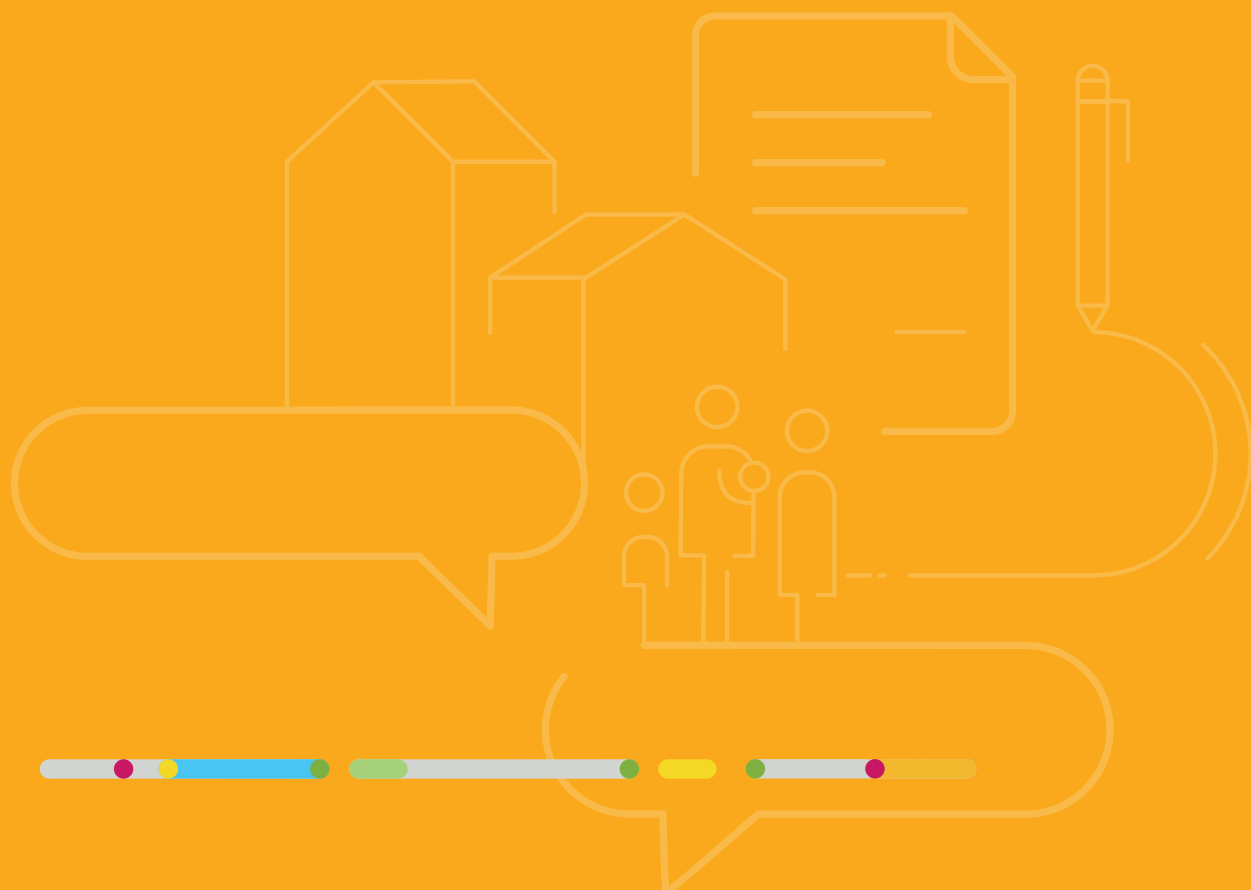


Sinem Yilmaz

EUROPE'S PATCHWORK OF REFUGEE INTEGRATION POLICIES: THE EU ACTION PLAN ON INTEGRATION AND INCLUSION AS AN INSTRUMENT TO ADDRESS DEFICIENCIES

LINKING NIEM RESULTS TO EU ACTION 2021 TO 2027





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Introduction

The specific needs of beneficiaries of international protection (BIPs) receive less attention than needed in the migrant integration policies of EU Member States. Often, refugee integration is subordinated to undifferentiated approaches to the integration of third-country nationals. However, being forced to flee from war zone countries or violence and seeking for refuge in European countries, beneficiaries of international protection face specific challenges on their integration pathways. In many cases, they have to leave behind their families, possessions and documentation of their former qualifications. Starting from pre-migration stage, they might have gone through traumatizing experiences and suffered from physical and psychological violence. Therefore, their integration experiences differ from other groups of migrants in several aspects. Special needs of BIPs with a range of social and economic rights are also explicitly mentioned in the [1951 Refugee Convention](#) on which the European Union built and enshrined integration standards for BIPs in [the Common European Asylum System](#). In short, ensuring proper protection for BIPs requires disentangling their needs and priorities from those of migrants who arrived under other circumstances¹.

[The National Integration Evaluation Mechanism \(NIEM\)](#) provides evidence on the quality of the frameworks in place to support the long-term integration of beneficiaries of international protection² in 14 EU Member States³. Results are presented in relation to the concrete steps policymakers need to take in order to establish a framework that is in line with the standards required by international and EU law. NIEM's Evaluation 1 remains focused on those step-stones of a comprehensive approach to refugee integration related to the legal, policy and collaboration frameworks (see Annex I for more details).

The [EU Action Plan on Integration and Inclusion 2021 – 2027](#) is an important opportunity for EU Member States to develop more comprehensive integration policies and strengthen the understanding of integration as an inclusive two-way process.

This policy brief gives an overview of the 2019 results⁴ from the NIEM project and aims to see to what extent integration policies for BIPs of the 14 Member States covered are in line with the principles, values, and objectives of the EU Action Plan. Policymakers and refugee integration stakeholders can identify areas where the EU Action Plan and its concrete goals can help to address policy gaps and needs as identified by NIEM research. Conversely, using NIEM results will contribute to the overall assessment of the achievement of Action Plan objectives as this EU instrument is being implemented in the coming years. Therefore, this brief also presents specific recommendations to the European Commission and Member States about how to foster the implementation of the Action Plan and/or make it more effective in their integration policies.

¹ UNHCR Executive Committee 2005 <https://www.unhcr.org/42a6f29f2.pdf>; J. Tánczos (2016) 'Lost in transition? The European standards behind refugee integration'. NIEM Policy Brief, Migration Policy Group, Brussels

² The data presented in this brief covers both recognized refugees and beneficiaries of subsidiary protection.

³ The NIEM analysis in 2019 includes 14 countries: Bulgaria (BG), the Czech Republic (CZ), France (FR), Greece (GR), Hungary (HU), Italy (IT), Latvia (LV), Lithuania (LT), Netherlands (NL), Poland (PL), Romania (RO), Slovenia (SI), Spain (ES) and Sweden (SE).

⁴ Wolffhardt A., Conte C. and Huddleston T. (2020), 'The European benchmark for refugee integration: a comparative analysis of the national integration evaluation mechanism in 14 EU countries'. NIEM Evaluation I Comprehensive Report [online]. Available from: https://www.migpolgroup.com/wp-content/uploads/2020/07/The-European-benchmark-for-refugee-integration.-Evaluation-1_-Comprehensive-report.pdf

For an overall assessment, this brief focuses on cross-cutting sectoral areas in the Action Plan and how they are reflected in and the corresponding NIEM analytical dimension, namely education and training, employment and skills, housing, and health. Italy pays regard to multi-stakeholder partnerships, fostering participation of beneficiaries and building bridges with the receiving society.

Comparing NIEM 2019 results with the EU Action Plan on Integration and Inclusion

On 24 November 2020, the European Commission published its Action Plan on Integration and Inclusion 2021-2027 which outlines the priorities, goals, and actions to facilitate integration and inclusion. Compared to [the 2016 Action Plan](#) which only focused on third country nationals, the target group of this new action plan covers both migrants and EU citizens with migration background. The key priorities shaping the backbone of the actions in the plan are inclusion for all, targeted support where needed, mainstreaming gender and anti-discrimination priorities, support at all stages of the integration process, and multi-stakeholder partnerships. The main actions, on the other hand, are foreseen in the sectoral areas of education, employment, housing, and health.

Using ‘migrants’ as a broad term, the plan refers to refugees and asylum seekers where relevant. Although special needs of refugees are not systematically mainstreamed in all priorities and sectoral areas, the EU Action Plan highlights the importance of targeted support for certain groups and certain areas.

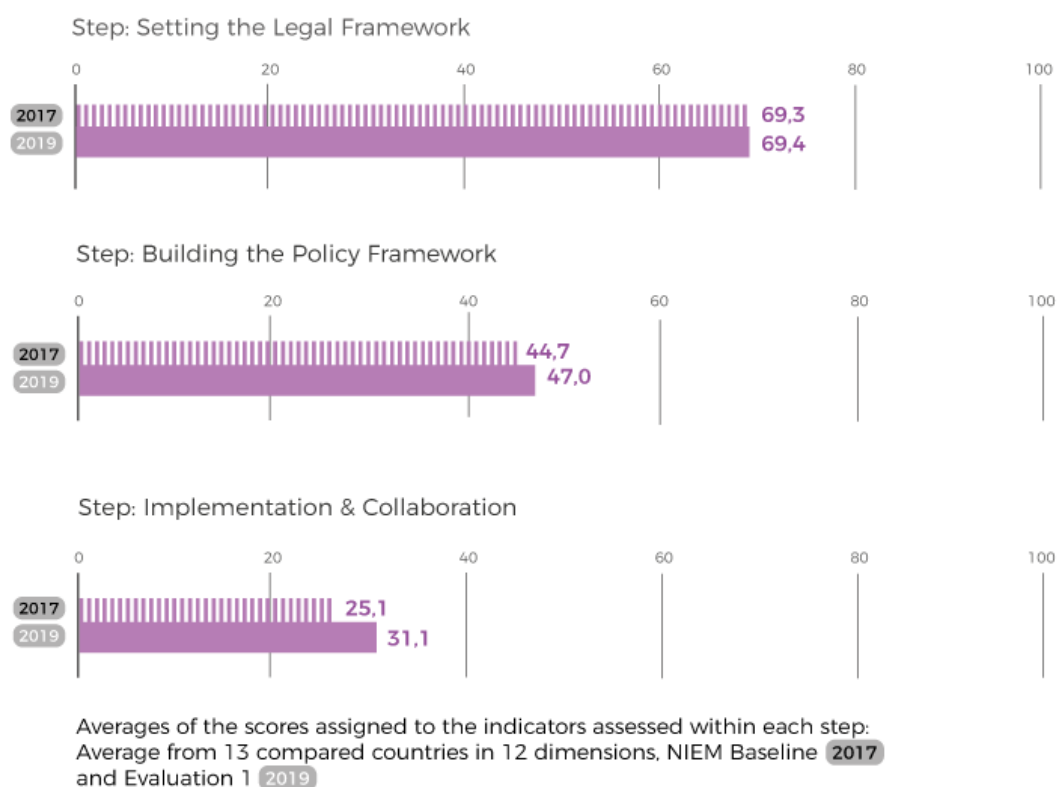
Through its indicator-based assessment system, NIEM aims to regularly monitor the quality of government policies on integration of BIPs across EU countries. With its comparable methodology, NIEM assesses how comprehensively Member States respond to the needs of BIPs and the opportunities provided to BIPs in receiving countries. Results have been scored on a scale from 0 to 100, ranging from least favourable to most favourable provisions (See Annex III for the scoring methodology). Comparing refugee integration policies across EU Member States is challenging since Member States rarely rely on EU-agreed indicators. NIEM aims to fill this knowledge gap with its extensive indicators which enables comparisons across Member States.

Following the Baseline Report⁵ based on 2017 data, NIEM Evaluation 1 analysed the refugee integration policies and key trends as of 2019. NIEM’s latest analysis of national refugee integration frameworks focuses on a variety of legal and policy indicators. The cross-country comparison covers 12 dimensions, ranging from general conditions to the legal, socio-economic, and socio-cultural aspects of integration. Overall, NIEM results show that countries are better in establishing the legal framework than in taking steps to develop and implement policies for refugee integration. Beneficiaries of international protection rarely experience favourable conditions and are not given the same fair and reasonable chance to integrate across the EU. With incomplete and low-quality integration policies in place across the EU, countries create – intendedly or unintendedly – different opportunities for BIPs to achieve a better life in Europe. Moreover, only few positive changes – along with some negative changes

⁵ Wolffhardt A., Conte C. and Huddleston T. (2019), ‘The European benchmark for refugee integration: a comparative analysis of the national integration evaluation mechanism in 14 EU countries’. NIEM Baseline Publication [online]. Available from: <https://www.migpolgroup.com/wp-content/uploads/2019/06/The-European-benchmark-for-refugee-integration.pdf>

– occurred in the refugee integration framework of the 13 countries which were assessed both in 2017 and 2019 (Bulgaria was included in the comparative analysis for the first time in 2019). Important conclusions can be drawn from the cross-country comparison for the implementation of the EU Action Plan on Integration and Inclusion.

Overall change 2017 to 2019



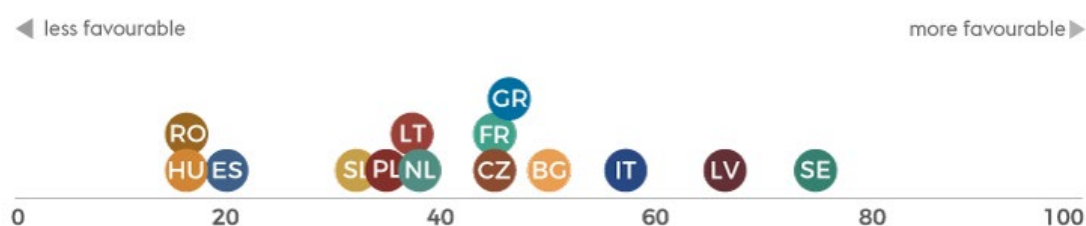
Education and Training

The role of education is crucial in the long-term integration of beneficiaries of international protection. Among others, education enables skill development, language acquisition, contributes to emotional and social wellbeing of migrants, helps them to adapt to a new country and culture as well as establishing social relations with the receiving society. Research shows that refugees are more likely to have significantly different learning needs due to their specific situation⁶. Therefore, tailored services are needed to address their learning needs. To support Member States in their efforts to integrate migrants in education, European Commission implemented concrete actions under the Action Plan on the Integration of Third Country Nationals. As a continuation, the Commission proposed new actions in the recent Action Plan on Integration and Inclusion and encouraged Member States to make full use of EU funding, in particular the European Social Fund Plus, the Asylum and Migration Fund and the European Regional Development Fund, to support programmes and measures related to education, skills and language training, in accordance with identified needs at national and regional level. Despite these efforts, policies related to education of BIPs in NIEM countries do

⁶ Tangen, D. (2009). Identifying the Learning Development of Students Who Are Refugees. *Australian Journal of Guidance and Counselling*, 19(2), 150-160. doi:10.1375/ajgc.19.2.150

not seem to be sufficient to integrate them. In fact, almost all the countries ensure access to different levels of education to BIPs on equal basis with nationals from pre-school to post-secondary and tertiary education. However, according to NIEM policy indicators (cf. Annex II for the indicators to which the illustrations of each chapter refer to), none of the countries succeeds to provide the most favourable conditions for BIPs in education. Moreover, Hungary, Spain and Romania provide the least favourable conditions in education policies. Between 2017 to 2019, further negative changes happened in Romania where legal access to education for BIPs has been significantly narrowed down.

Step: Building the Policy Framework



The **EU Action Plan** encourages Member States to increase the number of migrant children in early childhood education and ease administrative procedures to access education.

A Good Practice from NIEM

Assessment of educational attainment in Slovenia: Slovenia improved the assessment of the knowledge of BIPs without proof of educational qualifications in 2018. Newly introduced assessment rules and exams are available both for BIPs wishing to continue education at the secondary level (or apply for a job which requires completed school education) as well as for BIPs wishing to enrol in tertiary level higher vocational or academic programmes. The exams for those who cannot prove that they have already finished primary school outside Slovenia are administered by the National Education Institute of Slovenia (NEIS), which issues a certificate to successful candidates to be used for enrolment. Candidates can apply any time. The certificates, which open the door to tertiary education, are awarded by the National Examinations Centre.

Administrative obstacles do not exist in primary and early secondary education in all NIEM countries except Romania, Lithuania, and Slovenia. However, these barriers increase in post-secondary education, which is more likely to have negative impacts on skill development throughout the entire life and on the transition from school to work for BIPs. In addition, assessment and recognition of formal education is a major weakness across the countries analysed. Nation-wide assessment criteria and adequate translation for assessment are usually missing in the majority of countries.

Member States are encouraged to ensure support for language

learning beyond initial or intermediary proficiency levels. Nevertheless, only five NIEM countries provide long-term language instructions to BIPs. Most of the countries assessed do not pay attention to quality criteria in language courses with a lack of targeted curricula and trained and certified language teachers. Along with language courses, social orientation courses are crucial for BIPs' successful participation in the receiving society. In the majority of NIEM countries, there are no administrative barriers to social orientation. However, high quality orientation courses with a full scope of measures only exist in Sweden among NIEM

countries. While half of the countries take no measures to ensure high quality social orientation, other countries fulfil at least some quality criteria.

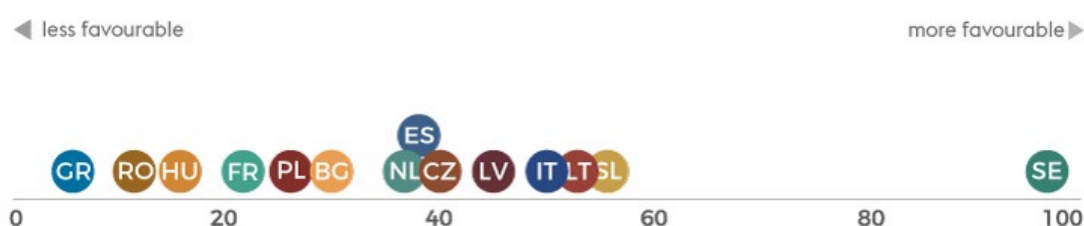
Inclusive and targeted education programmes are one of the priorities of the Action Plan. Supporting this, [EU cooperation in the European Education Area](#) identified inclusion and gender equality as one of the dimensions to be achieved by 2025. In addition, the [Digital Education Action Plan](#) aims to create more inclusive education systems. However, NIEM results show that special education programmes are very rare and noncomprehensive in the assessed countries. For example, vulnerable groups are only identified in education legislation in a few countries while targeted programmes for children and youth under international protection are foreseen in education law in Italy, Latvia, and the Netherlands.

Employment and Skills

Employment is key to ensure successful integration into the host societies. Refugees who are successfully integrated into the EU labour market can also contribute to the economy of the receiving countries with their skills as workers or entrepreneurs. With their qualifications they can meet skill shortages in certain sectors, which is an opportunity for receiving countries.

Providing targeted employment support is crucial to facilitate economic integration of refugees. The EU aims to support Member States' labour market integration efforts through its EU Action Plan which encourages Member States to make full use of EU funding, especially the European Social Fund Plus and the European Regional Development Fund, to support programmes related to integration into the labour market in accordance with identified needs. However, the policy frameworks in the assessed NIEM countries do not seem to be effective enough to provide this targeted support to refugees. NGOs or other dedicated organisations provide services to refugees to decrease the gaps in relevant public authorities in some NIEM countries.

Step: Building the Policy Framework



Although not explicitly included in the Action Plan, targeted job-seeking counselling is an important indicator in NIEM's analysis. However, the assessment shows that this targeted support is largely absent in the assessed countries. Only in half of the countries there is specialised staff for counselling job-seeking refugees and targeted positive actions (such as subsidies for employers, on-the-job trainings) and other active labour market measures for refugees are limited. In addition, special services for refugees belonging to vulnerable groups only exist in Sweden (disabled refugees, victims of violence and abuse, unaccompanied minors) and Italy (disabled refugees and unaccompanied minors).

The **EU Action Plan** encourages Member States to conduct skill assessments even at pre-departure stage to accelerate the process of integration into the EU labour market. Member States are also urged to make use of [the EU Skills Profile Tool for Third Country Nationals](#) at an

early stage and promote it among public authorities and other organizations especially for asylum seekers and refugees. Although nation-wide criteria to assess professional education and skills exist in eight NIEM countries, only three of them provide assessments with appropriate translation or in the first language of the client, which negatively affects efficient assessment. In addition, half of the 14 countries assessed present procedural obstacles to accessing employment such as hard-obtain-documentation, excessive waiting periods or discretionary decisions. Only the Netherlands, Sweden and recently France introduced measures to raise awareness about the specific labour market situation of refugees.

Migrant entrepreneurs' contribution to economic growth and creation of new jobs is crucial. Through the EU Action Plan, the EU aims to provide support for migrant entrepreneurs with inclusive entrepreneurship under [InvestEU](#) and Member States are encouraged to include entrepreneurship in integration programmes and support migrant entrepreneurs through easier access to tailored training and mentoring. However, targeted entrepreneurship support remains a blind spot in most of the refugee integration policies assessed. Targeted policies to support developing a business only exist in Italy, Sweden and Lithuania.

Participation in high-quality Vocational Education and Training (VET) with a strong work-based learning dimension facilitates access to the job market. The EU Action Plan aims to achieve higher participation of migrants in high-quality VET. Nevertheless, it does not provide any tool to reduce the obstacles to their participation in VET. As shown in the dedicated NIEM analysis on vocational training, the majority of the assessed NIEM countries do not put up administrative barriers to accessing VET. However, only six countries adopt measures to increase the participation of refugees in VET and to encourage employers to provide and increase the number of VET programmes. In addition, publicly funded targeted VET support only exists in eight countries.

Health

The right to the enjoyment of physical and mental health was enshrined in the Constitution of the World Health Organisation and Universal Declaration of Human Rights. The EU [Council Directive 2004/83](#) also states that health care should be ensured to beneficiaries of refugee or subsidiary protection status. Furthermore, wellbeing of every person in a society is in the interest of good public health governance. However, there has been a large health gap between migrant and non-migrant populations. This gap increases for refugees since fundamental rights – including access to health services – remain under threat in many Member States and they are frequently excluded from national healthcare systems ([FRA](#),

A Good Practice from NIEM

Targeted initiative to foster refugee employment in France: The French Skills Investment Plan developed by the Ministry of Labour has led to advances in terms of the policy and the overall coordination frameworks. As part of this strategy, the government issued a call for proposals in October 2018 with a budget of 15 million euros to facilitate the integration of 6,000 BIPs through employment. By December 2019, 35 projects which principally aim at building employment pathways for refugees have been awarded in total across the country. By 2022, the Skills Investment Plan will also allocate 63 million euros to the HOPE targeted programme, which aims at integrating refugees through work while providing comprehensive support (temporary housing, health care, language as well as vocational training). Additional funding is available under regional pacts of the Skills Investment Plan. The National Strategy for the Integration of Refugees, adopted in June 2018, mentions that the employment ministry will set up a mechanism to monitor the employment outcomes of BIPs.

2016). Further to that, health needs of refugees and other special needs groups have been largely neglected during the Covid 19 pandemic, which deeply affected [wellbeing and health of refugees](#).

The **EU Action Plan** encourages Member States to provide training to health care workers on diversity management and the needs of specific migrant groups and acknowledges that refugees need special support due to traumas in their country of origin, challenges in every step of their migration journeys and post-arrival experiences. However, NIEM results show that most of the countries do not take systematic measures in the health systems to raise awareness for the specific health care needs of refugees.

Step: Building the Policy Framework



Only in Italy, Sweden, and the Netherlands (to a limited extent) healthcare providers receive information about entitlements and specific limitations of refugees. With the Action Plan 2018-2020 on the Integration of Foreigners into Lithuanian Society, Lithuania also foresees measures to organise intercultural training for health service workers aimed at reducing stereotypes and promoting respect for diversity and equality. Support for health authorities about the entitlements improved in France between 2017 and 2019. Refugees are systematically provided with information about entitlements and use of services in eight countries, of which only France, Spain, Latvia, the Netherlands, and Romania provided for individualised face-to-face information. However, only a few countries guarantee

A Good Practice from NIEM

Comprehensive, individualised and multi-lingual information concerning entitlements in Sweden:

Sweden obtains the highest possible score related to the policy-related health indicators. With regard to information about entitlements and the use of health services, health communicators exist in most of the regions and the book "About Sweden" includes a chapter on health with different information. Some regions offer face-to-face information in the language of the BIPs, even though services offered vary greatly according to regions. The National Board of Health and Welfare's report from 2016 identifies the need to coordinate information nationally.

interpretation services in the health system in a systematic manner. Other countries provide this service on ad-hoc basis, while access to interpretation is not available at all in Hungary, Lithuania, the Netherlands, and Slovenia. In Greece, government-sponsored pilot interpretation services no longer exist in 2019. In Bulgaria, policy-related assessment shows very disadvantageous conditions for BIPs. For example, the procedure to obtain entitlement to health care is subject to discretionary decisions, no measures are taken to raise awareness for the specific needs of BIPs in the health system, and information on health care entitlements and use of services is not provided in a

systematic way.

The **EU Action Plan** encourage Member States to facilitate migrants' access to general health services, including mental health, by providing services adapted to their needs and tackling discrimination. To support programmes and measures related to health care or migrants, the plan encourages Member States to make full use of EU funds such as the European Social Fund Plus, the Asylum and Migration Fund and the European Regional Development Fund. Most of the NIEM countries provide all the fundamental health care services for special needs groups (paediatric care for minors, care for minors who have been victims of abuse and trauma, pregnancy and childbirth care, care for persons with disabilities, nursing care for elderly person and psychiatric care for victims of violence). Romania showed a positive development between 2017 to 2019 by providing more health care entitlements for special needs groups. Although access to healthcare is guaranteed overall, most of the countries put up administrative barriers such as excessive administrative delays and waiting periods and discretionary decisions with uncertain outcome to obtaining entitlement to health care.

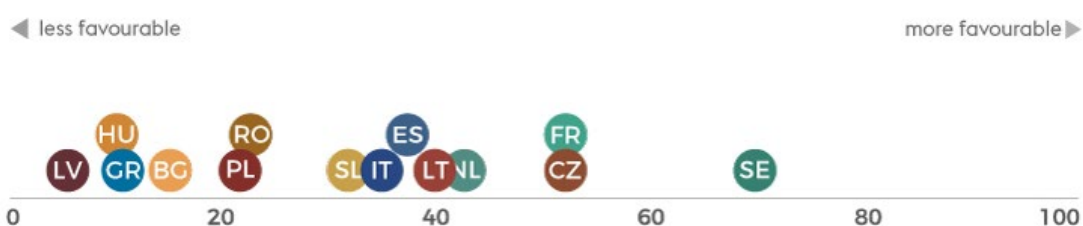
Overall, NIEM results suggest that comprehensive health policies for refugees are not in place in most of the countries assessed. Based on the NIEM analysis, tools to ensure accountability and evaluation for refugee support in healthcare systems appear to be necessary.

Housing

Accessing adequate accommodation is a basic human right which was enshrined in various human rights laws. Satisfactory housing is also an integral factor for the enjoyment of social, economic, and cultural rights. Inadequate housing conditions may cause poor health outcomes and reduced educational and employment opportunities. For this reason, the **EU Action Plan** encourages Member States to ensure an integrated approach and coordinate housing policies with other policy areas such as employment, education, health care and social services. It also encourages Member States to make full use of EU funds such as the European Regional Development Fund, the Asylum and Migration Fund and InvestEU, to promote adequate and affordable housing.

Under the [Council Directive 2004/83](#), Member States shall ensure that beneficiaries of refugee or subsidiary protection status have access to accommodation under equivalent conditions as other third country nationals legally resident in their territories. Despite these standards, accessing adequate and affordable housing is still a challenge for beneficiaries of international protection in many Member States. Through the EU Action Plan, the Commission aims to support Member States as well as local and regional authorities to address the challenges and promote housing solutions.

Step: Building the Policy Framework



In most of the NIEM countries, the needs of vulnerable persons are taken into account and targeted housing support is provided, although the identification of vulnerable groups shows

variation. Whereas some countries have more comprehensive approaches, others extend this support to only a few groups. Raising awareness among relevant actors about the specific challenges faced by refugees on the housing market is not on the agenda in most countries.

The **EU Action Plan** encourages Member States to provide adapted and autonomous housing solutions as early as possible for refugees and asylum seekers who are likely to be granted international protection; and to enable a smooth transition for asylum seekers to independent living once they have been granted international protection. Among NIEM countries, Sweden, Lithuania, and Slovenia provide temporary targeted housing support (such as in-kind provisions like housing centres, shared homes, or other accommodation) without further eligibility rules, while wait periods and eligibility rules are in place in eight other countries and such support does not exist at all in Greece and Latvia. Between 2017 and 2019, targeted housing support to all BIPs was phased out in Czechia and replaced with a limited support only for the elderly and people with disabilities. Long-term targeted housing support without time-limit, on the other hand, is only available in the Netherlands, Poland, Sweden and (partially) Italy. The lack of support in other countries is more likely to put refugees in a weaker position with poor housing conditions and segregation in the mainstream social housing system. Refugees also face obstacles in their access to social housing – an important instrument for refugees with a weak income – such as hard-to-obtain documentation, excessive waiting periods or discretionary decisions. They can get targeted housing advice from legal experts systematically only in Czechia, Italy and Sweden, while other countries provide this advice only on ad hoc basis and mostly through small NGO-led projects.

According to [the United Nations \(UN\) Committee on Economic, Social and Cultural Rights](#), satisfactory housing consists of: legal security of tenure; availability of accessible services, facilities and infrastructure; habitability; accessibility (e.g. access to employment, health services, schools, etc.); cultural adequacy; and affordability. NIEM assessment shows that regulations about the quality of accommodation where BIPs settle are not in place or incomplete in most of the countries. For example, the number of countries taking into account the affordability of the accommodation is the highest, while availability of key services, employment opportunities and beneficiaries' preferences are considered only in Czechia, Sweden and (partially) France.

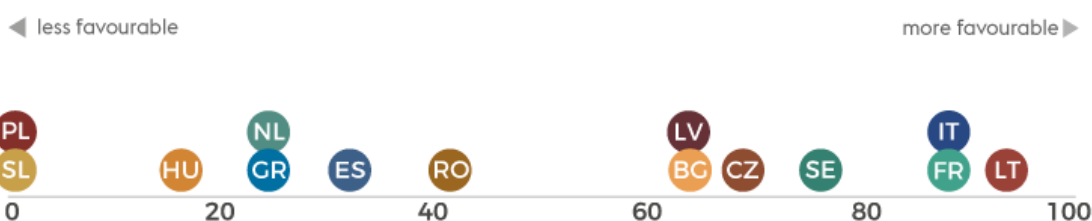
A Good Practice from NIEM

Accommodation, care, and guardianship for unaccompanied minors in Greece: The “supported independent living for unaccompanied minors” initiative addresses the lack of accommodation in appropriate facilities for the thousands of unaccompanied minors (UAMs) living in the country under precarious circumstances – in detention, camps or even on the street. Implemented by METAdrasi, an NGO dedicated to reception and integration of refugees and immigrants, the comprehensive programme underpins the new regulatory framework for the guardianship of unaccompanied children introduced for the first time in Greek law in 2018. It offers safe housing for UAMs aged 16 to 18 (both BIPs and asylum seekers) as well a series of services that cover their basic needs (education, health, psychosocial development, legal aid, interpretation, etc.), along with a proper level of care and guardianship. This innovative activity aims to prepare and empower unaccompanied minors for a smooth transition into adulthood and their integration into Greek society.

Multistakeholder Partnerships for Better Integration Policies

The EU Action Plan highlights the importance of building strong multi-stakeholder partnerships at various levels of governance for a more sustainable and successful integration process. In such a process, migrants, host communities, public authorities and institutions, NGOs, social and economic partners, philosophical communities, and private sector share the responsibility. The plan also aims to support Member States through strengthening the European Integration Network and using it to support Member States to develop, update, and implement national strategies and action plans for integration. NIEM, on the other hand, assesses the efforts of countries towards developing, coordinating, and implementing an all-of-government and all-of-society response under its 'Mainstreaming' dimension. It examines the existence of national integration strategies, mainstreaming of refugee integration, cooperation within government and with social actors and fostering the participation of receiving societies. Overall, such an all-of-government and all-of-society response to the challenges of refugee integration is absent in most of the countries. More comprehensive and systematic national approaches are only found in Czechia, France, Italy, Sweden, and recently in Lithuania while coordinated multistakeholder strategies in education, employment; housing and health are relatively rare in the countries assessed.

Step: Implementation & Collaboration



NIEM also assesses the level of support central governments provide for stakeholders (local and regional authorities and NGOs) to better assist BIPs across various policy areas. Results

A Good Practice from NIEM

Lithuania with its Action Plan to launch a country-wide integration policy including monitoring and stakeholder involvement: In Lithuania, the Action Plan 2018-2020 on the Integration of Foreigners into Lithuanian Society, adopted in December 2018, aims to improve and ensure the successful integration of foreigners – including asylum seekers and BIPs – into society. Its implementation measures are financed from the state budget and EU funds. Remarkably, the action plan requires monitoring of the integration processes and the collection of quantitative and qualitative data. Moreover, it aims for stakeholder working groups on AMIF projects for decisions on their implementation, with the participation of NGOs, the Association of Local Authorities in Lithuania and relevant ministries.

show that governments mainly support local and regional levels of government by providing tools and means in education while they receive less support in employment, vocational training, housing, and health dimensions. NGOs, on the other hand, receive active government support for the services they provide to BIPs in vocational training and health areas in nine respectively ten countries while their services in the areas of housing, employment and education are only supported in four to six countries.

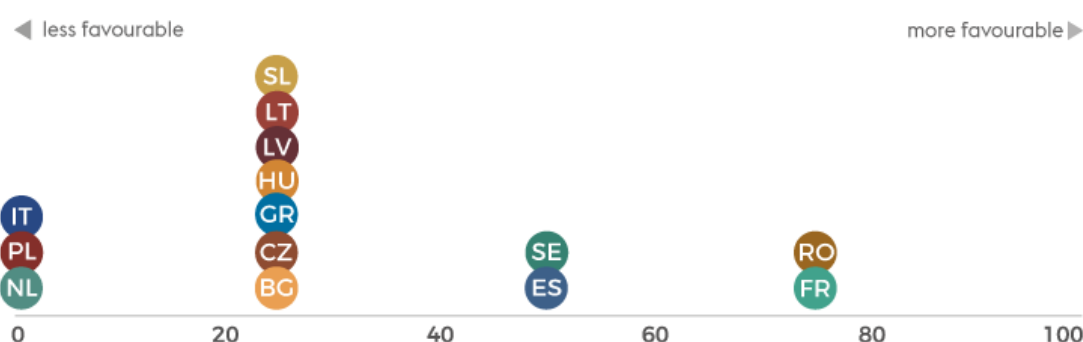
The **EU Action Plan** envisages to support Member States through providing targeted funding and capacity building to Member States to promote coordination between key integration stakeholders. In most of the NIEM countries, however, governments do not work in partnership with NGOs, local and regional authorities to develop and implement their policies. National governments' financial support for the activities of these actors are either not in place or not stable and long-term.

Although there have been some markedly positive changes between 2017 and 2019, the widest gaps remain in the mainstreaming of policies in the long-term integration and multi-level and multi-stakeholder collaboration.

Building Bridges between Refugees and the Host Society

Integration is a two-way process that needs the engagement of both migrants and the receiving society. Active participation of migrants in consultative bodies and decision-making processes is crucial for their empowerment and strengthening integration policies. To this end, the European Commission has formed an expert group on the views of migrants composed of migrants and organisations representing their interests to consult in the design and implementation of future EU asylum, migration, integration policies. To develop more effective refugee integration policies, beneficiaries of international protection should also have a say in the design and implementation of measures.

Step: Building the Policy Framework



However, among NIEM countries, only Greece has a dedicated national consultative body including an association of BIPs or an elected representative. In Czechia, general migrant advisory bodies also deal with refugee integration. Similar to participation in decision-making processes, support for the involvement of BIPs in civic activities is largely absent across NIEM countries. Only Sweden and the Netherlands provide targeted information on

A Good Practice from NIEM

Spain with a community sponsorship initiative: In Spain, a Community Sponsorship pilot project in the Basque Country aims to develop a model for the reception and integration of refugees in which society assumes direct responsibility. This will be carried out through initiatives arising from public administrations and private actors, including citizens, companies, non-profit organisations, etc. Supported by the Basque government, the intervention is part of an international network called the Global Refugee Sponsorship Initiative, which aims to provide guidelines and support for the implementation of this model of reception in other countries. The goal of the pilot is to draw lessons and conclusions that can be used in a broader project of community sponsorship as an initiative that can be reproduced in other regions of Spain.

the rights and possibilities of BIPs to join civic activities and support initiatives which encourage BIPs to join civic activities.

The **EU Action Plan** encourages Member States to promote exchanges with the host societies through volunteering, sport, non-formal education, youth work, and cultural activities. Although voluntary initiatives can complement government integration policies in important ways, France is the only NIEM country where the government provides sustainable support for national, regional or local coordination of voluntary initiatives. In France, the 2018 National Strategy for the Integration of Refugees has a specific focus on fostering links between refugees and the host society. It also sets out to strengthen the participation of young BIPs in civic activities. Moreover, only in Sweden there are provisions which expect the receiving society to be actively involved in the process and to accommodate BIPs, while the strategies of Czechia, Hungary, Lithuania, and Romania expect the receiving society at least to be tolerant and accepting of BIPs.

Overall, the assessed countries widely fail to build the bridges that would help to bring together people benefitting from international protection and the receiving society. NIEM results also shows that building bridges is the weakest part of refugee integration policies in Europe.

Conclusions and Recommendations

Overall, NIEM countries provide the most favourable conditions in the health and education areas, while employment, housing and vocational training emerge as dimensions with the least favourable conditions. There is also a high variation and gaps across relevant policy areas within countries which might be a sign of a lacking overall policy approach to refugee integration. Between 2017 and 2019, some countries have witnessed positive changes across various dimensions (France, Lithuania, Latvia, and Slovenia), while some others saw no improvement in any dimensions (Italy, the Netherlands and Sweden). Romania, Italy, and Hungary, on the other hand, saw deterioration in some dimensions.

The 2021 to 2027 EU Action Plan is a follow-up of the Action Plan on the Integration of Third Country Nationals (2016). 2017 and 2019 NIEM results show that the policies and regulations in countries assessed mostly fall short of fulfilling the guiding principles of the action plan. The following recommendations might help both Member States and the European Commission to take advantage of the Action Plan to close the policy gaps that persist in integration policies for beneficiaries of international protection across Europe

Recommendations for Member States (especially the ones assessed in NIEM):

- Member States should pursue comprehensive integration policies for beneficiaries of international protection which evenly cover all dimensions of the integration process and fulfil the EU and international standards.
- Member States should base their refugee integration policies on a rigorous assessment of needs and existing policy gaps based on evidence, such as provided by NIEM.
- Member States should make full use of EU funds to improve their national integration strategies and fill the gaps in their refugee integration services.
- Member States should aim to use the priorities of the Action Plan along with its tools and actions as guideline to improve their refugee integration policies.
- Member States should make sure to differentiate refugees from other migrants and highlight distinct characteristics of refugees in integration policies.

- Member States should lift all the administrative obstacles in getting access to health, housing, education, and employment opportunities.
- Member States should develop actions to close the gap between legal and policy frameworks about refugee integration.
- Member States should systematically follow the standards set by the EU and international law regarding the rights of refugees. With high-quality and comprehensive integration policies, refugees should be given equal and fair chance to integrate across the EU.
- National governments should work in partnership with civil society and local and regional authorities to develop and implement their refugee integration policies.
- Member States should mainstream the two-way character of integration in their national integration strategies through fostering the participation of BIPs and involving the receiving societies.

Recommendations for the European Commission:

- The European Commission should systematically mainstream the integration of BIPs in all the actions while implementing the EU Action Plan on Integration and Inclusion.
- The EU should take measures to actively promote EU fundamental rights and values on equality and non-discrimination through promoting positive narratives about refugees.
- Through its Action Plan, the European Commission should promote more effective means and tools for Member States to address the special needs and challenges of BIPs.
- The Action Plan should be systematically evaluated with criteria governed by a set of standards which consider refugee integration as a specific priority both in policy frameworks and outcomes.
- The European Commission should continue to involve the new EU expert group on the views of migrants in the monitoring of the implementation of the Action Plan and its evaluation.
- The European Commission should give guidance to Member States to address the needs of refugees with tailored policies and a more nuanced approach to integration.
- The European Commission should aim for high visibility and applicability of the Action Plan to increase its uptake by Member States and to create an EU-added value.
- The European Commission should further encourage Member States (especially those which provide the least favourable conditions across all sectoral areas covered in this brief, such as Bulgaria, Hungary, Greece and Romania) to engage in mutual learning and work together in refugee integration by making full use of the European Integration Network.
- The European Commission should pay attention to the gaps identified by evidence-based research (such as NIEM) during its consultations with Member States related to the programming and implementation of nationally managed EU programmes, especially AMIF and ESF+.

Annexes

Annex I: Stepstones towards a comprehensive integration framework

- **Step: Setting the Legal Framework:** This building block of a comprehensive approach to integration of BIPs refers to the legal standards which a country needs to comply with to ensure the most supportive frame conditions. Across the various dimensions, the step includes indicators on types and duration of residence permits; conditions for obtaining long-term residence, family reunification and citizenship; and access to rights, services, benefits and entitlements across different policy areas/dimensions.
- **Step: Building the Policy Framework:** This stepstone refers to the policies, rules and arrangements that a country needs to put in place to support the integration of beneficiaries in all relevant policy areas. Across the various dimensions, the step includes indicators on the availability, scope and duration of targeted provisions and services; provisions for special needs groups and needs-based criteria for the allocation of goods and services; administrative barriers; fees for long-term residence, family reunification and citizenship; and awareness-raising/information for stakeholders and beneficiaries.

Step: Implementation & Collaboration: This element of a comprehensive approach to the integration of BIPs refers to the efforts towards developing, coordinating, and implementing an all-of-government and all-of-society response. It implies the existence of an overall strategic approach, cooperation within government and with social actors, the fostering of participation and the recognition that integration is also a challenge for the receiving society. Across the various dimensions, the step includes indicators on the existence and implementation of an overall refugee integration policy/strategy; mainstreaming across all relevant policy fields; multi-level and multi-sectoral coordination with local and regional authorities, social partners and civil society; acknowledgment of integration as a two-way process and support for an active role on the part of the receiving society; and encouragement of the participation of BIPs in society and integration policy making.

As the EU Action Plan mostly refers to policy measures, this NIEM Policy Brief focuses on results in the Step: Building the Policy Framework in the chapters on 'Education and Training', 'Employment and Skills', 'Health', 'Housing' and 'Building Bridges between Refugees and the Host Society'. In the chapter 'Multistakeholder Partnerships for Better Integration Policies' the assessed NIEM indicators refer to the Step: Implementation & Collaboration. Annex II: Indicators included in the comparative charts

Chapter Education and Training (NIEM dimension 'Education')

- Access to education for groups of special concern
- Administrative barriers to education
- Awareness raising about the specific situation of beneficiaries of international protection regarding education
- Placement in the compulsory school system
- Length of language support
- Regularity of orientation and language programmes and targeted education measures

Chapter Employment and Skills (NIEM dimension 'Employment')

- Access to employment for groups of special concern
- Administrative barriers to accessing employment
- Awareness raising about the specific labour market situation of beneficiaries of international protection
- Assessment of skills
- Job-seeking counselling and positive action
- Targeted support for entrepreneurs

Chapter Health (NIEM dimension 'Health')

- Access to health care for special needs
- Information for health care providers about entitlements
- Information concerning entitlements and use of health services
- Availability of free interpretation services

Chapter Housing (NIEM dimension 'Housing')

- Access to housing for vulnerable persons
- Awareness raising about the specific challenges of beneficiaries of international protection on the housing market
- Targeted housing advice, counselling, representation
- Provision of targeted temporary housing support
- Provision of targeted long-term housing support
- Period of targeted housing support
- Administrative barriers to accessing public housing
- Housing quality assessment

Chapter Multistakeholder Partnerships for Better Integration Policies (NIEM dimension 'Mainstreaming')

- National strategy for the integration of beneficiaries of international protection
- Commitments in the national strategy for the integration of beneficiaries of international protection
- Monitoring and review of policies for the integration of beneficiaries of international protection

Chapter Building Bridges between Refugees and the Host Society (NIEM dimension 'Building Bridges')

- Expectations of mutual accommodation by beneficiaries of international protection and host society members
- Awareness raising on the specific situation of beneficiaries of international protection

Annex III: NIEM Methodology and Scoring System

NIEM applies a standardised questionnaire and assessment based on a scoring system in order to ensure a valid and robust evaluation of results that allows for cross-country comparison. Each indicator is formulated as a specific question relating to a different aspect of refugee integration. For most indicators, there are a number of alternative answer options reflecting different policy options. The first option is based on favourable terms, while the successive options generally represent less favourable or unfavourable provisions. Points are assigned to each policy option, with 100 points awarded to the most favourable and 0 to the least favourable options. Depending on the number of alternative answer options, scores are

assigned along a scale from 0 to 100 (for example, when there are three options, scores of 0, 50 or 100 are assigned, while when there are six options, scores of 0, 20, 40, 60, 80 and 100 are assigned, respectively).

For the remaining indicators analysed (mostly asking for absolute figures or percentages), special scoring rules have been developed based on the available data and benchmarks set against the normative framework in use. The specific scoring rules for each indicator are provided, together with the full questionnaire, on the NIEM website ([www. forintegration.eu](http://www.forintegration.eu)).

For a score to be assigned (to an indicator) and eventually aggregated (for a dimension), simple averages are used. Data gathering involves practitioner interviews in the government and civil society realms, desk research and analysis. Expert focus groups and surveys may be used to gain additional insights. After validation and verification on the national level, the data are submitted and processed by NIEM's transnational research partner. Data are screened from a comparative point of view and further validated in clarification loops with the national researchers before scoring and comparative analysis.