plan on the integration of third country nationals, first through general comments and then through specific analysis of the European Commission's proposal.

We trust these comments are a helpful contribution to shaping the future of the European Union's migration policy and in particular the integration of third country nationals. We are committed to continuing our constructive engagement in this debate and remain available to discuss these proposals.

General comments

We welcome the intention to establish a common policy framework and supporting measures to help Member States to further develop and strengthen their national integration policies for third-country nationals. Even though integration is primarily a competence of Member States, the European Union can support Member States in this effort by providing a framework based on best practice and creating incentives to strengthen integration policies.

However, this action plan is not enough in itself as integration must most of all be mainstreamed through a wide range of policies. One of the weaknesses of the Action Plan is its isolation from other new regulations proposed by the European Commission whereas integration should have been a main consideration while defining new regulations such as the reform of Dublin. Integration must be mainstreamed outside from the action plan, looking both at the immediate impact and longer term consequences in terms of integration.

According to both the EU Action Plan as well as the Common Basic Principles for migrant integration policy,¹ integration is a two-way process between newcomers and longstanding residents. This means that integration must also reflect the fact that the responsibility for integration rests not with one particular group alone but rather with many actors - the immigrants themselves, the receiving government, institutions, and communities, to name a few. The integration of migrants in Europe must be based on dialogue and shared rights and responsibilities, ensuring full participation in accordance with the law, empowerment and inclusion of everyone in society.

The EU can strengthen equal rights and opportunities by fostering anti-discrimination policies and appropriate diversity management strategies within public institutions. Concerning the current legislation, equality can be ensured through a correct implementation of existing EU Directives (e.g. the so-called “Race Equality Directive” 2000/43/EC). A cohesive and welcoming society must provide migrants with the necessary means to help them overcome structural, socio-economic, and cultural challenges and barriers that hinder their full participation and integration. Ensuring this will benefit not just the migrants themselves but the common good, the whole of society. Theory is often easier than practice, though, and challenges remain in implementation. Much emphasis is often still being placed on migrants as the main actors responsible for integration, with a focus on migrants’ obligations, and less focus on the responsibility of receiving societies to create enabling environments that foster inclusion. Against the background of the financial crisis and increased refugee arrivals, this challenge has become even more pressing.

Investment in integration must not only be prioritised in capitals and bigger cities, but also in smaller cities, towns and rural areas. Integration programmes need to be developed in areas which have less experience, particularly if refugees and asylum applicants are obliged to stay in these regions.

We share the European Commission’s vision that the costs of non-integration will be higher than the cost of investment in integration policies. We appreciate the recognition that *“actions to support the integration of third-country nationals need not, and should not, be at the expense of measures to benefit other vulnerable or disadvantaged groups or minorities”*. New financial means must be mobilised for the integration of third country nationals to reinforce social cohesion and stop any kind of competition between vulnerable groups.

¹ Common Basic Principles for Migrant Integration Policies in the EU, November 2004, http://www.eesc.europa.eu/resources/docs/common-basic-principles_en.pdf

The key sectors identified by the European Commission to facilitate integration are essential. These fundamental instruments of social inclusion include language learning, education and training, labour market access as well as skills and qualifications acquisition and recognition, and access to basic services such as housing and medical care. In addition, particularly vulnerable groups, such as exploited labourers, women, children –in particular unaccompanied minors, should also have access to specialised services, including psychological support and counselling. Based on our members’ experiences and activities across the continent, we would like to share three concrete proposals linked to the various policy priorities outlined in the Action Plan.

1- Promoting community cohesion - recognise the role of religion and faith-based organisations

The rise of populist political movements is changing the narrative on migration, portraying it as a threat to societal stability and European identity. Discrimination on the basis of religion or ethnicity is increasing. While we welcome the European Commission mentioning the importance of interreligious dialogue to promote community cohesion, as faith-based organisations we believe it has not yet been appropriately valued as an instrument of cohesion. Faith-based communities and organisation are often first entry and meeting points for newcomers. Unfortunately, the Action Plan only proposes concrete action in the shape of general projects combating racism and xenophobia, mentioning interreligious activities as one example. We therefore call on the European Commission to promote a more ambitious and comprehensive approach by:

- Extending the exchange of best practices beyond the realm of labour market integration so as to include interreligious and intercultural dialogue, and religious literacy programmes to combat perceptions.
- Recognising that inside communities of diverse faiths encounter and mutual learning is facilitated, enhancing the civic and social participation of newcomers.²
- Recognising the specific role of Churches and faith-based organisations in reinforcing social cohesion. Religion ought not to be perceived only as a problem, but as part of the solution.
- Actively involving Churches, religious communities and associations and other faith-based actors in the planned European Integration Network to ensure better stakeholder coordination, greater participation, and to counteract radicalisation.
- Exploring the possibility of earmarked funding for projects run by Churches and faith-based organisations for the inclusion of newcomers.

2- Capitalising on civil society expertise

We welcome the European Commission’s aim to promote integration in close cooperation with non-governmental stakeholders. Regular meetings to discuss integration policies and funding issues are important to make the most of civil society’s on-the-ground expertise. NGOs, Churches and other faith-based communities and service providers are often important contact points between migrants and local communities, building mutual trust and enabling exchange on common values. We therefore call on the European Commission to:

² More background information is available, e.g. EU funded research project POLITIS – civic participation of new citizens 2004-2007, <http://www.politis-europe.uni-oldenburg.de>, EU-co-funded project MIRACLE – Models of Integration through Religion, Activation, Cultural Learning and Exchange, 2009 <http://www.ccme.be/areas-of-work/uniting-in-diversity/miracle/-2010>, and EU funded research project ACCEPT Pluralism, 2010-2013, <http://accept-pluralism.eu/Home.aspx>

- Develop, in close cooperation with civil society organisations, guidance notes for stakeholder’s involvement in the context of the Partnerships under the Urban Agenda for the EU, to ensure transparent and effective dialogue.
- Open access to other stakeholders and facilitate participation in the European Integration Network.
- Advance further the exchange of practices and policies between Member States' civil society and public institutions, in particular local and regional authorities who are essential actors of integration. Strengthen the dialogue between governmental and non-governmental actors at European and Member State levels. Facilitate cross-border exchange between such actors in various regions of the EU, such as Nordic-Baltic, Southern, Central Europe.

3- Ensuring effective implementation across policy fields

We welcome the European Commission’s aim to promote cooperation between different levels of governance and to align relevant EU funding instruments. The Commission rightly recognises that migrant integration is a challenge which connects a broad range of areas. This is why the European Commission should look toward rebalancing social and economic priorities in the context of the European Semester to ensure that the policy cycle effectively contributes to national integration processes. We urge the Commission to use the flexibility clause in the Stability and Growth Pact for what it is meant for: to allow Member States to exempt investments having a clear positive impact on economic growth, including public social investment (childcare, education and training) from the calculation of national budgetary expenditure. A better balance is needed between measures aimed at fiscal consolidation and those aimed at social inclusion. We also emphasize the potential of social innovation in facilitating integration.

One of the Action Plan’s current shortcomings is the lack of clear and concrete implementation mechanisms; this challenge could be addressed by drawing on the potential of comprehensive social policy initiatives and tools and minimizing the tendency of creating competitive environments which result in opposing migrants versus other marginalised citizens. In particular, we call on the Commission to work toward the implementation of the action plan by fostering:

- **Inclusive anti-poverty and employment strategies**
 - Set up a framework for national inclusive anti-poverty and employment strategies, taking into account the Sustainable Development Goals and the Europe 2020 poverty target, including national targets for poverty reduction and employment, measures to achieve the targets and a budget for the implementation.
 - Migrants are disproportionately affected by, or at risk of, poverty and should therefore be a specific target group within inclusive anti-poverty and employment strategies.
- **Social protection**
 - Ensure comprehensive adequate national social provision coverage, covering the vital needs of all persons residing in the country.
 - Require Member States not to criminalize social service providers supporting undocumented migrants.

- Strengthen monitoring and reporting mechanisms so that the EU within its competences, can correctly keep Member States accountable for human rights violations in access to basic services.
- Clarify the connection between the Action Plan and the Europe 2020 Poverty and Employment targets and the European Pillar of Social Rights. Ensure that the principles outlined in the final version of the Pillar apply to, and meet the needs of all European residents, including third country nationals residing in the EU.

➤ **Labour market integration:**

- Facilitate access to employment immediately after registration, at the earliest possible stage.
- Ensure that employment agencies cooperate closely with civil society actors in identifying skills at an early stage, for example through the envisaged *Skills Profile Tool for third country nationals* of the ‘New skills Agenda for Europe’.
- Call on Member States to provide adequate employment services, facilitating labour market participation, including services targeting the specific support needs of migrant women and migrant persons with disabilities. This could be done through a greater involvement of non-governmental and non-profit actors.
- Promote connections between education providers and business sector to provide Third Country Nationals a first professional experience in the reception country, i.e. through paid apprenticeships, internships or first job opportunities.
- In line with the Action Plan, call on Member States to support employment opportunities for migrants, also within social economy and the not-for-profit sector, making use of its job creation potential. At a time when many social service providers are experiencing growing staff shortages, migration may be an important resource for future professionals, if managed correctly.
- Foster on-the-job training to transfer knowledge of cultural and work life norms, practices, customs, and facilitate migrants’ participation in volunteering opportunities and volunteering cultural exchanges.
- Work with Member States so they do not limit refugees’ and asylum seekers’ quick access to the labour market, as this could force them into accepting employment in unregulated, dangerous, degrading and exploitative conditions, which in turn can expose them to other risks, including that of sexual exploitation and trafficking in human beings, for which particularly women and girls – at no fault of their own - are commonly targeted. Limiting asylum seekers’ quick access to the labour market can also be costly for receiving communities, not only because it leaves a considerable amount of human potential and resources untapped, but because of the obligation of the state to provide benefits and support during this time of exclusion.

➤ **Pre departure and pre arrival measures:**

- The role of pre-departure and pre-arrival measures for refugees who will be resettled in EU Member States is well recognised in the Action Plan. In addition to providing skills, such orientation programmes are important to meaningfully fill the often still lengthy waiting periods. This, however, cannot replace post-arrival

training and courses. Language acquisition is often much easier with immersion courses, thus contact with persons speaking the language is crucial after arrival.

- The reference to the experiences and recommendations developed by the SHARE network is much appreciated. While we appreciate the European Commission's intention to continue support for IOM and Member States, we wish to underline that some of our member organisations have also developed and implemented orientation courses. Therefore, support for programmes of civil society organisations and also of municipalities should be included in funding programmes.
- The role of family life for the integration of newcomers, particularly for refugees needs to be underlined in this context, too. Ideally, for successful integration, separation of families ought to be avoided and waiting periods for family reunification, for refugees and labour migrants, should be as short as possible. We would appreciate therefore if specific support to foster family unity could also be planned.

➤ **Post arrival measures**

- Promote the importance of "post arrival measures" to prepare host communities. This will include giving appropriate support to religious organisations, Churches and civil society organisations who play a crucial role at local level in countering xenophobia, offering welcome services and raising awareness among local citizens about newcomers, particular in the current political climate.

➤ **Education**

- Provide free access to language courses upon arrival.
- Work to foster access to the regular school public system at the earliest possible stage; segregation based on ethnicity and social status must be avoided.
- Rather than denying children and teenagers access to schooling due to their experiences and severe traumatisation, which may or may not have the potential to slow down their learning process, provide them individualised, targeted support to facilitate their participation in the regular system.
- Decrease the administrative complexities that currently constitute a heavy barrier for enrollement in early childhood education and schools.
- Promote higher education and life-long learning for third country nationals and foster alternatives for migrants unable to pursue the typical educational path, i.e. promoting school programmes for non-traditional students.
- Facilitate access to youth exchange programmes for non-formal education. Promote cultural diversity bilaterally among pupils, involving both citizen and migrant children. Education can have a double reciprocal effect, meaning states are responsible for educating migrants as well as educating the receiving community about its cultural diversity..
- Ensure teachers' and service providers' training on intercultural competencies and cultural diversity, which can be beneficial in supporting migrant children's individualised needs.

9th February 2017