




BRIEFING #80

The EU action plan on integration of third country nationals



With this briefing paper SOLIDAR would like to make a first assessment and present main recommendations for a good implementation of the recently issued EU Action Plan on integration of third country nationals. The Action Plan establishes a framework for action and concrete initiatives to support Member States in the integration of the 20 million non-EU nationals residing legally in the EU. It includes actions supporting pre-departure and pre-arrival measures, education, employment and vocational training, access to basic services, active participation and social inclusion.







INTRODUCTION

Research suggests that third country nationals in the European Union continue to face barriers in the education system, on the labor market, and in accessing decent housing¹. Moreover, this group is more at risk of poverty or social exclusion compared to host country nationals. Given the fact that the cost of non-integration might turn out to be higher than the cost of investment in integration policies - evidence shows that third-country nationals have a positive fiscal net contribution if they are well integrated in a timely manner², the integration of third country nationals remains a big challenge for the years ahead.

The EU and Member States share competences on migration and integration policies, however the EU's role as legislator in this field has been very limited due to the principle of subsidiarity claimed by Member States. Therefore the EU has tried to support harmonisation and coordinating Member States' actions and policies on integration through soft-law instruments. Against this background, the European Commission presented in a communication released on 7 June 2016 an Action Plan on the integration of third country nationals³. The Action Plan establishes a framework for action and concrete initiatives to support Member States in the integration of the 20 million non-EU nationals resi-

1 In 2015, third country nationals' employment rate was 12.4 pp lower than the one of host countries nationals, with women having particularly low rates. Third country migrants are often under-employed, even when holding university diploma. Educational underachievement is twice as high among first generation migrants (42%) as compared to students with native-born parents (20%), and still high for the second generation (native-born with foreign born parents) (34%). In 2014, 49 % of third-country nationals were at risk of poverty or social exclusion compared with 22 % among host-country nationals. 18.2% of the young non-EU- born population faced severe material deprivation. Third country nationals were more likely to live in an overcrowded household than the native-born population.

2 See: OECD, The Fiscal Impact of Immigration in OECD Countries, in «International Migration Outlook 2013» and EC Policy Review Research on Migration: Facing Realities and Maximising Opportunities 2016.

3 See: http://ec.europa.eu/dgs/home-affairs/what-we-do/policies/european-agenda-migration/proposal-implementation-package/docs/20160607/communication_action_plan_integration_third-country_nationals_en.pdf

ding legally in the EU. It includes actions supporting pre-departure and pre-arrival measures, education, employment and vocational training, access to basic services, active participation and social inclusion. Through this Plan, the Commission aims to create a two-way process on integration. This means not only expecting third country nationals to embrace EU fundamental values and learn the host language but also offering them meaningful opportunities to participate in the economy and society of the Member State where they settle.

1. THE ACTION PLAN: POLICY PRIORITIES AND ACTIONS FORESEEN

The Commission sets out five priorities to be undertaken at both EU and Member State level to strengthen and support integration across key policy areas.

1.1 Pre-departure/ pre-arrival measures

These measures target both those arriving from third countries and the receiving society. If jointly designed by the countries of origin and of destination, providing support to third country nationals at the earliest possible moment has proven to be an essential feature of successful integration. Pre-departure/ pre-arrival measures for third country nationals, which can be particularly important to prepare the resettlement of refugees, may include pre-departure language and job-related training as well as providing refugees with information on the country of resettlement and helping them to build realistic expectations about their new life. In this respect, the Commission announced in the Action Plan that it will take the following actions:

- Launch call for project proposal supporting pre-departure and pre-arrival measures for local communities, such as pre-departure language classes, job-related training as well specific information on the country of resettlement in order to speed up the integration process .





- Engage with Member States to strengthen cooperation with selected third-countries on pre-departure measures, including under *La Valletta Action Plan*⁴.

Moreover, Member States are encouraged to:

- Promote private sponsorship programs for the resettlement of refugees, in order to actively involve local communities in the integration process of third country nationals.
- Consider to take part in multi-stakeholder projects for the resettlement of refugees such as the EU project for *Facilitating resettlement and Refugee Admission through New Knowledge exchange*.
- Provide pre-departure information to prepare individuals for arrival in the EU, including, by appointing 'Integration Liaison Officers in Embassies' in key third countries.

1.2 Education

Education and training should be ensured and promoted as early as possible. The acquisition of basic skills is the foundation for further learning and the gateway to employment and social inclusion. In particular, learning the language of the destination country and early childhood education and care are crucial for third country nationals to succeed their integration process. Under the New Skills Agenda for Europe, the Commission will propose measures to promote the upskilling of low-skilled and low-qualified persons which could be beneficial to third country nationals⁵. In this respect the Commission will take the following actions:

⁴ See: http://ec.europa.eu/dgs/home-affairs/what-we-do/policies/european-agenda-migration/proposal-implementation-package/docs/20160607/communication_action_plan_integration_third-country_nationals_en.pdf

⁵ See: A New Skills Agenda for Europe: Working together to strengthen human capital, employability and competitiveness (COM(2016) 381), forthcoming

- Provide online language assessment and learning for newly arrived third country nationals, especially refugees, through the Erasmus+ online linguistic support (100.000 licenses for online language courses available to refugees for a period of three years).
- Support peer learning events on key policy measures such as welcome classes, skills and language assessment, support for unaccompanied children, intercultural awareness, recognition of academic qualifications and integration into higher education.
- Support the school community in promoting inclusive education and addressing specific needs of migrant learners through the COM online platform School Education Gateway.
- Remove barriers to the participation of third country national girls and boys to early childhood education through the development of the European Quality Framework for Early Childhood Education and Care (ECEC), including assistance to ECEC staff to respond to the specific situation of families.
- Support the upskilling of low-skilled and low-qualified persons in the context of the New Skills Agenda for Europe.

Moreover, Member States are encouraged to:

- Equip teachers and school staff with skills needed to manage diversity and promote the recruitment of teachers with a migrant background.
- Promote and support the participation of migrants' children in early childhood education and care

1.3 Labour market integration and access to vocational training

Employment is fundamental to becoming part of the host country's economic and social life, ensuring access to decent accommodation and living condi-





tions as well as economic inclusion. However, third country nationals' employment rates remain below the average of host-country citizens⁶ and work in less favourable conditions in most Member States⁷. Similarly, early integration into vocational training with a strong work-based learning dimension might prove particularly effective for some third country nationals to provide them with the basis for successful integration into the labour market. In this respect the Commission will take the following actions⁸:

- Develop an online repository of promising practices on integration into the labour market for refugees and asylum seekers who have a high-chance to be granted protection, as a source for policy makers in Member States.
- Under the New Skills Agenda for Europe⁹: a) Develop a «Skills and Qualifications Toolkit» to support timely identification of skills and qualifications for newly arrived third country nationals; b) Ensure that better information about qualification recognition practices and decisions in different countries is collected through the Europass portal; and c) Improve the transparency and understanding of qualifications acquired in third-countries, through the revision of the European Qualifications Framework.
- Provide specific support for early recognition of academic qualifications of third country nationals including refugees, through enhancing cooperation between National Academic Recognition Information Centres (NARIC) and training staff in reception facilities.

⁶ See Eurostat: Migrant integration in the EU labour market of 6.06.2016

⁷ More than 40% of third-country workers with high level of education work in medium or low-skilled occupations compared to around 20% among host-country nationals, Eurostat, Labour Force Survey.

⁸ See: http://ec.europa.eu/dgs/home-affairs/what-we-do/policies/european-agenda-migration/proposal-implementation-package/docs/20160607/communication_action_plan_integration_third-country_nationals_en.pdf

⁹ See: A New Skills Agenda for Europe: Working together to strengthen human capital, employability and competitiveness (COM(2016) 381), forthcoming

- Launch projects (under the Asylum Migration and Integration Fund and under the EU Programme for Employment and Social Innovation) promoting labour market integration of refugees, 'fast track' insertion into labour market and vocational training and labour market integration of women.
- Identify best practices to promote and support migrant entrepreneurship and fund pilot projects for their dissemination.

Moreover, Member States are encouraged to:

- Support fast track insertion into the labour market of newly arrived third country nationals, through for example early assessment of skills and qualifications, combined language and on-the-job training, specific guidance and mentoring.
- Remove obstacles to ensure effective access to vocational training and to the labour market for refugees and, where there are good prospects of granting them protection, for asylum seekers.
- Assess, validate and recognize, as soon as possible, skills and qualifications of third country nationals, making full use of the tools available at EU level.
- Encourage entrepreneurship through tailored business training and mentoring and by opening up to third country nationals mainstream entrepreneurship support structures.

1.4 Access to basic service

Access to adequate and affordable housing is a basic condition for third country nationals to start a life in a new society, but presents a major challenge in the context of the current inflows, regarding both the initial reception phase as finding long-term housing solutions. Simultaneously, as evidence shows, ill health and access to health services for third-country nationals are essential in order to avoid obstacles for integration, Lack of access to health





services can have an impact on virtually all areas of life and shape the ability to enter employment, education and learning the host country's language. In this respect the Commission will take the following actions¹⁰:

- Promote the use of EU funds for reception, education, housing, health and social infrastructures for third country nationals.
- Strengthen cooperation with the European Investment Bank (EIB), to provide funding for temporary accommodation and health facilities for newly arrived third country nationals and social housing.
- Promote peer learning exchanges between Member States and cities in the form of study visits, peer reviews and sharing of best practices on how to address housing challenges, including geographical isolation and ghettoisation.
- Support best practices in care provision for vulnerable third country nationals and refugees, including women, children and older persons under the Health Programme.
- Develop pilot training modules for health professionals on health for third country nationals and refugees, with a view to upgrade and strengthen the skills and capabilities of first line health professionals, and promote a holistic approach to health care of third country nationals and refugees.

Moreover, Member States are encouraged to:

- Ensure an integrated approach, coordinating policies on housing with equitable access to employment, healthcare and social services and inter-sectoral collaboration supported by strengthening communication between local, regional and national levels.

¹⁰ http://ec.europa.eu/dgs/home-affairs/what-we-do/policies/european-agenda-migration/proposal-implementation-package/docs/20160607/communication_action_plan_integration_third-country_nationals_en.pdf

- Create competence networks of health experts, for example on mental health - especially on post-traumatic stress disorder - of refugees, in close collaboration with health authorities, NGOs and health professionals' organisations for prevention and early detection of problems and provision of support and treatment.

1.5 Active participation and social inclusion

The involvement of third country nationals themselves in the design and implementation of integration policies is essential to improve their participation and their integration outcomes. Integration is not just about learning the language, finding a house or getting a job. It is also about playing an active role in one's local, regional and national community. When developing integration policies at EU, national or local level, special attention should be paid to gender aspects, to the situation of children – including unaccompanied and separated children – and to that of persons in a potentially vulnerable situation, including victims of gender based violence and persons belonging to religious or ethnic minorities. In this respect the Commission will take the following actions:

- Launch projects to promote intercultural dialogue, cultural diversity and European common values through culture, films and arts (Creative Europe).
- Launch projects to promote social inclusion through youth and sport (Erasmus+).
- Propose to give greater priority, within the European Voluntary Service, to activities dedicated to integration of refugees and asylum seekers into their new host communities.
- Develop handbooks and toolboxes for practitioners on cultural awareness and expression; intercultural dialogue; active participation of third country nationals in political, social and cultural life and sports in the host societies; and the contribution of youth work.
- Launch projects under different EU funds





promoting: participation in political, social and cultural life and sports; social inclusion through education, training and youth; preventing and combating discrimination, gender-based violence, racism and xenophobia, including hate crime and hate speech, and fostering better understanding between communities, including religious communities.

- Continue to work with the European Parliament and the Council towards the adoption of the anti-discrimination directive.

Moreover, Member States are encouraged to:

- Promote exchanges with the host society from the very beginning through volunteering, sport, and culture activities. Increase third country nationals' participation in local democratic structures.
- Invest in projects and measures aimed at combating prejudice and stereotypes
- Fully implement legislation on combating racism and xenophobia and on victims' rights and strictly enforce equal treatment and anti-discrimination legislation.
- Organise civic orientation programmes for all third country nationals as a way to foster integration in the host society and promote the understanding and respect of EU values.

2. EU FUNDING INSTRUMENTS FOR INTEGRATION

The EU has supported integration actions through dedicated funding and more broadly through instruments addressing social and economic cohesion across Member States. Under the previous Financial Framework 2007-2013, the EU provided support through the European Fund for the Integration of non-EU immigrants (EIF) national and EU initiatives that facilitate the integration of non-EU immigrants into European societies. For this period the financial assistance under this Fund amounted to EUR 825

million¹¹. The mid-term evaluation of the European Integration Fund demonstrated that in most Member States the projects financed under the Fund would not have been carried out otherwise¹². In addition to this dedicated support, substantial amounts were also available to Member States under the Structural Funds to support integration related measures of third country nationals. For example, the European Social Fund (ESF) co-funded actions that have reached more than 5 million individuals¹³.

2.1 Asylum, Migration and Integration Fund

In the current Multi-annual Financial Framework 2014-2020, the EU funds for integration are part of the Asylum, Migration and Integration Fund¹⁴ (AMIF) with a global amount of 3.137 million euros¹⁵. The general objective of the AMIF shall be to contribute to the efficient management of migration flows and to the implementation, strengthening and development of the common policy on asylum, subsidiary protection and temporary protection and the common immigration policy.

Regarding the integration of third country nationals, the Fund aims to support:

- Immigration and pre-departure measures (e.g. information packages and campaigns to raise awareness and promote intercultural dialogue, the assessment of skills and qualifications, training enhancing employability in a Member State);
- Integration measures (e.g. setting up and developing integration strategies with the parti-

11 See: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32007D0435>

12 See: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0847&from=EN>

13 Other funds, such as Erasmus+, have funded more than 200 projects in 2014-15 dealing with refugees or addressing challenges related to the inclusion of refugees.

14 Regulation (EU) No 516/2014 of 16 April 2014

15 See: http://ec.europa.eu/dgs/home-affairs/financing/fundings/pdf/overview/regulation_eu_no_5162014_of_the_european_parliament_and_of_the_council_en.pdf





icipation of local or regional actors, providing assistance in areas such as housing, health, child care, measures focusing on education, actions to promote self-empowerment)¹⁶.

As stated in the Commission's communication on the Action Plan in Integration, 765 million euros has been earmarked by Member States for integration under the AMIF national programmes. This figure shows a slight decrease over the previous period while the needs are actually larger and it is now proving to be inadequate for the current situation¹⁷.

All EU States except Denmark participate in the implementation of this Fund. Examples of beneficiaries of the programmes implemented under this Fund can be state and federal authorities, local public bodies, non-governmental organisations, humanitarian organisations, private and public law companies and education and research organisations.

The largest share of the total amount of the AMIF (approximately 88%) will be channeled through shared management: the Commission entrusts the Member States with implementing programmes at national level. Member States then allocate these funds to end recipients (e.g. international organisations, non-governmental organisations, social partners.). Under the shared management, each Member State has primary responsibility for setting up a management and control systems. The Commission monitors the implementation of the Fund by evaluating the extent to which the objectives of the Fund have been achieved.

The remaining 12% of the total amount is divided between Union actions and emergency assistance (i.e., heavy migratory pressure in one or more Member States) to be implemented through direct or centralised management by the Commission¹⁸.

2.2 Other EU Funds for integration policies

In order to increase the impact of EU funds on integration, the Commission suggests Member States to increase possible synergies between the AMIF and other existing funds which have social inclusion as a considerable scope. For this purpose, the following Funds are mentioned by the Commission in the Action Plan:

¹⁶ See: http://ec.europa.eu/dgs/home-affairs/financing/fundings/pdf/overview/regulation_eu_no_5162014_of_the_european_parliament_and_of_the_council_en.pdf

¹⁷ See: http://ec.europa.eu/dgs/home-affairs/what-we-do/policies/european-agenda-migration/proposal-implementation-package/docs/20160607/communication_action_plan_integration_third-country_nationals_en.pdf

¹⁸ See: http://ec.europa.eu/dgs/home-affairs/financing/fundings/migration-asylum-borders/index_en.htm





European Social Funds (ESF)	
Legal Basis	Regulation (EU) No 1304/2013 of 17 December 2013
Global budget for 2014-2020	86 billion euros
Management modes	Shared management
Objectives of the fund	The ESF shall promote high levels of employment and job quality, improve access to the labour market, support the geographical and occupational mobility of workers and facilitate their adaptation to industrial change and to changes in production systems needed for sustainable developments, encourage a high level of education and training for all and support the transition between education and employment for young people, combat poverty, enhance social inclusion, and promote gender equality, non-discrimination and equal opportunities, thereby contributing to the priorities of the Union as regards strengthening economic, social and territorial cohesion. The ESF shall benefit people, including disadvantaged people such as the long-term unemployed, people with disabilities, migrants, ethnic minorities, marginalised communities and people of all ages facing poverty and social exclusion (See: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:347:0470:0486:EN:PDF).
Coordination mechanism	There are no specific provisions for the coordination of actions for migrants. However, the Common Provisions Regulation (CPR) establishes a Common Strategic Framework with guiding principles for ensuring coordination and synergies between the European Structural and Investment Funds (ESI funds) and other Union policies and instruments (See: Synergies between the Asylum Migration and Integration Fund (AMIF) and other EU funding instruments in relation to reception and integration of asylum seekers and other migrants. European Commission 16 November 2015).





Scope of support to asylum seekers	<p>The ESF must always aim for, even if indirectly, the integration of the asylum seekers into the labour market. To this purpose, asylum seekers can only be supported by the ESF provided once they are legally able to participate in the labour market (in accordance with Article 15 of Directive 2013/33/EU, Member States must have ensured that third-country nationals or stateless persons who have made an application for international protection in respect of which a final decision has not yet been taken ('applicants') have access to the labour market no later than 9 months from the date when they apply for international protection).</p> <p>In case the national legislation provides that these asylum seekers (who applied for international protection in respect of which a final decision has not yet been taken) have access to vocational training, these asylum seekers are also eligible in case the ESF supports vocational training.</p> <p>Minor children of asylum seekers or asylum seekers who are minor are eligible for ESF support under the ESF investment priorities on education which addresses minors (e.g. access to primary and secondary education, tackling early school leaving) (Directive 2013/33/EU (Article 14) provides that Member States are to grant access to the education system under similar conditions as their own nationals.).</p>
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European Regional Development Funds (ERDF)	
Legal Basis	Regulation (EU) No 1301/2013 of 17 December 2013
Global budget for 2014-2020	183 billion euros
Management modes	Shared management
Objectives of the fund	<p>The ERDF shall contribute to the financing of support which aims to reinforce economic, social and territorial cohesion by redressing the main regional imbalances in the Union through the sustainable development and structural adjustment of regional economies, including the conversion of declining industrial regions and regions whose development is lagging behind. The ERDF does not focus on specific target groups. However, in order to promote social inclusion and combat poverty, marginalised communities, such as migrants, are highlighted in the ERDF regulation (See: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:347:0289:0302:EN:PDF).</p>





Scope of support to asylum seekers and migrants

The European Regional Development Fund can co-finance a wide range of measures to support the effective integration of migrants and refugees. The following areas of actions under the ERDF programmes may reinforce the integration of legal migrants, such as (See: Synergies between the Asylum Migration and Integration Fund (AMIF) and other EU funding instruments in relation to reception and integration of asylum seekers and other migrants. European Commission 16 November 2015):

- Urban regeneration: Physical and social regeneration of deprived neighbourhoods
- Investments in education infrastructure: Kindergarten, schools, vocational schools, etc.
- Investments in social and health infrastructure: Community-based social care, community centres, shelters, prevention and primary care health services, etc.
- Housing infrastructure: Social housing

In general, ERDF focusses on structural, medium and long-term measures rather than on emergency actions. However, on a case-by-case basis it may support emergency measures related to the reception of migrants and refugees complementing the support from AMIF. This may include building or extending the capacities of reception centers, shelters, tents, containers.

Moreover, ERDF can be used in order to strengthen the institutional capacity and the efficiency of public administrations and public services related to the implementation of the ERDF (including public authorities dealing with the integration of migration) (ERDF can support also actions under the ESF to strengthen the institutional capacity and the efficiency of public administration. (Article 5 of the ERDF Regulation)).





European Agricultural Fund for Rural Development (EAFRD)	
Legal Basis	Regulation (EU) No 1305/2013 of 17 December 2013
Global budget for 2014-2020	95 billion euros
Management modes	Shared management
Objectives of the fund	Within the overall framework of the Common Agricultural Policy (CAP), support for rural development, including for activities in the food and non- food sector and in forestry, shall contribute to achieving the following objectives: (a) Fostering the competitiveness of agriculture; (b) Ensuring the sustainable management of natural resources, and climate action; and (c) Achieving a balanced territorial development of rural economies and communities including the creation and maintenance of employment. Management modes – shared management. Available budget on the relevant objectives (on the basis of the adopted Operational Programme (OP) – N/A
Scope of support to asylum seekers and migrants	<p>The EAFRD regulation does not foresee specific support for minorities or disadvantaged groups, or actions/measures specifically targeted on such groups. However, within the objective of combating poverty and social exclusion in rural areas, the rural development policy may contribute to empowering these groups, facilitating their access to rural development measures, and promoting their integration in the local/rural economy and population.</p> <p>The rural development policy can contribute to address the current situation with migrants mainly in the medium term assistance, which covers the help in two to three years perspective in the key life influencing factors: housing, health care, education and employment (the same used for other marginalised communities like the Roma, but taking into account specific needs of refugees relating to language, jobs adapted to their competences, etc) (See: Synergies between the Asylum Migration and Integration Fund (AMIF) and other EU funding instruments in relation to reception and integration of asylum seekers and other migrants. European Commission 16 November 2015).</p>





Fund for European Aid to the Most Deprived (FEAD)	
Legal Basis	Regulation (EU) No 223/201412
Global budget for 2014-2020	Approximately 3.8 billion euros
Management modes	Shared management
Scope of support to asylum seekers	The eligibility of asylum seekers under the FEAD depends on the way Member States define the type of assistance and who may benefit from this fund. The assistance to be provided by the FEAD may take the form of a food and/or basic material assistance operational programme or a social inclusion operational programme. The exact group or groups of people to be targeted by the FEAD is identified at national level. Depending on the criteria used to identify the FEAD recipients, it is possible for asylum seekers to receive assistance. If the OP contains a precise definition of the target group, which excludes the possibility for asylum seekers to receive support, then an amendment of the OP would be necessary. In addition, the national criteria for the most deprived and how they are identified should allow for asylum seekers to actually be targeted.





Internal Security Fund (ISF)	
Legal Basis	Regulation (EU) No 515/2014 of 16 April 2014
Global budget for 2014-2020	2.76 billion euros + additional funding
Management modes	Shared management and centralised management for Union actions and emergency actions
Objectives of the Fund	The general objective of the Instrument shall be to contribute to ensuring a high level of security in the Union while facilitating legitimate travel, through a uniform and high level of control of the external borders and the effective processing of Schengen visas, in compliance with the Union's commitment to fundamental freedoms and human rights.
Coordination mechanisms	National programmes contain specific provisions on the administrative arrangements, procedures and processes between the Monitoring and Management Authorities to ensure synergies and complementarities.
Emergency assistance (Article 2 of the Regulation (EU) 515/2014 of 16 April 2014 establishing, as part of the Internal Security Fund, the instrument for financial support for external borders and visa) resulting from:	<ul style="list-style-type: none">• An urgent and exceptional pressure where a large or disproportionate number of third-country nationals are crossing or are expected to cross the external border of one or more Member States;• Or any other duly substantiated emergency situation requiring urgent action at the external borders; The emergency assistance can take the following forms under ISF Borders and Visa:<ol style="list-style-type: none">1. Support for registration/fingerprinting of new arrivals;2. Interpretation services for registration procedures;3. Accommodation for new arrivals prior to their registration/screening;4. Food/non-food items for people in reception centres.





SOLIDAR's assessment of the Action Plan

In view of the feedbacks received by the members of the SOLIDAR Advisory Group on Migration & Integration as well as the findings of the Social Progress Watch, SOLIDAR advocates for the plan to include a comprehensive strategy for integration based on a rights based approach to provide equal opportunities and concrete means for participation in societies and labor market for migrants and refugees. To achieve this objective, the following general comments and recommendations have been developed

General recommendations

- The EU Action Plan on Integration should be implemented in synergies with the EU initiative for a Pillar of Social Rights.
- Actions in support of civic participation are missing and should be included in order to foster social cohesion.
- The paper does not include a clear distinction between different categories of third country nationals, therefore it is blurry to assess each different action proposed since they are all addressing different target groups.

Recommendations

- Make sure that Member States apply the partnership principle to involve Civil Society Organisations (CSOs) in the planning, allocation and implementation of the funds and on defining policy priorities/target groups (Multi-stakeholder approach);
- There should be a stronger link to the framework of the European Pillar of Social Rights¹⁹;
- There should be a stronger link to the EU action

plan on Human rights and democracy²⁰;

- On the first priority on pre-departure measures, it is very important that local social partners and CSOs are involved when implementing pre-departure measures in countries of origin to make sure that migrants coming to work in the EU are aware of their rights and do not receive misleading information. Raising awareness about labour rights is a way to empower migrant workers and to prevent cases of exploitation and human rights abuses;
- With regards to the fourth priority, we insist on the fact that services provided should meet the general interest and should meet the criteria set in the Social Protection Committee's Voluntary European quality framework on social services²¹. Therefore we question the increased private investment through the higher participation of the EIB and call on the EU to set transparent and strong criteria to make sure that the services financed through the EIB meet the general interest. Furthermore, to recall our position of the Pillar of Social rights, we call for higher and sound public investment;
- In relation to the priority five, more funds should be invested in projects and programmes (e.g. training for social workers/social service providers) on fighting hate speech and preventing discrimination. Besides, the actions funded through EU programmes, we highlight that real participation in the democratic life is guaranteed by universal political rights (e.g. right to vote in local, national, European elections; right to run for elections). Therefore we call on the EU to be a promoter of universal political rights.

¹⁹ Consult SOLIDAR briefing <http://www.solidar.org/en/publications/the-european-pillar-of-social-rights-a-basis-for-upward-social-convergence>

²⁰ Consult SOLIDAR briefing http://solidar.org/IMG/pdf/2015_07_28_eu_action_plan_v2.pdf

²¹ http://wedo.ttp.eu/sites/wedo.ttp.eu/files/SPC_QF_document_SPC_2010_10_8_final%5B1%5D.pdf





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SOLIDAR is a European network of membership based Civil Society Organisations who gather several millions of citizens throughout Europe and worldwide. SOLIDAR voices the values of its member organisations to the EU and international institutions across the three main policy sectors; social affairs, lifelong learning and international cooperation.



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