

Mainstreamed or overlooked?

Migrant inclusion and social cohesion in the European Social Fund

by Aliyyah Ahad and Timo Schmidt
March 2019



ACKNOWLEDGMENTS

The authors thank Hanne Beirens of the Migration Policy Institute (MPI) Europe and Meghan Benton (MPI) for their invaluable guidance and feedback on drafts of this report. They also thank consultant Helen McCarthy and Katarzyna Czyz, MPI Europe, for their support with the country case studies, Lauren Shaw, MPI, for her excellent edits, and Giacomo Manca (ECRE/PICUM) for his feedback.

Finally, the authors thank the many interviewees who shared their time and expertise. The interviews and research for this report were conducted between October 2018 and January 2019.



This publication is supported by the European Programme for Integration and Migration (EPIM), a collaborative initiative of the Network of European Foundations. The sole responsibility for the publication lies with the authors and the content may not necessarily reflect the positions of EPIM, NEF or the Foundations that contribute to EPIM.

CONTENTS

EXECUTIVE SUMMARY	1
A. <i>How does the ESF support migrant inclusion?</i>	1
B. <i>What will the ESF+ change?</i>	2
C. <i>Challenges and opportunities to improve ESF support for migrant inclusion</i>	3
I. INTRODUCTION	4
II. HOW THE ESF WORKS	6
III. PRIORITISING MIGRANT INCLUSION IN THE ESF	9
A. <i>European Commission ESF+ proposal</i>	9
B. <i>ESF negotiations in the European Parliament</i>	11
C. <i>Shared management between the European Commission and Member States: Partnership agreements</i>	12
IV. UNDERSTANDING THE BUDGET FOR MIGRANT INCLUSION IN THE ESF	14
A. <i>Migration in the allocation formula</i>	14
B. <i>Planned financing by thematic objectives</i>	15
V. MONITORING, REPORTING, AND EVALUATION	19
A. <i>Limited visibility of migrants in common indicators</i>	20
B. <i>Common results indicators</i>	22
C. <i>Performance reserve</i>	22
D. <i>Limited civil-society participation in monitoring committees</i>	23
VI. IMPLEMENTATION OF ESF FUNDS FOR MIGRANT INCLUSION	25
A. <i>EU payments</i>	25
B. <i>Project participants with migrant backgrounds</i>	27
VII. IMPLICATIONS FOR CIVIL-SOCIETY ORGANISATIONS 31	
A. <i>Nongovernmental organisations' issues accessing funds</i>	32
B. <i>Partnership in practice: Untapped potential</i>	35
C. <i>Voluntary inclusive design and management tools</i>	36
VIII. CONCLUSIONS AND RECOMMENDATIONS	38
ANNEXES	41
<i>Annex 1. Number of ESF programme participants with a migrant, foreign, or minority background, by investment priority, 2015–16</i>	41
<i>Annex 2. Country case studies</i>	43
WORKS CITED	58
ABOUT THE AUTHORS	66

EXECUTIVE SUMMARY

With the European Union in the throes of negotiating the 2021–27 multiannual financial framework, **a window of opportunity has opened to increase the funding for migrant inclusion—and how strategically it is spent.** The most relevant change is the proposed European Social Fund Plus (ESF+), which will succeed the current ESF—the oldest of the European Structural Investment Funds and the largest to tackle issues relating to migrant labour-market inclusion.

The influx of people seeking humanitarian protection in Europe in 2015 and 2016 placed huge and unexpected strains on the European Union’s approximately 3-billion-euro Asylum, Migration, and Integration Fund (AMIF), **pushing the European Commission to highlight how other larger funds, such as the ESF (with 120.6 billion euros), could be used for migrant-related programmes.** The proposed ESF+ would take this one step further by explicitly prioritising long-term migrant integration measures such as employment support, training, and language instruction.

While these changes make sense in theory, to understand how they will work in practice requires careful analysis of the strengths and weaknesses of the existing ESF. But relatively little is **known about how the current ESF stacks up in supporting newcomers or longstanding migrant populations,** and therefore whether the proposals put forward by the European Commission in May 2018 and amended by the European Parliament in January 2019 are a step in the right direction, or a step back. Drawing on interviews with EU policymakers, and national and subnational ESF managing and monitoring authorities and beneficiaries in France, Germany, Italy, Poland, and Sweden, this study aims to fill this gap and identify what added value the ESF+ could bring to efforts to support migrant inclusion.

A. How does the ESF support migrant inclusion?

The current ESF supports migrant inclusion through national and local-level operational programmes established under partnership agreements between the European Commission and national authorities.

The ESF comprises 120.6 billion euros, of which 83.9 billion come from the European Union. **It is difficult to determine how much of the fund is spent on migrant inclusion since Member States do not use a universal indicator to collect data on initiatives that touch on this issue area.** ‘Migrants’ are conceptualised differently across national migration contexts,¹ and the ESF reporting requirements for programmes that serve migrants employ a single broad category that also includes participants with foreign and minority backgrounds.

Overall, **1.1 million participants in ESF-supported initiatives between 2015 and 2016 had a migrant, minority, or foreign background.** However, this figure masks huge variation among Member States, with more than one-third of these participants living in France. Social inclusion more broadly has certainly been a priority for European countries, since most spend between 20 per cent and 30 per cent of their allotted funds on social inclusion. But it is unclear how much of this is allocated to migrant inclusion specifically. Finally, the fact that **some countries take a ‘mainstreamed’ approach to supporting migrants** means that many ESF-funded initiatives either serve everyone or vulnerable populations more broadly (e.g., low-income families) in ways **that may benefit migrants among other residents.**

¹ For instance, while Poland understands migrants to include returning emigrants, Germany includes the descendants of migrants, and France only measures foreign-born and foreign-born parents.

While on paper, the structure of the fund promotes migrant inclusion, in practice there are a number of barriers:

- **Consultation.** The drafting of the European Union's next budget (the Multiannual Financial Framework, or MFF) begins long before evaluations are completed for projects under the current funding cycle. While legislators draw on evaluations from previous funding cycles and stakeholder consultation, the views of migrant associations are not often solicited. Smaller and volunteer-run organisations with limited administrative capacity may be unable to participate in time-consuming consultations or those for which they receive little warning.
- **Target groups.** While some Member States have become increasingly interested in how (many) migrants are supported by the ESF, particularly given the limited information available, others prefer not to highlight spending on this population both for political and practical reasons. For instance, in Poland one civil-society interviewee feared that increasing the visibility of spending on migrant inclusion within the ESF+ would politicise the fund and negatively affect implementation. And in France, the high sensitivity of the government and the broader public to the collection of racial and ethnicity data could push potential applicants away from the ESF should it adopt more detailed reporting requirements.
- **Bureaucracy.** Attempts to make the ESF more dynamic and increase coherence with other European frameworks and funds, such as by allowing operational programmes that combine ESF and European Regional Development Funds (ERDF), can generate administrative complexity that public authorities have been slow to adapt to, potentially leaving civil-society organisations that rely on ESF funds in the lurch. Reporting requirements that are onerous—or at least the perception that they are—can put off smaller would-be beneficiaries. And, due to their voluntary nature, Member States have not fully implemented tools that would promote simplification or a bottom-up, whole-of-society approach, such as community-led local development.
- **Responsiveness.** While in theory the ESF might be used to plug gaps in government responsiveness (for instance, where migration creates rapidly evolving needs for certain services), its organisational structure can produce inflexible programming since project priorities cannot be readily changed once established. This is a problem in Sweden, for instance, where programmes designed for refugees in response to the 2015–16 migration crisis may not have evolved to keep up with on-the-ground conditions.
- **Lack of clarity on goals.** While the ESF can be used for social inclusion, it suffers from a branding issue; public authorities may encourage civil-society organisations to apply to AMIF since it has integration explicitly in its name, and its objectives and priorities are indisputably targeted at third-country nationals.

Many of these issues are slated for change with the ESF+.

B. What will the ESF+ change?

The ESF+ will bring changes to budget size and allocations for migrant and social inclusion.

The overall fund's budget will be even bigger than the ESF, with 100 billion euros from the European Union. It will also integrate the Youth Employment Initiative, Fund for European Aid to the Most Deprived, EU Programme for Employment and Social Innovation and Health Programme with the aim of simplifying the management of these resources.

The proposed Berlin+ formula also marks the first time that migration will be taken into account in ESF+ allocations. However, it is not clear how this will work in practice. The proposed allocation of 400 euros per person per year is calculated based on the number of third-country nationals migrating to a particular subnational region since 2013, but it does not factor

in the different costs of living in each locality. On the other hand, **the ESF+ will for the first time have a proposed indicator on third-country nationals**, setting a common definition for migrants and a way to identify their participation and results within programming supported by the fund.

Under the European Commission proposals, **ESF+ funding earmarked for social inclusion could increase** from 20 per cent to 25 per cent (or to 27 per cent, as set out by a January 2019 European Parliament report). But since most Member States allocate between 20 and 30 per cent already, this change could be largely symbolic.

Finally, **the proposal to divide up responsibility for early integration measures (AMIF) and longer-term integration measures (ESF+) could have unintended consequences**. Asylum seekers and persons with an irregular status, who already face many barriers to benefiting from the ESF, could fall through the gaps. And it could become more difficult to fund long-term projects that serve beneficiaries through multiple stages.

The success of the ESF+ largely depends on how effectively actors at all levels, from civil-society organisations to governments, are able to glean knowledge on the current system to inform recommendations for the future.

C. Challenges and opportunities to improve ESF support for migrant inclusion

Although negotiations for the 2021–27 ESF+ are too far along to be repointed, this analysis suggests **several ways to embed migrant inclusion more firmly within the next ESF process**. This could be done **at the pre-negotiation and negotiation stage at both the EU and national levels**, including in the European Commission’s stakeholder and public consultations. For example, civil-society organisations have the opportunity to engage with Members of the European Parliament who are members of the committee responsible for the ESF report. National and regional stakeholders are also able to participate in the preparation of the partnership agreements in Member States. Meanwhile, policymakers will need to decide whether to make specific reference to migrant or third-country-national populations in the next funding cycle. The success of these changes largely depends on how effectively actors at all levels, from civil-society organisations to governments, are able to glean lessons from the current system and use them to inform future plans.

As EU and Member States policymakers and civil-society organisations prepare for the negotiations on the MFF, including the ESF+, they could consider:

- **Improving consultation processes.** According to the ‘partnership principle’, the authorities responsible for the management of operational programmes are supposed to consult with diverse social and economic stakeholders at national and local levels, but in practice this varies between Member States, and there is no requirement to engage with migrant-focused organisations. Even when consulted, these organisations do not always have enough advance warning to prepare and submit proposals and the complex functioning of the ESF may hinder their ability to make informed recommendations.
- **Helping managing authorities and beneficiaries adapt to change.** With the ESF+ promising changes, such as regarding the conditions (also known as ‘conditionalities’) that Member States need to meet in advance of funds being disbursed, civil-society organisation may need assistance from external funders to cover potential financing gaps—especially where their work receives limited support from public funds. Greater

support for managing authorities, such as through virtual and in-person trainings, and improved coordination systems across funds could help managing authorities navigate these changes and get projects off the ground sooner. At the same time, it is important to recognise the practical limits to making the ESF more responsive to change in order to avoid setting unrealistic guidelines that eventually create inefficiency rather than agility.

- ***Prioritising integration without jettisoning ‘mainstreaming’.*** The new ESF+ indicator on third-country nationals will help identify migrant participants in funded programming and evaluate how well the fund is supporting them. But clear guidelines on which migrants are eligible to benefit from ESF-backed initiatives are necessary to ensure that key groups do not fall through funding gaps as a result of this policy shift. In Sweden, for instance, because it can take several years for asylum seekers to receive a residence permits, and only holders of these permits are eligible to participate in ESF projects, there is a long period in which these newcomers are unable to access resources that could support their integration. If a Member State’s integration activities are consolidated under this fund, such rules could reduce opportunities for asylum seekers to get a head start on their integration. At the same time, this indicator could create incentives for applicants to target third-country nationals rather than the broader population, even when other vulnerable groups (including new citizens or mobile EU nationals) could benefit from these services. There are also risks attached to appearing to prioritise migrants over other residents, including public backlash.
- ***Improving evaluation of migrant inclusion.*** The volume and quality of reporting on migrant inclusion differs widely across Member States. While there are isolated cases of evaluations on migrant inclusion, this is far from the norm. The resulting lack of high-quality evidence on how ESF funded projects perform for this target group deprives policymakers of the information needed to compare their labour market and social inclusion outcomes and improve programmes on an ongoing basis.

Improving programming under the ESF+ will not only depend on expanding the legislative toolkit. To separate the wheat from the chaff when searching for good practices, **policymakers must draw lessons from on-the-ground experiences**—including those of civil-society partners and migrant organisations.

I. INTRODUCTION

The European Commission has made it clear that migrant² inclusion is a priority for EU funding.³ The influx of people seeking humanitarian protection in Europe in 2015 and 2016 put pressures on the European Union’s Asylum, Migration, and Integration Fund (AMIF)—resulting in a budget increase of 120 per cent by the end of 2017.⁴ The European Commission has also taken pains to highlight that responsibility for promoting migrant inclusion not only

² For the purposes of this report the term ‘migrant’ includes refugees and asylum seekers, unless explicitly stated otherwise.

³ European Commission, ‘Questions and Answers on the New Social Fund and Globalisation Adjustment Fund for the Period 2021-2027’ (fact sheet, 30 May 2018), http://europa.eu/rapid/press-release_MEMO-18-3922_en.htm.

⁴ The Commission topped up AMIF’s initial allocation of 3.137 billion euros to 6.888 billion euros by the end of 2017. European Commission, ‘Commission Staff Working Document: Interim Evaluation of the Asylum, Migration and Integration Fund 2014-2017 Accompanying the document Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on interim evaluation of the Asylum, Migration and Integration Fund and the Internal Security Fund’ (SWD [2018] 399 final, 12 June 2018), https://ec.europa.eu/home-affairs/sites/homeaffairs/files/what-we-do/policies/european-agenda-migration/20180612_swd-2018-339-commission-staff-working-document_en.pdf.

rests with AMIF but also with other funds, such as the European Social Fund (ESF) and European Regional Development Fund (ERDF).⁵

Changes are also afoot that aim to embed immigrant integration more explicitly within the design, implementation, and monitoring of the next Multiannual Financial Framework (MFF), the future EU budget for 2021–27. Under the European Commission’s current proposals for the 2021–27 funding period, the ESF will be replaced with an ESF Plus (ESF+), which would have **specific output indicators to measure the participation of third-country nationals in funded programmes**, as is already done by the AMIF, which could become the Asylum and Migration Fund (AMF) under the next MFF.⁶ **The European Commission’s proposals, which are still being revised and negotiated, could also boost synergies between the ESF+ and AMF** (which could still revert back to being called AMIF if the European Parliament’s attempt to reintroduce integration into the title is successful⁷). The proposals make it clearer which migrant integration activities are eligible for support under each fund—with early measures (e.g., language courses, legal assistance, and civic orientation) resting with AMF (or AMIF) and long-term measures (e.g., labour-market and health-care access, anti-poverty strategies, and social inclusion efforts) under the purview of ESF+.

As the ESF prepares to potentially take a more muscular role in integration matters, with implications for inclusion and social cohesion programming across the European Union, this is a critical moment to examine how the fund can bring the most added value—and whether it is fit for purpose. The negotiations of the next MFF are underway⁸ but may not be finalised before the May 2019 European Parliament elections. This leaves the door open for policymakers to revise the existing proposals, potentially strengthening or weakening the prioritisation of migrant inclusion and social cohesion in both the ESF and AMF (or AMIF).

The purpose of this report is threefold: (1) **to understand how money is allocated** to efforts that promote migrant inclusion within the current ESF, (2) **to examine how the ESF has been**

⁵ European Commission, ‘Synergies between the Asylum Migration and Integration Fund (AMIF) and Other EU Funding Instruments In Relation to the Reception and Integration of Asylum Seekers and Other Migrants’, updated 16 November 2015,

<http://ec.europa.eu/DocsRoom/documents/15121/attachments/7/translations/en/renditions/native>.

⁶ Under the CPR proposals for the next funding cycle (2021–27), there would be specific indicators for third-country nationals: specific actions to increase participation of third-country nationals in employment (119) and measures for the social integration of third-country nationals (12). See European Commission, ‘Annexes to the Proposal for a Regulation of the European Parliament and of the Council Laying down Common Provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, and the European Maritime and Fisheries Fund and Financial Rules for Those and for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument’ (annex, 29 May 2018), https://www.funduszeuropejskie.gov.pl/media/61825/Regulation_proposal_common_provisions_COM_2018_375_29_05_2018_Annexes_EN.pdf.

⁷ The European Parliament’s 29 January 2019 report reintroduced integration into the title of the European Commission’s proposed Asylum and Migration Fund. The final title is still subject to negotiations. European Parliament, ‘Report on the Proposal for a Regulation of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, and the European Maritime and Fisheries Fund and financial rules for those and for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument’ (COM [2018] 375, COM-0230/2018-2018/196 COD, 29 January 2019), http://www.europarl.europa.eu/doceo/document/A-8-2019-0043_EN.pdf.

⁸ The European Commission submitted a proposal for the 2021–27 Multiannual Financial Framework (MFF) on 2 May 2018. The proposal must be adopted unanimously by the Council of Ministers, following approval by the European Parliament. The Council had a first round of discussion on May 14, 2018, followed by a request for a timely review of the proposal in June 28 with a subsequent policy debate being held on September 18. The Austrian presidency published a state of play report on the MFF on October 16. After the Council held a further policy debate on November 12 and a ‘first substantial exchange of views’ on the MFF, EU leaders decided to push an agreement from before the elections to autumn 2019. For details on this timeline, see European Council, Council of the European Union, ‘Multiannual financial framework for 2021-2027: Negotiations’, accessed 25 February 2019, <https://www.consilium.europa.eu/en/policies/multiannual-financial-framework/mff-negotiations/>.

implemented thus far, and (3) to **recommend ways to reinforce the priority given to these issues** under the next MFF. This report draws information from interviews conducted between October 2018 and January 2019 with EU officials in the Directorate-General for Migration and Home Affairs (DG HOME), the Directorate-General for Employment, Social Affairs, and Inclusion (DG EMPL), and the European Parliament Committee on the ESF+, as well as discussions with consultants working on ESF evaluations and statistical analysis of ESF data. It was also informed by interviews with national and subnational managing authorities, monitoring committees, intermediate bodies, and fund beneficiaries in five countries—France, Germany, Italy, Poland, and Sweden—as a way to look beyond the legislative level to explore how the fund is implemented in practice. (For details on these countries, see Annex 2.)

II. HOW THE ESF WORKS

The ESF is the oldest of the five European Structural and Investment Funds (ESIF).⁹ While its original mission was to create jobs and increase competitiveness, the objectives of the ESF have broadened over time. The most recent set of objectives, for the 2014–20 period, include social inclusion and cohesion, alongside improving employment opportunities; fighting poverty; promoting education, skills, and lifelong learning; and developing active, comprehensive, and sustainable inclusion policies.¹⁰ Looking to the future, **the proposal for an ESF+ in the 2021–27 period aims to deepen the social dimension of the fund even further**, explicitly making it a key instrument for implementing the European Pillar of Social Rights.¹¹

The ESF is governed by the ESF Regulation and accompanying Common Provisions Regulation (CPR), which are negotiated at the EU-level. These documents are the rulebooks for how the ESF is translated to national contexts. Unlike in previous years, **the 2014–20 ESIF have a Common Strategic Framework**, essentially meaning there is a set of overall thematic objectives that are supported by the five different funds.¹² The ESF primarily supports four out of the 11 thematic objectives, which are accompanied by investment priorities indicating the types of intervention the ESF supports:

- Thematic Objective 8: promoting sustainable and quality employment, and supporting labour mobility;

⁹ The others are the European Regional Development Fund (ERDF), Cohesion Fund (CF), European Agricultural Fund for Rural Development (EAFRD), and European Maritime and Fisheries Fund (EMFF). See European Commission, 'European Structural and Investment Funds', accessed 6 December 2018, https://ec.europa.eu/info/funding-tenders/funding-opportunities/funding-programmes/overview-funding-programmes/european-structural-and-investment-funds_en.

¹⁰ 'Regulation (EU) No 1304/2013 of the European Parliament and of the Council of 17 December 2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006', *Official Journal of the European Union*, 2013 L 347/470, 20 December 2013, Preamble (2), <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1304&from=en>.

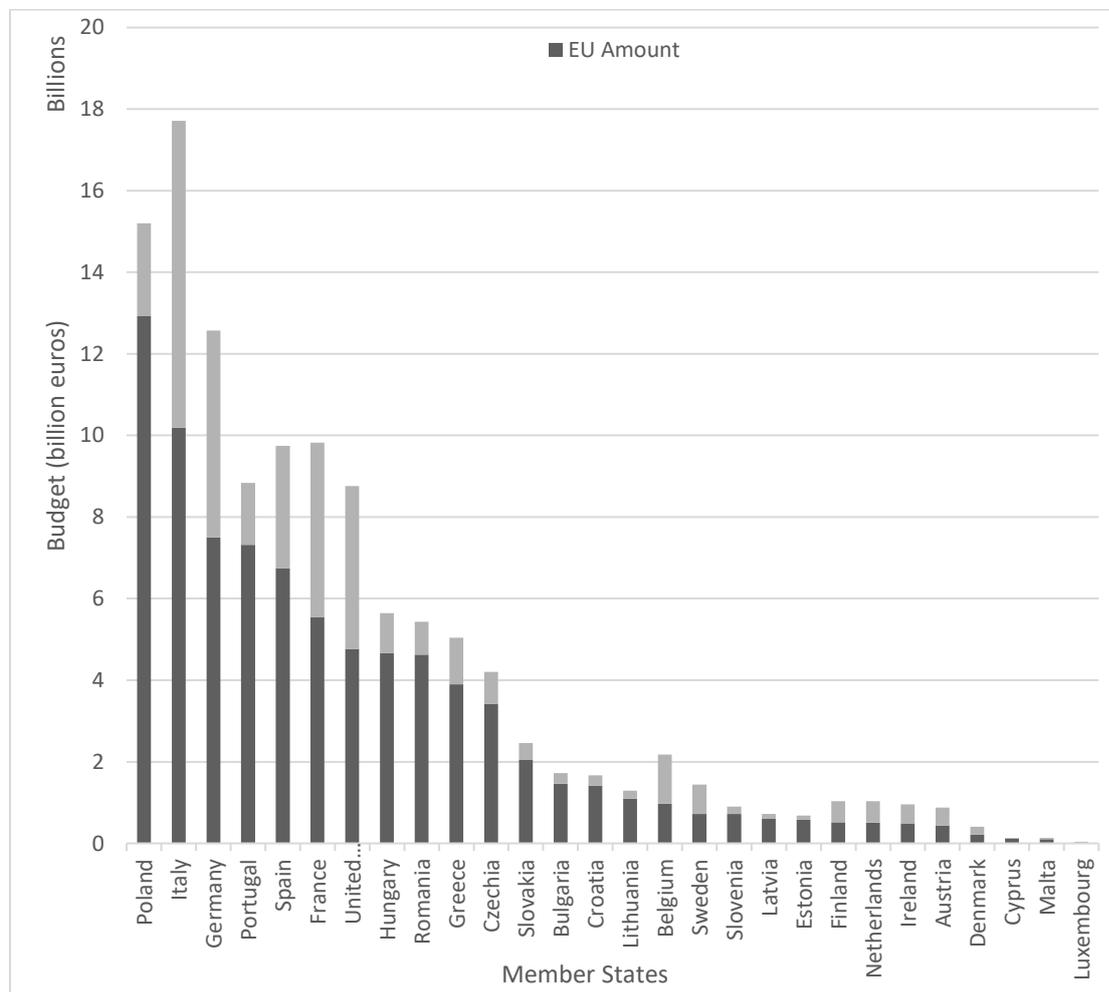
¹¹ Jointly signed by the European Parliament, the Council and the Commission on 17 November 2017, the European Pillar of Social Rights is a document that sets out 20 principles aimed at delivering new and more effective rights for citizens in the EU. See European Commission, 'The European Pillar of Social Rights in 20 Principles', accessed 7 December 2018, https://ec.europa.eu/commission/priorities/deeper-and-fairer-economic-and-monetary-union/european-pillar-social-rights/european-pillar-social-rights-20-principles_en; European Commission, 'Questions and Answers on the New Social Fund and Globalisation Adjustment Fund for the Period 2021-2027' (fact sheet, 30 May 2018), [http://europa.eu/rapid/press-release MEMO-18-3922_en.htm](http://europa.eu/rapid/press-release_MEMO-18-3922_en.htm).

¹² For example, the ESF can also contribute towards Thematic Objectives 1–4, such as enhancing the competitiveness of SMEs, but these are not its primary objectives. See 'Regulation (EU) No 1304/2013 of the European Parliament and of the Council of 17 December 2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006', *Official Journal of the European Union*, 2013 L 347/470, 20 December 2013, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1304&from=en>; European Commission, 'Priorities for 2014-2020', accessed 30 January 2019, http://ec.europa.eu/regional_policy/en/policy/how/priorities.

- Thematic Objective 9: promoting social inclusion, combating poverty and any discrimination;
- Thematic Objective 10: investing in education, training, and vocational training for skills and life-long learning; and
- Thematic Objective 11: enhancing institutional capacity of public authorities and stakeholders and efficient public administration.

The European Union contributes 83.9 billion euros to the ESF, and Member States contribute an additional 37 billion euros through a system of national co-financing, **bringing the ESF's total budget to 120.6 billion euros for the 2014–20 period (see Figure 1)**.¹³ Poland, Italy, and Germany receive the highest absolute allocations of the EU's ESF funds, and, coupled with their national co-financing, also have the highest overall allocations.

Figure 1. EU and national allocations to the 2014–20 ESF budget, by country



Source: Author analysis of data from European Commission, ‘European Structural and Investment Funds—Data by Fund—European Social Fund’, accessed 23 November 2018, <https://cohesiondata.ec.europa.eu/funds/esf>.

¹³ By contrast, the total allocation for ESF 2007-2013 was 115.6 billion euros, of which 76.8 billion euros came from the EU budget, 35.1 billion euros from national public contributions and 3.7 billion euros from private funds. See European Commission, ‘Questions and Answers: European Social Fund 2007-2013 evaluation’ (fact sheet, 5 January 2017), http://europa.eu/rapid/press-release_MEMO-16-3985_en.htm.

The Commission has proposed allocating 101.2 billion euros to the ESF+ budget, of which 100 billion euros will be reserved for the shared management strand (integrating ESF, the Youth Employment Initiative, or YEI, and the Fund for European Aid to the Most Deprived, or FEAD) and 1.2 billion euros will either be under direct management or a combination of direct and indirect management (the Employment and Social Innovation, or EaSI, programme and the Health Programme).¹⁴ Table 1 compares the 2014–20 budget for the funds that are to be merged under the 2021–27 ESF+.

Table 1. Budget breakdown of current (2014–20) and proposed ESF+ fund allocations

	Current budget allocations (2014–20)	Proposed ESF+ budget allocations (2021–27)	Management
European Social Fund (ESF) + Youth Employment Initiative (YEI)	83.9 billion euros + 4.4 billion euros	100 billion euros	Shared management
Fund for European Aid to the Most Deprived (FEAD)	3.8 billion euros	A minimum of 2 per cent of the 100 billion euros allocated to the ESF+	
Employment and Social Innovation (EaSI) programme	0.919 billion euros	0.761 billion euros	Direct and indirect management
Health Programme	0.449 billion euros	0.413 billion euros	Direct management

Source: European Commission, 'European Structural and Investment Funds – European Social Fund Data', accessed 25 February 2019, <https://cohesiondata.ec.europa.eu/funds/esf>; European Commission, 'Youth Employment Initiative (YEI)', accessed 25 February 2019, <https://ec.europa.eu/social/main.jsp?catId=1176>; European Commission, 'Fund for European Aid to the Most Deprived (FEAD)', accessed 25 February 2019, <https://ec.europa.eu/social/main.jsp?catId=1089>; European Commission, 'EU Programme for Employment and Social Innovation (EaSI)', accessed 25 February 2019, <https://ec.europa.eu/social/main.jsp?catId=1081>; European Commission, 'EU Health Programme', accessed 25 February 2019, https://ec.europa.eu/health/funding/programme_en; European Commission, 'Questions and Answers on the new Social Fund and Globalisation Adjustment Fund for the period 2021-2027' (fact sheet, 30 May 2018), [http://europa.eu/rapid/press-release MEMO-18-3922_en.htm](http://europa.eu/rapid/press-release_MEMO-18-3922_en.htm); European Commission, 'Proposal for a Regulation of the European Parliament and of the Council on the European Social Fund Plus (ESF+)' (COM [2018] 382 final, 30 May 2018), https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-european-social-fund-plus-regulation_en.pdf; EURO CITIES, 'Policy brief on the ESF+ proposal for 2021-2027', accessed 25 February 2019, http://nws.eurocities.eu/MediaShell/media/EURO CITIES_policy_brief_on_ESF_.pdf.

While the ESF constitutes one of the main EU financial tools to support the inclusion of migrants who have established legal residence within a Member State, this is not mirrored in the 2014–20 ESF Regulation and Common Provisions Regulation. At present, **it is nearly impossible to identify migrant participants in programming supported by the fund and to track their**

¹⁴ 'Proposal for a Regulation of the European Parliament and of the Council on the European Social Fund Plus (ESF+)' (COM [2018] 382 final, 30 May 2018), Article 5(1), https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-european-social-fund-plus-regulation_en.pdf.

progress towards labour-market and social inclusion. The rest of this report will examine how this situation has arisen by looking at how migrant inclusion priorities are set; what funding is allocated to migrant inclusion efforts; how effective reporting, monitoring, and evaluation for this target group are; how efforts to support migrant inclusion are implemented under the current ESF; and what implications these findings have for nongovernmental organisations seeking to amplify this goal.

III. PRIORITISING MIGRANT INCLUSION IN THE ESF

There are several opportunities to boost the prominence of migrant inclusion in the design and subsequent implementation of the ESF. In this respect, it is important to note that the ESF is designed and implemented through **shared management**: the European Commission, European Parliament, and Council of the European Union establish ESF regulations and guidelines at the European level, and the European Commission and Member State authorities negotiate national partnership agreements and operational programmes. The operational programmes are then implemented by the relevant national or subnational authorities within each Member State.¹⁵ This section examines the stages and processes that create room to insert a focus on migrant inclusion into the blueprint of the fund, and what this means for stakeholders interested in shaping this process.

One of the earliest opportunities for all actors to boost migrant inclusion within the ESF is **within the fund's regulations themselves during both the pre-negotiation and negotiation phases.** At EU level, the negotiation phase can be divided into the drafting and submission of the European Commission's proposal, the consideration of amendments and debates in the European Parliament, and finally, the unanimous adoption of a regulation by the Council of the European Union. And even before the European Commission drafts proposals on the next MFF, it examines evaluations from the previous funding cycle and holds public consultations with stakeholders.¹⁶

A. European Commission ESF+ proposal

A major challenge for improving the ESF is that **the process of drafting the next MFF begins long before the first evaluations of projects under the current funding cycle have been completed.** For example, the European Commission submitted its draft proposal for the 2021–27 MFF on 2 May 2018, while operational programmes running under the 2014–20 ESF have yet to complete their mid-term evaluations. To bridge this gap, legislators draw on evaluations and stakeholder consultations from previous funding cycles. But even when this is done, **information must be available well in advance, and special consideration may be needed to engage smaller civil-society organisations in this review process.** The European Commission's stakeholder consultation for the ESF+ was based on a stakeholder mapping, which included organisations operating both at the national and EU levels in the fields of social and employment policy, associations representing civil-society organisations, public authorities at all levels of government, social partners, funding beneficiaries, and end users. **Smaller civil-society groups, which many migrant-led organisations are, do not appear to have been a particular target**

¹⁵ European Commission, 'European Social Fund - How the ESF works', accessed 30 January 2019, <http://ec.europa.eu/esf/main.jsp?catId=525&langId=en>.

¹⁶ For example, the European Commission held public consultations from January to March 2018 looking at the current performance and future challenges for EU funding programme. See European Commission, 'Public Consultations on the Future of the European Funds Now Officially Launched', accessed 30 January 2019, <http://ec.europa.eu/esf/main.jsp?catId=67&langId=en&newsId=9035>.

in this process, though they were able to participate in one of the four open online public consultations or to submit a position paper.¹⁷

The proposal for the ESF+ Regulation caters to several new objectives that are broader in scope than those of the current ESF, while also **introducing social integration measures that make specific reference to migrant or third-country-national populations**. The ESF+ is explicitly geared towards supporting the delivery of the 20 principles of the European Pillar of Social Rights, which are structured around three categories: (1) equal opportunities and access to the labour market, (2) fair working conditions, and (3) social protection and inclusion.¹⁸

¹⁷ European Commission, 'Commission Staff Working Document: Impact Assessment Accompanying the document Proposal for a Regulation of the European Parliament and the Council on the European Social Fund Plus (ESF+) and Proposal for a Regulation of the European Parliament and the Council on the European Globalisation Adjustment Fund (EGF)' (SWD [2018] 289 final, 30 May 2018), https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-esf-egf-swd_en.pdf.

¹⁸ European Commission, 'Proposal for a Regulation 2018/0206 of the European Parliament and of the Council on the European Social Fund Plus (ESF+)' (COM [2018] 382 final, 30 May 2018), Preamble (1), https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-european-social-fund-plus-regulation_en.pdf.

Box I. Increased ESF+ complementarity with AMF

Although migrant integration activities that will boost social inclusion, reduce discrimination, and increase labour-market outcomes are eligible for support under the ESF, **many Member States turn instead to Asylum, Migration and Integration Fund (AMIF)**. One interviewee in DG HOME suggested that because integration is in AMIF's name, and its objectives and priorities are indisputably targeted at third-country nationals, there is less ambiguity over whether it can support a given action.

Raising the profile of migrant inclusion within the ESF+ could reduce some of the current ambiguity among Member States' managing authorities (those responsible for operational programmes) and **potential beneficiaries over which projects should draw from ESF versus AMIF coffers**. The Commission's proposal delineates which activities are eligible under which fund, with the Asylum and Migration Fund (the proposed successor of AMIF) responsible for early integration measures, such as language course, civic orientation, and capacity building for national authorities, while the ESF+ would be responsible for longer-term measures, such as vocational training, education, and housing. Yet, the ESF's restriction on non-legal residents' participation in funded programmes could become a challenge if integration moves more firmly from the AMIF and into the ESF portfolio, as has been proposed in the next funding cycle. Through the current AMIF, people who do not hold a residence permit can still access integration programming. **But under the ESF, asylum seekers are only eligible for support for vocational training, activities concerning minor children's education, and where they are legally able to participate in the labour market (with requirements varying across Member States)**. In countries where it can take a couple years for asylum seekers to receive formal status, some may be ineligible for many ESF projects for extended periods, meaning **they will miss an opportunity to get a head start on their integration**.

Unlike the system governing the current ESF and AMIF, the European Commission's **ESF+ proposal would set Common Provisions Regulations to govern both ESF+ and the new Asylum and Migration Fund (AMF)**. This should improve synergies between the funds and allow for more precise data collection on third-country-national participants in ESF+-funded programming. While there are some examples of Member States issuing joint AMIF and ESF projects, it is far from the norm. Italy has launched one such initiative, after a successful pilot, which provides refugees with tutoring, counselling, career guidance, and job orientation covered by AMIF and a six-month internship with a private company paid for by the ESF. According to Italian interviewees, this project presents an opportunity to maximise impact within each fund's eligibility rules but also creates challenges by necessitating coordination, monitoring, and reporting mechanisms that 'speak the same language'. In January 2019, Italy launched a call for another AMIF-ESF funded project on the prevention of irregular work and exploitation in the agricultural sector, which followed a public consultation with civil-society organisations and workers' and employers' associations.

Sources: MPI Europe interview with official, DG HOME, European Commission, 23 November 2018; MPI Europe interview with John Gunnarsson, ESF Monitoring Committee Member, 16 November 2018; Integrazione Migranti, 'INSIDE-Inserimento Integrazione Nordsud Inclusionone', updated 11 July 2018, <http://www.integrazionemigranti.gov.it/Attualita/Notizie/Pagine/INSIDE-INserimento-Integrazione-nordsud-inclusionone.aspx>; Adriana Rosasco, 'Synergies between ESF and AMIF on integration of people with migrant background', (presentation at the ESF Transnational Platform meeting, Helsinki, 17 September 2018), https://ec.europa.eu/esf/transnationality/filedepot_download/2490/1908; Integrazione Migranti, 'Avviso Pubblico 1/2019 Per Presentazione Progetti Da Finanziare A Valere Su Fami E Fse', 21 January 2019, <http://www.integrazionemigranti.gov.it/Attualita/Notizie/Pagine/Avviso-pubblico-12019-per-presentazione-progetti-da-finanziare-a-valere-su-FAMI-e-FSE.aspx>; European Commission, 'Support to asylum seekers under the European Social Fund and the Fund for European Aid to the Most Deprived', accessed 12 February 2019,

B. ESF negotiations in the European Parliament

After the European Commission launches its proposal for the next MFF, the **next opportunity to increase the prioritisation of migrant inclusion is during the European Parliament's negotiations**. Within the European Parliament, the ESF+ proposal was assigned to the Committee

on Employment and Social Affairs (EMPL). Committee members have submitted hundreds of amendments, some reducing and others amplifying the profile of migrant inclusion within the proposal text. For example, a member of the Greens/European Free Alliance proposed that Member States should allocate 2 per cent of ESF+ resources to the inclusion of third-country nationals and marginalised communities at the local level—an amendment that did not make it into the European Parliament’s final report on the European Commission’s proposal.¹⁹ Once the committee agrees on a final report, it is debated and adopted in the plenary. **Third parties, such as civil-society organisations, have taken the opportunity to influence this process by reaching out to committee members** to propose and defend amendments focused on migrant inclusion, and some have **published their own proposed amendments as a blueprint**.²⁰

The European Parliament adopted its report on the ESF+ on 16 January 2019, clearing the way to start negotiations with the Council. Yet it remains unclear when the final budget will be agreed. The European Commission aimed initially to finalise the MFF before the May 2019 European Parliament elections, but as this goal has become less and less feasible, EU leaders eventually decided to push the adoption of the final agreement at least until Autumn 2019.²¹ **Delaying the final agreement risks delaying the start date for the use of the new fund(s)** not only due to a shift in the timeline but also because it eats into the time available for managing authorities within the Member States to adapt to any new rules.

C. Shared management between the European Commission and Member States: Partnership agreements

The mechanism through which EU priorities for funds are translated to the national context is the partnership agreement.²² These agreements, negotiated between the European Commission and each Member State, address the entire Common Strategic Framework, which includes all of the ESIF. However, since the ESF is designed and implemented through shared management between the European Commission and the Member States, **national (and subnational) programmes and viewpoints on migrant inclusion, and the degree to which nonpublic actors can influence them, are reflected in the extent to which migrant inclusion is prioritised within a given partnership agreement**. There is an expectation that national authorities will consult with regional, social, and economic partners when setting priorities, expected results, budget, and operational programmes; when selecting and implementing projects; and when monitoring results.²³ **But implementation of this ‘partnership principle’**

¹⁹ This amendment, tabled in September 2018, did not make it through to the 12 December 2018 report. See European Parliament, ‘Amendments 20-231’ (proposal for a regulation, European Parliament, Committee on Employment and Social Affairs, 26 September 2018), <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+COMPARL+PE-626.995+02+DOC+PDF+V0//EN&language=EN>.

²⁰ Such as the position papers published by European Council on Refugees and Exiles (ECRE) and Platform for International Cooperation on Undocumented Migrants (PICUM), the European Anti-Poverty Network (EAPN). See: ECRE and PICUM, ‘ECRE and PICUM Position on the Proposal for a Regulation of the European Social Fund + 2021-2027 COM(2018) 382’, October 2018, <https://www.ecre.org/wp-content/uploads/2018/11/Comments-on-ESF.pdf>; EAPN, ‘EAPN Multiannual Financial Framework Position Paper’, March 2018, <https://www.eapn.eu/wp-content/uploads/2018/07/EAPN-2018-EAPN-MFF-paper.pdf>.

²¹ For details on this timeline, see European Council, ‘Multiannual financial framework: shaping EU expenditure’ accessed 30 January 2019, <https://www.consilium.europa.eu/en/policies/multiannual-financial-framework/mff-negotiations/>.

²² ‘Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund and repealing Council Regulation (EC) No 1083/2006’, *Official Journal of the European Union*, 2013 L 347/320, 20 December 2013, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1303&from=EN>.

²³ Member States, in partnership with the European Commission, agree on one or more operational programmes for the ESF (and other ESIF). Operational programmes refer to a Member State’s priorities either in one fund and one

varies between Member States, and migrant-focused organisations are not always invited to the table.

Each partnership agreement is approved by the Commission following an assessment and dialogue with Member State.²⁴ In the 2014–20 period, part of this process involved defining ‘ex ante conditionalities’²⁵—that is, conditions that must be in place within a Member State by the time a programme is adopted (or by the end of 2016 at the latest), with the aim of ensuring that ESIF resources are used in the most efficient manner;²⁶ only one of these conditions refers explicitly to migrants.²⁷ For 2021–27, the ex ante conditionalities are to be replaced with a smaller set of what are to be called ‘enabling conditions’, which, unlike their predecessors, will be subject to ongoing monitoring. Even so, **migrants are only mentioned explicitly in the enabling conditions for the ERDF, and only in relation to the goal of combatting segregation.**²⁸

Migrant inclusion can also find its way into partnership agreements via the expected links between these documents and existing EU frameworks, namely the European Semester, which is the cycle of economic and fiscal policy coordination within the European Union that allows the European Commission to make country-specific recommendations.²⁹ Each year, the European Commission analyses each country’s planned budget and macroeconomic and structural reforms, and then issues country-specific recommendations that Member States must refer to within ESIF programming through the partnership agreement. During 2021–27,

region, or according to a thematic objective that can include more than one fund and more than one region. For each priority, the operational programme will show how the financial allocations correspond to the investment priorities under the selected thematic objective. See European Commission, ‘European Social Fund - How the ESF works’, accessed 30 January 2019, <http://ec.europa.eu/esf/main.jsp?catId=525&langId=en>.

²⁴ ‘Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013’, *Official Journal of the European Union*, 2013 L 347/320, 20 December 2013, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1303&from=EN>.

²⁵ Member States must define ‘ex ante conditionalities’ in the Partnership Agreement at the beginning of the programming period to be eligible for ESF funds. Ex-ante conditionalities for the ESF, such as having a national Roma inclusion or lifelong learning strategic policy framework, are applied to a priority of a given programme, to which they must have a ‘direct and genuine link’ as well as a ‘direct impact on the effective and efficient achievement of a specific objective’. The fulfilment of such conditionalities are assessed by Member States but the Commission assessed the quality of evidence Member States provided. See ‘Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013’, *Official Journal of the European Union*, 2013 L 347/320, 20 December 2013, Preamble (21), <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1303&from=EN>.

²⁶ European Commission, ‘Ex ante conditionalities’, accessed 25 February 2019, https://ec.europa.eu/regional_policy/en/policy/what/glossary/e/ex-ante-conditionalities.

²⁷ While there are ex ante conditionalities that correspond to each thematic objective and investment priority, only one of the criteria to fulfil the ESF’s ex ante conditionalities refers to migrants, and even then it is only as an example of a potential target group for a national or regional strategic policy framework for lifelong learning. However, they could potentially be included within the more frequently referred to categories of ‘people from marginalised communities’ and ‘under-represented groups’. See ‘Regulation (EU) No 1303/2013’, Annex XI.

²⁸ European Commission, ‘Proposal for a Regulation of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, and the European Maritime and Fisheries Fund and financial rules for those and for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument’ (COM [2018] 375 final, 29 May 2018), <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2018%3A375%3AFIN>.

²⁹ Introduced in 2010, the European Semester sets a common EU agenda for growth and jobs, avoiding excessive government debt and macroeconomic imbalances, and boosting investment. Part of this framework includes the Europe 2020 Strategy, which sets EU wide and national targets to be reached by 2020, such as 75 per cent of people ages 20 to 64 to be in work. Each Member State has national targets as they progress towards each goal. See European Commission, ‘The European Semester: Why and How’, accessed 6 December 2018, https://ec.europa.eu/info/business-economy-euro/economic-and-fiscal-policy-coordination/eu-economic-governance-monitoring-prevention-correction/european-semester/framework/european-semester-why-and-how_en; European Commission, ‘Europe 2020 Strategy’, accessed 6 December 2018, https://ec.europa.eu/info/business-economy-euro/economic-and-fiscal-policy-coordination/eu-economic-governance-monitoring-prevention-correction/european-semester/framework/europe-2020-strategy_en.

ESF+ priorities will be even more closely tied to these recommendations.³⁰ However, Member States have considerable power over whether migrants are included or prioritised within their country's recommendations,³¹ which can reduce the attention given to migrants in partnership agreements and the ESF more broadly. Moreover, considering the European Semester is mainly an instrument of economic governance, tying this more closely to ESF+ priorities may only have a marginal impact on the social dimension of migrant inclusion.

Key Takeaways:

- Despite potential opportunities within the negotiations of the MFF and the partnership agreements, to date migrant-focused organisations do not appear to have been given a prominent role in designing the ESF blueprint at the EU and national levels.
- The European Union sets the broad parameters in which partnership agreements are made with Member States, but national (and subnational) priorities and visions on migrant inclusion also feed into this process. Managing authorities are supposed to consult with diverse social and economic stakeholders, but practices vary between Member States and migrant-focused organisations are not always invited to the table.
- The ESF and the proposed ESF+ aim to increase synergy with existing frameworks, such as the European Semester. However, some of the country-specific recommendations developed by the European Commission within the framework of the European Semester do not explicitly refer to migrant-specific objectives or are removed during negotiations with Member States, reducing their potential to shape the design of the ESF.

IV. UNDERSTANDING THE BUDGET FOR MIGRANT INCLUSION IN THE ESF

The ESF is one of the largest EU financial tools that can be used to support legally resident migrant populations and their descendants. Yet, **the allocation of ESF funds does not take into account the size or character of this population.** Nevertheless, the relatively high amount of ESIF funding allocated to the ESF and, more specifically, to ESIF Thematic Objective 9 on social inclusion suggests that **Member States value this financial tool and are at least indirectly supportive of using it to assist vulnerable populations, which can include migrants.**

A. Migration in the allocation formula

For the first time, the presence of migrants within a country is set to have an impact on the size of ESF+ allocations to EU Member States, a change in funding formula that brings ESF closer to alignment with the AMIF.³² To date, the primary criterion for allocating ESF money to a

³⁰ Member States will be expressly required to allocate an 'appropriate amount of their resources of the ESF+ strand' to implement country-specific recommendations set out under the European Semester. See European Commission, 'Proposal for a Regulation of the European Parliament and of the Council laying down common provisions' (COM [2018] 375 final, 29 May 2018), Preamble (21), <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2018%3A375%3AFIN>.

³¹ Meghan Benton, Elizabeth Collett, and Helen McCarthy, *Into the Mainstream: Rethinking Public Services for Diverse and Mobile Populations* (Brussels: Migration Policy Institute Europe, 2015) <https://www.migrationpolicy.org/research/mainstream-rethinking-public-services-diverse-and-mobile-populations>.

³² Annex I, 'Regulation (EU) No 516/2014 of the European Parliament and of the Council of 16 April 2014 Establishing the Asylum, Migration and Integration Fund, Amending Council Decision 2008/381/EC and Repealing Decisions No 573/2007/EC and No 575/2007/EC of the European Parliament and of the Council and Council

particular Member State has been the relative development of its constituent regions (i.e., how many are less developed, in transition, or more developed).³³ Hence, a Member State where the majority of regions are well developed may still obtain a (substantial) allocation under the ESF because of the existence of less developed or transitioning regions, such the West Wales and Cornwall regions in the United Kingdom.³⁴ Allocation is based on a 'Berlin formula' whose calculations are based on Member State regions' per capita gross national income (GNI), unemployment levels, population density, and, for more developed regions, education levels. **The 'Berlin+' formula** that has been proposed for the ESF+ retains the current system for classifying regions as less developed, in transition, and more developed. But **it will add migration from outside the European Union to the set of factors considered, with a premium of 400 euros per person per year applied to the share of net third-country-national migration into the region since 2013.**³⁵ It is unclear, however, how this sum of 400 euros was calculated. Moreover, the Berlin+ formula retains an overall weakness of the existing formula by not accounting for differences in the costs of living in different regions, given that the same premium is applied across the board.

B. Planned financing by thematic objectives

All legal residents³⁶—with and without migrant backgrounds—can be beneficiaries of actions associated with any of the thematic objectives of the ESF. The ESF Regulation mentions that attention should be paid to asylum seeking and refugee participants.³⁷ But many Member States have interpreted the regulation so that **asylum seekers and irregular migrants can only participate in ESF activities under certain circumstances** (e.g., where they have the right to work, and in the case of minor children seeking to participate in educational programmes and vocational training),³⁸ **and asylum seekers, refugees, and other migrants are not explicitly referred to in any of the ESF's thematic objectives or their corresponding investment priorities.** In the case of Thematic Objective 9 (social inclusion), for example, its investment priorities focus on specific experiences (e.g., marginalisation, discrimination) and social/group markers (e.g., racial or ethnic origin, religion or belief) (see Box 2). The experience of being a migrant or having migrated, and the marker of 'migrant' or 'newcomer', are not explicitly included. **This omission could be a deliberate mainstreaming approach, where**

Decision 2007/435/EC', Pub. L. No. 32014R0516, 150 OJ L (2014). <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0516&from=EN>.

³³ Annex V, VI, and VII of the 'Commission Implementing Decision of 3 April 2014' detail which Member States have regions that fall within the three categories. See 'Commission Implementing Decision - of 3 April 2014 - Setting out the Annual Breakdown by Member State of Global Resources for the European Regional Development Fund, the European Social Fund and the Cohesion Fund under the Investment for Growth and Jobs Goal and the European Territorial Cooperation Goal, the Annual Breakdown by Member State of Resources from the Specific Allocation for the Youth Employment Initiative Together with the List of Eligible Regions, and the Amounts to Be Transferred from Each Member State's Cohesion Fund and Structural Funds Allocations to the Connecting Europe Facility and to Aid for the Most Deprived for the Period 2014-2020, *Official Journal of the European Union* 2014 L 104/13, 8 April 2014, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014D0190&from=EN>.

³⁴ Less developed regions are defined as areas at the 'Nomenclature of territorial units for statistics' 2 (NUTS 2) level where the GDP per person is less than 75 per cent of the EU-27 average; in transition regions it is between 75-90 per cent; and for more developed regions the GDP per person is greater or equal to 90 per cent of the EU-27 average. See European Commission and Directorate-General for Regional and Urban Policy, *Structural Funds (ERDF and ESF) Eligibility 2014-2020* (Luxembourg: Publications Office, 2014), <http://bookshop.europa.eu/uri?target=EUB:NOTICE:KN0113867:EN:HTML>.

³⁵ European Commission, 'Proposal for a Regulation of the European Parliament and of the Council laying down common provisions' (COM [2018] 375 final, 29 May 2018), <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2018%3A375%3AFIN>.

³⁶ Definitions of what constitutes a 'legal resident' and the processes of becoming one vary between Member State, thus affecting an individual's inclusion under the ESF differently. For instance, because it can take a couple of years for asylum seekers to receive formal residence status in Sweden, the period in which they are not eligible for ESF projects can be longer than it is for asylum seekers in other national contexts.

³⁷ 'Regulation (EU) No 1304/2013'.

³⁸ European Commission, 'Support to asylum seekers under the European Social Fund and the Fund for European Aid to the Most Deprived', accessed 12 February 2019, <http://ec.europa.eu/esf/BlobServlet?docId=14499&langId=en>.

beneficiaries are targeted based on a shared challenge rather than a group identifier, or it could be unintentional on the part of the legislators of the fund.

Box 2. Investment priorities for Thematic Objective 9: Promoting social inclusion, combatting poverty and any discrimination

Within its thematic objective on social inclusion, the ESF enumerates the following six priorities for investment:

1. active inclusion, including promoting equal opportunities and active participation, and improving employability;
2. integration of marginalised communities such as the Roma;
3. combatting discrimination based on sex, racial or ethnic origin, religion or belief, disability, age, or sexual orientation;
4. enhancing access to affordable, sustainable, and high-quality services, including health care and social services;
5. promoting the social economy and social enterprises; and
6. community-led local development strategies.

Source: Fintan Farrell and Patrizia Brandellero, *Social Inclusion Indicators for ESF Investments: Areas for Development in Addressing the 20% Social Inclusion Target in the ESF* (N.p.: ESF Transnational Platform and Aeidl, 2018), <https://ec.europa.eu/esf/transnationality/content/social-inclusion-indicators-esf-investments-areas-development-addressing-20-social-inclusion>.

For some Member States, such as Sweden, third-country nationals are believed to be among the main beneficiaries of ESF projects across all of thematic objectives.³⁹ Yet this information is based more on anecdotal evidence than quantitative data since the national authorities that administer these funds are not required to collect data on whether project participants have a migrant background. Nevertheless, **it is likely that people with a migrant background (whether third-country nationals with a legal migration status or their decedents) participate in projects under all three major ESF thematic objectives to varying degrees in different countries**, provided that they possess other characteristics targeted by the objectives, such as being homeless or socially excluded, having lower rates of employment and school completion, or being disabled.⁴⁰

While the present design of the ESF does not allow for the pinpointing of what funds were spent on migrant inclusion efforts within the overall funding allocation, social inclusion—and, potentially, migrant inclusion—is clearly a priority for Member States. **At the European level, at least 23.1 per cent of all funding on the ESIF has to be allocated towards the ESF**, with minimum shares set for each Member State individually in accordance with the CPR Article 92(4).⁴¹ Eighteen Member States allocated more budget to the ESF than their minimum requirement under the Common Provision Regulations—with Italy, Hungary, Estonia, and

³⁹ According to one interviewee, Swedish residence permits are a pre-condition for individuals to take part in ESF funded projects. MPI Europe interview with official, ESF Council Stockholm, Sweden, 21 November 2018.

⁴⁰ MPI Europe interview with representative, Swedish ESF Monitoring Committee, 20 November 2018; MPI Europe interview with Anna Mårtensson, Integration Halland, Project Manager, Sweden, 28 November 2018.

⁴¹ These minimum shares of ESF allocation range from 18 per cent of ESIF funds in Estonia (which allocated 23.8 per cent) to 52 per cent in Belgium (which allocated the required amount). See European Commission, *European Structural and Investment Funds 2014-2020: Official Texts and Commentaries* (Luxembourg: Publications Office of the European Union, 2015),

https://ec.europa.eu/regional_policy/sources/docgener/guides/blue_book/blueguide_en.pdf.

Ireland allocating between 5.3 and 7.1 percentage points more.⁴² Only ten Member States decided to allocate exactly the minimum share.⁴³

Member States' ESF spending priorities reflect national strategies for fighting unemployment, poverty, and social exclusion, as well as country-specific recommendations under the European Semester⁴⁴ and Council recommendations.⁴⁵ Depending on the wealth of a subnational region, a certain minimum percentage of the ESF budget must be concentrated on up to five of the investment priorities of each operational programme: more developed regions (at least 80 per cent), transitioning regions (at least 70 per cent), and less developed regions (at least 60 per cent). In other words, **transitioning and less developed regions have more flexibility in how they spend a portion of the ESF**. These requirements are supposed to ensure that enough funding is targeted to key investment priorities in a way that will yield significant results. Within these requirements, **Member States are required to safeguard at least 20 per cent of funding for social inclusion, making this a key priority within the ESF**.

Under the ESF+, funding earmarked for social inclusion could increase to 25 per cent according to the European Commission's proposal **or to 27 per cent** under the European Parliament's January 2019 report. There were numerous proposals to raise it even further, up to 30 per cent.⁴⁶ This proposed benchmark will **essentially confirm the status quo, rather than push Member States to increase spending on social inclusion, given that the majority of Member States already allocated between 20 and 30 per cent of their 2014–20 ESF budgets to such programming**, and some states (e.g., Austria, Belgium, France, Germany, Ireland, Latvia, Malta, and the Netherlands) allocated more than 30 per cent.⁴⁷ But even where inclusion funding has been generous, it may still be more limited than what is allotted to other issue areas. In 2014–20, most Member States directed more funds to the other two major priorities: sustainable and quality employment, and education and vocational training (see Figure 2).⁴⁸

⁴² In Italy this amounted to 33.6 per cent instead of the 26.5 per cent required), in Hungary it was 30.5 per cent instead of 24.0 per cent, in Estonia it was 23.8 per cent instead of 18.0 per cent and in Ireland it was 57.0 per cent instead of the required 51.7 per cent. See European Commission, *The Analysis of the Outcome of the Negotiations Concerning the Partnership Agreements and ESF Operational Programmes, for the Programming Period 2014-2020* (Brussels: Directorate-General for Employment, Social Affairs and Inclusion, September 2016) <https://publications.europa.eu/en/publication-detail/-/publication/b2c01d15-ffef-11e6-8a35-01aa75ed71a1/language-en>.

⁴³ These ten Member States are Belgium, Cyprus, Denmark, Finland, France, Luxembourg, Netherlands, Malta, Romania, and the United Kingdom. Ibid.

⁴⁴ In accordance with Article 121(2) the Treaty on the Functioning of the European Union (TFEU). See 'Consolidated Version of the Treaty on the Functioning of the European Union', *Official Journal of the European Union*, 2012 C 326/50, 26 October 2010, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:12012E/TXT&from=EN>.

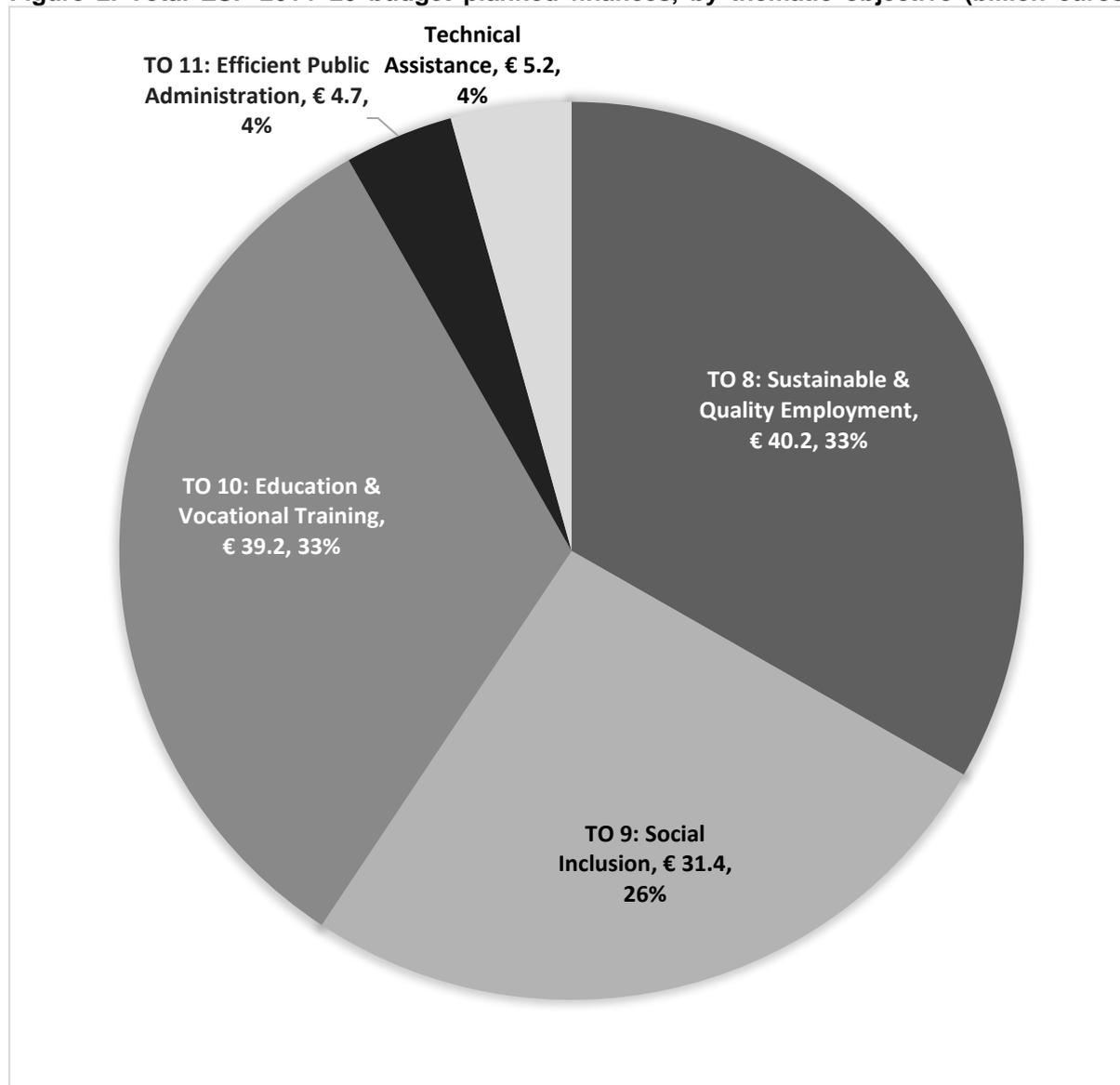
⁴⁵ In accordance with Article 148(4) TFEU. Anecdotal evidence from nongovernmental organisations suggested that the ESF's strong accent on employability was a problem for the Member States which have almost no unemployment. However, rather than leading to higher allocations towards Thematic Objective 9, there is no clear pattern between the percentage allocated to the different thematic objectives by each Member State and its unemployment levels.

⁴⁶ Such as the European Economic and Social Committee (EESC), ECRE, PICUM, the European Anti-Poverty Network, and Social Platform.

⁴⁷ Fintan Farrell and Patrizia Brandellero, *Social Inclusion Indicators for ESF Investments: Areas for Development in Addressing the 20% Social Inclusion Target in the ESF* (N.p.: ESF Transnational Platform and Aeidl, 2018), <https://ec.europa.eu/esf/transnationality/content/social-inclusion-indicators-esf-investments-areas-development-addressing-20-social-inclusion>.

⁴⁸ There were 243 actions planned under Thematic Objective 8, 203 under Thematic Objective 9, 203 under Thematic Objective 10, 94 under Thematic Objective 11, and 226 under Technical Assistance. See European Commission, 'European Structural and Investment Funds—Data by Fund—European Social Fund', accessed 23 November 2018, <https://cohesiondata.ec.europa.eu/funds/esf>.

Figure 2. Total ESF 2014–20 budget planned finances, by thematic objective (billion euros)



Source: Author analysis of data from European Commission, ‘European Structural and Investment Funds—Data by Fund—European Social Fund’.

One possible reason for the allocation of more than the minimum share of funds to Thematic Objective 9 is that social inclusion is often seen through the lens of labour-market inclusion, meaning Member States may view the allocation as an investment in overall economic growth. An evaluation of Spain's 2007–13 operational programme for the fight against discrimination (focusing on the social inclusion priority) concluded that the activities produced 9 million euros in savings by substituting social support with employment.⁴⁹ Member States may also view the objective of social inclusion (Thematic Objective 9) as a slightly more flexible extension of the objective of sustainable and quality employment (Thematic Objective 8). The European Commission’s comments on draft partnership agreements reveal that some Member States

⁴⁹ European Commission, ‘Commission Staff Working Document: Impact Assessment Accompanying the document Proposal for a Regulation of the European Parliament and the Council on the European Social Fund Plus (ESF+) and Proposal for a Regulation of the European Parliament and the Council on the European Globalisation Adjustment Fund (EGF)’ (SWD [2018] 289 final, 30 May 2018), https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-esf-egf-swd_en.pdf.

hardly distinguish between the two thematic objectives.⁵⁰ However, when it comes to raising the profile of migrant inclusion in ESF funding, perhaps even more important than earmarking funding allocations is taking steps to ensure that these amounts are actually spent, and in a timely manner, as will be outlined in Section VI.

Key Takeaways:

- The ESF is the largest EU financial tool to support legally resident migrant populations and their descendants, but the current formula used to allocate funding does not take account of the size or characteristics of this population. The Berlin+ allocation formula proposed for the new ESF+ will include, for the first time, consideration of the share of net migration from outside the European Union to a given subnational region. However, it is unclear how the premium of 400 euros per person per year was calculated and the sum does not account for divergence in the costs of living in different regions.
- Most Member States not only allocated more of their total ESIF budget towards the ESF than they were required to in 2014–20, but within the ESF, they also allocated more towards Thematic Objective 9 (social inclusion) than the minimum threshold. There is clear appetite to boost social inclusion—and perhaps, though not explicitly named, migrant inclusion—but inclusion remains framed through an economic lens.
- According to interviewees at the national and subnational levels, migrants make up a significant proportion of participants in ESF-supported projects under all three main thematic objectives. However, data limitations make it impossible to pinpoint the degree to which this is the case.

V. MONITORING, REPORTING, AND EVALUATION

There are **four overarching challenges** within the current ESF evaluation structure that make it difficult to understand—and promote changes to—the degree to which the fund fosters migrant inclusion: (1) **the limited visibility of migrants in the common indicators**, (2) **the narrow economic focus of common result indicators**, (3) **the performance reserve**, and (4) **the limited participation of civil-society organisations in monitoring committees**. Each of these are explored in more detail in the subsections that follow.

The Common Provisions Regulation for the 2014–20 period outlines the monitoring, reporting, and evaluation guidelines for ESF programmes. More broadly, the key to measuring the overall performance of the funds is the performance framework, which includes a performance review undertaken by the European Commission in cooperation with Member States in 2019.⁵¹ This review monitors progress towards the priorities of each programme on the basis of annual implementation reports. For each priority, the performance framework defines milestones to be achieved by 2018 and targets to be accomplished by 2023.⁵² Milestones and targets based

⁵⁰ For example, European Commission, 'Observations on the Partnership Agreement with Sweden', 10 July 2017, https://ec.europa.eu/info/sites/info/files/partnership-agreement-sweden-observations-july2014_en.pdf.

⁵¹ 'Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund and repealing Council Regulation (EC) No 1083/2006', *Official Journal of the European Union*, 2013 L 347/320, 20 December 2013, Preamble (22), <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1303&from=EN>.

⁵² *Ibid.*, Annex II.

on the CPR's common criteria enable the European Commission and Member States to measure and compare progress towards specific objectives.

In the absence of clear indicators on migrant inclusion, there is only limited information that can be gleaned on this target group through the monitoring, reporting, and evaluation processes of the ESF. Furthermore, the evaluation process itself (see Table 2 in Section VII.A.)—including the selection of monitoring committee members and the new performance related reserve—does not ensure that the interests of migrants are represented or that funding for projects focused on migrant inclusion is in any way protected from cuts or elimination.

A. Limited visibility of migrants in common indicators

The limited visibility of migrants in both the thematic objectives and investment priorities of the ESF extends to the fund's common output and results indicators.⁵³ When migrants participate in funded programming, they are recorded within a category that is also for participants with a foreign background and minorities (including marginalised communities such as the Roma). This makes **it nearly impossible to accurately trace the amount of funding allocated to or spent specifically on migrants, or even to know who a country might count in its data as a migrant**: third-country nationals, Europeans with one or more migrant parent, returning citizens, intra-EU migrants, all foreign-born persons, or some other grouping. This potentially reduces government accountability for delivering effective programmes to this target group. Under the CPR proposals for the next funding cycle (2021–27), specific indicators would be introduced for third-country nationals and separate ones for participants with foreign and minority backgrounds.

While these proposals made it into the European Parliament's January 2019 report, there is still a possibility that they will be axed during negotiations with the Council (see Box 3). **Some Member States may be less interested in having such indicators broken out, particularly if their privacy regulations could make it difficult to comply.** For example, in France it is only legal to collect data on country of birth and not nationality. Adding more indicators to an already administratively tasking fund **could also make it less attractive to potential beneficiaries**—especially if failure to comply could result in funds not being reimbursed.⁵⁴ Moreover, **making reporting requirements on participants' personal data more stringent could discourage the participation of irregular migrants by dissuading applications for funding from the organisations that support them—in the few cases where irregular migrants are eligible to participate in ESF programming, such as educational activities for minors.**

⁵³ For example, the common output indicators for participants in Annex 1 of the ESF Regulation includes 'migrants, participants with a foreign background, minorities (including marginalised communities such as the Roma)'. There are a number of other participant indicators such as participants with disabilities, those living in jobless households, long-term unemployed, below 25 years of age, etc. 'Regulation (EU) No 1304/2013 of the European Parliament and of the Council of 17 December 2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006', *Official Journal of the European Union*, 2013 L 347/470, 20 December 2013, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1304&from=en>.

⁵⁴ MPI Europe interview with official, Ile-de-France Region, France, 11 January 2019.

Box 3. Disagreement over the use of migrant-specific output indicators

According to interviewees from DG HOME and DG EMPL, some Member States have recently become more interested in how many migrants are supported by the ESF. However, **the lack of a common and consistent definition of who is a migrant limits the scope for assessing ESF's impact on this target group.** It is not feasible to retroactively impose implementation indicators as they should be part of a financial framework from the beginning. As a result, the current indicators will remain in place until 2020. **Member States could, however, create their own programme-specific indicators to measure the participation of migrants,** potentially seeking guidance from the European Commission's Help Desk on Evaluation. While this could yield some insights into the current ESF, the overall analytical value of such a step would be limited if it only covers a portion of the financial framework or if the definitions used do not allow for comparison either across Member States or operational programmes within a country (for example, if some measure third-country nationals while others measure all foreign-born persons). It could, however, be useful as a preparation or trial for the next MFF.

Yet, this appetite for being able to more accurately track spending on migrants is not universal, and some countries would prefer not to highlight spending on migrants. **In addition to political opposition to the collection of data on migrants, there are also practical reasons not to do so.** It could increase the administrative burden on beneficiaries. Moreover, in increasingly diverse societies, it is difficult to draw a bright line between migrants and non-migrants. A 'mainstream' approach that focuses on vulnerabilities instead of particular background characteristics could be more effective, given that not all migrants are vulnerable, and those who are share many needs and challenges with other members of society. On the other hand, **migrants can have unique needs,** especially regarding language. In addition, migrants' lack of familiarity with or entitlement to mainstream services can make them more reliant on civil-society actors and actions funded through the ESF.

See also: Elizabeth Collett and Milica Petrovic, *The Future of Immigrant Integration in Europe: Mainstreaming Approaches for Inclusion* (Brussels: Migration Policy Institute Europe, 2014), www.migrationpolicy.org/research/future-immigrant-integration-europe-mainstreaming-approaches-inclusion.

Even without a common indicator on migrants in the 2014–20 ESF, some Member States have been looking for ways to explore how (well) the ESF is supporting this target group. For example, the French national managing authority is completing an internal report on this topic. External consultants commissioned within the context of the ESF 2018–19 annual implementation report and 2019 progress report also produced an ad hoc note with a focus on migrant inclusion.⁵⁵ But this is exceptional rather than the norm.⁵⁶ However, **these isolated cases could be a starting point for sharing promising practices with managing authorities that would like to do the same,** either during this funding cycle or in the next one. The European Commission's Evaluation Help Desk, which provides support to Member States on impact, process, and monitoring and evaluation, could help with these efforts.

⁵⁵ MPI Europe interview with consultant, Applica, (Consultants on ESIF Evaluations), 22 November 2018.

⁵⁶ Ibid.

B. Common results indicators

Assessments of ESF programmes are based on three types of indicators: financial indicators relating to expenditure allocated; output indicators relating to supported activities (such as, the number and types of participants); and result or outcome indicators relating to the investment priority at the heart of the programme (such as the number of participants in employment six months after the project ends).⁵⁷ Several civil-society interviewees felt, however, that more value was given in these assessments to administrative requirements (e.g., filling in the right box on the correct form or having a logo displayed in the correct places) and not to genuine results such as improvements in the lives of participants or the social and economic standing. Furthermore, some lamented that even within the common result indicators, progress is primarily viewed through a narrow employment lens, when a great deal of programmatic work goes into moving people who may, for example, suffer substance abuse or have been homeless or long-term unemployed, closer to the labour market, even when this does not result in a job.⁵⁸ For irregular migrants, asylum seekers, and refugees, these challenges may be compounded by experiences of trauma or interrupted school trajectories. Rushing a participant into work too quickly in order to satisfy result indicators can even be counterproductive if the person is not in a position to maintain it.

Although the ESF+ proposal sets out a more clearly defined role for the fund on issues relating to longer-term migrant inclusion, such as labour-market and health-care access, antipoverty, and social inclusion measures, the proposed common results indicators for 2021–27 are still employment focused. In some contexts, such as Poland, where many migrants either arrive with a work contract or find jobs easily, there could be more added value from ESF projects that focus on social inclusion results. Such measures could include, for example, a sense of belonging to the national community, increases in host-country language proficiency, decreases in the share of migrants who have felt discriminated against, and gains in life satisfaction.⁵⁹ Crucially, some employment results are interlinked with social inclusion measures, such as attitudes towards women’s role in the household. One ESF beneficiary of a labour-market inclusion project explained that although there is no ESF result indicator for changes in attitudes towards gender equality, it plays a large role in success of the project.⁶⁰

C. Performance reserve

The 2014–20 funding period also introduced a performance-related ‘reserve’—essentially a bonus system for programmes that achieve their milestones on time—that could result in either additional or fewer resources for investment priorities related to migrant inclusion and social cohesion. Under the scheme, Member States will receive an extra 5 per cent to 7 per cent of the resources allocated to a particular investment priority for programmes and priority areas that have achieved their milestones by the end of 2018.⁶¹ This is intended to promote quick implementation and a focus on achieving results.

⁵⁷ ‘Regulation (EU) No 1304/2013 of the European Parliament and of the Council of 17 December 2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006’, *Official Journal of the European Union*, 2013 L 347/470, 20 December 2013, Annexes I-II, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1304&from=en>

⁵⁸ MPI Europe interview with Heidi Sandberg, Policy Officer, National Forum for Voluntary Organisations (Social Forum), Sweden, 6 December 2018.

⁵⁹ Organisation for Economic Cooperation and Development (OECD) and European Union, *Indicators of Immigrant Integration: Introduction and Overview* (Paris and Brussels: OECD Publishing, 2018), <http://www.oecd.org/publications/indicators-of-immigrant-integration-2018-9789264307216-en.htm>.

⁶⁰ MPI Europe interview with Anna Mårtensson, Integration Halland, Project Manager, Sweden, 28 November 2018.

⁶¹ The total amount of the reserve allocated by the ESIF will be 6 per cent. See European Commission, *European Structural and Investment Funds 2014-2020: Official Texts and Commentaries* (Luxembourg: Publications Office of the

The European Commission will determine which investment priority areas have achieved their milestones based on the information and assessments presented by Member States in the 2019 annual implementation report. **Where Member States have not achieved their milestones, the share of the performance reserve allocated to those priorities will be reallocated towards priorities that have**—and no later than three months after the Commission makes its decision.⁶² In cases where milestones are not met and Member States fail to implement corrective measures (i.e., reallocation of performance reserve or amendments to the programme), the European Commission could suspend or reduce payments.⁶³ Hence, **if Member States have been slow to implement programmes, including those that benefit migrants—either on purpose or unintentionally⁶⁴—funding for these programmes may be shifted towards the more effective ones.**⁶⁵ Interestingly, even before the performance reserve can be tested in the current funding cycle, it has been dropped from the ESF+ proposal, which instead delays budget allocations for the last two years of the 2021–27 period until an in-depth mid-term review in 2025.⁶⁶

D. Limited civil-society participation in monitoring committees

Once the European Commission has approved ESF programmes, Member States must set up monitoring committees within three months.⁶⁷ A representative of the Member State or the managing authority chairs each committee, with the rest of the seats filled by relevant national and local authorities and programme representatives.⁶⁸ **Participating in the national and subnational monitoring committees can give migrant-focused organisations the opportunity to influence the strategic direction and implementation of the ESF.** This may

European Union, 2015),

https://ec.europa.eu/regional_policy/sources/docgener/guides/blue_book/blueguide_en.pdf.

⁶² ‘Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 laying down common provisions’, *Official Journal of the European Union*, 2013 L 347/320, 20 December 2013, Article 21, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1303&from=EN>.

⁶³ *Ibid.*

⁶⁴ For example, the Polish Ministry of Interior cancelled a March 2015 AMIF call for proposals, citing ‘The migration crisis, increase in terrorist activity and growing concerns about the impact of the current migration situation on internal security have led to the need to assess the existing measures implemented in the field of adaptation and integration of foreigners’ (author’s translation). Three calls were subsequently published, but a group of nongovernmental organisations were still waiting for the results in December 2016. While there is no information on the ministry’s website that subsequent calls were cancelled, there is also no list of grants awarded, which has to be published in accordance with Polish law on access to public information. If the ESF takes a more prominent role in migrant integration under the next financial framework, these sorts of challenges may also impact the ESF+. See Anonymous (19 non-governmental organisations), ‘Letter to Jakub Skiba, Minister of Internal Affairs and Administration’, 19 December 2016, http://ffrs.org.pl/wp-content/uploads/2016_12_19_List_wSprawie_FAMI_Poszlo_Tresc_StrInt.pdf; Matthias Oel, ‘Your Email of 22 March 2017 to Commissioner Dimitris Avramopolous - Immigration Integration Programs in Poland’, 7 April 2017, <https://www.facebook.com/InterkulturalniPL/photos/a.151662441572153/1445760752162309/?type=3&theater>; Ministry of Interior and Administration (MSWiA), ‘Dwa Nowe Nabory w Ramach Funduszu Azylu, Migracji i Integracji’, accessed 7 December 2018, <http://fundusze.mswia.gov.pl/ue/nabory-projektow/fundusz-azylu-migracji/13783.Dwa-nowe-nabory-w-ramach-Funduszu-Azylu-Migracji-i-Integracji.html>.

⁶⁵ If there evidence that failure to achieve the milestones are due to implementation weaknesses then the Commission can suspend all or part of the interim payments for this priority, but it is not clear what the benchmark of proof is, whether the Commission would follow through on this option, and if that would worsen the situation for projects under these programme areas.

⁶⁶ European Commission, ‘Proposal for a Regulation of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, and the European Maritime and Fisheries Fund and financial rules for those and for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument’ (COM [2018] 375 final, 29 May 2018), <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2018%3A375%3AFIN>.

⁶⁷ ‘Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 laying down common provisions’, *Official Journal of the European Union*, 2013 L 347/320, 20 December 2013, Article 47(1), <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1303&from=EN>.

⁶⁸ *Ibid.*, Article 48(1,5).

be done, for example, by giving input into the design of calls for projects and helping decide between competing proposals. However, invitations to join these committees are typically handed out through closed processes, and migrant organisations may be considered too small (and therefore not representative) to participate or they may be simply overlooked.

The committees meet at least once a year for performance monitoring, taking into account any issues that impacted affected the operational programmes, such as delays in the calls for projects or issues with payment.⁶⁹ Under the partnership and multi-level governance principle, Member States are required to facilitate inclusive participation, including that of social partners and civil-society organisations, in monitoring committees.⁷⁰ **However, there is no strict obligation to include civil-society organisations that represent the populations targeted by a programme, such as migrants.**

While interviewees consulted for this study could not recall any migrant-focused organisations sitting on monitoring committees, they indicated that such groups may be represented indirectly through umbrella organisations. However, the extent to which an umbrella organisation can and will push for consideration of migrants in performance assessments is unclear. In contrast, according to one managing authority interviewee, because gender equality is an overarching principle of the ESF, organisations focused on gender equality, may be invited to join monitoring committee, in accordance with article 5 of the CPR.⁷¹ Non-discrimination is also an overarching principle, but it does not appear that this has been interpreted in way that has led to greater inclusion of representatives from marginalised groups. Still, the increased focus on migrant inclusion in ESF+ could lead to greater participation by migrant-focused civil-society organisations in monitoring committees. **These organisations could also be invited as observers, regardless of whether they are involved in implementing ESF programmes, to integrate their unique expertise into the broader process.** In Poland, for example, monitoring committees accommodate observers, such as from the European Commission and the European Investment Bank, that are able to express opinions and participate in deliberations but without being able to vote. This model does not appear to be used for civil-society organisations, but it could allow more to be heard.

Under the ESF+ proposal, monitoring committees may receive even more authority vis-à-vis the managing authorities, which makes this a key moment to ensure that diverse views, including those of migrants, are represented. Aside from direct civil-society representation on or observation of these committees, some private philanthropies may consider funding shadow reporting and evaluations by civil-society and migrant-focused organisations to help feed their experiences and expertise into this process.

Key Takeaways:

- The lack of a common and consistent definition of who is a ‘migrant’ in programme indicators limits the scope for assessing the impact of the ESF on this target group. And while there is some interest in introducing this type of indicator, it must be in place at the beginning of a funding cycle in order to be an effective tool for evaluation and comparative analysis.
- There are only isolated cases of Member States evaluating how their ESF programmes contribute to migrant inclusion. This makes it impossible to comprehensively assess the extent to which the fund is making a positive impact in this policy area, and the ability to compare states and identify good practices. Member State implementation of their own programme specific indicators beyond the Common Provisions Regulation could go some

⁶⁹ Ibid., Article 49(2).

⁷⁰ Ibid., Article 5(1-3).

⁷¹ MPI Europe interview with a representative from a regional ESF managing authority, Germany, 23 November 2018; *ibid.*

way towards identifying the impact of ESF on migrants, and the European Commission's Help Desk on Evaluation could be a central point of reference for Member States or beneficiaries wishing to do so.

- The (as yet untested) performance reserve is designed to reallocate Member States' funding to the most effective priorities. However, this could harm programmes supporting migrant inclusion if managing authorities have been (intentionally or unintentionally) slow to implement them.
- Migrant-focused organisations could play an important role in national and subnational ESF monitoring committees by shaping their strategic directions and advising on proposals. But while the Common Provisions Regulation has broad guidelines on what kinds of organisations should be involved, implementation varies across Member States and there are no consequences for not including organisations that represent target participants, such as migrants.

VI. IMPLEMENTATION OF ESF FUNDS FOR MIGRANT INCLUSION

A number of challenges complicate the effective and efficient implementation of the ESF for migrant inclusion. Attempts to make the fund more dynamic and flexible, such as through multi-fund operational programmes, have in some cases led to delays in implementation and project selection while authorities learn the new rules—disadvantaging the organisations reliant on the ESF for support, as well as migrants and other participants in their programming. Moreover, as discussed in the previous section, the lack of clear definitions or unique indicators for migrants makes it nearly impossible to count migrant participants or assess how well their needs are being met. Finally, the overall number of ESF participants with a migrant, minority, or foreign background in a given year masks huge variation in how these persons are distributed between investment priorities and across Member States, potentially making it appear that migrants and minorities are well represented among beneficiaries when in fact an exceptionally large share of these participants are concentrated in a single country (as in France in 2015–16, see Figure 5).

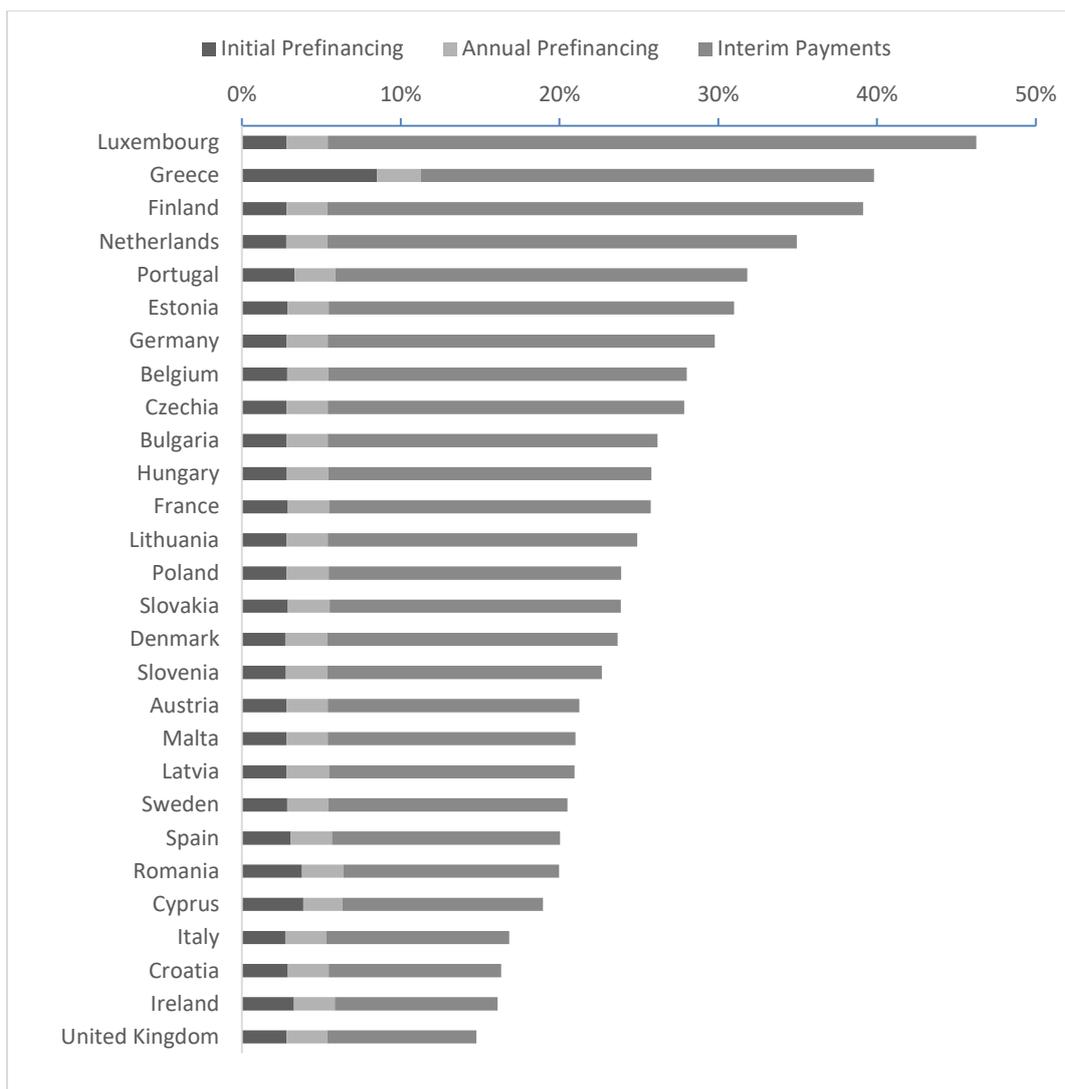
A. EU payments

On average, the European Union had paid nearly 20 per cent of ESF funds to Member States allocated for the 2014–20 cycle as of 23 November 2018; this percentage is based on the average share of initial prefinancing, annual prefinancing and interim payments by the European Commission (see Figure 3).⁷² These figures vary significantly from more than 30 per cent in Luxembourg, Greece, Finland, and the Netherlands, to less than 15 per cent in United Kingdom, Italy, Malta, Croatia, Spain, Romania, and Ireland.⁷³

Figure 3. Share of 2014–20 ESF allocated funds paid by the EU to Member States, as of 23 November 2018

⁷² These three payment types are used by the Commission to distribute EU Structural and Investment funding. For further information on this, see European Commission, 'Glossary – Payments', accessed 26 February 2019, https://ec.europa.eu/regional_policy/en/policy/what/glossary/p/payments.

⁷³ Funding that is not spent during the financial cycle will be decommitted and reabsorbed by the European Commission.



Source: Author analysis of data from European Commission, ‘European Structural and Investment Funds—Data by Fund—European Social Fund’.

This variation can be explained to some degree by managing authorities’ difficulties adapting to new rules on multi-fund programmes, and subsequent delays implementing projects. The 2014–20 Common Strategic Framework offered Member States the option to combine ESF operations with other structural funds. However, this **flexibility was at the expense of agility: the ESF-only operational programmes had the highest project selection rate**⁷⁴ (33 per cent compared to 21 per cent for multi-fund ESF/ERDF operational programmes) and the highest share of declared expenditure⁷⁵ (8 per cent compared to 4 per cent ESF/YEI, 3 per cent ESF/ERDF, and 5 per cent ESF/other multi-fund).⁷⁶ Moreover, Member States reported that **combining funds made implementation more difficult than with a single-fund operational programme**, largely due to differences in fund-specific rules and the different

⁷⁴ The project selection rate is the share of funding allocated under an operational programme that has been absorbed by projects.

⁷⁵ Declared expenditure is the share of eligible costs (according to the ESF Regulation and Common Provisions Regulations) that has been claimed by project beneficiaries compared to the share of funding allocated under an operational programme.

⁷⁶ Fondazione G. Brodolini and European Commission, *Synthesis Report of ESF 2017 Annual Implementation Reports Final report* (Luxembourg: Publications Office of the European Union, 2018)

<https://ec.europa.eu/esf/transnationality/content/synthesis-report-esf-2017-annual-implementation-reports>.

levels of reporting detail needed for each fund.⁷⁷ Specific trainings and tailored support on how to coordinate and manage multi-fund operational programmes could therefore be useful, in addition to more simplified and harmonised rules in the next financial framework. The managing authority of Sweden solved the problem of multi-fund operational programme delays in rural regions by assigning a single authority for all funds and applying a singular comprehensive set of implementation and financial regulation requirements.⁷⁸

Managing authorities are required to monitor projects awarded under different funds to ensure that they are not being funded more than once for similar projects. Yet these attempts to boost synergies between funds, such as by prioritising between similar projects that target the same group, can similarly result in implementation delays, at least in the short term. **If attempts to boost synergies result in delays in project selection, nongovernmental organisations that receive little to no support from the state and instead rely heavily on the ESF may face shortfalls.** Delays in the current MFF negotiations may already leave Member States scrambling to put together partnership agreements and start implementing the ESF+, which could compound delays further. At the EU level, if some activities have to be paused or abandoned in some Member States due to a funding gap, this may undermine the European Union's ability to promote certain objectives in relation to national migration, integration, and asylum systems.

Due to the complex nature of the ESF both for managing authorities and beneficiaries, it can be difficult for unseasoned experts to maximise the fund's potential benefits. For example, when France reorganised its ESF management structure for 2014–20 to delegate authority to subnational governments for the first time, these governments did not receive sufficient guidance on how to make strategic operational programmes.⁷⁹ According to one interviewee in France, the country's regional programme is more of a laundry list of priorities, which has made implementation more difficult.⁸⁰ Beneficiaries also complain that a certain level of expertise is needed to cope with the ESF's administrative requirements.⁸¹

B. Project participants with migrant backgrounds

It is too early to tell what effects the ESF has had thus far on migrants and minorities, as Member States are required to report on result indicators for the first time in their 2018 annual implementation reports, to be submitted in 2019. And even when the data are available, because there is no migrant-specific indicator or definition of this group, it will not be possible to determine how many migrants (however defined) are included within the output indicator for persons with a migrant, foreign, or minority background, such as Roma. However, using this broad category as the closest available proxy and looking at figures from 2015 and 2016 (the latest available data), **it would seem that there are many projects serving persons with a migrant, foreign, or minority background. These projects are largely centred around only three Investment Priorities.**

At least for actions implemented in the first two years of the current ESF, 47 per cent of participants with a migrant or minority background were part of projects that fell under the

⁷⁷ Ibid.

⁷⁸ Ibid.

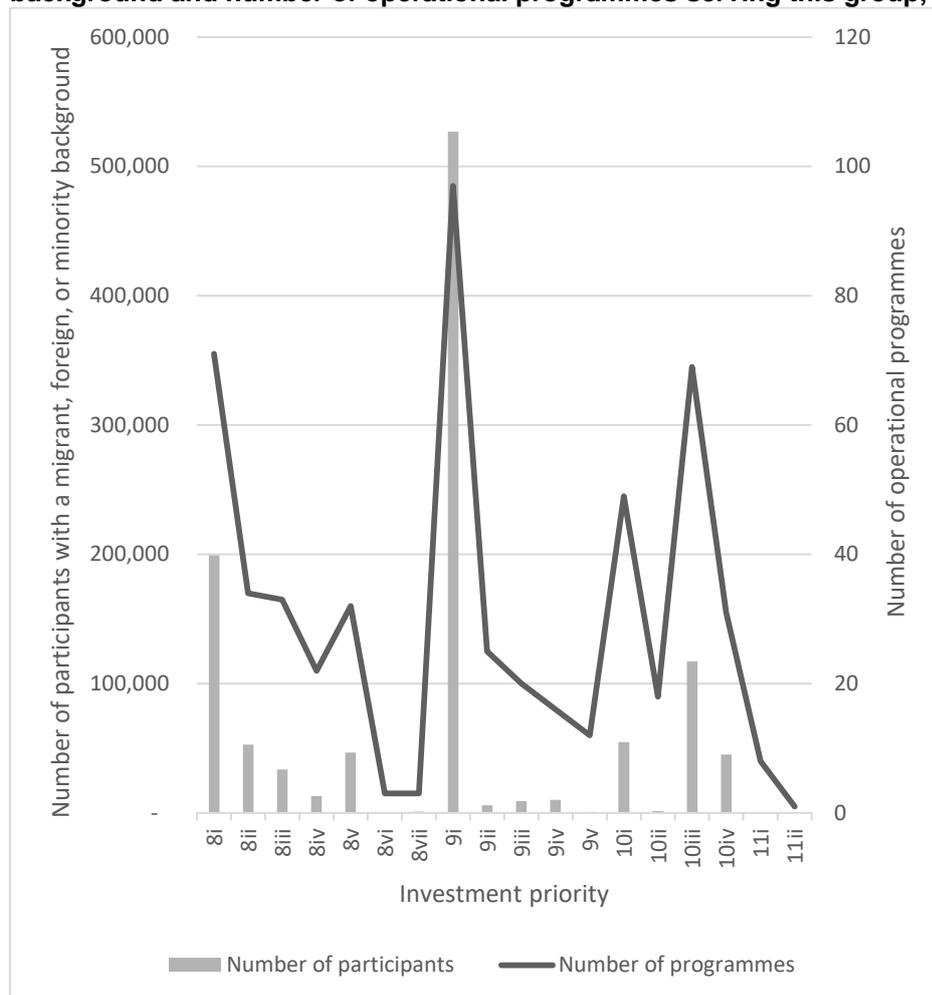
⁷⁹ France's subnational governments manage 35 per cent of the national envelope of the ESF, particularly in the field of vocational training and apprenticeships. The national government manages the remaining 65 per cent, mainly in the fight against poverty and access to employment. Ministry of Labour, 'Qu'est-ce que le FSE?', Fonds Social Européen en France 2014-2020, accessed 30 January 2019, <http://www.fse.gouv.fr/quest-ce-que-le-fse>.

⁸⁰ MPI Europe interview with official, Ile-de-France.

⁸¹ MPI Europe interview with Marie-Josée Come, Responsable du Service FESI, Correspondante Académique Fonds Structurels, DAFPIC/GIP-FCIP and Elisabeth Delabre, Creteil, France 16 January 2019.

investment priority 9i (active inclusion⁸²) within the thematic objective on promoting social inclusion, combating poverty and any discrimination (see Figure 4). The other priority areas with the largest shares of migrant and minority participants were 8i (access to employment for jobseekers and economically inactive people, including the long-term unemployed and people far from the labour market) and 10iii (enhancing equal access to lifelong learning for all age groups; upgrading the knowledge, skills, and competences of the workforce; and promoting flexible learning pathways). This confirms that **although Thematic Objective 9 is the most obviously related to migrant inclusion, the other thematic objectives also support this aim**. Given that the implementation rate of projects under the 2014–20 ESF has been slower than usual (see Section VI.A.), it is likely that figures tracking the number of people served will increase in the later years of the financing cycle.

Figure 4. Number of ESF programme participants with a migrant, foreign, or minority background and number of operational programmes serving this group, 2015–16



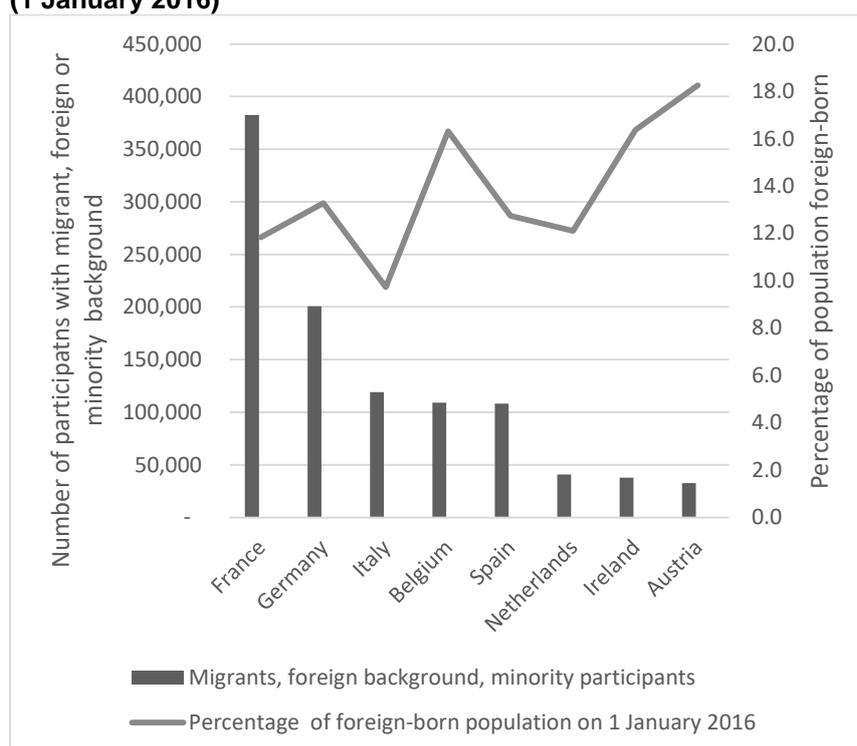
Source: Author analysis of data from European Commission, ‘European Structural and Investment Funds—Data by Fund - European Social Fund’.

Importantly, EU-level data mask important differences in implementation patterns between Member States (see Figure 5). Of the 1,118,000 ESF programme participants with a migrant, foreign, or minority background in the period 2015–16, more than 34 per cent (382,000) were located in France. While this may stem from the large number of foreign-born persons in France

⁸² The Commission defines active inclusion as ‘enabling every citizen, notably the most disadvantaged, to fully participate in society, including having a job’. Annex 1 shows the number of programmes and participants falling under this investment priority. European Commission, ‘Policies and Activities – Active Inclusion’, accessed 26 February 2019, <https://ec.europa.eu/social/main.jsp?catId=1059&langId=en>.

(approximately 8 million in 2016), this is only a partial explanation. For example, in Italy, with a foreign-born population of almost 6 million, there were only 119,000 participants with migrant or minority backgrounds. One potential explanation for France’s higher numbers is that the profile of its migrant population tends to be closer to that of those who can benefit from the ESF,⁸³ whereas migrants in some other Member States may have fewer challenges entering the labour market or finishing education. Additionally, the existence in France of administrative ‘priority zones’ in disadvantaged neighbourhoods, which receive additional national funds, may mean that the nongovernmental organisations in the country that apply for ESF funding are better organised and able to hit the ground running with implementation (see Annex 2).

Figure 5. Number of ESF programme participants with a migrant, foreign, or minority background in the top Eight Member States (2015–16) and size of the foreign-born population (1 January 2016)



Source: Author analysis of data from European Commission, ‘European Structural and Investment Funds—Data by Fund—European Social Fund’.

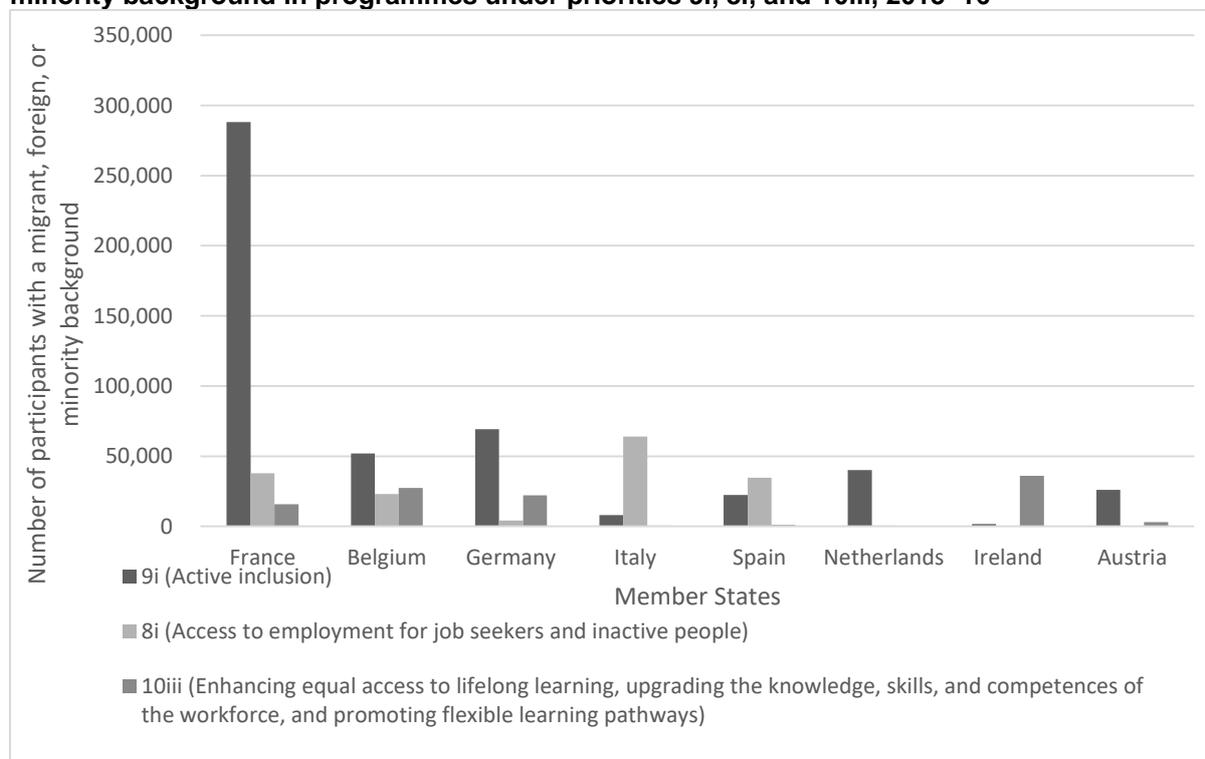
However, analysis of the top three investment priorities for participants with a migrant, foreign, or minority background shows an even more complex picture (see Figure 6). While the available data suggest that activities tied to or funded under ESF priority 9i have targeted the highest number of persons with a migrant, foreign, or minority background, the majority (55 per cent or 288,145 people) of participants in 9i programmes live in France. In other Member States, migrant, foreign, and minority participants are more evenly distributed between other top priority areas—though some states skew more heavily towards certain priorities, such as 8i in Italy and 10iii⁸⁴ in Ireland. Only time will tell how these trends will evolve over the

⁸³ MPI Europe interview with Marie-Josée Come, Responsable du Service FESI, Correspondante Académique Fonds Structurels, DAFPIC/GIP-FCIP and Elisabeth Delabre, Creteil, France 16 January 2019.

⁸⁴ Investment priority 8i is access to employment for job-seekers and inactive people, including the long-term unemployed and people far from the labour market, also through local employment initiatives and support for labour mobility), and investment priority 10iii is enhancing equal access to lifelong learning for all age groups in formal, nonformal, and informal settings; upgrading the knowledge, skills, and competences of the workforce; and promoting flexible learning pathways, including through career guidance and validation of acquired competences. See European Commission ‘Commission Implementing Regulation (EU) No 215/2014 of 7 March 2014 laying down rules for

remainder of the financial period, but it is likely that these three areas will remain key resources for projects related to migrant inclusion and social cohesion.

Figure 6. Top Eight Member States by number of ESF participants with a migrant, foreign, or minority background in programmes under priorities 9i, 8i, and 10iii, 2015–16



Source: Author analysis of data from European Commission, 'European Structural and Investment Funds—Data by Fund—European Social Fund'.

Key Takeaways:

- Between 2015 and 2016, more than 1.1 million ESF participants had a migrant, minority, or foreign background. However, this topline number masks considerable variation in how these participants were distributed between investment priorities and across Member States.
- Most participants with migrant and minority backgrounds were concentrated in programmes under Thematic Objective 9 as of 2015–16, and, more specifically, under Investment Priority 9i on active inclusion, which also had the highest number of operational programmes. However, with an exceptionally high concentration of those 9i-programme beneficiaries in France, this balance may shift as more national and subnational programmes are implemented and related monitoring data are collected.
- ESF-funded activities targeting or reaching persons with migrant, foreign and minority backgrounds occur under other investment priorities as well, such as 8i and 10iii, with

implementing Regulation (EU) No 1303/2013 of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund with regard to methodologies for climate change support, the determination of milestones and targets in the performance framework and the nomenclature of categories of intervention for the European Structural and Investment Funds', 7 March, 2014, <https://webgate.ec.europa.eu/esiflegislation/pages/viewpage.action?pageId=34441370>.

some Member States having more even distribution of migrant, foreign and minority background participants and others skewing more heavily to a particular priority.

- Funding gaps caused by the late adoption of the MFF at the EU level, requiring managing authorities to adapt rapidly to new regulations and instruments, can be particularly problematic for activities—and the organisations delivering them—that otherwise receive little state funding. Greater support could help managing authorities, and especially those with less ESF experience, adapt to these structural changes, including through virtual and in-person trainings and improved coordination systems across funds.

VII. IMPLICATIONS FOR CIVIL-SOCIETY ORGANISATIONS

Alongside public authorities, civil-society organisations are the main beneficiaries of the fund.⁸⁵ Yet their position as implementers is not always matched by representation at the table at key decision-making moments, whether in contributing to partnership agreements or participating in monitoring committees (see Section V). According to the European Code of Conduct on Partnership for ESIF, partners invited to contribute to the preparations of partnership agreement should include the ‘most representative of the relevant stakeholders’, for example, by giving feedback on the priorities, challenges, and good practices in the current funding cycle and offering written and oral feedback on drafts of the proposed agreements.⁸⁶ This means, in theory, that representatives of vulnerable and marginalised communities who may be affected by the national programmes but may find it difficult to influence their design and implementation—such as persons with disabilities, migrants, and Roma—should be included. In practice, however, according to interviewees and information on consultations included in Member States’ partnership agreements, there is limited evidence that migrant-led or migrant-focused organisations play a large role in the national or regional ESF.⁸⁷ Improving consultation, information-sharing, and training for civil-society organisations could give them the support they need to be able to contribute to the shaping of the ESF and ensure that their needs and interests are brought to the negotiation table. Although they are not widely used, the Common Provisions Regulation creates two additional tools for civil-society actors to take a leading role in designing and managing funds: community-led local development and the territorial investment tool.

⁸⁵ Most projects that are implemented by social partners or nongovernmental organisations are reported for investment priorities 9i on active inclusion (2,105); 8v on adaptation of workers, enterprises and entrepreneurs to change (2,061); 10i on improving the quality and efficiency of, and access to, tertiary and equivalent education with a view to increasing participation and attainment levels, especially for disadvantaged groups (844); and 10iii on enhancing equal access to lifelong learning for all age groups in formal, non-formal and informal settings, upgrading the knowledge, skills and competences of the workforce, and promoting flexible learning pathways, including through career guidance and validation of acquired competences (486). See Fondazione G. Brodolini and European Commission, *Synthesis Report of ESF 2017 Annual Implementation Reports Final report* (Luxembourg: Publications Office of the European Union, 2018) <https://ec.europa.eu/esf/transnationality/content/synthesis-report-esf-2017-annual-implementation-reports>.

⁸⁶ European Commission, ‘The European code of conduct on partnership’ (leaflet, Publications Office of the European Union, January 2014) <http://ec.europa.eu/esf/BlobServlet?docId=443&langId=en>.

⁸⁷ For an overview, see for example, Leda Stott, ‘Review of the European Code of Conduct on Partnership (ECCP)’ (technical dossier 7, Thematic Network on Partnership, European Commission, 7 June 2018), <https://publications.europa.eu/en/publication-detail/-/publication/d26c92e2-9abc-11e8-a408-01aa75ed71a1/language-en/format-PDF/source-74622160>.

A. Nongovernmental organisations' issues accessing funds

Member States could boost the submission, and eventual uptake, of proposals for projects designed and implemented by nongovernmental organisations and their partners simply by improving communication and information-sharing about calls for proposals and guidance on the application process. This includes projects with a migrant inclusion and social cohesion focus. A survey of beneficiaries revealed that the overall perception among almost 80 per cent of respondents was that the regulatory framework was still very complex for both managing authorities and ESF operators.⁸⁸ One interviewee from the ESF regional office in Stockholm explained that the reporting requirements of the ESF were one of the greatest challenges to its implementation.⁸⁹ Another in France lamented that despite the positive potential of the fund, the level of detail required when applying for funding and submitting implementation reports made it difficult to convince beneficiaries to come (back) to the ESF.⁹⁰

While the ESF's administrative requirements can be burdensome for any civil-society organisation, they can be prohibitive for many small organisations, especially where these ESF regulations are 'gold plated' with additional national and regional requirements.⁹¹ The reporting burden may be particularly disadvantageous for migrant organisations if their members are less familiar with the national/regional administrative system, and for any volunteer-run civil-society organisation that lacks sufficient administrative capacity. Moreover, some call-for-proposal requirements (e.g., large minimum budgets and annual turnover figures) can make it difficult for small organisations to qualify for funding without being in a consortium. However, there is some indication that this situation could improve with the limited but growing use of simplified cost options, where beneficiaries are reimbursed through lump sums or standard costs previously agreed with the Member States if they fulfil certain conditions or achieve certain results, instead of having to provide itemised expenditures.⁹²

There are an increasing number of examples of different nongovernmental organisations being partners with or subcontractors for larger partners who successfully bid for ESF funding,⁹³ a trend that could be especially promising for smaller entities. Yet **there is a need for continued simplification and increased uptake of simplified cost options in the current funding cycle**. One interviewee in Germany acknowledged that national regulations made it difficult to implement this tool in the current funding cycle.⁹⁴ As a result, the Ministry of Labour and Social Affairs has put forward proposals to simplify national regulations for the next funding period.

A major barrier to nongovernmental organisations participating in ESF project implementation is the lack of communications on funding opportunities and guidelines with clear instructions on financial and performance reporting requirements.⁹⁵ This guidance is provided at the

⁸⁸ Based on a survey requested by the European Parliament's EMPL committee of 71 respondents. See Istituto per la Ricerca Sociale, *The European Social Fund: Beneficiaries' Experience in the Current Funding Period* (Brussels: European Parliament: Policy Department for Economic, Scientific and Quality of Life Policies, 2018), [http://www.europarl.europa.eu/RegData/etudes/STUD/2018/626052/IPOL_STU\(2018\)626052_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2018/626052/IPOL_STU(2018)626052_EN.pdf).

⁸⁹ MPI Europe interview with official, ESF Council Stockholm, Sweden, 21 November 2018.

⁹⁰ MPI Europe interview with official, Ile-de-France.

⁹¹ MPI Europe interview with Heidi Sandberg, Sweden; MPI Europe interview with an official from the Federal Office of Family Affairs and Civil Society Functions, Germany, 7 December 2018.

⁹² Simplification is supported by a High-Level Group on monitoring simplification and ESF Platform on Simplification. But the overall uptake of these simplified cost options has been relatively modest, in part because of the difficulty changing existing administrative procedures and systems, and the initial extra workload in implementing these measures, and the additional national and regional rules and regulations that tend to over play the EU rules (what is known as 'gold plating'). See Istituto per la Ricerca Sociale, *The European Social Fund*.

⁹³ MPI Europe interview with representative, Swedish Monitoring Committee, Sweden, 16 November 2018.

⁹⁴ MPI Europe interview with an official from the Federal Office of Family Affairs and Civil Society Functions, Germany, 7 December 2018.

⁹⁵ See Istituto per la Ricerca Sociale, *The European Social Fund*.

Member State level and not by the European Commission, and its quality varies between states, with some having very up-to-date and easily navigable websites, and others less so.⁹⁶ The Common Provisions Regulation sets out what communication and information-sharing Member State and managing authorities must do: organise a major information ‘activity’ publicising the launch of an operational programme or programmes; display the EU emblem on their premises; publish an electronic list of operations; and give examples and updated information about the implementation of operations on either an ESF-specific website or the operational programme’s website in both the official language(s) of the Member State and (another) widely spoken official language of the European Union. Information is to be updated, but without any indication as to an appropriate timeframe for updates or whether pages should indicate the date they were last updated.

In reality, the information available on ESF-specific websites operated by different Member States varies. Box 4 describes some key strengths of the websites of the five countries examined as case studies for this study.

⁹⁶ Authors’ review of national ESF websites. See Ministry of Labour, ‘Fonds Social Européen en France 2014-2020’, accessed 23 November 2018, <http://www.fse.gouv.fr/quest-ce-que-le-fse>; Cabinet of Germany, ‘Europäischer Sozialfonds in Deutschland’, accessed 23 November 2018, <https://www.esf.de>; Department for Cohesion Policies, ‘OpenCoesione. Verso un migliore uso delle risorse: scopri, segui, sollecita’, accessed 23 November 2018, <https://opencoesione.gov.it>; Ministry of Investment and Development, ‘Portal Funduszy Europejskich’, accessed 23 November 2018, <http://www.funduszeuropejskie.gov.pl/>; Ministry of Employment and Social Affairs, ‘Svenska ESF-rådet’, accessed 23 November 2018, <https://www.esf.se/sv/>.

Box 4. Good practices on the ESF-specific websites of case-study countries

France: useful one-stop shop with up-to-date facts and figures from ESF evaluations and final performance reports (latest one from September 2018), as well as user-friendly archive of project implementation guidelines for beneficiaries.

Germany: user-friendly and in-depth catalogue of ESF projects (divided by federal and state level) including project descriptions, contact details, links to project websites, and relevant information on the role of the monitoring committee and contact details for its members.

Italy: comprehensive overview of articles describing examples of ESF good practices (until 2016) and a detailed list of monitoring committee members (including social bodies).

Poland: user-friendly and in-depth registry of ESF projects (categorised by target group) that includes project descriptions, contact details, links to project websites, and other relevant information, plus a list of trainings and conferences for those seeking ESF support (e.g., entrepreneurs).

Sweden: user-friendly and in-depth catalogue of ESF projects (categorised by target group), including project descriptions, contact details, links to project websites, and other relevant information, as well as an extensive overview of project implementation and monitoring and evaluation guidelines, often including PDFs with reporting and implementation tutorials.

Source: Author analysis of ESF websites. See Ministry of Labour, 'Fonds Social Européen en France 2014-2020', accessed 23 November 2018, <http://www.fse.gouv.fr/quest-ce-que-le-fse>; Cabinet of Germany, 'Europäischer Sozialfonds in Deutschland', accessed 23 November 2018, <https://www.esf.de>; Department for Cohesion Policies, 'OpenCoesione. Verso un migliore uso delle risorse: scopri, segui, sollecita', accessed 23 November 2018, <https://opencoessione.gov.it>; Ministry of Investment and Development, 'Portal Funduszy Europejskich', accessed 23 November 2018, <http://www.funduszeuropejskie.gov.pl/>; Ministry of Employment and Social Affairs, 'Svenska ESF-rådet', accessed 23 November 2018, <https://www.esf.se/sv/>.

Yet even among these examples of good practices, there are important gaps in the information Member States provide. This could constrain any actor looking to implement a project on social cohesion or migrant inclusion, especially those less familiar with the regulatory framework or with limited administrative capacity.

On the other hand, **some concerns have been raised that if managing authorities put too much emphasis on information-sharing, this could reduce the budget for actual actions.**⁹⁷

For example, according to an interviewee in Sweden, authorities there decided to use some ESIF funds allocated to tackle material deprivation on information-sharing activities rather than projects since there are already nationally funded protections for disadvantaged groups.⁹⁸ However, because there are always more people who could benefit from assistance, it will be key to balance cost-effective communications with spending on project activities, so that actors have both the information and the available funds they need.

⁹⁷ MPI Europe interview with Heidi Sandberg, Sweden.

⁹⁸ Ibid.

B. Partnership in practice: Untapped potential

Partnership agreements—both how they are negotiated and implemented—offer a (largely untapped) opportunity for civil-society organisations and stakeholders to promote migrant inclusion within national and subnational operational programmes. **Although the agreements are negotiated between national representatives and the European Commission, under the ‘partnership principle’ Member States are required to involve other partners, such as subnational governments, nongovernmental organisations, employers, and workers’ organisations in the design of the ESF strategy and in its monitoring and implementation** (see also Section V and VI).⁹⁹ As such, the development of agreements not only presents an opportunity for civil-society organisations to engage with national and regional ESF managing authorities on issues of concern, but also to directly take part in consultation, negotiation and decision-making processes related to the Agreement.

Subnational governments are especially important given that they are responsible for developing and implementing 136 of the 187 operational programmes agreed between the 28 Member States and the European Commission.¹⁰⁰ In Belgium and the United Kingdom, the local dimension of the ESF is so important that not a single national operational programme was produced.¹⁰¹ Civil-society organisations looking to boost migrant inclusion may also find it easier to get the ear of a subnational actor than a national one. Feedback may not be instantly acted on, especially given how many managing authorities are constrained by existing regulations, yet it can plant a seed that may improve the chances of making an impact on the next funding cycle.¹⁰²

However, the potential impact of the partnership principle is somewhat compromised by the flexibility currently granted to Member States during implementation. How and when they select partners, for which tasks, and how such information is advertised and how far in advance are all factors that can expand or limit the scope for civil-society involvement. Preparations for the partnership agreement in France, for example, began about one year before the new multiannual framework started. Relatively long time horizons like this can enable smaller organisations in particular to gear up for involvement. Under the partnership principle, states are encouraged to make special efforts to engage disadvantaged groups who are affected by ESF programmes but would otherwise find it difficult to influence them, such as migrants and Roma. But migrants are a very heterogeneous group in terms of nationality, legal status, length of stay, host-country language proficiency, and more. Certain migrant populations may be more visible to policymakers than others, potentially creating bias in which are represented when no systematic consultation procedures exist. Moreover, there is no requirement that Member States consult or engage with migrant-focused organisations specifically, and no consequences if they do not. Even when these groups are consulted, there is no accompanying requirement to first give them a crash course in how the ESIF and specifically the ESF works—knowledge which could increase their ability to make informed recommendations.

The participation of civil-society organisations in the preparation of partnership agreements thus varies widely. For example, there are uneven opportunities for migrant-focused organisations to be involved across Member States. The EU average is that 22 per cent of the partners in a partnership agreement are from civil society, but national figures range

⁹⁹ ‘Regulation (EU) No 1304/2013 of the European Parliament and of the Council of 17 December 2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006’, *Official Journal of the European Union*, 2013 L 347/470, 20 December 2013, Preamble (12), <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1304&from=en>.

¹⁰⁰ European Commission, *The Analysis of the Outcome of the Negotiations*.

¹⁰¹ *Ibid.*

¹⁰² MPI Europe interview with official, Ile-de-France.

from more than 50 per cent in France and Czechia to less than 2 per cent in the Netherlands, Portugal, and the United Kingdom and it is unclear how many of them are migrant-focused.¹⁰³

C. Voluntary inclusive design and management tools

The Common Provisions Regulation includes two new tools for distributing funds across priorities within or between the funds that make up ESIF (including the ESF), which could potentially enable community actors to have a more hands-on role in managing the funds and to involve smaller organisations. For example, it has the potential to encourage a place-based approach to migrant inclusion and social cohesion by supporting multiple priorities as part of a neighbourhood, municipal, or regional strategy under the Integrated Territorial Investment tool,¹⁰⁴ or within a whole-of-society approach by involving local civil society and residents in designing and implementing local projects through the community-led local development tool.¹⁰⁵ This tool allows local ownership over projects by encouraging a bottom-up approach (see Box 5). Under the ESF, priorities dedicated to this kind of programming receive a bonus top-up of 10 percentage points over the standard co-financing rates.¹⁰⁶ It would be interesting to monitor the eventual outcome of these measures, as at present these are taken up on a voluntary basis and only to a limited extent.

¹⁰³ Sweco and Spatial Foresight & Nordregio, *Implementation of the Partnership Principle and Multi-Level Governance during the 2014-2020 ESI Funds* (Luxembourg: Publications Office of the European Union, 2016), https://ec.europa.eu/regional_policy/en/information/publications/studies/2016/implementation-of-the-partnership-principle-and-multi-level-governance-during-the-2014-2020-esi-funds.

¹⁰⁴ An Integrated Territorial Investment (ITI) facilitates a geographical approach to particular challenges and development needs. It enables the implementation of a territorial strategy while drawing funds from at least two different priority axes in the same or different programmes. An ITI can be implemented at any sub-national level (e.g. region, municipality, neighbourhood, etc.) that has an integrated territorial development strategy. Use of it is completely voluntary.

¹⁰⁵ European Commission, 'Guidance for Member States and Programme Authorities on Community-Led Local Development in European Structural and Investment Funds', 17 September 2018, https://ec.europa.eu/regional_policy/sources/docgener/informat/2014/guidance_community_local_development.pdf.

¹⁰⁶ The rates are 80-85 per cent for less developed regions, 60 per cent for transition regions, 50 per cent for more developed regions and 85 per cent for European Territorial Cooperation programmes. Ibid.

Box 5. Community-led local development (CLLD) as a good practice

STARZEN vor Ort is a German federal ESF programme launched in 2009 which covered 280 administrative districts and local areas all over Germany. These ranged in size from small districts with only a few hundred inhabitants to those with hundreds of thousands of inhabitants. It was 85 per cent funded by the ESF and 15 per cent by local authorities. **The project funded 9,000 microprojects** (such as ones that only target three local schools) aimed at supporting vulnerable groups of young people, with or without a migrant background, and women suffering from social exclusion and/or vulnerability through activities such as job training and coaching. More than 220,000 young people and women participated between programme launch and the end of 2011. **It is considered an example of good practice for using committees made up of local stakeholders and institutions, residents, professionals, volunteers, officials, and politicians who decide which projects to fund based on local needs.** It also gave small organisations the opportunity to benefit from ESF funds, which they might not qualify for on their own.

Sources: European Commission, 'Guidance for Member States and Programme Authorities on Community-led Local Development in European Structural and Investment Funds' (working document, 17 September 2018), https://ec.europa.eu/regional_policy/sources/docgener/informat/2014/guidance_community_local_development.pdf; Federal Office of Family Affairs and Civil Society, 'STÄRKEN vor Ort', accessed 28 January 2019, <https://www.jugend-staerken.de/programme/programme-2007-2014/staerken-vor-ort.html>.

However, while there is untapped potential, it takes time for managing authorities to adapt. According to the 2016 annual implementation reports, only 13 Member States allocated budget to the ESF priority 9vi on community-led local development strategies. Among them, only Lithuania, Poland, and the United Kingdom had selected any projects. Successful development programming of this type requires a shift in mindset from both authorities and partners. Managing authorities have to learn to trust local actors to make decisions, and local partners have to learn to take responsibility for the projects they fund.¹⁰⁷ With time, however, and as trust is built, this method could become more popular, as they have in other policy realms. For example, community-led local development tools have been used in the European Agricultural Fund for Rural Development (EAFRD) for decades with broad and active participation.¹⁰⁸

Key Takeaways:

- The development of partnership agreements gives civil-society organisations the opportunity to engage with national and subnational ESF managing authorities on issues of concern and to take part directly in the consultation, negotiation, and decision-making processes related to the agreement. Outreach to subnational governments can prove particularly productive because actors at this level play a particularly large role in implementing ESF operational programmes.
- Civil-society organisations are one of the main beneficiaries of the ESF, but the participation of smaller civil-society organisations is often restricted by the real or perceived complexity of bureaucratic requirements, and large minimum budget requirements. Tools within the CPR, such as simplified cost options and community-led local development projects have attempted to alleviate some of these pressures and lower the barriers to participation.
- There is little evidence to suggest that the European Code of Conduct on Partnership's guidelines are used to involve vulnerable and marginalised communities, such as Roma

¹⁰⁷ European Commission, European Social Fund, 'CLLD – a Useful Approach for ESF', European Social Fund, 13 September 2016, <https://ec.europa.eu/esf/transnationality/content/clld-useful-approach-esf>.

¹⁰⁸ Ibid.

and migrants. Member States' flexibility to create their own consultation procedures for partnership agreements and selection processes for monitoring committees could be partly responsible. Even where they are included, there is no requirement to prepare a preliminary 'crash course' introduction to the ESIF's rules that could support more effective civil-society engagement.

- Two features were introduced into the CPR that promote a whole-of-society approaches to migrant inclusion and social cohesion: community-led local development strategies and the Integrated Territorial Investment tool. But uptake of these optional features is low, potentially reflecting managing authorities' unfamiliarity or discomfort with these new systems.

VIII. CONCLUSIONS AND RECOMMENDATIONS

Ultimately, as one interviewee in DG HOME explained, the core challenges facing the ESF are to further simplify the process for managing authorities and beneficiaries and to ensure the funds complement and add value to one another. Each funding cycle attempts to get one step closer to these aims.¹⁰⁹ The current proposals, if they are adopted by the Council, would be a significant leap forward in terms of efforts to support migrant inclusion and social cohesion—from being able to define and identify migrant participants in programme data, to facilitating evaluation of how successful the fund has been in promoting their inclusion.

At present, the thematic objectives and corresponding investment priorities of the ESF cater to all legal residents, irrespective of their migrant background. Thus while the fund likely serves many migrant-background individuals, their visibility within common output and result indicators is extremely limited, with only a single broad category used to record whether participants have a migrant, foreign, or minority background. This makes efforts to monitor and evaluate how much funding was allocated to or spent on programmes that foster migrant inclusion nearly impossible, ultimately reducing the accountability of managing authorities to this population. By comparison, injecting a focus on migrant inclusion into the blueprint of the ESF+ would provide clearer guidance for managing authorities and civil-society partners in supporting this target group. Particularly for actors at the subnational level and those with limited experience in strategically integrating a complex set of objectives, greater transparency at the EU level as to how migrant-oriented projects can be included in the ESF is important when communicating these guidelines to potential beneficiaries.

The risk, however, is that by singling out third-country nationals or other vulnerable groups for support, this could undermine the mainstreamed and whole-of-society approaches more common under the ESF. Moreover, it can be difficult to draw a bright line around 'migrants' when societies are increasingly diverse, and some lifelong residents may share key needs and characteristics with newcomers. The administrative burden of an additional indicator could also dissuade potential beneficiaries from applying for funding or place strain on those uncomfortable with or incapable of collecting information specifically on migrants. And with migration an increasingly politicised topic in Europe, moves to highlight the use of ESF resources to support migrants could even prompt some governments to purposefully delay implementing programmes for this target group. On the other hand, having a unique indicator on third-country nationals does not prevent projects from catering to multiple target groups. As European officials contemplate these tradeoffs, it is important to note that the status quo, which leaves migrants effectively invisible in the data, reduces the accountability of managing

¹⁰⁹ MPI Europe interview with official, DG HOME, European Commission, 23 November 2018.

authorities to this population and poses the risk that their needs and those of the communities in which they live are not being catered to by the ESF at the same moment that the fund is set to take on more responsibility for integration.

While much attention is now focused on the negotiations of the ESF+, there is still time and opportunity to advance migrant inclusion and social cohesion within the current funding cycle. To maximise support for these goals now and in the 2021–27 period, there are five main points that policymakers should consider:

- ***Flexibility can sometimes come at the expense of agility.*** Particularly where negotiations of the MFF are delayed—as is currently the case—proposing significant changes to established operations, even where these will promote flexibility in the long term, can lead to delays in implementation in the short term while public authorities adapt. Greater EU support to help managing authorities navigate these changes, such as through virtual and in-person trainings, and improved coordination systems between funds could help get projects up and running sooner. Organisations dependent on ESF funds may also need support to tide them over in the event of delays in the dispersal of these funds.
- ***Make space for small (migrant-focused) organisations.*** A number of governmental and nongovernmental actors at the national, subnational, and local levels participate in the ESF. Civil-society organisations are among the most important, especially for implementing social inclusion projects. However, they often have a limited voice when it comes to setting priorities or selecting projects. This is especially true for smaller civil-society organisations that can be easily overlooked for partnership agreement consultations by managing authorities and during European Commission stakeholder mappings and may lack capacity to submit written proposals on short notice. Where migrant organisations are too small to implement projects, they can still play a role as members or observers on monitoring committees, or they can conduct shadow reporting and evaluations.
- ***Improve communications and information-sharing with partners to maximise their contribution.*** Ensuring that all relevant organisations are able to participate in the ESF process—both at the preparation and implementation stages—hinges on improving communications and information-sharing, including by advertising consultation events and the requirements of calls for projects far enough in advance for smaller organisations to take part. Stakeholders also need sufficient information on how the ESF works and on the government’s priorities to maximise the value of their contributions to consultations.
- ***Social inclusion is more than employment.*** Despite the increased visibility of longer-term integration activities within the ESF+ proposal, the corresponding common results indicators in the proposed Common Provisions Regulation have not caught up. Employment is an important part of inclusion, but a broader look at social indicators, such as language proficiency, life satisfaction, sense of belonging, and attitudes towards gender equality, could better capture the value ESF projects bring to participants both with and without a migrant background, including those farther from the labour market or already in work. Doing so might also motivate potential ESF beneficiaries to use funds for more diverse and meaningful programming—knowing that the progress participants make on this expanded set of goals will be acknowledged, even where it does not immediately result in a job.
- ***National and subnational actors are well positioned to support migrant inclusion through the ESF.*** The vast majority of ESF operational programmes are subnational in scope—136 out of 187 EU wide—and some Member States do not even run national operational programmes. While the European Union sets the broad parameters of partnership agreements with Member States, national (and subnational) priorities for

migrant inclusion colour in the details. National and subnational managing authorities and social partners are therefore uniquely situated to ensure that issues of relevance to local communities, including migrant inclusion, are addressed. This may take the form of efforts to increase the representation of groups affected or targeted by ESF programming around the decision-making table, or ensuring that EU simplification and whole-of-society tools, such as simplified cost options and community-led local development are fully implemented.

Whether targeted specifically by programming or served as part of broader populations, migrants are undoubtedly key participants in ESF programmes in many Member States. And with immigrant integration high on the list of political priorities in many countries, this is likely to remain the case for years to come. Yet in many ways, immigrants are under-represented in the fabric and processes of the fund. As European policymakers and stakeholders work to finalise plans for ESF+ and look ahead to its implementation, this is an important moment for reflection on and adjustment of these systems. Even without the introduction of a unique indicator to record migrant participation in funded programmes, improvements now in communication, simplification, and consultation could all help the ESF put its money where its mouth is: transforming its stated commitments to prioritising migrant integration into European societies into action.

ANNEXES

Annex 1. Number of ESF programme participants with a migrant, foreign, or minority background, by investment priority, 2015–16

Investment priority	Number of programmes	Number of participants
Total	544	1,118,334
9i: Active inclusion	97	526,954
8i: Access to employment for job-seekers and inactive people, including the long-term unemployed and people far from the labour market, also through local employment initiatives and support for labour mobility	71	199,221
10iii: Enhancing equal access to lifelong learning for all age groups in formal, non-formal and informal settings, upgrading the knowledge, skills and competences of the workforce, and promoting flexible learning pathways, including through career guidance and validation of acquired competences	69	117,306
10i: Reducing and preventing early school-leaving and promoting equal access to good quality early-childhood, primary and secondary education including formal, non-formal and informal learning pathways for reintegrating into education and training	49	54,838
8ii: Sustainable integration into the labour market of young people, in particular those not in employment, education or training, including young people at risk of social exclusion and young people from marginalised communities, including through the implementation of the Youth Guarantee	34	52,795
8v: Adaptation of workers, enterprises and entrepreneurs to change	32	46,719
10iv Improving the labour market relevance of education and training systems, facilitating the transition from education to work, and strengthening vocational education and training systems and their quality, including through mechanisms for skills anticipation, adaptation of curricula and the establishment and development of work-based learning systems, including dual learning systems and apprenticeship schemes	31	45,168
8iii: Self-employment, entrepreneurship and business creation including innovative micro, small and medium sized enterprises	33	33,576
8iv: Equality between men and women in all areas, including in access to employment, career progression, reconciliation of work and private life and promotion of equal pay for equal work	22	13,121
9iv: Enhancing access to affordable, sustainable and high-quality services, including health care and social services of general interest	16	10,252
9iii: Combating discrimination based on sex, racial or ethnic origin, religion or belief, disability, age, or sexual orientation	20	9,150
9ii: Integration of marginalised communities, such as the Roma community	25	5,873
10ii: Improving the quality and efficiency of, and access to, tertiary and equivalent education with a view to increasing participation and attainment levels, especially for disadvantaged groups	18	1,413
8vii: Modernisation of labour market institutions, such as public and private employment services, and improving the matching of labour market needs, including through actions that enhance transnational labour mobility as well as through mobility schemes	3	1,071

and better cooperation between institutions and relevant stakeholders		
9v: Promoting the social economy and social enterprises	12	778
11i: Investment in institutional capacity and in the efficiency of public administrations and public services at the national, regional and local levels with a view to reforms, better regulation and good governance	8	65
11ii: Capacity building for all stakeholders delivering education, lifelong learning, training and employment and social policies, including through sectoral and territorial pacts to mobilise for reform at the national, regional and local levels	1	18
8vi: Active and healthy ageing	3	16
9vi: Community-led local development strategies	-	-

Source: Author analysis of data from European Commission, 'European Structural and Investment Funds—Data by Fund—European Social Fund'.

Annex 2. Country case studies

Within the framework of shared management between the European Union and Member States, there are significant variations in how the ESF is translated into local contexts. This annex captures some of these practical distinctions, and their implications for migrant inclusion, in five case study countries: France, Germany, Italy, Poland, and Sweden. These countries were selected for their geographical diversity and differing migratory contexts in order to offer a range of insights on the challenges and opportunities for boosting migrant inclusion within the current ESF and under the proposed ESF+.

France

France is a particularly important case when it comes to boosting migrant inclusion under the ESF. EU wide, the largest share of ESF participants in 2015 and 2016 who had migrant, foreign, or minority background were in France—34 per cent.¹¹⁰ Even when considering the size of the foreign-born population in the country relative to that of other EU Member States, the share of minority and migrant participants in France is high.¹¹¹ Nonetheless, there are a number of key challenges in France for migrant inclusion in implementing the fund, such as low take-up by civil-society applicants, limitations on efforts to target persons from disadvantaged neighbourhoods, resistance to the collection of personal data, and limited consultation with stakeholders during the implementation period.

Migrant inclusion priorities in the French ESF

There are several actors responsible for the ESF in France, but those at the subnational level have become more important. A new governance model was introduced for the 2014–20 period which devolved 35 per cent of the national ESF budget to the Regional Councils (the local government bodies) and kept 65 per cent with the state.¹¹² At the national level, the ESF is managed by the General Delegation for Employment and Vocational Training (DGEFP) in the Ministry of Employment. Beyond this, there are intermediate bodies called Plan locaux pour l’insertion et emploi, which can launch their own calls for projects.

Out of the 75 operational programmes covering all of the ESIF in France—there are 32 regional programmes and one national programme co-financed by the ERDF and ESF, and two regional programmes and two national programmes financed only by the ESF.¹¹³ According to one regional actor, their operational programme is overly complicated, essentially a laundry list with 12 dimensions and many specific objectives.¹¹⁴ The interviewee suggested that since it was the first time regional governments were given authority over the ESF in France, it would have been useful to have more guidance from the European Union on what a manageable and strategic operational programme would have looked like.¹¹⁵

The French authorities are very interested in how to best use the ESF to support migrants in the country. Indeed, at the time of the interviews for this report, the DGEFP was working on an

¹¹⁰ European Commission, ‘European Structural and Investment Funds—Data by Fund—European Social Fund’.

¹¹¹ For example, Spain (with approximately 6 million foreign born residents; 12.7 per cent of the total population) has over 3.5 times fewer migrant, foreign and minority background ESF participants than France (with approximately 8 million foreign born residents; 11.8 per cent of the total population). See Eurostat, Population on 1 January by age group, sex and country of birth [migr_pop3ctb], updated 17 January 2019, https://ec.europa.eu/eurostat/web/products-datasets/-/migr_pop3ctb.

¹¹² Ministry of Labour, ‘Qu’est-ce que le FSE ?’, Fonds Social Européen en France 2014-2020, accessed 30 January 2019, <http://www.fse.gouv.fr/quest-ce-que-le-fse>.

¹¹³ Ibid.

¹¹⁴ MPI Europe interview with official, Ile-de-France Region, France, 11 January 2019.

¹¹⁵ Ibid.

internal report on good practices for migrants under the ESF. This interest in migrant inclusion is also reflected to some extent in the ESIF partnership agreement between France and the European Union. The partnership agreement sets out that regional programmes can mobilise the ESF and ERDF for social integration, including social, health, cultural, educational, and recreational services, in order to improve access for vulnerable and disadvantaged members of the population. In particular, interventions in housing that provide accommodation for vulnerable persons, including migrants, are prioritised.

Whether migrants are specifically targeted within the ESF can also depend on coordination between the ESF and AMIF managing authorities. For example, in France the ESF and AMIF managing authorities agreed that the ESF would not fund operations specifically targeting third-country nationals' integration in order to comply with the European Commission's restrictions on 'double funding' (i.e., where beneficiaries use more than one fund to cover the same expenditure item).¹¹⁶ However, in the second half of 2018, the French AMIF managing authority approached the ESF managing authority to explore whether this agreement could be revised over fear that dwindling resources would constrain support for integration-related operations under the AMIF—a fear that as of yet has not come to pass.¹¹⁷

Nevertheless, based on the ESF's common indicator of participants with either a migrant, foreign, or minority background, an exceptional number of such persons benefit from the ESF in France. One potential explanation for this is the geographical structure of funding allocations in France. Funding tends to be channelled to administrative priority zones, Quartier prioritaire de la politique de la ville, where more than half of residents earn less than 11,250 euros per year and large concentrations of migrants live. There are 1,300 of these neighbourhoods spread over 700 communes. Because these areas have higher social needs, there are more nongovernmental organisations working there that in turn apply for the ESF.¹¹⁸ Moreover, the partnership agreement calls for 10 per cent of the operational programme 'Employment and Inclusion' to target persons from priority neighbourhoods,¹¹⁹ with targets set for the number of participants in this category under different investment priorities.¹²⁰ In the 2007–13 funding cycle, the 10 per cent of funding towards priority neighbourhoods was a specific objective that needed to be verified with data rather than an less strict overall objective, as it is now.¹²¹ The French authorities found that it was too burdensome to satisfy the EU auditors by going back

¹¹⁶ For example, in France the General Delegation for Employment and Vocational Training (DGEFP) receives an update from AMIF on projects that concern employment in order to ensure there is no overlap in financing for particular beneficiaries. MPI Europe interview with Official, Ministry of Labour, DGEFP, Programmes Deployment Support Office, Europe and International Directorate, Policy Officer (at the time of the interview) France, 19 November 2018.

¹¹⁷ Upon reassessment the AMIF Managing Authorities determined they could manage without the ESF assistance. MPI Europe interview with official, Ministry of Labour, Programmes Deployment Support Office, Europe and International Directorate, France, 6 February 2019.

¹¹⁸ MPI Europe interview with official, Ministry of Employment, General Delegation for Employment and Vocational Training (DGEFP), Support for the Deployment of Programmes, France, 12 December 2018.

¹¹⁹ MPI Europe interview with official, Ile-de-France Region; République Française, *Accord de partenariat 2014-2020 France*, 20 June 2018, <http://www.europe-en-france.gouv.fr/content/download/27819/257169/file/Accord%20de%20partenariat.pdf>.

¹²⁰ For example, for Investment Priority 10i on reduction and prevention of early school leaving and promotion of equal access to early childhood development, the target number of participants is 51,600 from middle income regions, of which 5,136 should come from priority zones. See Programme Opérationnel Au Titre De L'objectif 'Investissement Pour La Croissance Et L'emploi', 2 December 2014, <http://www.europe-en-france.gouv.fr/content/download/31135/299701/version/1/file/Programme%20op%C3%A9rationnel%20FEDER-FSE-IEJ%20%E2%80%93%20Midi-Pyr%C3%A9n%C3%A9es%20et%20bassin%20de%20la%20Garonne%20%28Conseil%20r%C3%A9gional%29.pdf>.

¹²¹ MPI Europe interview with official, Ile-de-France Region.

after projects ended and searching for the address of each participant to verify if they lived in a high priority zone.¹²²

Consultation and engagement with civil society

While there appears to have been an effective, inclusive, and multi-layered stakeholder consultation in preparation for the partnership agreement in France, this level of engagement with civil-society actors does not extend into the life of the fund. To prepare for the partnership agreement, a ‘national partnership’ was created with 350 organisations representing different regional networks, civil-society organisations, public authorities, and social partners.¹²³ National partners were invited to give written comments and 96 contributions were received. On the basis of these contributions, 17 seminars were organised by themes, territories, and tools, bringing together 300 participants. Then there was a two-month open online consultation, which resulted in around 50 contributions from citizens, associations, and local authorities.

In parallel, a smaller select body was created bringing together over 70 representatives of the national partnership—including civil-society organisations working on migrant inclusion—who were consulted on successive versions of the partnership agreement. This l’Instance Nationale de Preparation de l’Accord de partenariat (INAP) met four times to give oral and written feedback on draft partnership agreements. All the information on the drafting of the agreement, as well as the minutes of meetings and seminars, were also available on a dedicated website accessible to the public.¹²⁴ However, the final partnership agreement notes that while many of their priorities were included in the final document, some were left out, such as projects for cultural and sports facilities.

Yet when it comes to an ongoing consultation mechanism, the DGEFP felt it was important but has not found a way to implement one effectively.¹²⁵ Intermediary bodies, such as Creteil, receive informal feedback from project managers but there is no formal process for channelling this upwards.¹²⁶ Similarly, at the regional level there is no established system. It is possible for project managers, for example, to send feedback via email or to schedule a meeting, but one interviewee acknowledged that it was very difficult to adapt to suggestions until the next funding cycle.¹²⁷

Looking to the ESF+

In terms of supporting migrant inclusion in the ESF+, policymakers in France have several key considerations, including:

- ***Sensitivity to the collection of personal data.*** The ESF+ proposal that a unique indicator be added to data collection and reporting for third-country nationals could be particularly unpopular in France, where the principle of equality in the constitution has been interpreted as prohibiting the government from collecting racial and ethnicity data.¹²⁸ In France, the category of ‘migrant’ is defined as foreign born, or French born

¹²² Ibid.

¹²³ République Française, *Accord de partenariat 2014-2020 France*.

¹²⁴ Partenariat 2014, ‘A propos’, accessed 30 January 2019, <http://www.partenariat20142020.fr/>.

¹²⁵ MPI Europe interview with Official, DGEFP, France.

¹²⁶ MPI Europe interview with Marie-Josée Come, Responsable du Service FESI, Correspondante Académique Fonds Structurels, DAFPIC/GIP-FCIP and Elisabeth Delabre, Creteil, France 16 January 2019.

¹²⁷ MPI Europe interview with official, Ile-de-France Region.

¹²⁸ See Loi Informatique et Libertés, ‘Act No. 78-17 of 6 January 1978 on Information, Data Files and Civil Liberties’, <https://www.cnil.fr/sites/default/files/typo/document/Act78-17VA.pdf>; Jeremie Gilbert and David Keane, ‘How French Law Makes Minorities Invisible’, *The Conversation*, 13 November 2016, <https://theconversation.com/how-french-law-makes-minorities-invisible-66723>.

with a foreign-born parent. Among the public more broadly, there is also high sensitivity to the collection of personal data. As an interviewee explained, there used to be a questionnaire for ESF beneficiaries on whether participants were in single-parent households, but after lobbying from human rights organisations against it, it is no longer compulsory to answer.¹²⁹

- ***More intrusive indicators could undermine interest in the ESF in France.*** Unwillingness to collect intrusive personal data is already one factor with the potential to push current and potential beneficiaries away from the ESF—in addition to the greater administrative hassle of collecting such data.¹³⁰ A regional call for projects working with new arrivals was moved from the ESF to public funds for this reason.¹³¹ The regional authorities were worried that under the strict EU reporting requirements of the ESF they would not have been reimbursed if they could not prove that the project reached a certain number of participants from the target population, but the project managers did not feel comfortable asking participants for their personal information.¹³² Keeping a broader indicator—one that includes but does not isolate third-country nationals—might facilitate data collection without making the ESF+ too demanding or unappealing.

Germany

Germany is among the largest and most populous countries in the European Union, and as such, it had an ESF budget for the 2014–20 period of approximately 12.5 billion euros.¹³³ Unsurprisingly, Germany also had among the highest number of participants with a migrant, minority, or foreign background in ESF programming between 2015 and 2016 (200,836 persons).¹³⁴ This can be attributed at least partly to the high prioritisation of migrant inclusion by authorities, social partners, and civil-society organisations during preparations for the partnership agreement.

The ESF in Germany is structured into one national-level operational programme and 16 regional-level operational programmes corresponding to the 16 German states. Only one of these programmes, the national one, is co-financed with the ERDF. While there is only one national operational programme, this is implemented and managed by a number of different ministries which are able to design their programming to meet their specific policy requirements. The federal operational programme is based on the priorities of the EU2020, Germany's National Reform programme, and the country-specific recommendations on employment. The ESF budget is split fairly equally between three main thematic objectives—8 (employment and labour market); 9 (social inclusion); 10 (education and training)—with the highest amount (34 per cent) spent on social inclusion, substantially above the required 20 per cent.¹³⁵

However, there are potential limitations for migrant inclusion both for the current and next ESF. While civil society is generally well represented within the German ESF, and especially on monitoring committees, it is not always brought in early enough to shape the operational programme's strategic direction. Moreover, looking ahead, Germany faces a significant reduction in funding in absolute terms, and may need to scale back to fewer priorities. Yet, the

¹²⁹ MPI Europe interview with official, Ile-de-France Region.

¹³⁰ Ibid.

¹³¹ Ibid.

¹³² Ibid.

¹³³ Roughly 40 per cent of that came from national match-funding, making the EU contribution roughly 7.5 billion. European Commission, 'European Structural and Investment Funds—Data by Fund—European Social Fund'.

¹³⁴ Ibid.

¹³⁵ European Commission, 'Annual Implementation Reports 2017: Country Summary Tables – Germany,' updated 2017, <https://ec.europa.eu/social/BlobServlet?docId=19293&langId=en>.

next funding cycle could also open opportunities for the ESF in Germany to develop strategic programmes based on its 2018 National Action Plan on Integration and to adapt national laws so that it can maximise the simplification measures offered by the ESF.

Migrant inclusion priorities in the German ESF

In Germany, the definition of ‘migrants’ for the ESF follows the national statistics office’s definition of an individual with a migration background. This includes first generation immigrants (people who migrated to Germany, but may have naturalised); non-German citizens born in Germany (the second generation); plus any individual who has at least one parent who immigrated or who was born in Germany but without German citizenship (this could include some third-generation individuals).¹³⁶

In Germany, the overarching priority of ‘equal opportunities and nondiscrimination’ has been used as one of the key driving elements around the inclusion of migrant and refugees. This has resulted in a number of the national level programmes specifically addressing migrant needs. These programmes have been implemented strategically across ministries and include pilot projects that have been scaled up, continuation and further development of successful ESF projects from previous funding rounds, and successful ESF projects becoming part of permanent policy programmes.¹³⁷ Moreover, the national monitoring committee includes a representative from the Office of the Commissioner for Migration, Refugees and Integration. This office promotes and develops integration policy, working across ministries and in close liaison with migrant and refugee organisations.¹³⁸ While it has been less easy to evaluate how effectively integration priorities have been mainstreamed in regional operational programmes, it is clear that regions have responded to the changing needs on the ground, such as increased irregular arrivals in 2015. One regional managing authority described that their ESF programme structure proved that it was flexible enough to respond in 2016 with a specific call for projects targeting newly arrived refugees.¹³⁹

Consultation and engagement with civil society

Germany is noted for good engagement with civil society under the ESF, especially through its monitoring committees. However, it has been noted that this engagement varies between programmes, and partners can feel that they are only consulted in the later stage of the process once the decisions have been made by public authorities.¹⁴⁰

In 2012, in preparation for the partnership agreement between Germany and the European Union, an online public consultation was carried out with partner organisations. The

¹³⁶ According to the statistics office there are ‘narrow’ and ‘broad’ definitions. The narrow definition is based only on the characteristics of the individual whilst the broad definition includes details of the parents. See Destatis, ‘Persons with a migration background’, accessed 30 January 2019, <https://www.destatis.de/EN/FactsFigures/SocietyState/Population/MigrationIntegration/Methods/MigrationBackground.html>.

¹³⁷ A project providing occupational language support for people with migration background became a permanent programme under the Federal Office for Migration and Refugees. Federal Ministry of Labour and Social Affairs, ‘Berufsbezogene Sprachförderung für Menschen mit Migrationshintergrund - ESF-BAMF-Programm’, accessed 30 January 2019, <https://www.esf.de/portal/DE/Foerderperiode-2014-2020/ESF-Programme/bmas/2014-12-11-Sprachfoerderung-ESF-BAMF.html>

¹³⁸ MPI Europe interview with official from the Office of the Commissioner for Migration, Refugees and Integration, Germany, 21 January 2019.

¹³⁹ MPI Europe interview with a representative from a regional ESF managing authority, Germany 23 November 2018.

¹⁴⁰ European Commission, ‘Position of the Commission Services on the development of Partnership Agreement and programmes in Germany for the period 2014-2020’, updated 2012, https://www.esf.de/portal/SharedDocs/PDFs/EN/PP-Gemrmany_final.pdf?__blob=publicationFile&v=4.

consultation was available on Germany's main ESF portal, but was also circulated to the almost 400 stakeholders and received almost 800 responses.¹⁴¹ A wide range of organisations contributed to the consultation, including public authorities, municipalities and districts, labour-market agencies, civil society, religious associations, nongovernmental organisations, welfare associations, trade unions, community colleges, employer organisations, industry bodies, and private individuals. The consultation asked respondents to prioritise the objectives within the broader thematic objectives, to prioritise actions under the cross-cutting themes of the ESF, and to comment on successful existing ESF projects.

The results of this wide-ranging consultation show that respondents saw migrant integration as key component of the ESF. Migrant integration came out as one of the main priorities within the cross-cutting theme of anti-discrimination with 11 per cent of responses. Migrants and minorities were also identified by respondents as one of the top five target groups (32 per cent of responses), and two of the successful ESF programmes that partners wanted to see continue related to migrant/refugee needs. Both were continued in the 2014–20 period, suggesting a responsiveness to the consultation.¹⁴²

Beyond these official consultations, it is clear that at different programme levels there will be different levels of engagement with local civil-society actors. For instance, one interviewee who worked on the 'Strong in the work place – Immigrant mothers get on board' (Stark im Beruf) programme, described having built a good network of engagement and peer exchange with their (mostly small) delivery partners. This exchange and feedback allowed them to identify direct implementation and delivery challenges. However, it was unclear whether there were effective channels to feed this on-the-ground learning back up to the authorities that were managing the ESF as a whole.¹⁴³

Looking to the ESF+

Germany is expecting to get a significant funding reduction in absolute terms in the forthcoming ESF+. As such, it is expected that the resources will focus on those most in need where they can have the most impact. With that in mind, there are some potential opportunities for migrant inclusion:

- ***Simplification of national-level regulations.*** Despite the European's Commission attempts at simplifying the management and administration of the ESF, it appeared that this has not fed through to the national level in Germany. For example, one interviewee described how the simplified cost options were hard to implement in the German context due to the national regulations. As a result, the Ministry of Labour and Social Affairs has put forward proposals to simplify the national regulations for the next funding period. This is particularly important for those projects that work with smaller organisations, as some small organisations are put off from applying for ESF support due to the administrative burden.
- ***National Action Plan on Integration.*** During 2018, the German Commissioner for Migration, Refugees and Integration started developing a National Action Plan on

¹⁴¹ The full report is available in German here Kai Sattler, Jürgen Viedenz, and Dennis Egenolf, *Auswertung der Online-Konsultation* (Bonn: Federal Ministry of Labour and Social Affairs, 2013), https://www.esf.de/portal/SharedDocs/PDFs/DE/Meldung/2013/2013_04_05_konsultation_bericht.pdf?__blob=publicationFile&v=2.

¹⁴² Among the top five successful ESF programmes that respondents wanted to see continue were: the language programme for those with a migration background and a programme on integration and diversity. The former, described above, was made part of the permanent national offer, while the latter was continued in slightly updated form.

¹⁴³ MPI Europe interview with an official from the Federal Office of Family Affairs and Civil Society Functions, Germany, 7 December 2018.

Integration. This has involved close dialogue with migrant and refugee organisations alongside a range of other stakeholders. Ministries are now being asked to come up with detailed proposals on actions to implement the plan and report back on these on an annual basis until 2021. It is likely that this plan will influence the programming for the next funding period, with the ESF seen as a vehicle through which innovative approaches can be piloted. The current ESF period has shown that Germany is willing to scale-up and mainstream successful interventions.

Italy

Italy is another large recipient of the ESF, with a total budget of about 17.5 billion euros in the 2014–20 period, more than 40 per cent of which was contributed by the national government. One interviewee concluded that the funding landscape in Italy was so complicated that it was difficult to get an overall picture of the ESF in the country.¹⁴⁴ This is supported by a closer look at financing data; according to official figures, at the end August 2018, only 14.3 per cent of the ESF had been paid out while 32.6 per cent had been allocated,¹⁴⁵ the third lowest in the EU-28.¹⁴⁶ These funds are disbursed through 29 operational programmes; eight at the national level, 13 in most developed regions, three in transitioning regions, and five in the least developed regions. Five of the national operational programmes are jointly funded with the ERDF, and one with the Youth Employment Initiative. This naturally results in many layers of coordination, between multiple national ministries and agencies, intermediate bodies, and regional managing authorities, as well as technical assistance associations, which may contribute to the slow implementation.

Migrant inclusion in the Italian ESF

Migrant inclusion has been promoted more recently in the Italian ESF under the encouragement of the European Union, and there are some examples of good practices when it comes to creating multi-fund ESF and AMIF projects to support migrants' labour-market inclusion. However, overall implementation has been slow, in part due to the decentralised infrastructure through which the ESF is disbursed in Italy.

One of the notable features of the current funding period of the use of the ESF in Italy, has been a new programme aimed at helping refugees integrate into the labour market which is co-financed by the AMIF.¹⁴⁷ The project has built on an initial pilot project, INSIDE, that ran between November 2015 and May 2017 and that targeted refugees living in reception centres and provided them with training (such as on employability and Italian language) and mentoring, followed by a six-month internship with a company. Rolling out the programme on a larger scale, the AMIF is now being used to fund the initial training and mentoring while the ESF is funding the individuals during their internship programme, costs which would not have been eligible under the AMIF.¹⁴⁸ Nevertheless, there may be a limit to how much joint AMIF–

¹⁴⁴ MPI Europe interview with a representative of Fondazione G. Brodolini Italy, 30 November 2018.

¹⁴⁵ Ministry of the Economy and Finance, *Monitoraggio Politiche di Coesione Programmazione 2014-2020: Situazione al 31 agosto 2018* (Rome: Ministry of the Economy and Finance, 2018), http://www.rgs.mef.gov.it/Documenti/VERSIONE-I/attivita_istituzionali/monitoraggio/rapporti_finanziari_ue/monitoraggio_politiche_di_coesione_2014-2020/2018-08-31/MPC_Situazione_al_31_agosto_2018.pdf.

¹⁴⁶ European Commission, 'Data', European Structural & Investment Funds.

¹⁴⁷ This project was presented as a case study at the Transnational Platform (the European Commission supported framework for transnational cooperation on the ESF) within the thematic meeting on migrants in the ESF of 17 September 2018, see documents here: <https://ec.europa.eu/esf/transnationality/library>.

¹⁴⁸ Integrazione Migranti, 'INSIDE-Inserimento Integrazione Nordsud Inclusion', 11 July 2018, <http://www.integrazionemigranti.gov.it/Attualita/Notizie/Pagine/INSIDE-INserimento-Integrazione-nordsud->

ESF programmes can achieve due to differences in the regulations in terms of how the funding is managed and can be used.

Consultation and engagement with civil society

In the partnership agreement negotiations between Italy and the European Union, initial discussions are held internally within ministries and departments, and between the regional and national level. One interviewee suggested that the external context and the political and economic situation in a country can shape how this process plays out. Early involvement by the Member State in discussions with the European Commission about the proposal for the regulation can also shape the process. By taking a proactive approach, national and subnational authorities can help shape the Commission's proposals and as a result gain greater clarity about what the final state of the regulations.¹⁴⁹ Once the budget and the indicators have been approved by the European Commission, the national consultation takes place.

The national consultation takes the form of thematic meetings in which a number of stakeholders are invited to take part to discuss the priorities of the programming. These are reportedly large-scale meetings in which around 400 individuals may participate, ranging from regional authorities, civil-society actors, and representatives from different directorates-general and ministries.¹⁵⁰ Nevertheless, invitations to these meetings appear to be made through a closed process, and it is unclear what level of representation there is from civil society or whether this is systematic across all the thematic areas.

Looking to the ESF+

Several key takeaways from discussions with interviewees have implications for the future ESF+.

- **Increased focus on migrants.** Most interviewees acknowledged that refugees and other migrants are likely to play a more prominent role in the programming for the next period, given the influx of newcomers Italy has received in recent years. In the last period, there had been little appetite to include migrants as a specific target group in programmes, with the focus instead being on 'disadvantaged groups' more widely. This has changed to some extent since 2017, in part because of the European Commission push for more focus on this group. As a result, one would expect greater focus on this in the next programming round alongside the additional allocation to account for migrants. However, the political environment may make explicit targeting difficult.
- **Lack of regional appetite for increased focus on social inclusion.** Interviewees from Tecnostruttura, which provides technical support on the ESF to subnational actors in Italy, reported that at the moment, Italian regions and politicians have no appetite to increase the required proportion of the ESF to be spent on social inclusion, but believe that the current threshold of 20 per cent is the right level.¹⁵¹ Since social inclusion is one of the main objectives through which migrant inclusion has been targeted to date this raises questions about the interest in increasing these efforts.

[inclusionE-.aspx](#); Adriana Rosasco, 'Synergies between ESF and AMIF on integration of people with migrant background' (presentation at the ESF Transnational Platform meeting, Helsinki, 17 September 2018), https://ec.europa.eu/esf/transnationality/filedepot_download/2490/1908.

¹⁴⁹ MPI Europe interview with representatives from Tecnostruttura. Tecnostruttura is a body that provides the institutional technical support for the 'Coordination of Italian Regions' within the European Social Fund and in the Structural Funds and Cohesion Policies.

¹⁵⁰ MPI Europe interview with an official from Ministry of Labour and Social Policy, Italy, 22 November 2018; MPI Europe interview with a representative of Fondazione G. Brodolini Italy, 30 November 2018.

¹⁵¹ MPI Europe interview with representatives from Tecnostruttura.

- **Consultation mechanisms are not formalised.** While most interviewees agreed there was plenty of consultation, it was not entirely clear whether these consultation processes happened in a transparent or formalised way. Regional authorities reportedly consult with a range of stakeholders, but it was acknowledged that this was patchy: some did so more often and more effectively than others. National authorities report having registers of organisations which work with migrants or refugees and these organisations are contacted for online consultations which are conducted prior to launching programme calls. However, this seems to primarily concern programmes already directly targeting migrants rather than ensuring a broader consideration of migrant and refugee needs across all ESF programmes.

More broadly, interviewees expressed some concerns about what the proposals for the upcoming ESF+ and the AMF will mean for integration. There is a fear that integration priorities will get lost through the difficulties defining short-term versus medium-term integration.

Poland

In Poland, support for migrant inclusion has a unique dimension as it includes returning Polish citizens and people of Polish decent, in addition to other foreign-born persons, reflecting the country's history of emigration. Third-country national migrants are prioritised more under the AMIF than the ESF, with the former becoming more politicised and subject to delays in calls for proposals—challenges that could be inherited by the ESF+ if it follows through with proposals to increase integration activities. Some migrant-focused actors in Poland prefer using the AMIF to the ESF because of their perception that ESF has more complicated administrative requirements and that they risk not being reimbursed for projects that do not meet target results indicators.

Poland receives the largest share of the European Union's contribution to the ESF—12.9 billion euros. This is accounted for partly by its relatively large population size and the fact that, with the exception of the capital region of Masovia, Poland is composed entirely of 'less developed regions', as defined by the allocation formula that determines the size of the EU contribution.¹⁵² The 16 regions—called Voivodeships—manage 66 per cent of the ESF, but only through multi-fund operational programmes co-financed by ERDF and ESF. There is also one national operational programme on 'Knowledge, Education, and Development' financed by the ESF. The fund is managed at the national level within the Ministry of Investment and Development and at the regional level by the local government institutions and regional boards.¹⁵³

Migrant inclusion priorities in the Polish ESF

The partnership agreement between Poland and the European Commission was signed on 23 May 2014.¹⁵⁴ Within this agreement, there is only one reference to immigrants.¹⁵⁵ On the other hand,

¹⁵² European Commission, 'Summary of the Partnership Agreement for Poland, 2014-2020' (working document, 23 May 2014), https://ec.europa.eu/info/sites/info/files/partnership-agreement-poland-summary-may2014_en.pdf.

¹⁵³ Portal Funduszy Europejskich, 'Fundusze Europejskie w Polsce', updated 11 June 2016, <https://www.funduszeuropejskie.gov.pl/stroony/o-funduszach/zasady-dzialania-funduszy/fundusze-europejskie-w-polsce/#Programy%20regionalne>.

¹⁵⁴ European Commission, 'European Commission Adopts "Partnership Agreement" with Poland on Using EU Structural and Investment Funds for Growth and Jobs in 2014-2020' (press release, 23 May 2014), http://europa.eu/rapid/press-release_IP-14-596_en.htm.

¹⁵⁵ The reference is a citation of an OECD report *Demographic transition and an ageing society: Implications for local labour markets in Poland* recommendation that Poland should attract new immigrants to offset demographic challenges. See Ministry of Infrastructure and Development, 'Umowa Partnerstwa' (partnership agreement, 21 May 2014), https://ec.europa.eu/info/sites/info/files/partnership-agreement-poland-may2014_pl.pdf; OECD, *Demographic transition and an ageing society: Implications for local labour markets in Poland* (Paris: OECD Publishing, 2013), https://www.oecd.org/cfe/leed/Poland%20Report_V8.1%20FINAL.pdf.

depopulation and the challenge of Polish nationals migrating overseas or internally features quite prominently.

How countries define the indicator for programme participants with a migrant, minority, or foreign background reflects their migratory contexts and legal restrictions. In Poland, for example, a national ESF call to increase the employability of young people ages 15 to 29 specifically targeted ‘immigrants (including people of Polish origin and returning nationals)’. The Polish government’s position paper on the ESF+ proposal expresses doubts about applying the concept of ‘third-country national’ instead of migrant, suggesting that this could hinder the proper implementation of the ESF+ by creating different specific objectives for that target group.¹⁵⁶ No explanation is offered for why having specific objectives would be negative apart from that it could make implementation more difficult. Instead of having specific projects for migrants, one interviewee suggested allocating bonus points to proposals that include them as a target group, therefore increasing their likelihood of being selected.¹⁵⁷ Bonus points are already occasionally used, for example, in the selection criteria for calls for projects under the national ESF operational programme.¹⁵⁸

According to an interviewee from an organisation working on refugee and migrant integration in Poland, they did not apply for ESF funding because the financial risk to nongovernmental organisations appears too high as they are unable to guarantee that they can achieve the results indicators of getting participants into work after the project. In his view, the monitoring and reporting processes attached importance only to formal aspects, such as correct use of logos, and not the merits and real impacts of the activities. The transition into work can be bumpy; there are many people in precarious jobs who need support to maintain employment, such as upskilling and host-country language training, and others who are simply a long way from the labour market. Yet the ESF may incentivise projects to either work with those more likely to successfully enter work or study, or encourage projects to end as soon as participants enter work rather than deliver continued support and risk that the person becomes unemployed.¹⁵⁹

At the same time, the ESF’s employment focus is overly narrow in Poland. Most migrants in Poland are labour migrants, many of whom already have employment contracts when they arrive. An assessment of possible ways to support foreigners under the Silesia Region’s operational programme found that unemployment was only a marginal issue among migrants in Poland.¹⁶⁰ It was therefore suggested that the ESF should focus more on up-skilling this population rather than labour-market entry, and on the nonemployment aspects of social inclusion, such as language courses for migrants and their families.¹⁶¹

Consultation and engagement with civil society

¹⁵⁶ Republic of Poland, ‘Wniosek Rozporządzenie Parlamentu Europejskiego i Rady w sprawie Europejskiego Funduszu Społecznego Plus (EFS+)’ (Position paper on ESF Plus, 4 June 2018), https://www.funduszeuropejskie.gov.pl/media/61887/Stanowisko_Rzadu_RP_do_EFS_COM_2018_382_przyjete_KS_E_29_06_2018.pdf.

¹⁵⁷ MPI Europe interview with representative of the Department of the European Social Fund at the Ministry of Development, Poland, 26 November 2018.

¹⁵⁸ Ministry of Development, *Ocena trafności i skuteczności stosowania kryteriów wyboru projektów w PO WER*, (Warsaw: Ministry of Development, 2018), https://www.power.gov.pl/media/50550/Raport_zlozony_graficznie.pdf.

¹⁵⁹ Eurocities, *Boosting Employment and Social Inclusion in EU Cities: Lessons Learned from Cities Experiences with the European Social Fund in 2014-2017* (n.p.: Eurocities, 2018), https://ec.europa.eu/futurium/en/system/files/ged/eurocities20report20on20esf20and20cities_final.pdf.

¹⁶⁰ Fundusze Europejskie, Grupa BST Sp. z o.o. and EU-CONSULT Sp. z o.o., *Analiza sytuacji społeczno-ekonomicznej cudzoziemców w województwie slaskim wraz z oceną możliwości wsparcia tej grupy w ramach RPO WSL na lata 2014-2020* (Katowice and Gdansk, Poland: Grupa BST Sp. z o.o. and EU-CONSULT Sp. z o.o., 2017), https://rpo.slaskie.pl/media/files/cms/Ewaluacja/grudzen_2017/Cudzoziemcy%20ewaluacja/Analiza%20sytuacji%20spoleczno-ekonomicznej%20cudzoziemcow%20w%20województwie%20slaskim%20-%20raport.pdf.

¹⁶¹ Ibid.

In Poland, there are many opportunities for nongovernmental organisations to learn how to apply for the ESF, including at information sessions hosted by the Local Information Points for European Funds. Interested organisations can also schedule telephone, email, and in-person consultations at these offices. The Polish European Funds Portal is also a user-friendly way for interested groups to search for training courses and conferences. It is possible to filter by topic, location, operational programme, and type of user (i.e., nongovernmental organisation, entrepreneur, institution, or natural person). More than 190 courses and conferences were available for the first two months of 2019 alone.¹⁶² However, it does not appear that this has translated into quick implementation of the fund. Poland has the fourth lowest rate of fund absorption in the European Union, with only 51 per cent of funds decided and 19 per cent spent as of 30 September 2018.

It does not appear that migrant-focused organisations have played a significant role in the preparations of the Poland-EU partnership agreement or in its implementation. However, there may be an underexplored route for civil-society organisations to participate in monitoring committees even without being members. For example, in Poland, monitoring committees can be joined by observers, such as those from the European Commission or the European Investment Bank, who are able to express opinions and participate in deliberations but without being able to vote. This model does not appear to be used for civil-society organisations at the moment, but it could allow more (and smaller) organisations to have a seat at the table.

Looking forward to the ESF+

If the ESF+ prioritises migrants more explicitly, this could have negative impacts on the implementation of the fund in Poland.

- ***Politicisation of migration can delay implementation.*** The Polish government's ESF+ position paper says that having specific objectives for third-country nationals would make implementation of the fund more difficult, but without offering any further details. One interviewee feared that, due to the politicisation of migration in Poland, increasing the visibility of migrant inclusion within the ESF+ would politicise the fund and negatively impact implementation.¹⁶³ The current 2014–20 AMIF could spell a cautionary tale. In Poland, funding for migrant inclusion is concentrated within the AMIF rather than the ESF. The Polish Ministry of Interior cancelled a March 2015 AMIF call for proposals, saying 'The migration crisis, increase in terrorist activity, and growing concerns about the impact of the current migration situation on internal security have led to the need to assess the existing measures implemented in the field of adaptation and integration of foreigners'.¹⁶⁴ While there is no information on the ministry's website that subsequent calls were cancelled, there is also no list of grants awarded, which would usually be published, in accordance with Polish law on access to public information.¹⁶⁵ Such disruptions in disbursing funds could also pose a threat to integration on a more structural level by weakening nongovernmental organisations working in this area if, for instance, they allot precious human resources to developing project proposals that will not move forward, ultimately causing cashflow problems for organisations that receive little to no support via state funding. In cases where the government is less inclined to

¹⁶² Funduszy Europejskich, 'Szkolenia i konferencje', accessed 26 February 2019, <https://www.funduszeuropejskie.gov.pl/strony/o-funduszach/szkolenia/#/dataOd=01-01-2019/dataDo=31-12-2019/najstarsze=1>.

¹⁶³ MPI Europe interview with Civil society representative, Poland, 5 December 2018.

¹⁶⁴ Authors' translation. Ministry of Interior and Administration (MSWiA), 'Dwa Nowe Nabory w Ramach Funduszu Azylu, Migracji i Integracji', Departament Funduszy Europejskich MSWiA, accessed 7 December 2018, <http://fundusze.mswia.gov.pl/ue/nabory-projektow/fundusz-azylu-migracji/13783.Dwa-nowe-nabory-w-ramach-Funduszu-Azylu-Migracji-i-Integracji.html>.

¹⁶⁵ See Anonymous (19 non-governmental organisations), 'Letter to Jakub Skiba'; Oel, 'Your Email of 22 March 2017 to Commissioner Dimitris Avramopoulos'.

support migrant inclusion efforts, there is therefore a risk that funding for this target population will be diverted or not spent appropriately.

- ***Clearer guidance is needed on use of non-competitive calls.*** The managing authority may choose non-competitive calls for projects for politically sensitive topics. For example, the two national ESF calls to boost employability for young people under the age of 30 that specifically mentioned migrants were both non-competitive procedures. In some cases, an open call can decrease efficiency where there are few bodies capable of fulfilling the criteria. But without a competitive selection, those most aware of participants' needs, which are potentially smaller and less well-known organisations, might be excluded from the process. Clearer guidance on which circumstances are best served by non-competitive procedures could minimise these risks.

Sweden

Unlike in many other Member States, the Swedish ESF not only wants to target migrants, it wants to support a specific subsection of the migrant population: newly arrived migrants and people born abroad. However, the government's prioritisation of refugees, especially in the wake of the 2015–16 migration crisis, led to some projects being designed that are no longer in sync with demands—and with limited flexibility to adapt. It is widely believed that migrants comprise a large group of participants in the Swedish ESF, even if data are not collected at this granular level. But with the ESF+ set to take more responsibility for integration measures, there are some concerns that long wait times for asylum seekers to receive a formal status (and thus eligibility for support under the ESF according to Sweden's rules) could delay their access to labour-market integration programmes.

The ESF allocation for Sweden is 774 million euros, with an additional 44 million euros allocated to three of Sweden's regions under the Youth Employment Initiative.¹⁶⁶ In Sweden, the ESF is managed by the Swedish ESF Council, which consists of a central office and eight regional offices.¹⁶⁷ The ESF budget is managed by the Swedish ESF Council with 25 per cent of the total funding delegated to an office with responsibility for broader (more strategic) projects in different regions.¹⁶⁸

Migrant inclusion priorities in the Swedish ESF

Over the course of 2013 and in February 2014¹⁶⁹, four dialogue meetings and hearings were held with actors at the local, subnational, and national level to discuss the priorities, coordination needs, and coordination opportunities for the Swedish ESF.¹⁷⁰ Sweden and the European Union reached an agreement on the ESF national programme on 29 October 2014.¹⁷¹ According to one

¹⁶⁶ The Youth Employment Initiative is dedicated to regions of the European Union with unemployment rates among youth (ages 15 to 24) higher than 25 per cent.

¹⁶⁷ Swedish ESF Council, 'The European Social Fund', accessed 30 January 2019, <https://www.esf.se/sv/Sidhuvud/The-swedish-ESF-council/The-European-Social-Fund/>.

¹⁶⁸ MPI Europe interview with official, ESF Council Stockholm, Sweden, 21 November 2018.

¹⁶⁹ Based on this timing, organisations wishing to take part in the upcoming 2021-2027 dialogues should start making their interest known to the authorities in 2019 to explore opportunities to participate.

¹⁷⁰ Ministry of Enterprise and Innovation, Arbetsmarknadsdepartementet Landsbyggsdepartementet, 'Partnerskapsöverenskommelsen' (partnership agreement, N.d., <https://www.regeringen.se/4a61e5/contentassets/c581908af38a4be0a40663540fd9c0bc/partnerskapsoverenskommelsen>).

¹⁷¹ European Commission, 'European Commission adopts "Partnership Agreement" with Sweden on using EU Structural and Investment Funds for growth and jobs in 2014-2020' (press release, Brussels, 29 October 2014), http://europa.eu/rapid/press-release_IP-14-1217_en.htm.

interviewee, it was a tough negotiation due to disagreement over earmarks for funding.¹⁷² The European Commission did not have to push migrant inclusion in Sweden's case, but there was disagreement over terminology. In the European Commission's 10 July 2014 observation on the Swedish partnership agreement, it notes that the draft agreement prioritised 'people born abroad' and 'newly arrived immigrants', rather than the full breadth of third-country nationals, as per the EU policies and *acquis* in that respect.¹⁷³ The Commission asked Sweden to systematically use the reference third-country nationals were possible.

Within the partnership agreement, migrant inclusion features prominently under Thematic Objectives 8 and 9,¹⁷⁴ which both target youth unemployed, newly arrived immigrants, long-term unemployed persons with a disability, and those returning to work after a long illness. Within the priority on youth unemployment, there is also a specific reference to foreign-born young people who migrated to Sweden after they reached school age.¹⁷⁵ For newly arrived immigrants, the Swedish ESF is intended primarily for refugees with residence permits, others in need of protection, family migrants, or third-country-national family members of an EEA citizen. The target group is intended to correspond with the target groups covered by public labour-market policies for new arrivals.

There are many examples of Swedish ESF projects that target migrants or aim to improve the services provided to them. For example, InVäst-Integration Västsverige is an ESF project in western Sweden that strengthens the capacity of organisations working with new arrivals.¹⁷⁶ The Swedish ESF Council held a full-day conference in January 2019 looking at the results and lessons gained from these projects.

Another interviewee highlighted how the discourse at the national level, which set the tone for funding, was focused on refugees.¹⁷⁷ But a project that, for example, helps people access education and training, could also benefit other target groups. However, there is limited flexibility to change the priorities of projects once they begin. A project designed for refugees in response to the 2015–16 migration crisis, for example, might not reflect the needs of today. However, it is difficult to expand the target group beyond refugees of an ongoing project, especially if the target group has to align with a specific Public Employment Service initiative.¹⁷⁸

Moreover, in Sweden, applications for ESF funding typically also need co-funding from a government actor. This can make it difficult for nongovernmental organisations to convince municipal authorities to co-fund cross cutting projects that blur the lines between ministries.¹⁷⁹ While some interviewees felt nongovernmental organisations should take a more active role and

¹⁷² MPI Europe interview with representative, Swedish ESF Monitoring Committee, 20 November 2018.

¹⁷³ European Commission, 'Observations on the Partnership Agreement with Sweden', 10 July 2017, https://ec.europa.eu/info/sites/info/files/partnership-agreement-sweden-observations-july2014_en.pdf.

¹⁷⁴ For Thematic Objective 10, the target is organisations, authorities, companies, and other employers in the private, public and non-profit sectors to provide workplace-based learning, which could also benefit migrant but less explicitly.

¹⁷⁵ Ministry of Enterprise and Innovation, Arbetsmarknadsdepartementet Landsbygdsdepartementet, Partnerskapsöverenskommelsen.

¹⁷⁶ The activities include quality development and building a digital platform for competence building, support material to assess newcomers knowledge between placement in upper secondary schools, and hosting meetings for employees of organisations working with newly arrived persons to develop skills in intercultural care and expand their knowledge about the beneficiaries. Göteborgsregionen (GR), 'InVäst – Integration Västsverige', Göteborgsregionen, accessed 16 January 2019, <https://goteborgsregionen.se/toppmenyn/dettajobbargrmed/skolautbildning/nyanlandaslarande/invastintegrationvastsverige.4.624218c15ea17395f51aea6.html>.

¹⁷⁷ MPI Europe interview with Anna Mårtensson, Integration Halland, Project Manager, Sweden, 28 November 2018.

¹⁷⁸ MPI Europe interview with Anna Mårtensson.

¹⁷⁹ MPI Europe interview with Heidi Sandberg, Policy Officer, National Forum for Voluntary Organisations (Social Forum), Sweden, 6 December 2018.

have more flexibility, others thought it was best for the public authorities to take ownership and then get input and buy-in from nongovernmental organisations. One reason for this is to help nongovernmental organisations avoid running afoul of complicated legislation on state aid.¹⁸⁰ Moreover, without the support of local authorities, there is a higher risk that the project will disappear once it runs out of funding.¹⁸¹

Another challenge to supporting migrant inclusion in the Swedish ESF is the staff turnover and reorganisation of Swedish ESF Council, which has caused delays and loss of expertise. The relocation of the ESF Council from Stockholm to Gävle has meant there is a 'lack of people, time, everything'.¹⁸² High staff turnover has resulted in a loss of skills which some interviewees said was causing delays in implementation and confusion for project owners.¹⁸³ In one case, it took the ESF Council years to present a funding offer after a pre-study, by which time the key people involved in the study no longer worked at the organisation.¹⁸⁴ Such delays in funding could be crippling, especially for smaller organisations with limited cash flow.

Consultation and engagement with civil society

The Swedish ESF Council produces guidance on the project process, from a decision to launch a call through to the expenditure declaration to the European Commission. The national and regional Managing Authorities organise information sessions and workshops for potential participants.¹⁸⁵ For example, in the Stockholm region, two information sessions and a workshop were scheduled for January 2019.¹⁸⁶ This gives potential applicants the opportunity to review the call, discuss the success factors for a sustainable project and what to consider when writing the application, and familiarise themselves with the internet service where applications are submitted.

With the support of the Swedish ESF Council, Region Halland launched dialogues with all local municipalities to raise awareness, identify potential areas of development and foster partnerships.¹⁸⁷ A key element of this support is that Region Halland also provides funding to stakeholders, if needed, for pilot studies in preparation for full applications to the ESF.

However, despite these good practices, some interviewees felt more could be done to support capacity building. A former project manager at Integration Halland built a network of project leaders in the region to exchange lessons learned.¹⁸⁸ The large interest in being part of the network suggests these kinds of dialogues could be organised and supported by the local ESF coordinator or the regional office rather than relying on the spare time and goodwill of project managers.

Looking forward to the ESF+

Moving elements of the integration portfolio from the AMIF to the ESF+ could have serious consequences for asylum seekers in Sweden.

¹⁸⁰ MPI Europe interview with representative, Swedish ESF Monitoring Committee, 20 November 2018.

¹⁸¹ Ibid.

¹⁸² It should be noted that multiple attempts to interview officials at the Swedish ESF Council for this research were rejected due to the moving and loss of staff.

¹⁸³ MPI Europe interview with representative, Swedish ESF Monitoring Committee, 20 November 2018.

¹⁸⁴ MPI Europe interview with Heidi Sandberg.

¹⁸⁵ Swedish ESF Council, 'Min region', accessed 30 January 2019, <https://www.esf.se/sv/Min-region/>.

¹⁸⁶ Swedish ESF Council, 'Informationsmöten', accessed 30 January 2019, <https://www.esf.se/Min-region/Stockholm/Informationsmoten1/>.

¹⁸⁷ MPI Europe interview with Lena Neinhardt, International Strategist, Department of Analysis and Coordination, Region Halland, 17 January 2019.

¹⁸⁸ MPI Europe interview with Anna Mårtensson.

- ***Wasted time for asylum seekers.*** A key challenge highlighted by one Swedish interviewee is that because it can take a couple of years for asylum seekers to receive a residence permit, there is a long period in which they are not eligible for ESF projects, missing an opportunity to get a head start on their integration.¹⁸⁹ Through the current AMIF, asylum seekers can still access integration programming. If integration moves more firmly from the AMIF into the ESF, as has been proposed in the next funding cycle, this could end up delaying asylum seekers' access to those activities and pushing back their labour market integration. On the other hand, the rules on asylum seekers' eligibility for the ESF are set by Member States. Modifying the national criteria to include those without permits could reduce the risk of delay.

¹⁸⁹ MPI Europe interview with representative, ESF Monitoring Committee, 16 November 2018.

WORKS CITED

- Anonymous (19 non-governmental organisations). 2016. Letter to Jakub Skiba, Minister of Internal Affairs and Administration. 19 December 2016. http://ffrs.org.pl/wp-content/uploads/2016_12_19_List_wSprawie_FAMI_Poszlo_Tresc_StrInt.pdf.
- Applica. 2018. MPI Europe, interview with Applica consultant on ESIF Evaluations, 22 November 2018.
- Benton, Meghan and Elizabeth Collett, and Helen McCarthy. 2015. *Into the Mainstream: Rethinking Public Services for Diverse and Mobile Populations*. Brussels: Migration Policy Institute Europe. <https://www.migrationpolicy.org/research/mainstream-rethinking-public-services-diverse-and-mobile-populations>.
- Cabinet of Germany. N.d. Europäischer Sozialfonds in Deutschland. Accessed 23 November 2018, <https://www.esf.de>.
- Come, Marie-Josée and Elisabeth Delabre. 2019. MPI Europe, interview with responsible authority for FESI and Correspondante Academique Fonds Structurels, DAFPIC/GIP-FCIP, Creteil, France 16 January 2019.
- Commission Implementing Decision - of 3 April 2014 - Setting out the Annual Breakdown by Member State of Global Resources for the European Regional Development Fund, the European Social Fund and the Cohesion Fund under the Investment for Growth and Jobs Goal and the European Territorial Cooperation Goal, the Annual Breakdown by Member State of Resources from the Specific Allocation for the Youth Employment Initiative Together with the List of Eligible Regions, and the Amounts to Be Transferred from Each Member State's Cohesion Fund and Structural Funds Allocations to the Connecting Europe Facility and to Aid for the Most Deprived for the Period 2014-2020, *Official Journal of the European Union* 2014 L 104/13, 8 April 2014. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014D0190&from=EN>.
- Commission nationale de l'informatique et des libertés. Loi Informatique et Libertés. Act No. 78-17 of 6 January 1978 on Information. Data Files and Civil Liberties. <https://www.cnil.fr/sites/default/files/typo/document/Act78-17VA.pdf>.
- Department for Cohesion Policies. N.d. OpenCoesione. Verso un migliore uso delle risorse: scopri, segui, sollecita. Accessed 23 November 2018, <https://opencoesione.gov.it>.
- Department of the European Social Fund at the Ministry of Development. 2018. MPI Europe, interview with representative of the Department of the European Social Fund at the Ministry of Development, Poland, 26 November 2018.
- Destatis. Persons with a migration background. Accessed 30 January 2019, <https://www.destatis.de/EN/FactsFigures/SocietyState/Population/MigrationIntegration/Methods/MigrationBackground.html>.
- Directorate General Migration and Home Affairs. 2018. MPI Europe interview with official from Directorate General Migration and Home Affairs, European Commission, 23 November 2018.
- ESF-BAMF-Programm. Occupational language support for people with a migration background-ESF BAMF Programme. Accessed 30 January 2019, <https://www.esf.de/portal/DE/Foerderperiode-2014-2020/ESF-Programme/bmas/2014-12-11-Sprachfoerderung-ESF-BAMF.html>.
- ESF Council Stockholm. 2018. MPI Europe interview with official of the ESF Council Stockholm, Sweden, 21 November 2018.
- Eurocities. 2018. *Boosting Employment and Social Inclusion in EU Cities: Lessons Learned from Cities Experiences with the European Social Fund in 2014-2017*. https://ec.europa.eu/futurium/en/system/files/ged/eurocities20report20on20esf20and20cities_final.pdf.
- Eurocities. N.d. Policy brief on the ESF+ proposal for 2021-2027. Accessed 25 February 2019, http://nws.eurocities.eu/MediaShell/media/EUROCITIES_policy_brief_on_ESF.pdf.
- European Anti-Poverty Network. 2018. EAPN Multiannual Financial Framework Position Paper. <https://www.eapn.eu/wp-content/uploads/2018/07/EAPN-2018-EAPN-MFF-paper.pdf>.

- European Commission. 2010. Consolidated Version of the Treaty on the Functioning of the European Union. *Official Journal of the European Union*, 2012 C 326/50, 26 October 2010. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:12012E/TXT&from=EN>.
- European Commission. 2012. Position of the Commission Services on the development of Partnership Agreement and programmes in Germany for the period 2014-2020. https://www.esf.de/portal/SharedDocs/PDFs/EN/PP-Gemrmany_final.pdf?blob=publicationFile&v=4.
- European Commission. 2013. CLLD – a Useful Approach for ESF, European Social Fund. 13 September 2016. <https://ec.europa.eu/esf/transnationality/content/clld-useful-approach-esf>.
- European Commission. 2014. European Commission adopts Partnership Agreement with Sweden on using EU Structural and Investment Funds for growth and jobs in 2014-2020. Press Release. Brussels. 29 October 2014. http://europa.eu/rapid/press-release_IP-14-1217_en.htm.
- European Commission. 2014. Commission Implementing Regulation (EU) No 215/2014 of 7 March 2014 laying down rules for implementing Regulation (EU) No 1303/2013 of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund with regard to methodologies for climate change support, the determination of milestones and targets in the performance framework and the nomenclature of categories of intervention for the European Structural and Investment Funds. *Official Journal of the European Union*, L 69/65, 7 March 2014. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0215&from=EN>.
- European Commission. 2014. Summary of the Partnership Agreement for Poland 2014-2020. 23 May 2014. https://ec.europa.eu/info/sites/info/files/partnership-agreement-poland-summary-may2014_en.pdf.
- European Commission. 2014. The European code of conduct on partnership. Leaflet. Publications Office of the European Union. January 2014. <http://ec.europa.eu/esf/BlobServlet?docId=443&langId=en>.
- European Commission. 2014. European Commission Adopts Partnership Agreement with Poland on Using EU Structural and Investment Funds for Growth and Jobs in 2014-2020. Press Release. 23 May 2014. http://europa.eu/rapid/press-release_IP-14-596_en.htm.
- European Commission and Directorate-General for Regional and Urban Policy. 2014. Structural Funds (ERDF and ESF) Eligibility 2014-2020. Luxembourg: Publications Office. <http://bookshop.europa.eu/uri?target=EUB:NOTICE:KN0113867:EN:HTML>.
- European Commission. 2015. Synergies Between the Asylum Migration and Integration Fund (AMIF) and Other EU Funding Instruments in Relation to the Reception and Integration of Asylum Seekers and Other Migrants. 16 November 2015. <http://ec.europa.eu/DocsRoom/documents/15121/attachments/7/translations/en/renditions/native>.
- European Commission. 2016. *The Analysis of the Outcome of the Negotiations Concerning the Partnership Agreements and ESF Operational Programmes, for the Programming Period 2014-2020*. Brussels, Belgium: Directorate-General for Employment, Social Affairs and Inclusion. <https://publications.europa.eu/en/publication-detail/-/publication/b2c01d15-ffef-11e6-8a35-01aa75ed71a1/language-en>.
- European Commission. 2017. Annual Implementation Reports 2017: Country Summary Tables – Germany. <https://ec.europa.eu/social/BlobServlet?docId=19293&langId=en>.
- European Commission. 2017. Observations on the Partnership Agreement with Sweden. 10 July 2017. https://ec.europa.eu/info/sites/info/files/partnership-agreement-sweden-observations-july2014_en.pdf.
- European Commission. 2017. Questions and Answers: European Social Fund 2007-2013 evaluation. Fact Sheet. http://europa.eu/rapid/press-release_MEMO-16-3985_en.htm.

- European Commission. 2018. Annexes to the Proposal for a Regulation of the European Parliament and of the Council Laying down Common Provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, and the European Maritime and Fisheries Fund and Financial Rules for Those and for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument. Annex. 29 May 2018. https://www.funduszeuropejskie.gov.pl/media/61825/Regulation_proposal_common_provisions_COM_2018_375_29_05_2018_Annexes_EN.pdf.
- European Commission. 2018. Commission Staff Working Document: Impact Assessment Accompanying the document Proposal for a Regulation of the European Parliament and the Council on the European Social Fund Plus (ESF+) and Proposal for a Regulation of the European Parliament and the Council on the European Globalisation Adjustment Fund (EGF). SWD [2018] 289 final, 30 May 2018. https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-esf-egf-swd_en.pdf.
- European Commission, Commission Staff Working Document: Interim Evaluation of the Asylum, Migration and Integration Fund 2014-2017 Accompanying the document Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on interim evaluation of the Asylum, Migration and Integration Fund and the Internal Security Fund. SWD [2018] 399 final, 12 June 2018. https://ec.europa.eu/home-affairs/sites/homeaffairs/files/what-we-do/policies/european-agenda-migration/20180612_swd-2018-339-commission-staff-working-document_en.pdf.
- European Commission. 2018. European Structural and Investment Funds. Funding Tenders. accessed 6 December 2018, https://ec.europa.eu/info/funding-tenders/funding-opportunities/funding-programmes/overview-funding-programmes/european-structural-and-investment-funds_en.
- European Commission. 2018. Guidance for Member States and Programme Authorities on Community-Led Local Development in European Structural and Investment Funds. 17 September 2018. https://ec.europa.eu/regional_policy/sources/docgener/informat/2014/guidance_community_local_development.pdf.
- European Commission. 2018. Proposal for a Regulation 2018/0206 of the European Parliament and of the Council on the European Social Fund Plus (ESF+). (COM [2018] 382 final, 30 May 2018). https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-european-social-fund-plus-regulation_en.pdf.
- European Commission. 2018. Proposal for a Regulation of the European Parliament and of the Council on the European Social Fund Plus (ESF+). (COM [2018] 382 final, 30 May 2018). https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-european-social-fund-plus-regulation_en.pdf.
- European Commission. 2018. Proposal for a Regulation of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, and the European Maritime and Fisheries Fund and financial rules for those and for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument' (COM [2018] 375 final, 29 May 2018). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2018%3A375%3AFIN>.
- European Commission. 2018. Questions and Answers on the New Social Fund and Globalisation Adjustment Fund for the Period 2021-2027. Fact Sheet. 30 May 2018. http://europa.eu/rapid/press-release_MEMO-18-3922_en.htm.
- European Commission. N.d. *European Structural and Investment Funds 2014-2020: Official Texts and Commentaries*. Luxembourg: Publications Office of the European Union. https://ec.europa.eu/regional_policy/sources/docgener/guides/blue_book/blueguide_en.pdf.
- European Commission. N.d. European Structural and Investment Funds—Data by Fund—European Social Fund. Accessed 23 November 2018. <https://cohesiondata.ec.europa.eu/funds/esf>.
- European Commission. N.d. Europe 2020 Strategy. Accessed 6 December 2018, https://ec.europa.eu/info/business-economy-euro/economic-and-fiscal-policy-coordination/eu-economic-governance-monitoring-prevention-correction/european-semester/framework/europe-2020-strategy_en.

- European Commission. N.d. The European Semester: Why and How. Accessed 6 December 2018, https://ec.europa.eu/info/business-economy-euro/economic-and-fiscal-policy-coordination/eu-economic-governance-monitoring-prevention-correction/european-semester/framework/european-semester-why-and-how_en.
- European Commission. N.d. The European Pillar of Social Rights in 20 Principles. Accessed 7 December 2018. https://ec.europa.eu/commission/priorities/deeper-and-fairer-economic-and-monetary-union/european-pillar-social-rights/european-pillar-social-rights-20-principles_en.
- European Commission. N.d. ESF TP Library. Accessed 30 January 2019, <https://ec.europa.eu/esf/transnationality/library>.
- European Commission. N.d. European Social Fund - How the ESF works. Accessed 30 January 2019, <http://ec.europa.eu/esf/main.jsp?catId=525&langId=en>.
- European Commission. N.d. Priorities for 2014-2020. Accessed 30 January 2019. http://ec.europa.eu/regional_policy/en/policy/how/priorities.
- European Commission. N.d. Public Consultations on the Future of the European Funds Now Officially Launched. Accessed 30 January 2019. <http://ec.europa.eu/esf/main.jsp?catId=67&langId=en&newsId=9035>.
- European Commission. N.d. Support to asylum seekers under the European Social Fund and the Fund for European Aid to the Most Deprived. Accessed 12 February 2019, <http://ec.europa.eu/esf/BlobServlet?docId=14499&langId=en>.
- European Commission. N.d. EU Health Programme. Accessed 25 February 2019, https://ec.europa.eu/health/funding/programme_en.
- European Commission. N.d. EU Programme for Employment and Social Innovation (EaSI). Accessed 25 February 2019, <https://ec.europa.eu/social/main.jsp?catId=1081>.
- European Commission. N.d. Ex ante conditionalities. Accessed 25 February 2019. https://ec.europa.eu/regional_policy/en/policy/what/glossary/e/ex-ante-conditionalities.
- European Commission. N.d. Fund for European Aid to the Most Deprived (FEAD). Accessed 25 February 2019, <https://ec.europa.eu/social/main.jsp?catId=1089>.
- European Commission. N.d. Youth Employment Initiative (YEI). Accessed 25 February 2019, <https://ec.europa.eu/social/main.jsp?catId=1176>.
- European Council, Council of the European Union. 2019. Multiannual financial framework for 2021-2027: Negotiations. Accessed 25 February 2019. <https://www.consilium.europa.eu/en/policies/multiannual-financial-framework/mff-negotiations/>.
- European Commission. N.d. Glossary – Payments. Accessed 26 February 2019, https://ec.europa.eu/regional_policy/en/policy/what/glossary/p/payments.
- European Commission. N.d. Policies and Activities – Active Inclusion. Accessed 26 February 2019, <https://ec.europa.eu/social/main.jsp?catId=1059&langId=en>.
- European Council on Refugees and Exiles and Platform for International Cooperation on Undocumented Migrants. 2018. ECRE and PICUM Position on the Proposal for a Regulation of the European Social Fund + 2021-2027 COM(2018) 382. <https://www.ecre.org/wp-content/uploads/2018/11/Comments-on-ESF.pdf>.
- European Parliament. 2018. Amendments 20-231, European Parliament, Committee on Employment and Social Affairs. 26 September 2018. <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+COMPARL+PE-626.995+02+DOC+PDF+V0//EN&language=EN>.
- European Parliament. 2019. Report on the Proposal for a Regulation of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, and the European Maritime and Fisheries Fund and financial rules for those and for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument. (COM [2018] 375, COM-0230/2018-2018/196

- COD, 29 January 2019). http://www.europarl.europa.eu/doceo/document/A-8-2019-0043_EN.pdf.
- EUROSTAT. Population on 1 January by age group, sex and country of birth (migr_pop3ctb). Accessed 17 January 2019, http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=migr_pop3ctb&lang=en%20.
- Farrell, Fintan and Patrizia Brandellero. 2018. *Social Inclusion Indicators for ESF Investments: Areas for Development in Addressing the 20% Social Inclusion Target in the ESF*. N.p.: ESF Transnational Platform and Aeidl. <https://ec.europa.eu/esf/transnationality/content/social-inclusion-indicators-esf-investments-areas-development-addressing-20-social-inclusion>.
- Federal Office of Family Affairs and Civil Society Functions. 2018. MPI Europe, interview with an official from the Federal Office of Family Affairs and Civil Society Functions, Germany, 7 December 2018.
- Federal Office of Family Affairs and Civil Society. N.d. STÄRKEN vor Ort. Accessed 28 January 2019, <https://www.jugend-staerken.de/programme/programme-2007-2014/staerken-vor-ort.html>.
- Fondazione G. Brodolini and European Commission. 2018. *Synthesis Report of ESF 2017 Annual Implementation Reports Final report*. Luxembourg: Publications Office of the European Union. <https://ec.europa.eu/esf/transnationality/content/synthesis-report-esf-2017-annual-implementation-reports>.
- Fondazione G. Brodolini. 2018. MPI Europe interview with representative of Fondazione G. Brodolini Italy, 30 November 2018.
- Funduszy Europejskich. Szkolenia i konferencje'. Accessed 19 January 2019, <https://www.funduszeuropejskie.gov.pl/strony/o-funduszach/szkolenia/#/dataOd=01-01-2019/dataDo=31-12-2019/najstarsze=1>.
- Fundusze Europejskie. 2017. *Analiza sytuacji społeczno-ekonomicznej cudzoziemców w województwie śląskim wraz z oceną możliwości wsparcia tej grupy w ramach RPO WSL na lata 2014-2020*. December 2017. https://rpo.slaskie.pl/media/files/cms/Ewaluacja/grudzen_2017/Cudzoziemcy%20ewaluacja/Analiza%20sytuacji%20społeczno-ekonomicznej%20cudzoziemców%20w%20województwie%20ślaskim%20-%20raport.pdf.
- Germany regional ESF managing authority. 2018. MPI Europe interview with representative of a German regional ESF managing authority, 23 November 2018.
- Gilbert, Jeremie and David Keane. 2016. How French Law Makes Minorities Invisible. *The Conversation*. 13 November 2016. <https://theconversation.com/how-french-law-makes-minorities-invisible-66723>.
- Göteborgsregionen (GR). InVäst – Integration Västsverige. Göteborgsregionen. Accessed 16 January 2019, <https://goteborgsregionen.se/toppmenyn/dettajobbargrmed/skolautbildning/nyanlandaslarande/invastintegrationvastsverige.4.624218c15ea17395f51aea6.html>.
- Gunnarsson, John. 2018. MPI Europe interview with representative, Swedish Monitoring Committee, Sweden, 16 November 2018.
- Integrazione Migranti. 2018. INSIDE-Inserimento Integrazione Nordsud Inclusion. 11 July 2018. <http://www.integrazionemigranti.gov.it/Attualita/Notizie/Pagine/INSIDE-INserimento-Integrazione-nordsud-inclusionE-.aspx>.
- Integrazione Migranti. 2019. Avviso Pubblico 1/2019 Per Presentazione Progetti Da Finanziare A Valere Su Fami E Fse', <http://www.integrazionemigranti.gov.it/Attualita/Notizie/Pagine/Avviso-pubblico-12019-per-presentazione-progetti-da-finanziare-a-valere-su-FAMI-e-FSE.aspx>.
- Ile-de-France Regional Office. 2019. MPI Europe interview with Regional official, Ile-de-France Region, France, 11 January 2019.
- Istituto per la Ricerca Sociale. 2018. *The European Social Fund: Beneficiaries' Experience in the Current Funding Period*. Brussels, Belgium: European Parliament: Policy Department for Economic, Scientific and Quality of Life Policies. [http://www.europarl.europa.eu/RegData/etudes/STUD/2018/626052/IPOL_STU\(2018\)626052_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2018/626052/IPOL_STU(2018)626052_EN.pdf).

- Mårtensson, Anne. 2018. Europe, interview with Project Leader of Integration Halland, 28 November 2018.
- Ministry of Development. 2018. *Ocena trafności i skuteczności stosowania kryteriów wyboru projektów w PO WER*. Warsaw: Ministry of Development, 2018.
https://www.power.gov.pl/media/50550/Raport_zlozony_graficznie.pdf.
- Ministry of Employment and Social Affairs. N.d. Svenska ESF-rådet. Accessed 23 November 2018,
<https://www.esf.se/sv/>.
- Ministry of Interior and Administration (MSWiA). Two New Recruitments under the Asylum, Migration and Integration Fund. Dwa Nowe Nabory w Ramach Funduszu Azylu, Migracji i Integracji', Departament Funduszy Europejskich MSWiA. Accessed 7 December 2018,
<http://fundusze.mswia.gov.pl/ue/nabory-projektow/fundusz-azylu-migracji/13783,Dwa-nowe-nabory-w-ramach-Funduszu-Azylu-Migracji-i-Integracji.html>.
- Ministry of Investment and Development. N.d. Portal Funduszy Europejskich. Accessed 23 November 2018, <http://www.funduszeuropejskie.gov.pl/>.
- Ministry of Labour, General Delegation for Employment and Vocational Training (DGEFP). 2018. MPI Europe interview with official at the Ministry of Labour, General Delegation for Employment and Vocational Training (DGEFP), Programmes Deployment Support Office, Europe and International Directorate, Policy Officer (at the time of the interview) France, 19 November 2018.
- Ministry of Labour, General Delegation for Employment and Vocational Training (DGEFP). 2018. MPI Europe interview with an official of the Ministry of Labour, General Delegation for Employment and Vocational Training (DGEFP), Support for the Deployment of Programmes, France, 12 December 2018.
- Ministry of Labour and Social Policy. 2018. MPI Europe interview with official from the Ministry of Labour and Social Policy, Italy, 22 November 2018.
- Ministry of Labour, Programmes Deployment Support Office. 2019. MPI Europe interview with official at the Ministry of Labour, Programmes Deployment Support Office, Europe and International Directorate, France, 6 February 2019.
- Ministry of Labour. Qu'est-ce que le FSE ?. Fonds Social Européen en France 2014-2020. Accessed 30 January 2019, <http://www.fse.gouv.fr/quest-ce-que-le-fse>.
- Ministry of the Economy and Finance. 2018. *Monitoraggio Politiche di Coesione Programmazione 2014-2020: Situazione al 31 agosto 2018*. Ministry of the Economy and Finance.
http://www.rgs.mef.gov.it/Documenti/VERSIONE-I/attivita_istituzionali/monitoraggio/rapporti_finanziari_ue/monitoraggio_politiche_di_coesione_2014-2020/2018-08-31/MPC_Situazione_al_31_agosto_2018.pdf.
- Ministry of Enterprise and Innovation, Arbetsmarknadsdepartementet Landsbygdsdepartementet. Partnerskapsöverenskommelsen. Accessed 30 January 2019,
<https://www.regeringen.se/4a61e5/contentassets/c581908af38a4be0a40663540fd9c0bc/partnerskapsoverenskommelsen>.
- Neinhardt, Lena. MPI Europe, interview with International Strategist, Department of Analysis and Coordination, Region Halland, 17 January 2019.
- OECD/European Union. 2018. *Indicators of Immigrant Integration: Introduction and Overview*. Paris/Brussels: OECD Publishing. <http://www.oecd.org/publications/indicators-of-immigrant-integration-2018-9789264307216-en.htm>.
- OECD/LEED. 2013. *Demographic transition and an ageing society: Implications for local labour markets in Poland*. Paris: OECD Publishing.
https://www.oecd.org/cfe/leed/Poland%20Report_V8.1%20FINAL.pdf.
- Oel, Matthias. 2017. Your Email of 22 March 2017 to Commissioner Dimitris Avramopolous - Immigration Integration Programs in Poland. 7 April 2017,
<https://www.facebook.com/InterkulturalniPL/photos/a.151662441572153/1445760752162309/?type=3&theater>.

- Office of the Commissioner for Migration, Refugees and Integration. 2019. MPI Europe interview with official from the Office of the Commissioner for Migration, Refugees and Integration, Germany, 21 January 2019.
- Partenariat. A propos. Accessed 30 January 2019, <http://www.partenariat20142020.fr/>.
- Polish civil society actor. 2018, MPI Europe, interview with civil society representative, Poland, 5 December 2018.
- Portal Funduszy Europejskich. 2016. Fundusze Europejskie w Polsce. 11 June 2016. <https://www.funduszeuropejskie.gov.pl/strony/o-funduszach/zasady-dzialania-funduszy/fundusze-europejskie-w-polsce/#Programy%20regionalne>.
- Programme Opérationnel Au Titre De L'objectif. 2014. Investissement Pour La Croissance Et L'emploi. 2 December 2014, <http://www.europe-en-france.gouv.fr/content/download/31135/299701/version/1/file/Programme%20op%C3%A9rationnel%20FEDER-FSE-IEJ%20%E2%80%93%20Midi-Pyr%C3%A9n%C3%A9es%20et%20bassin%20de%20la%20Garonne%20%28Conseil%20r%C3%A9gional%29.pdf>.
- Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund and repealing Council Regulation (EC) No 1083/2006', *Official Journal of the European Union*, 2013 L 347/320, 20 December 2013. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1303&from=EN>.
- Regulation (EU) No 1304/2013 of the European Parliament and of the Council of 17 December 2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006', *Official Journal of the European Union*, 2013 L 347/470, 20 December 2013. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1304&from=en>.
- Regulation (EU) No 516/2014 of the European Parliament and of the Council of 16 April 2014 Establishing the Asylum, Migration and Integration Fund, Amending Council Decision 2008/381/EC and Repealing Decisions No 573/2007/EC and No 575/2007/EC of the European Parliament and of the Council and Council Decision 2007/435/EC', Pub. L. No. 32014R0516, 150 OJ L, 20 May 2014. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0516&from=EN>.
- République Française. 2018. Accord de partenariat 2014-2020 France. 20 June 2018. <http://www.europe-en-france.gouv.fr/content/download/27819/257169/file/Accord%20de%20partenariat.pdf>.
- Republic of Poland. 2018. w sprawie Europejskiego Funduszu Społecznego Plus (EFS+). 4 June 2018. https://www.funduszeuropejskie.gov.pl/media/61887/Stanowisko_Rzadu_RP_do_EFS_COM_2018_382_przyjete_KSE_29_06_2018.pdf.
- Rosasco, Adriana. 2018. Synergies between ESF and AMIF on integration of people with migrant background. Presentation at the ESF Transnational Platform meeting. Helsinki. https://ec.europa.eu/esf/transnationality/filedepot_download/2490/1908.
- Sandberg, Heidi. 2018. MPI Europe, interview with Policy Officer at the National Forum for Voluntary Organisations, Social Forum, Sweden, 6 December 2018.
- Sattler, Kai and Jürgen Viedenz, and Dennis Egenolf. 2013. *Auswertung der Online-Konsultation*. Bonn: Federal Ministry of Labour and Social Affairs. https://www.esf.de/portal/SharedDocs/PDFs/DE/Meldung/2013/2013_04_05_konsultation_bericht.pdf?__blob=publicationFile&v=2.
- Stott, Leda. 2018. *Review of the European Code of Conduct on Partnership (ECCP)*. Technical dossier 7, Thematic Network on Partnership. European Commission. 7 June 2018. <https://publications.europa.eu/en/publication-detail/-/publication/d26c92e2-9abc-11e8-a408-01aa75ed71a1/language-en/format-PDF/source-74622160>.

- Sweco & Spatial Foresight & Nordregio. 2016. *Implementation of the Partnership Principle and Multi-Level Governance during the 2014-2020 ESI Funds*. Luxembourg: Publications Office of the European Union.
https://ec.europa.eu/regional_policy/en/information/publications/studies/2016/implementation-of-the-partnership-principle-and-multi-level-governance-during-the-2014-2020-esi-funds.
- Swedish ESF Council. Informationsmöten. Accessed 30 January 2019, <https://www.esf.se/Min-region/Stockholm/Informationsmoten1/>.
- Swedish ESF Council. Min region. Accessed 30 January 2019, <https://www.esf.se/sv/Min-region/>.
- Swedish ESF Council. The European Social Fund. Accessed 30 January 2019.
<https://www.esf.se/sv/Sidhuvud/The-swedish-ESF-council/The-European-Social-Fund/>.
- Swedish ESF Monitoring Committee. 2018. MPI Europe, interview with representative of the Swedish ESF Monitoring Committee, Sweden, 20 November 2018.
- Tecnostruttura. 2019. MPI Europe, interview with representatives from Tecnostruttura, Italy, 11 January 2019.

ABOUT THE AUTHORS

Aliyyah Ahad is an Associate Policy Analyst with the Migration Policy Institute (MPI) Europe, where her research focuses on European migration and integration policy, with a special focus on the European Union's partnerships with third countries, free movement and Brexit, and social innovation in refugee reception and integration.

Previously, Ms. Ahad completed a 12-month internship with the Bermuda Government's Cabinet Office. She also managed a research project for WPP Government and Public Sector Practice on how to improve communications between refugees and the public and humanitarian sectors. She also interned with MPI, and spent three months in Rabat, Morocco, volunteering with a centre that provided medical and social care to unauthorised migrant women who were pregnant.

Ms. Ahad holds a master of science in migration studies and master of public policy, with distinction, from the University of Oxford, where she studied as a Rhodes Scholar. She also holds an honours bachelor of arts degree in political science and sociology from the University of Toronto, with high distinction. Ms. Ahad also spent a year studying at Sciences Po Paris, where she received an exchange programme certificate, cum laude.

Timo Schmidt is a Research Intern with MPI Europe, where he focuses on EU financial instruments for migration, return management, and refugee resettlement.

Prior to joining MPI Europe, Mr. Schmidt worked as a Research Associate with the United Nations Development Programme's Programme of Assistance to the Palestinian People in Jerusalem. He also chairs the migration commission at a Berlin-based non-profit organisation and works as a director and coproducer of a transmedia project on EU migration. He has also worked as a mentor for refugee children in Amman, Jordan, and Beirut, Lebanon, as well as a student consultant on refugee labour-market integration at Leiden University.

Mr. Schmidt holds a master of science in migration studies, with distinction, from the University of Oxford, where he specialised in EU migration policy and the economics of migration. He received an honours bachelor's degree in international studies, cum laude, from Leiden University, where he focused on Middle Eastern studies. Mr. Schmidt also spent a semester at the Netherlands Institute Morocco in Rabat, completing research on migrant integration and intensive Arabic language courses.