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**Contribution by Christian organisations to the consultation on the Future
of Home Affairs Policies: An open and safe Europe – what next?**

Our organisations represent Churches throughout Europe – Anglican, Orthodox, Protestant and Roman Catholic – as well as Christian agencies and church-related service providers working with and for migrants, refugees, and people seeking asylum. As Christian organisations we are deeply committed to the inviolable dignity of the human person created in the image of God, to the freedom of every human being, as well as to the common good, global solidarity and the promotion of societies that welcome strangers.

In 2014, the EU will have the opportunity and face the challenge of designing the future layout of policies in the area of Freedom, Security and Justice, including asylum and migration policies, in the successor of the Stockholm Programme. In this process, the EU will set the agenda for an area of central importance both for the inner cohesion of the EU and good-neighbourly international relations, in both the short and long term. We very much welcome the opportunity to contribute our views and experiences to the consultation on future orientations in this programmatic area.

In today's Europe, migration is a hotly debated subject, touching as it does on both the migration and protection of third country nationals and the intra-EU migration of European Union citizens. Debate is often fed by a negative discourse, and migrants and beneficiaries of international protection are often marginalised and socially excluded. In a context of economic crisis, xenophobia, racism and negative migration discourse, migrants and refugees have often felt a negative impact upon their lives in Europe. EU home affairs policies could and should play a central role in overcoming this negative reality by granting security, protecting the human rights and promoting a real and accurate public perception of the migration phenomenon.

The governing principle must be that all policies and actions acknowledge and respect the inalienable dignity of every human being. Consequently, the human rights of all human beings, irrespective of their nationality or citizenship and immigration status must be respected so as to permit the full enjoyment of these rights.

In our view, a return to the balanced approach of the Tampere summit conclusions could be a useful guiding principle for asylum and migration policies in the following years.

FAIR TREATMENT OF THIRD COUNTRY NATIONALS

Family life: key to refugee protection, migration procedures and integration

As Christian organisations we attach highest importance to the right to family life. Family life is of utmost importance for the wellbeing of refugees and migrants, and a central precondition for their successful integration. The right to family reunification is laid down in the Family Reunification Directive. The Court of Justice has underlined in its jurisprudence that the aim of the directive is to enable family life and that it must be interpreted and applied in this light. We hope that the planned interpretative guidelines of the European Commission will underline this fundamental objective of the directive and lead to better application at the national level during the coming period.

As an evaluation of the directive by the European Commission has shown, a number of Member States use and interpret the directive in too restrictive a manner. We would encourage the European Commission to hold Member States accountable for such unjustified restrictions, which often impact dramatically on migrants' lives. While less severe measures are preferable, the Commission should not shy away from launching infringement procedures against Member States not correctly applying the directive.

Anti-discrimination policies: an integral part of asylum and migration policy

In recent years, migrants, people seeking asylum, refugees and ethnic minorities in EU Member States have become increasingly likely to be victims of racist or xenophobic sentiments or abuse, in some cases expressed through acts of physical violence. It is therefore of paramount importance that these groups are adequately protected against all such racism and discrimination. Full implementation of the two Equality Directives of 2000 and of the Framework Decision on racism and xenophobia is therefore necessary, and should be carefully monitored by the Commission. Failure to implement the directives must not remain unchallenged and should result in punitive action by the European Commission.

Preventing and addressing destitution: the right to benefit from basic services is a human right regardless of residence status

Destitution is a reality increasingly affecting people seeking asylum in the EU, as well as other migrants both from within and outside the EU. A lack of permanent status often prohibits people seeking asylum and other third country nationals from taking up employment, thus forcing them into destitution. Citizens from EU countries who move to other Member States often experience difficulties in finding work providing a sufficient living income. These groups are also affected by various forms of exclusion such as from support services, social security and other financial allocations. In some cases, poor public employment services and lack of accessible information about rights contribute to many falling through the welfare system. The Commission should ensure that public relief services at least cover the basic needs of

migrants, particularly for the most vulnerable among these so that they can have a dignified life.

...the legal dimension...

The Commission should closely monitor the transposition of relevant EU law, into the national law of Member States. Monitoring in relation to the Reception Directive will ensure that refugees and people seeking asylum have access to proper accommodation that guarantees their rights to private and family life, and that providers of emergency shelters are not criminalized for providing accommodation to undocumented migrants. To ensure migrants are able to live in dignity, the Commission should ensure that public relief services in the Member States as a minimum meet their basic needs; most notably through specialist services for the most vulnerable including special food for the elderly or the ill, assistance for pregnant women or aid for persons with disabilities.

Based on a thorough evaluation of the Return Directive, the EU institutions are encouraged to adopt measures to lay down more precise standards for respecting the economic and social rights of undocumented migrants. The Commission must refrain from interpretations of the directive that restrict opportunities for Member States to adopt and maintain policies that ensure access of undocumented migrants to basic social services.

Where a Member State does not respect its obligations set out in international legal instruments with regard to the respect and fulfilment of economic and social rights of recognized refugees, it is in violation of the EU Charter on Fundamental Rights. The Commission as “the Guardian of the Treaties” should then start an infringement procedure.

...the practical dimension...

Undocumented migrants face particular barriers to accessing education and training, endure precarious housing situations, and are denied access to homeless shelters and shelters for victims of violence.

Access to adequate and affordable housing and living conditions is a basic human right that Member States need to grant universally. Although the right to an adequate standard of living is stipulated in the ICESCR as well as the UDHR, many migrants live in insecure accommodation and/or in housing conditions that are harmful to their health, due to factors such as inadequate financial resources and limited and/or inaccessible social housing. Whilst children may be entitled to accommodation under national law, undocumented families are sometimes not, thus family unity may be at risk. Barriers to accessing housing for families are often related to the lack of access to work, lack of required residence permits or other conditions related to residency and entitlement at the national and local levels.

Practical, administrative and legal obstacles, as well as extreme poverty combined with exclusionary practices, often prevent migrants, in particular undocumented migrants, from accessing essential basic services such as healthcare. Practical obstacles include the requirement to provide documentation or prove ability to cover medical expenses, a lack of information about the right to healthcare, and the duty of healthcare professionals to report undocumented to the authorities in some Member States. This in turn means that preventable health problems are left untreated and subsequently develop into more serious illnesses. In many Member States, emergency care is given freely to all; however the interpretation of „urgent care” differs from country to country. Additionally, in many cases healthcare professionals are unsure of the care entitlements of undocumented migrants. Information about the availability and the rights to services must be made accessible so that service providers and local authorities are well informed of rights to healthcare and treatment for

mobile EU citizens as well as of migrants from outside the EU. Funding by the EU and Member States alike should also include interpretation and cultural mediation so as to make services more accessible for migrants.

Whilst undocumented children tend to have more rights than their parents, they largely depend on their parents to understand where to access care and which institutions can provide the treatment they need. Undocumented parents fear exposure to the authorities, the subsequent risk of deportation and of their children being taken away by child protection authorities, all of which are important factors that prevent them from seeking medical help for themselves and their families.

...resources....

Churches, as well as NGOs and service providers, are often confronted with the dilemma of not being able to provide services for migrants due to a lack of resources or restrictions on the use of public funding for people who do not have a regular migration status. The EU should develop instruments to guarantee migrants' access to basic services and facilities including food, healthcare, accommodation and other homeless services (such as hygiene facilities, laundry and storage), debt counselling, and free or affordable language courses. The necessary financial and human resources should be put at the disposal of service-providing organisations to enable them to work effectively with all people experiencing destitution, including migrants.

Binding legislation to prevent criminalisation of humanitarian assistance to migrants

As recent incidents have shown, many service-providing organisations and ordinary citizens regularly refrain from helping undocumented migrants, or even do not dare to rescue them out of life-threatening situations, e.g. in distress on sea. The EU should make it compulsory for Member States to abolish laws that criminalise humanitarian and social assistance to undocumented migrants. Furthermore, service providers should not risk losing public funding because they assist undocumented migrants, which in some Member States is unfortunately now a reality.

The existing national frameworks should clearly define that humanitarian assistance to undocumented migrants is not legally punishable. We would, in this context, welcome if Article 1,2 of Council Directive 2002/90/EC defining the facilitation of unauthorised entry, transit and residence, which allows Member States to exclude humanitarian assistance from punishment, would be changed from a “may” clause into a “shall” clause.

A COMMON EUROPEAN ASYLUM SYSTEM

Implementing the CEAS: Ensure transposition and a monitoring mechanism for implementation and useful effect

Our organisations welcome the positive steps made toward the harmonisation of asylum and migration policy, in particular the decisions involving the Common European Asylum System (CEAS). While higher standards would have been desirable, the adopted EU legislation can provide protection to many migrants and refugees. National governments must now transpose and implement these new EU legislative standards in open dialogue and cooperation with EU institutions, NGOs, churches and UNHCR. Where concerns exist in the EU legislative standards, Member States should take the opportunity during the transposition process to apply more favourable standards in line with the Charter of Fundamental Rights and other international law. These standards should also guarantee that migrants, persons applying for asylum and beneficiaries of international protection are properly informed about and able to

access and assert their rights. The European Commission will need to robustly monitor the full and correct transposition of EU law into national law and practice. In cases where transposition fails, the Commission should, as an ultimate measure, launch infringement procedures.

Resettlement: Continued commitment and coordination to ensure a higher number of places and increased impact

Refugee resettlement remains an important instrument through which the EU shows its commitment to refugee protection and responsibility-sharing. Resettlement can provide lifesaving protection to refugees whose life or liberty is at risk, offer durable solutions to refugees alongside local integration and repatriation, and express European solidarity with those countries that host the majority of the world's refugees. While resettlement will remain a voluntary activity for Member States, the European Commission should ensure that EU resettlement remains on the political agenda and firmly anchored in the external dimension of the CEAS. In view of the increasing global numbers of refugees, particularly from Syria, Commission services, including the EU External Action Service, should jointly promote an increase in the number of resettlement places offered by Europe. Better coordination and links should be established with other EU programmes that ensure services and protection for refugees, such as through the European Community Humanitarian Office (ECHO), development programmes and Regional Protection Programmes (RPPs), in order to increase the impact and strategic use of resettlement. Resettlement is a durable solution, and the European Commission should therefore ensure that resettlement funding is not made available to programmes offering only a temporary residence status to refugees. Our organisations look forward to working with the Commission to mobilise public opinion in support of resettlement, and to achieve the target of 20,000 resettlement places in Europe each year by 2020. Regular exchange between the Commission, Member States, NGOs and UNHCR could contribute to a better coordination of responsibilities as well as to clearer common priority-setting for European resettlement in its global context.

Offering speedy access to Europe: humanitarian visas and protected entry procedures

In addition to resettlement, Member States can offer emergency protection to refugees by issuing humanitarian visas and offering Protected Entry Procedures. These mechanisms can offer speedy access to protection on the EU territory for refugees and their family members, and are therefore crucial protection tools. There is, however, a need for a coordinated approach, in particular for medical and vulnerable cases (56% of refugees from Syria are women and children). The EU should consider implementing measures that will enable access to protection for refugees already in their countries of origin or in neighbouring countries. The proposed Visa Code could allow easier access to embassies by including also the interchangeability of embassies of different Member States, making the situation of migrants much easier in other procedures such as family reunification.

Alternatives to the current Dublin system: countering its detrimental impact

In recent years, NGOs and Churches including members of this group have published substantial evidence on the detrimental impact of the Dublin system. The newly adopted Dublin III Regulation (Regulation 604/2013) has some potential to remedy some of the protection gaps. However the major problem remains: it forces people seeking asylum to reside in countries where they do not want to be and where often they do not get the access to specific protection mechanisms adapted to their needs. As long as there is limited convergence

and harmonization in asylum policies and practices across Europe, people seeking asylum who are subject to the Dublin system will remain at risk of having their rights violated.

We would therefore welcome discussions how to revise the Dublin system in order to ensure that it better accommodates the wishes of people seeking asylum and becomes a tool of guaranteeing access to high standard protection.

As long as the current Dublin system remains in place, the ‘Early Warning System’ that is provided for in the recast Dublin regulation must be further developed in order to identify, as early as possible, critical elements in a Member State’s asylum procedures and reception capacities. As the example of Bulgaria clearly shows, the current system does not sufficiently provide for an early identification of problems and development of solutions. It is recommended that the Commission and EASO include civil society reports more frequently in their assessments to identify gaps in asylum procedures and reception capacity.

MANAGEMENT OF MIGRATION FLOWS

Labour migration: offering a realistic, comprehensive and rights based framework

Despite current peaks of unemployment in a number of Member States, demographic trends alone will make it necessary for EU Member States to organise labour migration on a larger scale. Already today, many jobs requiring low or no qualifications are filled by irregular migrants in irregular employment situations. Labour migration policies therefore need to address labour market needs across all levels of qualification. In order to avoid increasingly complicated, untransparent and unworkable regulations, we argue for a horizontal, comprehensive approach to labour migration. A re-examination of the 2001 proposal for a Directive on the conditions of entry and residence of third-country nationals for the purpose of paid employment and self-employed might be useful in this respect. The ongoing reform of EURES could offer an opportunity to extend the features of the job portal to non-EU jobseekers.

Furthermore, migrant workers often face discrimination in the labour market, endure precarious working conditions and, as a result of temporary and short term contracts, face periods of unsecured social protection. The economic and financial crisis is making the situation of unemployed migrants even worse, through reduced access to the labour market and a lack of job opportunities in many parts of Europe. As the employment/labour rights of those without work or residence permits are at risk, global social protection coverage (access to healthcare, education, social security) – a main pillar of decent work – is crucial to creating societies where people can live in dignity.

Return policies: prioritising assisted voluntary return and ensuring safeguards in case of enforced returns

Sustainability of voluntary return and reintegration should be the main focus of EU policies on return. In practice, states should prioritize sustainable assisted voluntary return and reintegration over forced return.

Where forced returns are implemented, they must always be carried out in a safe, dignified and sustainable manner and in line with the Charter of Fundamental Rights. Binding standards to guarantee the dignified treatment of those returning should be further developed, and NGO-state cooperation on monitoring returns will remain essential and should be enlarged in scope.

Where return is not possible for technical or other reasons, or where it would be inhumane, people should not be left in limbo and should be granted a legal status to remain.

In some cases, there is a specific need for reintegration and repatriation services such as psycho-social help for those who have unsuccessfully attempted labour migration and returned to their country of origin. For sustainable return, it would be useful if the country of origin would better facilitate the repatriation process and meet the needs of their repatriated citizens via measures to facilitate their inclusion, so that they do not end up in the same situation of poverty and exclusion that they originally left. In programmes with countries of origin, the EU should underline the need for human rights to be upheld and social and other services to be improved and made accessible.

Integration: a two-way process which must go hand-in-hand with social inclusion

In recent years, integration has remained high on the political agenda, although less attention has been given to the notion that integration is a two-way process requiring change from those newly arrived and the 'host' society. For the coming period, we would therefore welcome an increased focus on measures to help prepare European societies for increased diversity and to ensure welcoming societies. Integration remains meaningless unless it is underpinned by social inclusion of migrants, and it is therefore important that social services and social affairs legislation affecting migrants facilitates their speedy social inclusion.

Migrants across Europe are today among the most vulnerable groups in society and are often socially excluded through lack of access to rights, employment, education and social services. One out of ten people at risk of poverty and social exclusion in the EU have a migrant background, all the more concerning in the context of the current economic crisis and harsh austerity measures, where migrants have been affected by the financial cuts to social protection mechanisms and social services. We are particularly concerned to see reduced welfare provisions and restricted access to social services for migrants. The fact that leading politicians in Member States argue that migrants posed an unreasonable burden to the welfare system, is of grave concern. Migrants are blamed for deficiencies of the systems without factual justifications. Exclusion will however lead to disintegration rather than integration.

We acknowledge that with rights come responsibilities and that like all EU citizens migrants are expected to contribute to and participate in civic life. Integration is a two-way process and every individual must be empowered to be active in that process. The Active Inclusion strategy is one tool that can address the need for integrated approaches to social inclusion, including the social inclusion of migrants. If implemented effectively, the three pillars of access to quality services, inclusive labour markets and adequate minimum income can prevent many migrants from falling into poverty and exclusion. However Member States overall are currently not managing to implement the strategy in an integrated way, and are overly focused on the employment pillar, stressing activation rather than active inclusion. The Commission therefore needs to do more to follow up on the implementation of active inclusion based on their commitment made in the Council Conclusions of 2008.

There are other non-legislative measures that could be implemented, Member States, for example, should develop a better understanding of the impact of inadequate migration and integration policies on poverty and extreme poverty, as well as the role of EU anti-discrimination legislation in preventing and combatting housing exclusion (for example through awareness-raising actions and facilitating the sharing of good practice). It would also be useful to undertake more research into the cost of migrant exclusion.

Developing and implementing alternatives to detention

Protracted detention of irregular migrants and people seeking asylum has fast become a routine practice rather than an exceptional measure. Given that EU instruments such as the Return Directive, the Reception Conditions Directive and the revised Dublin Regulation limit the use of detention, we would hope that the Commission will thoroughly monitor to ensure that detention is used as last resort. Monitoring would include an examination of how legal grounds for detention are used.

Developing and implementing alternatives to detention will produce much more humane outcomes for migrants, and also be less expensive for states. We would in this context recommend both partnering with NGOs and exchange among Member States on best practice for alternatives to detention, as well as undertaking pilot projects on alternatives with expert NGOs. In monitoring detention the Commission should pay particular attention to vulnerable groups, especially children and families, for whom detention violates fundamental rights such as the best interest of the child.

PARTNERSHIPS WITH COUNTRIES OF ORIGIN

Preventing loss of life at the EU's border: clearer rules and responses to search and rescue at sea

Over the past years, many persons have tried to escape human rights violations or other dangers to their life in their countries of origin and seek protection in Europe. They have often failed. Almost every week, we receive news about a boat with hundreds of refugees on board having foundered, with its passengers rescued with little time to spare or even drowned. The tragic events in Lampedusa, Italy, and the recent pushbacks of migrants and refugees at Greek borders highlight the need for a critical rethink of Europe's asylum and migration policies. As a priority, this would need to include the development of a clear and effective mechanism to determine who is responsible for rescuing boats in distress.

In addition, the EU must ensure that migrants are not pushed back or pulled back at the borders, a practice clearly refuted by the ECtHR judgement in the case of *Hirsi Jamaa v. Italy*. It has to be guaranteed that migrants have access to safety and proper asylum procedures. Border surveillance measures and joint border operations should be primarily used to save lives and bring people to safety, and not to keep people away who are seeking protection. A complaint mechanism should in this context be developed for FRONTEX operations.

Last but not least, legal migration alternatives should be developed to help reduce numbers making a perilous journey to Europe.

Maintain access to EU territory for vulnerable groups

While border protection is a legitimate interest of EU Member States, procedures should be designed in a way which allows access to EU territory for persons in need of international protection. We would in this context recommend an evaluation of the effects of the different instruments, such as carrier sanctions, on access to the EU for the most vulnerable.

No externalisation of responsibility for protection

In recent years and through a variety of instruments, the EU has influenced migration policy in countries in its neighbourhood. The focus has been on building the migration management capacity of those countries, usually including capacity building for asylum as well as tougher

management of borders with the EU. While it is a welcome development that more countries build protection capacity, this should not serve as motivation to shift the responsibility for protection to countries with new and fragile protection systems, or be used as a justification for keeping people away from the borders of the EU. Political and financial cooperation should not be made conditional on a third country's tightening of borders, and financial assistance should not be given to corrupt governments even if they sign readmission agreements.

Safeguards for human rights must be established in EU relations with third countries. Even if some readmission agreements contain a "non-affection clause" saying that the agreement does not affect any other obligations under international law, this is not sufficient to safeguard the human rights of the persons returned under the agreement. The right not to be subjected to torture, for instance, must not only be recorded in law but ensured by the implementation of concrete safeguards for its respect in practice.

ANTI-TRAFFICKING

Proper implementation and application of the EU Anti-Trafficking Directive is of central importance in combating trafficking

Trafficking in human beings in Europe remains a worrying phenomenon, with over 23,000 people identified as victims of trafficking in the EU during 2008-2010 period and many more victims unrecorded. The 2011/36/EU Directive on preventing and combating trafficking in human beings, with its orientation on protection and prevention, is of central importance to the fight against trafficking. The Commission must ensure that provisions on protection and prevention are transposed in national legislation and practice alongside criminal law provisions for combating trafficking. The Commission and Member States should place the 2011/36/EU Directive and relevant jurisprudence of the European Court of Human Rights and Court of Justice of the European Union at the centre of their anti-trafficking strategy.

FREEDOM OF MOVEMENT

Free movement needs clearer rules with regard to EU citizens who are economically inactive

In recent months, freedom of movement, one of the fundamental EU freedoms, has come under severe attack, and a number of Member States have very vocally raised the issue of EU citizens who have exercised their right to free movement and found themselves destitute in another Member State. Some Member States have expelled, or threatened to expel, such EU citizens – a clear breach of the EU *acquis* on free movement.

Despite being highly regulated and building on extensive case-law, understandings of residence rights provided by free movement, especially for people who do not have or no longer have any income, diverge across Member States. Additionally, access to emergency support and accommodation and social welfare benefits for this group differs widely between Member States.

The EU should clarify the rules in order to better define the criteria for residence to be considered by Member States in this context. It must be ensured that no EU citizen exercising his/her right to free movement is left destitute, and that EU citizens who are not economically self-sufficient can access emergency accommodation and support that is available until individual residence rights have been fully assessed.

We would also encourage the Commission to continue its work in defending the *acquis* on freedom of movement against unjustified attacks. It is the responsibility of the EU and its Member States to uphold the right to free movement enshrined in the Treaty, including by countering public perceptions that are not based on facts or economic realities.

Currently the responsibility to assist EU migrants who have fallen through the gaps of the welfare system is left to NGOs such as humanitarian and faith-based organisations, and many Churches and church-related service providers are already providing information, advice and support to many EU citizens exercising their right to free movement. However, service providers need to be supported to assist EU migrants and public funding should therefore be made available to provide such assistance (and not only during winter months). The EU should support Member States to provide assistance to EU citizens exercising their right to free movement, and Member States should work in collaboration with NGOs to provide information and support services, improve public employment services and train local authorities in the rights and entitlements of EU citizens.

HORIZONTAL ISSUES

The need for a facts-based debate

One of the more striking observations of recent years is that debates on migration, be it intra-EU or third country migration, are creating an alarmist discourse often based on anecdotal knowledge rather than detailed studies or facts. Migrants are often used as a scapegoat in times of crisis and are increasingly referred to as a “burden” on welfare states. We must not allow the crisis to justify the weakening of fundamental human rights in Europe and to lead to the proliferation of xenophobic rhetoric.

While most of this tendency can be attributed to politicians in Member States and their respective agendas, we urgently appeal to the Commission to contrast and counter such tendencies with factual information on migration and mobility. In this context, we commend the facts-based and principled approach by the Commission in recent debates on freedom of movement.

Policy coherence in all migration-related areas

At EU level, migration and asylum are policy areas which are not only dealt with under home affairs, but also under social affairs and employment, justice or neighbourhood policy – to name just a few. We would recommend that regular inter-service consultations become the rule, beyond the formal procedures foreseen for the adoption of official statements, to ensure an integrated and coherent approach to migration.

More specifically, migrants should be included within social inclusion, anti-poverty strategies and social investment strategies. Attention should be paid to the Commission’s Common Agenda for Integration, the principles of which should be taken into account when mainstreaming migration concerns into inclusion strategies, to the European Platform Against Poverty and Social Exclusion and the Social Investment Package. Mainstreaming the rights-based approach throughout the Europe 2020 Strategy, including the National Reform Programmes, the National Social Reports and the Country-Specific Recommendations, into the European Semester could ensure that migrants have equal access to rights, resources and opportunities.

Given the highly interrelated determining factors of integration such as housing, health, employment and education, the mainstreaming of integration objectives into all such relevant

policies is essential for policy coherence on migration. In order to achieve this, Member States need coordinated and cross-sectoral policies at national, regional and local level.

EU funding: boosting the benefits of migration, not preventing it

The new period of the post-Stockholm era coincides with the new programming cycle for funding in the area of Home Affairs.

The compromise of the MFF 2014-2020 has meant that EU funding for asylum and migration has been reduced from what was initially foreseen as necessary. The remaining funding needs to be carefully targeted to those who need it most. We therefore consider it important that these funds prioritise supporting migrants and refugees in their start into a new life rather than target spending at programmes to prevent migration.

The external dimension strand of the Asylum and Migration Fund must not merely serve migration control, but rather contribute to enhancing protection space in third countries in a spirit of solidarity and responsibility-sharing.

The EU should strengthen the use of the European Social Fund for support and tailored guidance for third-country nationals, and extend the scope of the ESF to include migrants, irrespective of their residence status.

Civil society and churches for an open, regular and transparent dialogue on setting the EU's migration agenda and the allocation of its funds

Civil society organisations are currently consulted in manifold ways on specific aspects of migration and asylum in the EU. While EASO has a consultative forum, it is different in its operations from the FRONTEX consultative forum or the consultations of the Fundamental Rights Agency, and the European Integration Forum again has a different method of operation. While various consultation mechanisms have their own merits, an overall consultation mechanism across the entire spectrum of asylum and migration, following article 11, 2 TEU and 17,3 TFEU, has yet to be developed.

We therefore suggest a regular forum of exchange between the European Commission and civil society, churches and religious associations or communities on the whole range of asylum and migration issues, including financial programming. This dialogue with civil society organisations should be realised at all levels of governance, and Member States should encourage and incentivise regional and local authorities to support and cooperate closely with civil society and NGO social service providers who work to foster social cohesion and the integration of migrants at the local level.

CONCLUSION

In shaping the new programme for Home Affairs, we hope that the European Commission, the Council of the EU and the European Parliament will set ambitious targets and show courage. Our organisations are convinced that the EU could indeed become a region providing more and better protection for those in need, and develop a meaningful migration policy for the citizens and migrants of Europe.