



Partnership in practice: the role of civil society in EU funded actions for the inclusion of migrants and refugees

Policy Note

I. Introduction

The **partnership principle** is a long standing commitment shared by the EU institutions and MS (MS) with regards to the EU funds which are managed at the national level. It brings added value to the funding by including a wide range of stakeholders in funding management.

Traditionally implemented in cohesion policy, the partnership principle enables more inclusive programming of EU funds through the involvement of stakeholders such as trade unions, employers, and non-governmental organisations (NGOs). This ensures the most effective and tailored approach to activities which are mainly implemented by NGOs, such as socio-economic inclusion of third country nationals (TCNs).

Despite the formal obligation of involving stakeholders, the implementation of the partnership principle is very uneven across different funds and different MS, depending on national culture of public administration management. Too often, compliance with the partnership principle is reduced to cosmetic consultations which does not impact the substance of national

programmes (in the case of the Asylum, Migration and Integration Fund - AMIF) and operational programmes (for the European Social Fund - ESF). Moreover, cooperation with civil society is generally less consistently implemented in AMIF than in ESF. In most MS the two funds are managed by different ministries which explains the difference in approach. The existence of parallel frameworks for the two main funds which deal with inclusion of migrants and refugees complicates, in most of the MS, consistent involvement of civil society in the funds' management.

As the upcoming months will be crucial for the definition of the overall architecture of funds in the next Multiannual Financial Framework (MFF), it is essential to ensure an adequate involvement of NGOs, local authorities and other stakeholders in the decision-making process to ensure the best outcomes. This policy note sets out how the partnership principle should be reflected in the structure of the AMIF and ESF+ as well as the preparation, implementation, monitoring and evaluation of national programmes.

II. Analysis

Ensuring that partners are included in defining the new architecture of EU funds

In the proposals for the upcoming MFF 2021 – 2027, socio-economic inclusion of migrants and refugees features as a clear priority¹. However, this strong commitment to integration is undermined by the general decrease of resources which will affect Cohesion policy, and the strong focus on security and externalisation of asylum policy characterising the proposals for the Justice and Home Affairs (JHA) funds. To mitigate the effects of the decrease and diversion of resources, the EC aims at mainstreaming integration across a wide amount of funding instruments, with AMIF² and ESF+ being the main funds delivering on this objective³. This will entail changes in the management of the funds, including the partnership with stakeholders.

The proposals for the next MFF foresee a unified [Common Provisions Regulation](#) (CPR) for all funds in shared management, which would facilitate a single, more mainstreamed approach to partners' participation, and entails the preparation of a single [Partnership Agreement](#) (PA)⁴ for all EU funds in shared management. However, many MS are reluctant to include AMIF in the same rules governing the cohesion policy, often considered too burdensome. This risks the continuation of a two-tier system, with uneven involvement of partners and insufficient coordination, which may create gaps in integration services. In

addition, the existence of a multiplicity of instruments funding integration which are subject to different rules would increase the already disproportionate bureaucratic burden for beneficiary organisations, with the opposite effect of the much discussed and coveted 'simplification' of EU funding.

In addition, a number of MS want to make partnership in AMIF voluntary, which would jeopardise the involvement of organisations implementing the majority of integration related programmes.

The [European Code of Conduct on Partnership](#) (ECCP), adopted for the 2014-2020 period and governing partnership rules for the Cohesion policy, does not consider the AMIF and JHA funds in its provision. A revision of the European Code of Conduct on Partnership (ECCP) is desirable, in order to be applicable to AMIF and other JHA funds in its provisions. It should set the ground for cooperation of the managing authorities of these funds with international organisations, NGOs and social partners on the basis of the procedures governing the ESF+.

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- 1 For ECRE and PICUM recommendations on inclusion, cf ECRE, PICUM (2019), [Promoting socio-economic inclusion of migrants and refugees in the next EU budget \(2021 – 2027\)](#)
 - 2 Both the EP and the Council agree in their position that the importance of integration should be reflected in the title of the fund. Therefore, this Policy Note uses the title 'AMIF' instead of AMF, as it is likely that this will be the eventual name of the fund after the end of the negotiations.
 - 3 Other funds in shared management involved in the provision of integration will be ERDF, the EAFRD, the Erasmus+, Rights and Values fund.
 - 4 Not to be confused with the 'partnership principle', the [Partnership Agreement](#) is a plan negotiated between the EC and each MS outlining national investment priorities for EU funds in shared management, the attribution of different funds and the overall architecture of the funding management for a programming period. It refers to the agreement of partnership between the European Commission and the member state, and it is not a reference to the obligation of MS to cooperate with partners from the private sector and civil society at national, regional and local level in the implementation of the fund.

The EC should regularly monitor and report on the implementation of the ECCP in all MS. To support MS' institutional development in this sense, the EC should facilitate the dissemination of good practices on partnership across MS, on the model of the European Community of Practice in Partnership⁵ and the work on partnership of the ESF transnational platform⁶. Such an approach should be extended to funds such as AMIF, where partnership can provide added value for efficient and effective programmes as has been suggested by some managing authorities.

ECRE and PICUM recommend that the partnership principle is firmly anchored in the new regulatory frameworks of the European Structural and Investment Funds (ESIF⁷) and AMIF to ensure that 'simplification' and harmonisation of funding management includes all relevant stakeholders and thereby leads to the most effective use of EU resources.

Include partners in the preparation of national programmes: identifying priorities for integration

to ensure that all the different programmes foresee an adequate amount of resources for inclusion, it is essential that MS conduct an evidence-based needs assessment prior to the preparation of national programmes (in the case of AMIF) and operational programmes (in

the case of ESIF funds), which are being drafted within the first months of 2020. The EC could facilitate such a process by organising national policy dialogues as done in the preparation of the current MFF for AMIF⁸, and they should allow non-governmental stakeholders to provide direct inputs. Additionally, as NGOs and local authorities are major players in integration, it is essential to ensure meaningful consultations with these stakeholders as they are the best placed to rightly identify the activities and the approach which would require a support at the national level.

As the MFF negotiations are still ongoing, a number of MS are reluctant to finalise their national programmes for the funding period after 2021 before there is an agreement on the regulation for the funds at the European level. Consequently, delays in this process are expected, with the upcoming risk of reducing the time available to launch effective and inclusive consultations reaching out to civil society organisations. Lack of time and resources would reduce the number of entities consulted to a few, big organisations, leaving behind smaller and grassroots NGOs that are delivering day-to-day integration and can effectively assess what works best regarding programmes for integration of migrants and refugees. To reduce this risk, consultations should take place on time, starting before the approval of the MFF funding instruments and should take place from the initial stage of drafting the programmes.

5 A network of ESF managing authorities and intermediate bodies funded through the ESF.

6 An open community of managing authorities and stakeholders for exchanging good practices on a series of topics, including good practices in 'partnership' and 'ESF actions on migrants' inclusion'.

7 The ESIF funds are those funds financing the Cohesion Policy. Besides the ESF and ERDF, such funds are the Cohesion fund, which supports exclusively less-developed Member States; the European Agricultural Fund for Rural Development; and the European Maritime and Fisheries Fund.

8 cf. ECRE, UNHCR (2018) [Follow the Money, Assessing the use of EU Asylum, Migration and Integration Fund \(AMIF\) funding at the national level](#), p. 18

Within the AMIF instrument, a considerable amount of money (estimated up to EUR 3,682 billion) will be managed at the European level through the so-called thematic facility managed by the EC, however the proposed regulation does not provide any specific information on how the partnership principle will be applied to the activities managed by the EC. In order to fully benefit from knowledge and expertise of partners at the European level, the EC should provide for periodical yearly consultations with organisations representing partners at the European level, to define the workplan, the priorities in Union actions, the challenges unmet by the national programmes and needs for emergency support, as well as the need for technical assistance at the EU level. The revised ECCP should address also the implementation of the partnership principle at the EU level and provide for ad-hoc frameworks.

Top-down integration programmes tend to result in standardised and time-consuming experiences for many migrants and refugees, which risk ignoring cultural background and underestimating pre-existing skills. This can produce dissatisfaction of recipients, who might feel their needs not addressed and their own capacity is wasted. To better address migrants and refugees with a person-tailored approach, programming should involve not only service providers, but also migrant and refugee-led organisations who can bring first-hand expertise on TCNs' needs. This should be reflected also in the availability of smaller grants and strands of work focusing on inclusion through active participation and exchanges with local society, domains in which migrant and refugee-led organisations, diaspora organisations as well as self-advocates are the best suited actors. Simplifying application and reporting processes would contribute to

increasing access to funds for small and medium sized organisations.

Continuous involvement of partners throughout monitoring committees

As part of effective implementation of EU funds, adequate oversight by and recommendations from stakeholders should take place not only in the design of funding programmes, but also in the yearly preparation of calls for proposals, and in monitoring and evaluation procedures. There are several examples of monitoring committees where partners are only informed of national decisions regarding calls for proposals, without a clear role in the definition of themes and selection of projects.

Monitoring committees should be involved in all the steps of the decision-making process for the national management of both ESF+ and AMIF, with stakeholders' representatives having the same voting power as government bodies. Selection and appointment into monitoring committees should be as open and transparent as possible, providing for the inclusion of new participants throughout the length of the programming period and not just at the beginning, to ensure the equal representation of local authorities, social partners, equality bodies, national human rights institutions and civil society organisations, including migrants and refugee-led organizations. Within the broad spectrum of ESF stakeholders, only few are specialised on inclusion of TCNs. This requires authorities to dedicate extra efforts to be inclusive in setting up monitoring committees and good cooperation with NGO networks that bring together NGOs and social services providers. MS should consider smaller, especially

refugee and migrant led organisations in the programming related to TCNs' inclusion.

In addition to the ESF+ and AMIF monitoring committees, national implementation of the funds would benefit from the establishment of cross-fund integration monitoring committees at the national level, which would improve coordination between the two main funds responsible for integration of TCNs. These bodies would assume an advisory and oversight role in relation to migrant integration by reviewing planned calls for proposals for both Funds, identifying room for joint ESF+/AMIF actions, pointing out unmet migrant integration needs and providing advisory recommendations within the project selection for the calls for proposals regarding integration.

The cross-fund committees should be composed by members of both the ESF+ and the AMIF monitoring committees, including regional stakeholders when relevant for the operational programmes involved, and should carry out their work in cooperation with the managing authorities of both funds⁹.

Ensure a broad and diverse range of partners through dedicated capacity building

Fully implementing the partnership principle as outlined above will lead to a more transparent selection process and a more diverse set of partners.

In order to better assess the needs for integration actions at the local level, as well as the problems faced by beneficiary organisations, it is important to enable smaller organisations to participate in all management aspects of EU funding, including the preparation, implementation, management, monitoring and evaluation EU funds. Clear efforts should be spent in the capacity building of partners.

ECRE and PICUM therefore support the European Parliament proposal to assist social partners and civil society organisations in capacity building by allocating 2% of the ESF+ envelope to the provision of dedicated workshops, training sessions and the coordination of networking structures, such as stakeholders' platforms which allow potential applicants to meet and cooperate. Such measures should be extended to local authorities and migrant and refugee-led organisations, who would particularly benefit from the provision of these services. An appropriate amount of resources should be allocated to the same purpose also for AMIF.

⁹ For more information on the integration monitoring committees, check: Rachel Westerby (2018) *The Way Forward: A reflection paper on the new proposals for EU funds on Asylum, Migration and Integration 2021-2027*

Recommendations

To the European Commission

- Adapt the revised ECCP to include AMIF and ensure the participation of stakeholders active in asylum and integration by including a mechanism for periodical monitoring and reporting on the partnership implementation in EU MS;
- Facilitate the dissemination of good practices regarding the implementation of the partnership principle through the development of communities of practices;
- Request input from national stakeholders on integration needs as a source for the EC's recommendations on integration;
- Establish a partnership principle on AMIF at the European level, including periodical consultations of stakeholders to define the priorities for the yearly work plan of AMIF under the thematic facility and to define the priorities for simplification and technical assistance at the EU level.

To EU Member States

- Maintain the partnership principle at the core of AMIF, and strengthen the role of AMIF monitoring committees following the example of the partnership existing within ESIF funds;
- Involve national stakeholders, including civil society organisations, local authorities and social partners in the discussion on the establishment of partnership agreements between the Commission and each MS, and the regulatory frameworks of funds;
- Carry out national level consultations on integration to prepare national programmes of AMIF and operational programmes on ESF+ related to integration, ensuring enough time and widespread coverage for the project;
- Reach out to refugee and migrant-led organisations to benefit from their direct expertise in integration throughout the preparation of national and operational programmes;
- Ensure that monitoring committees for EU funds are involved in the preparation, implementation, monitoring and evaluation of actions planned within the objectives of each fund within a renewed ECCP and grant all partners the same voting power;
- Establish cross-fund monitoring committees on integration for coordination and synergies between the funds responsible for integration of TCNs.
- Support the EP proposal for ESF and allocate at least 2% to the capacity building of civil society and social partners, looking both at the access to funds and at the participation in funds management and monitoring committees. Provide an adequate amount of resources for this goal under the AMIF, to strengthen stakeholders' capacity in supporting AMIF management.



This paper has been supported by the European Programme for Integration and Migration (EPIM), a collaborative initiative of the Network of European Foundation



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March 2020



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