The role and potential of local and regional authorities in the EU framework for the integration of immigrants
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Contents

Part I. Introduction and Methodology.................................................................1

1. Introduction: The local and regional dimensions of integration in the EU.....1
2. Methodology .................................................................................................4

Part II. The role of the CoR and local and regional authorities in the EU framework for integration .........................................................9

3. The local/regional dimensions and the EU framework on integration .........9
   3.1. The Hague Programme: towards a common integration agenda......... 9
   3.2. Towards the Stockholm Programme.....................................................16
   3.3. The European Integration Fund and local/regional authorities....... 19
   3.4. The Treaty of Lisbon and integration .................................................. 21
4. The CoR and integration...............................................................................22

Part III. Practices, lessons and tools for local and regional authorities on ‘Better Governance’ of integration policies.................................33

5. Practices and lessons by European networks of local and regional authorities: a state of the art.................................................................33
   5.1. CLIP: Cities for local integration policies for migrants’ ................. 33
   5.2. EUROCITIES and INTI-CITIES....................................................... 38
   5.3. ERLAI and ERLAIM.......................................................................... 43
6. Tools for local and regional authorities on integration policies.................45
   6.1. Better governance and integration policy strategies......................... 45
   6.2. Partnerships and networking............................................................... 50
   6.3. Evaluation and monitoring.................................................................. 53
      6.3.1. Benchmarking............................................................................. 53
      6.3.2. Peer Review............................................................................... 59

Part IV. Future Outlook, conclusions and policy recommendations.............61

7. Conclusions and final reflections .................................................................61
8. Policy recommendations..............................................................................67
Annexes .......................................................................................................................... 77

Annex 1 - Table 1: The INTI-Cities benchmark......................................................... 77
Annex 2 - Table 2: ERLAIM questionnaire ............................................................... 79
Annex 3 - Relevant priorities developed by Decision COM(2007)3926 in relation to Article 4 ........................................................................................................... 80
Annex 4 - List of abbreviations ................................................................................. 83
Part I. Introduction and methodology

1. Introduction: the local and regional dimensions of integration in the EU

The way in which any individual becomes socially integrated, and the dilemmas that follow from the framing of these social processes into policy and law is largely a local and regional phenomenon. It is at the local level of governance where the multifaceted consequences arising from public responses embracing societal interactions and participation become most visible. It is also ‘there’ that new forms and the struggle of citizenship emerge in the face of inappropriate policies and narrow legalities. The relevance of the ‘local and regional dimensions’ in the policy domain of immigrant integration has slowly but progressively increased at European Union (EU) level since the transfer of immigration policy to (shared) EU competence under the Treaty of Amsterdam in 1999. Integration falls within the general normative rubric of the Area of Freedom, Security and Justice (AFSJ), where the logic of intergovernmentalism and Member States’ competences has so far prevailed over those of the Union.

The integration of immigrants is considered to be closely associated with the principle of subsidiarity. Surprisingly, this has not entailed the implementation of substantive or institutional processes allowing for the ‘localization’ of integration policy at EU level. In fact, the prevalence of the principle of subsidiarity has served Member States’ national governments’ interests to limit the scope, reach and impact of the EU over integration debates in their respective domestic arenas very well. This might have actually prevented a more structured role for ‘the local and regional levels’ in the EU Framework on Integration from taking hold. Indeed, the official recognition by the Council and the European Commission of the role that local and regional authorities play in integration policies has proven to be difficult to convert into practical outputs allowing for their actual involvement in the formulation, implementation and evaluation of national and European public policies. The nation-state rationale driving Member States’ strategies at EU level predominates over integration-related debates and latest EU policy developments. This ‘national predominance’ might blind the EU’s approach on integration by preventing it from learning how social integration processes function and evolve and what the urban landscape actually needs in terms of public intervention. As we will argue in this report, a post-national approach on integration should be fostered
in the next phases of the EU Framework on Integration. That approach should set up supranational mechanisms and tools in order to bridge the practical knowledge and accumulated experience from the local and regional realms, support further the capacity of local players and practitioners to deliver social integration and reap the benefits of their privileged position in delivering social cohesion in local and regional communities, as well as in the evaluation of the implementation of national and European integration policies and laws.

The role that players falling within the category of ‘local and regional authorities’ currently have on integration policies at European level remains also dependent upon the nature and characteristics of the EU Framework on Integration itself. The latter is a by-product of the difficult relationship between the Europeanisation processes in the domain of integration and Member States’ intergovernmental strategies. The EU Framework on Integration constitutes a form of ‘soft-law or policy’. Its normative outputs are not legally binding on Member States. The EU Framework differs therefore from proper EU law and falls outside the Community method of cooperation. Instead, it represents a non-formally recognized or quasi-Open Method of Coordination (OMC). Indeed, the European Commission (Directorate General Justice, Freedom and Security, DG JLS) has managed to progressively develop since 2003 the EU Framework on Integration in a dynamic manner at discursive, institutional, financial and substantive levels. There is now a certain kind of common language about integration immigrants at EU level which is spreading the ‘EU’s integration discourse’ across the various integration players at supranational, national and local levels. This language has been the product of the adoption of a set of Common Basic Principles (CBPs) on immigrants’ integration policy, a European integration fund, the network of national contact points (NCPs) on integration, the setting up of a European Integration Forum, a European integration website, two handbooks on integration for practitioners and policy makers, and a whole series of European Commission acts (annual reports and other soft-policy measures such as communications). All these instruments aim to foster the exchange of information/practices between EU Member States and to develop supranational coordination mechanisms making use of evaluation techniques such as benchmarking.

One of the ingredients that characterizes the EU Framework on Integration is that in addition to the various interventions by the traditional EU institutions, there are informal and formal networking activities by a whole series of governmental and non-governmental actors which exchange information beyond their national configurations about ‘good practices’ or ‘lessons learned’ on integration-related policies. These networks diversify the usual EU institutional setting and ordinary
working methods and channels of participation foreseen in the Treaties. Each of these networks or platforms differs in its goals, nature and impact. Local and regional authorities also form part of this network patchwork of (at times competing or differing) interests moving within the context of the EU Framework on Integration.

The EU Framework on Integration could also be understood as a preliminary phase that precedes the development of a European joint coordination mechanism (or potentially a formal OMC) in the field of integration of migrants. The 2009 Swedish Presidency will be in charge of adopting the next multi-annual programme which will present the policy principles and priorities guiding the EU’s AFSJ for the next five years (2010 – 2014).\(^1\)

This programme, which has been already baptized the Stockholm Programme, is expected to be adopted at the European Council meeting of December 2009 and, along with other policy areas, will establish the EU’s policy agenda on integration. It is therefore an appropriate phase in the European integration processes to investigate the role that local and regional authorities have played up until the present in EU policy on the integration of immigrants, and to reflect on the potential for the future institutional and policy landscapes.

This report examines the roles that local and regional authorities are playing in the establishment of a common EU policy on the integration of third country nationals (TCNs). It assesses current (formal and informal) local and regional governance structures in the EU Framework on Integration, and the ways in which they could be improved on the basis of the practical experience and knowledge that is emerging mainly from activities of EU networks composed of municipal (cities) and regional bodies, civil society organizations and academics. After providing a methodological note about the material and personal scope of the report in Section 2, Section 3 starts our journey by assessing the main functionalities attributed to these ‘levels of governance’ in the EU’s policy discourses on integration under the mandate of the 2004 Hague Programme – the second multiannual programme on an AFSJ (which succeeds the Tampere programme). As we will show, there has been increasing official recognition of the role they play in integration policies, which, however, has been accompanied by a lack of implementation. Section 4 moves into an analysis of the contribution by the Committee of the Regions (CoR) to the domain of integration since the first policy measures were put forward by the

European Commission after Amsterdam (1999). We do so by mapping out its key Opinions dealing with integration and by summarising their main findings and recommendations. Section 5 provides a state of the art of selected research projects run by ‘supranational or European networks of local and regional authorities’, EU agencies (e.g. European Foundation for the Improvement of Living and Working Conditions) and NGOs. These networks and projects constitute non-formalized channels of ‘knowledge’ and ‘participation’ which diversify and enrich the role that local and regional authorities are playing in building the EU Framework on Integration. We look specifically at the examples provided by EUROCITIES, CLIP and ERLAI. They are valuable sources of knowledge and experience of integration policies at local and regional levels. The ‘practices to be promoted’ or ‘lesson learned’ coming out of the work already developed by these networks will make up, in addition to other academic and policy sources, Section 6 by identifying a package of ‘tools’ for local and regional authorities to improve and further develop their status and interventions on integration of TCNs at national and EU levels. Section 7 offers a future outlook by presenting final reflections and conclusions, and Section 8 puts forward a set of policy recommendations.

2. Methodology

This section aims to clarify a number of methodological issues that are of relevance to this report, and to outline some conceptual aspects and the personal scope, and also to give a brief explanation of the methods backing up its final shape. These definitions and concepts need to be clarified first. There are indeed important conceptual dilemmas at stake when examining ‘the local and regional dimensions’ in the EU Framework on Integration. One might easily fall into the trap of taking for granted certain concepts, categories and terms around which there seems to be unanimity or a common understanding amongst the main players involved. One of the key weaknesses of the EU Framework on Integration, however, is that it sometimes creates ‘the illusion’\(^2\) that we really know what we are talking about when using terms such as ‘integration’, ‘legally residing TCNs’, ‘benchmarking and indicators’, etc. These are words whose meaning and policy framing very much depend on, and vary according to, the nature and ideology of managerial strategies on human mobility and processes of inclusion/exclusion, as well as on the sorts of identity politics often advocated by the nation-state.

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definitional issue also applies when referring to ‘local and regional authorities’ in the scope of the EU Framework on Integration.

As stated in our introduction, this report focuses on the role of local and regional authorities, which are formally represented at EU level by the Committee of the Regions (CoR). The CoR constitutes the advisory body “representing the voice of regional and local authorities” in the EU’s institutional landscape, and acts as an intermediary between these authorities and EU institutions. It has a consultative role in the EU decision-making processes affecting the regional or local level where the principle of subsidiarity prevails. According to Article 263 of Chapter IV of the Treaty establishing the European Community (TEC), the Committee of the Regions consists of representatives of regional and local bodies who “either hold a regional or local authority electoral mandate or are politically accountable to an elected assembly”. The actual structure of local and regional authorities in the EU varies widely from one Member State to another, which, depending on each case, might include public entities labelled as regions, communities, provinces, municipalities, towns, councils, districts, counties, autonomous communities, departments, Länder, etc. All this leads to the existence of a hugely diversified patchwork of various forms of local and regional governments in Europe. Each Member State follows its own selection procedure for nominating the 344 CoR members. Article 263 TEC also states that CoR Members “may not be bound by any mandatory instructions and shall be completely independent in the performance of their duties, in the general interest of the Community”. That notwithstanding, it is worth recalling here the dominant political role and nature of the CoR. Indeed, CoR members have formed groups that reflect their political affiliations, including the European People’s Party (EPP), Party of European Socialists (PES), Group of the Alliance of Liberals and Democrats in Europe (ALDE) and Union for Europe of the Nations – European Alliance (UEN – EA).

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5 Committee of the Regions, Political Priorities 2008-2010 (retrievable from www.cor.europa.eu). In the Foreword, L. Van de Brande (President of the Committee of the Regions) states: “I intend to conduct an in-depth and wide-ranging debate within the Committee, based on an analysis of our strengths and weaknesses, our opportunities and limitations, and how are we perceived from the outside world...Alongside our important advisory work, we need to be a more proactive force on the European scene and in our dialogue with regional and local authorities.”
Any study on the role of local and regional authorities in integration policy at EU level would not be complete, however, if it did not consider the role of networks, which are actively involved in debates on integration policies, and their central role in providing venues for channelling local experiences, cities and regions’ voices, as well as academic research on the local dimension of integration at EU level. Their role is to promote local practitioners and cities’ views and draw on their experience. The local and regional institutional dimension at EU level constitutes therefore a diversified setting of formal (CoR) and informal actors (networks), which at times present different strategies, goals and roles. We also share the conception of city put forward by Bauböck (2003) who has defined it as “a political space inside the territorial nation-state where multicultural and transnational identities can be more freely articulated than at the provincial and national level”.

A similar conceptual dilemma applies to the term integration. There are as many concepts of integration as scholars and experts studying this field across the social sciences and humanities. Academic literature also presents a variety of various national models and theories to explain the normative processes that frame social integration processes into law and policy by the nation state as well as by the European Union. The CBPs on Immigrant Integration adopted by the Council in 2004 do not shed any light on the open conceptual dilemmas characterising the category of integration, because of their widely open nature. Research has shown how the European normative and discursive approaches on integration have on the whole evolved in a rather restrictive manner since the first policy responses at EU level were framed in the 1970s.

Integration now increasingly mirrors certain national integration policies (e.g. Netherlands, France, Austria, Germany and Denmark) and functions as a mandatory norm in immigration law (consisting of language and knowledge of national ‘values and way of life’) as a condition for TCNs to have access to fundamental rights, security of residence and social

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inclusion. Concerning the personal scope, the EU Framework on Integration, and more generally the general policy approach adopted by DG JLS of the European Commission, include only those labelled as TCNs who are ‘legally residents’. They do not cover irregular immigrants, asylum seekers and refugees, etc. By bringing the local and regional dimensions into the integration debate, the limits of this narrow categorization of individuals will become evident. By ‘localizing integration’, normative concepts and policy presumptions, such as the one allocated to the main addressees of the EU Framework, might fall apart.

The results put forward in this report are mainly the product of academic research and an in-depth assessment of the official discourse provided by the main policy documents forming part of the EU Framework on Integration, and the Opinions of the CoR on the role of local and regional authorities in the EU policy domain of integration. We have also studied the main results coming out of projects run by EU networks and platforms of cities and local and regional authorities, EU agencies and NGOs. This was complemented by an intensive reading of key bibliographical sources presented in the reference list of this report. Interviews were also held with representatives from some of the networks studied in the report (Eurocities and Erlai). The paper also benefited from information and comments provided by the CoR and the European Commission (DG JLS).
Part II. The role of the CoR and local and regional authorities in the EU Framework on Integration

3. The local/regional dimensions and the EU Framework on Integration

Since 2002, the EU Framework on Integration has evolved slowly but progressively. It now includes a number of substantive, network-based, technical tools and financial instruments. The common Framework constitutes an innovative multilevel setting of governance for the integration of TCNs at EU level comprising the interaction of a package of non-coercive regulatory tools and diversified supranational networks which have given birth to a non-formalised or quasi-Open Method of Coordination (OMC) where the exchange of information among Member States has overriding relevance (Carrera, 2009). In this section we address the role of local and regional authorities as framed in the EU policy measures adopted in the EU Framework on Integration since 2004– i.e. under the mandate of the Hague Programme, the second multi-annual programme on policies related to Freedom, Security and Justice agreed by the European Council on November 2004.2

3.1 The Hague Programme: Towards a Common Integration Agenda

The Hague Programme established the legislative timetable and policy roadmap of the so-called Area of Freedom, Security and Justice (AFSJ) for the period 2004-2009. The Council identified the integration of immigrants as a central priority and stressed the importance of developing “a comprehensive approach involving stakeholders at the local, regional, national, and EU level”.3 This was the first time the Council expressly acknowledged the essential character of involving local and regional authorities in the European Framework on Integration since the transfer of

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1 Justice and Home Affairs and Civil Protection, Council meeting 2455, 12894/02, Luxembourg, 14 and 15 October 2002.
In the field of immigration to (shared) competence between the EU and the Member States under the Amsterdam Treaty (1999) and the first EU multi-annual programme (1999-2004) on Justice and Home Affairs (JHA) policies – The Tampere Programme. The Council called for more coordination of national integration policies and the development of a set of common basic principles on integration at EU level.

The JHA Council Conclusions of 19 November 2004 adopted the “Common Basic Principles for Immigrant Integration Policy” (CBPs). The Conclusions underlined the need to engage local, regional and national institutions, and constituted the first occasion where the Council elaborated further, and agreed officially, on the central role of local and regional authorities inside the EU Framework on Integration. The CBPs offer a synthesis and compilation of the European point of view about the main conceptualizations and broad features that the term integration has played in previous European policy responses. The local dimension was therefore acknowledged to play a key role in the European approach to integration. The CBPs objectives are: first, to assist Member States in formulating integration policies for immigrants by offering them a simple non-binding, but well conceived guide to basic principles against which they can judge and assess their own policies; second, to serve as a basis for the Member States to explore how EU, national, regional and local authorities can interact in the development and implementation of integration policies; and third, to assist the Council to reflect upon and, over time, agree on EU-level mechanisms and policies needed to support national and local-level integration policy efforts, particularly through EU-wide learning and knowledge-sharing.

Among the 11 CBPs, the following are particularly relevant for the ‘local and regional dimensions’:

**CBP1:** Integration is a dynamic, two-way process of mutual accommodation by all immigrants and residents of Member States.

**CBP6:** Access for immigrants to institutions, as well as to public and private goods and services, on a basis equal to national citizens and in a non-discriminatory way is a critical foundation for better integration.

**CBP7:** Frequent interaction between immigrants and member state citizens is a fundamental mechanism for integration. Shared forums, inter-cultural dialogue, education about immigrants and immigrants’

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culture, and stimulating living conditions in urban environments enhance the interactions between immigrants and Member States citizens. Good cooperation among the different players involved is crucial. Integration is a process that takes place primarily at local level. **CBP9:** The participation of immigrants in the democratic process and in the formulation of integration policies and measures, especially at the local level, support their integration. **CBP10:** Mainstreaming integration policies and measures in all relevant policy portfolios and at all levels of government and public services is an important consideration in public-policy formulation and implementation, while at the same time targeted policies for integrating immigrants are being developed specifically.

The Commission developed further the CBPs by proposing concrete measures for their practical applicability at national and European levels in the Communication on *A Common Agenda for Integration* COM(2005) 389 (September 2005). In relation to CBP1, the Commission stressed that “in reality integration takes place at the local level as part of daily life and everyone has a part to play. Engaging local communities in working together is thus crucial”. It referred to the need to ensure the diffusion of accurate information about migrants, the provision of opportunities for local communities to meet (through for instance awareness raising campaigns, intercultural events, exhibitions, etc.), as well as welcoming committees or mentoring. The Communication also stated in relation to CBP3 (access to employment) the important role played by the private sector “much of which recognises today the importance of diversity management. However, it also highlighted that “more could be done, especially at the local level, to involve small companies and businesses, in particular by helping them to improve training for immigrants, and by building up their capacity to manage a more diverse workforce”. On the subject of the CBP6, the need to develop at the national level “schemes to gather and analyse information about the needs of different categories of TCNs at local and regional level”, was underlined and reference made to the importance of platforms for consultation, exchange of information between stakeholders, and surveys about the situation in immigrant communities. In the context of CBP7, the Communication recommended encouraging at EU level …the exchange of information and good practice with regional, local and urban authorities through networks operating at EU level and strengthening the link between these networks and the NCPs through ad hoc consultation

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and expertise...Supporting trans-national co-operation at regional, local and municipal level between public authorities, private enterprises and civil society, including migrants’ associations.

In relation to CBP9, the Communication stated that

… the Commission would set up a European Integration Forum. Its added value would be to assemble a range of stakeholders active in the area of integration at EU level. The targeted stakeholders would thus be, for example, EU umbrella organisations, with members from across a number of Member States. The main functions of the forum would be consultation, exchange of expertise, and drawing up recommendations to be published on the integration website.

The European Commission also called for a coherent approach at EU level “with due consideration of the competence of the Member States and of their local and regional authorities”. This coherence, the Commission’s argument continued, would stem from the consolidation of a common legal framework on the conditions of admission and stay of TCNs, and the development of the following soft-law components: “cooperation activities, exchange of information, mainstreaming and evaluation” through the implementation of CBPs 10 and 11.

Another substantive tool of the EU Framework on Integration have been the so-called Handbooks on Integration for Policy-Makers and Practitioners drawn up by the Migration Policy Group (MPG) on behalf of the European Commission (DG JLS). The First Edition was published in November 2004. The main objective of the Handbook was “to act as a driver for the exchange of information and best practices between the Member States”. The two kinds of integration programmes from which the Handbook draws “best practices” and “lessons” were the introduction of courses for newly arrived immigrants and civic participation. With regard to ‘best practices’ the Handbook acknowledged that all of these

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7 The Annex to the Communication stipulates: “Primary responsibility for the development and implementation of integration policy and measures nevertheless remain at the level of Member States”.

8 In view of this, the Communication recommended in relation to CBP10, for instance, mainstreaming integration in all relevant national policies and EU programmes, supporting further cooperation and coordination among relevant institutions and stakeholders involved in integration, ensuring that the NCPs constitute a national focal point for sharing information and coordination between the different levels of government, etc. Concerning CBP11, it proposed increasing the monitoring and evaluation of national policies, enhancing the use of statistics, developing evaluation schemes and improved knowledge of the impact of compulsory integration programmes, etc.

9 For information about the mission and activities of the MPG, see http://www.migpolgroup.com

needed to be adapted to local circumstances. A Section titled “The Local Level” referred to the need to develop “Partnerships between various levels of government [which] are governed by shared responsibilities and consultations on policy design and budget allocations”. It concluded by saying:

While the priority of central governments is to guarantee the quality of services provided by the municipalities, for instance by making funding results-oriented, it can be argued that what is needed is more influence on the policy-making process so that national framework regulations respond better to local realities. More explicit partnerships and a permanent framework can make the local level not only a performer but also give access to policy design. (Emphasis added).

The Second Edition of the Handbook on Integration was published in May 2007. It contains “good practices” and “lessons learned” drawn from the experience of policy-makers and practitioners across Europe. The Handbook is being structured into four main sections, all of which present aspects relevant to the role of local and regional authorities: i.e. mainstreaming immigrant integration, housing in urban environment, economic integration and integration governance. Chapter 1 deals with ‘mainstreaming immigrant integration’. For instance, when addressing the issue of ‘Government’ and the introduction of integration across the policies and structures it states that

the challenge for government is to introduce a concern for immigrant integration into the development, implementation, monitoring and evaluation of policies across all relevant portfolios...At the local level, a designed mainstreaming unit can be also created within municipal administration. (p. 15)

The Handbook also recommends setting up an ‘integration agent’, ‘integration focal points’ and inter-ministerial committees/working groups. Other proposals

11 The Handbook defines mainstreaming as follows: First, the incorporation of the integration perspective in “all policies at all levels and at all stages”; second, guaranteeing equal access to services; and third, balancing general and targeted/specific measures “in consultation with relevant stakeholders including immigrants”.

12 It stresses that “The Integration Agent can develop indicators on diversity and immigrant integration that involve the competences of different ministries. These indicators can be subject to regular reporting. Rather than engaging in detailed planning, the Integration Agent should set overall targets, offer advice and expertise, and monitor the process. The indicators used to monitor the progress can therefore be quite general in order to leave the main responsibility and choice of methods to the ministry concerned...the Integration Agent can also commission research that highlights service gaps and makes other departments more aware of immigration needs”. (pp. 18 and 19).
include drawing up impact assessments and ‘indicators’. Chapter 4 of the Handbook, entitled ‘Integration Governance’, looks at the structures, mechanisms, processes and forms of collaboration that make up the framework for integration policies and practices, and explores ways to coordinate integration policy at the local level. It starts by highlighting paths for better coordination of local authorities’ strategies and actions and recommends creating an ‘integration governance structure’.

The Handbook addresses three issues of central importance for local integration structures:

First, the *legislative and policy framework*. While local governments are responsible for implementing national laws, they also have “considerable competences” in some integration-related areas as well as in service provision. It argues that “structured communication and dialogue” between the various governance levels (EU, national and local) and mainstreaming makes it possible to examine the effects of integration policies.

Second, *integration strategies and goals*. Local authorities can elaborate an ‘integration strategy or concept’ in a “participatory way”.

Third, *networks and consultation*. “Local integration networks” should facilitate coordination among all the players involved, the exchange of information and the engagement/mobilisation of people.

Finally, the Handbook states that “The exchange of experiences among local communities can serve as an inspiration regarding innovative projects or approaches. In a more structured way, such horizontal exchanges can also give rise to common indicators or evaluation methods. Local communities could develop common quality standards on integration”. It argues that the attainment of general policy goals in integration programmes can only occur through careful planning and evaluation of the appropriateness and quality of integration policies themselves through “good governance indicators” rather than “attempting to measure the ‘degree of integration’ of individuals or immigrant groups, which remains a challenge”. A Third Edition of the Handbook has been planned for mid-2009 and will deal with the following issues: mass media, immigrant youth, education and labour market, citizenship and nationality, public awareness and
empowerment, dialogue platforms and European coordination mechanisms (e.g. European modules for integration practitioners and benchmarking).\textsuperscript{13}

Following up on the call for action made in the \textbf{Thessaloniki European Council Conclusions} (June 2003),\textsuperscript{14} the European Commission has already adopted three \textbf{Annual Reports on Migration and Integration}. These offer a broad overview of migration trends in Europe and describe policies on the admission and integration of TCNs both at the national and European levels.\textsuperscript{15} The \textbf{Second Annual Report on Migration and Integration} of June 2006\textsuperscript{16} stressed that the development and implementation of integration policies is generally shared between different levels of government and that there is an \textit{“increasing recognition of the importance of involving local actors in the planning and delivery of integration measures”}. Further, some examples of the involvement of local authorities were provided in relation to inter- and intra-religious dialogue, access to housing, health care, social security assistance and education and even regarding special bilateral agreements with third countries. The \textbf{Third annual Report on Migration and Integration} of September 2007\textsuperscript{17} picked up on the same objectives outlined by its predecessors. In connection with the perceived trends in national integration policies it says, concerning CBP7, that: \textit{“The importance of daily life interaction and the crucial role of local activities is stressed by most Member States, although the extent to which such activities are reflected in integration strategies differs widely”}.\textsuperscript{18}

On 5 November 2007, the European Commission together with Eurocities,\textsuperscript{19} signed the Milan Declaration.\textsuperscript{20} The Declaration recognized the key role of cities in integration policies and the need to strengthen their voices in the shaping of the EU’s

\textsuperscript{13} Refer to \url{http://www.migpolgroup.com/news/3817.html}
\textsuperscript{14} Thessaloniki European Council, 19-20 June 2003, Presidency Conclusions, 11638/03, Brussels, 1 October. See specifically paragraphs. 28-35, under the heading “The development of a policy at European Union level on the integration of third-country nationals legally residing in the territory of the European Union”.
\textsuperscript{18} In the Annex titled \textit{“Summary Report on integration policies in the EU-27”}, the Commission highlights some ‘local examples’ of practices and policies corresponding with the CBPs.
\textsuperscript{19} Eurocities is the network of major European cities. Founded in 1986, the network brings together the local governments of more than 130 large cities in over 30 European countries (see \url{www.eurocities.org}).
\textsuperscript{20} See Milan Declaration, “Integrating Cities”, signed by the former Vice-President of the European Commission and Commissioner responsible for Freedom, Security and Justice, Franco Frattini, Letizia Moratti and Ivo Opstelten – the Mayors of Milan and Rotterdam respectively. See also the announcement at the Eurocities Flash (An Information System for Eurocities Members), N° 72, November 2007, p. 3.
agenda on integration. It also officially opened the so-called ‘integrating cities process’ as a platform for fostering the dialogue between major cities and EU policy-makers on the relationship between the CBPs and the local dimension. This process is composed of an annual event/conference. One was organised in Rotterdam in 2006\textsuperscript{21} and another in Milan in 2007.\textsuperscript{22} These first two events were co-funded in the scope of a research project run by EUROCITIES called INTI-CITIES and funded by the European Integration Fund – Community Actions of DG JLS of the European Commission (see section below). The third event (Integrating Cities III ‘Embracing Diversity – Achieving Equal Opportunities’) took place in Berlin on 2 April 2009 and was funded by the EUROCITIES project on “Diversity and Equality in European Cities” (DIVE), which is also co-financed by DG JLS and aims to ‘capitalize’ on the results of INTI-CITIES (see section 5.1 below). The next Integrating Cities event is expected to take place in London in spring 2010.

On the basis of the Communication on a Common Agenda for Integration COM(2005) 389, the EESC was formally requested by the European Commission to draw up an Opinion on the establishment of a European Integration Forum (EIF), which was adopted on 9 July 2008.\textsuperscript{23} It will have a maximum of 100 members and will meet twice a year. One-third of the Forum’s members will be EU umbrella organisations working in the area of integration, including the social partners. The remaining participants will come from consultative bodies of the Member States. As regards its functions, the Forum would have the competence to draw up opinions, recommendations and reports concerning integration policies at EU level, which would include proposals and recommendations. The official launch of the Forum took place on the 20/21 April 2009 in Brussels.\textsuperscript{24} An accompanying initiative is the European Integration website which will contain an inventory of ‘good practices’ to promote structural exchange of experiences and information on integration. It aims to offer a searchable database on ‘practices’ and information on EU initiatives.\textsuperscript{25} The website is being developed by the MPG, together with three other organisations,\textsuperscript{26} and is expected to be operational by the time the EIF is launched.\textsuperscript{27}

\subsection*{3.2 Towards the Stockholm Programme}

\begin{itemize}
\item \textsuperscript{21} http://www.integratingcities.nl/introduction.php
\item \textsuperscript{22} http://www.integratingcities.it
\item \textsuperscript{23} EESC, Elements for the Structure, Organization and Functioning of a Platform for the Greater involvement of Civil Society in the EU-level promotion of policies for the integration of third country nationals, Opinion, SOC/281, Brussels, 9 July 2008.
\item \textsuperscript{24} http://www.europeanintegration.eu
\item \textsuperscript{25} Refer to www.integration.eu
\item \textsuperscript{26} These include UNISYS, Social Change Online and Eurocities.
\item \textsuperscript{27} See the announcement at http://www.migpolgroup.com/news/3586.html
\end{itemize}
The Communication on **A Common Immigration Policy in Europe: Principles, Actions and Tools** COM(2008)359 (June 2008) provided the new political vision of the European Commission for the further development of a common EU immigration policy.\(^\text{28}\) This common policy, the text argues, should aim at a “coordinated and integration approach to immigration” at EU, national and regional/local levels. The Communication called upon the European Council to adopt a set of common principles that would constitute the basis upon which the common immigration policy would be taken forward. The Commission proposed that this process would occur through “coordinated and coherent action” by the EU and its Member States and by setting up a “common methodology” consisting of the translation of the common principles into common objectives and indicators to guarantee their implementation. The Commission would draw up an annual report on the basis of the implementation of common objectives. The implementation of the ‘concrete actions’ would be monitored, on the basis of a Commission report, on an annual basis by the Spring European Council, which would carry out a “political assessment of the situation at European and national levels” and put forward recommendations. Concerning the local and regional authorities, it called for “stronger coordination between the EU and the national, regional and local level, especially in the areas of statistics and economic, social and development policies”, and underlined the need to establish and strengthen mechanisms promoting timely consultation of regional and local authorities.

One of the key priorities of the French EU Presidency (second half of 2008) was the adoption of the **European Pact on Immigration and Asylum**.\(^\text{29}\) The Pact presents general principles structured around “five basic political commitments”.\(^\text{30}\) One of these commitments is entitled “organise legal immigration to take account of the priorities, needs and reception capacities determined by each Member State, and encourage integration”. Within this heading, the Pact provides three concrete actions where integration is mentioned. Two of them aim to foster several of the constitutive elements of the EU Framework on Integration. One of the five key basic commitments is also for the pact “to be transposed into concrete measures, in particular in the programme to follow on from the Hague Programme in

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Further, it invited the Member States “to establish ambitious policies” and “to promote information exchange on best practice implemented in terms of reception and integration, and on EU measures to support national integration policies”. The European Ministerial Conference on Integration in Vichy under the French Presidency of 3 and 4 November 2008, acknowledged that:

Integration policies must also aim to provide a more satisfactory link between the level of policy design and evaluation and the sub-State level of local authorities, such as towns, which play an essential role in building the local community ties that make better involvement of migrants in local life possible...evaluation of integration policies must be a priority at European level.

The Vichy Declaration also stated that “the Commission is invited to draw up a report on the implementation of these measures and the progress made by the network of National Contact Points with a view to the next ministerial conference on integration” which will be organized in 2010 under the auspices of the Spanish Presidency. In light of the Commission Communication COM(2008) 359 and the Pact, the upcoming Swedish Presidency of the EU will adopt the next multi-annual programme on an AFSJ during its tenure in the second half of 2009. As the successor of the Hague Programme, it has already been informally baptised as the Stockholm Programme and will present the EU’s policy roadmap and legislative timetable for these policies for the next five years. If, as it is expected the integration of TCNs will be confirmed as one of the central policy priorities for the future AFSJ, the set of policy recommendations put forward in Section 8 of this report will be of up most relevance.

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3.3 The European Integration Fund and Local/Regional Authorities

The European Fund for the Integration of Third Country Nationals (EFI) was adopted on June 2007 by Council Decision 2007/435/EC and provides 825 million euros for the period between 1 January 2007 and 31 December 2013. 768 million euros have been earmarked for National Programmes and have been distributed to Member States according to a distribution key expressing solidarity, which is based on the number of legally staying third country nationals, whilst 57 million euros (7%) have been reserved for Community Actions. The general objective of the Fund is to contribute to Member States’ efforts to develop and implement national integration policies enabling TCNs “to fulfil the conditions of residence and to facilitate their integration into European societies, in accordance with the CBPs”. As regards the personal scope, the EFI primarily targets the co-financing of concrete actions which support the integration of “newly-arrived third country nationals”.

How does the EFI work in practice? Article 4 presents the set of eligible actions in relation to each of these four objectives. Several actions foreseen in this provision are directly relevant to local and regional authorities, and in several cases expressly acknowledge their relevance to the role of local and regional authorities. This has been confirmed by the Strategic Guidelines adopted by the European Commission in Decision COM(2007)3926 of August 2007, which set up the ‘framework for intervention’ of the Fund and provide the priorities of the Community in light of the CBPs (See Annex 3 of this report for a detailed description of the priorities developed by Decision COM(2007)3926 in relation to Article 4 of the EFI). Recital 19 of the same Decision states that the criteria for allocating annual funding to Member States should take into consideration the total number of TCNs legally

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34 http://ec.europa.eu/justice_home/funding/integration/funding_integration_en.htm
35 For the specific objectives see Article 3 of the Decision, and the eligible actions in Article 4.
36 The following categories of TCNs are excluded for the purpose of the calculation related to the last 60%: seasonal workers, TCNs admitted for the purposes of studies, pupil exchange, unremunerated training or voluntary service, and those admitted for scientific research, as well as TCNs who have received a renewal of an authorisation issued by a Member State or a change of status, including TCNs who acquire long-term resident status in accordance with Council Directive 2003/109/EC.
staying in their territory and the total number of immigrants newly admitted over a given period.\footnote{Article 12 states that there will be an annual fund allocation of EUR 500,000. The remainder of the available annual resources will be broken down between the Member States as follows: 40\% in relation to the average of the total number of legally residing TCNs over the previous three years, 60\% in proportion to the number of TCNs who have obtained an authorisation to reside on its territory over the previous three years.}

By 30 June 2009 the Commission will submit a report to the EP, the Council, the EESC and the Committee of the Regions reviewing the application of these criteria. The Community contribution supporting actions and projects is 50\% of total costs, and can be increased to 75\% for Member States actions addressing one of the following \textbf{five specific priorities}: actions involving participation of TCNs in the “formulation and implementation’ of integration policies, programmes and activities addressing specific target groups, actions developing “innovative introduction programmes”. These actions should “enable third country nationals to work and study at the same time, e.g. part-time courses, fast-track modules, distance or e-learning systems), intercultural dialogue and involvement of the host society in the integration process”. On the basis of the strategic guidelines, Member States present a draft multi-annual programme, which is implemented in annual programmes and requires approval by the Commission. When preparing their draft multi-annual programmes that draw on the Community resources available under the EFI, Member States are requested to target at least three of the priorities identified by the Commission.\footnote{Among the various priorities, those dealing with the implementation of actions designed to put the CBPs into practice (Priority 1) and those of indicators and evaluation mechanisms (Priority 2) are mandatory.}

\begin{itemize}
  \item Article 10 of Council Decision 2007/435 is also relevant here as it calls on Member States to organise “\textit{a partnership}” with authorities involved in the practical implementation of the multi-annual programme or “\textit{which are able to make a useful contribution to its development}”. This provision states: “\textit{Such authorities and bodies may include the competent regional, local, urban and other public authorities, international organisations and bodies representing civil society such as non-governmental organisations, including migrant organisations or social partners}”. At present no public information is available on the implementation of this particular provision across the EU Member States.\footnote{For a selection of national websites including information of Member States’ multiannual programmes and list of beneficiaries refer to \url{http://ec.europa.eu/justice_home/funding/intro/funding_solidarity_en.htm}}
\end{itemize}
3.4 Treaty of Lisbon and integration

The Treaty of Lisbon\(^\text{41}\), signed on 13 December 2007, would create two new separate bodies of EU Treaty law: an amended version of the Treaty on European Union (TEU) and the Treaty on the Functioning of the European Union (TFEU). The TFEU, which would be the new denomination of the current Treaty establishing the European Community (TEC), contains a new Title V “Area of Freedom, Security and Justice”, comprising five chapters and bringing together the currently dispersed FSJ policies (Articles 67-89). Although the future of the Treaty is at present uncertain following the ‘no-vote’ in the Irish referendum on the Lisbon Treaty on 12 June 2008, we can already examine the major innovations that the new institutional configuration would lead to in the area of integration of TCNs and its potential impact on the local and regional dimensions. The TFEU would contain a specific legal basis to support the integration of legally resident TCNs. The new Article 79.4 provides that

> The European Parliament and the Council, acting in accordance with the ordinary legislative procedure, may establish measures to provide incentives and support for the action of Member States with a view to promoting the integration of third-country nationals residing legally in their territories, excluding any harmonisation of the laws and regulations of the Member States. (Emphasis added.)

While it appears that integration policy would not be subject to proper harmonisation processes at the EU level, the current soft-law multilevel setting which makes up the EU Framework on Integration would be granted a clear legal basis in the Treaty. In other words, it would provide solid basis for the framework to be institutionalised and formalised. European cooperation in the field of integration would also benefit from the ordinary legislative procedure, which corresponds to the current co-decision procedure envisaged in Article 251 TEC (European Commission right of initiative and qualified majority voting – QMV – in the Council). This would ensure a higher degree of efficiency, legal certainty, accountability and democratic control of the laws and policies being developed. The position of the EP would be strengthened. This goes some way in responding to the criticism that there

is currently a deficit of proper democratic accountability in areas developed through soft-law mechanisms such as the EU Framework on Integration.

The role of national Parliaments would also be reinforced in the light of the subsidiarity principle. According to the Protocol on the Application of the Principles of Subsidiarity and Proportionality, national Parliaments would benefit from a stronger control mechanism. Article 6 of that Protocol states that any national Parliament or any chamber of a national Parliament may within eight weeks from the date of transmission of a draft legislative act send to the Presidents of the EP, the Council and the Commission a reasoned opinion stating why it considers that the draft in question does not comply with the principle of subsidiarity.\textsuperscript{42} The Committee of Regions would also be accorded an enhanced role in the subsidiarity test with regard to European policies where the local and regional dimensions has a prominent role, such as integration policy. Article 8 of the same Protocol grants the Committee the possibility to present an action before the ECJ on the grounds of infringement of the subsidiarity principle or in response to non-consultation of the Committee on legislation where consultation is required under the TFEU (See Article 2 of the Protocol).

\textbf{4. The CoR and integration}

This section of the report provides a synthesised overview of the main contributions made by the CoR in respect of the EU Framework on Integration and the role of local and regional authorities. A first important Opinion was adopted by the CoR in September 2001 after the entry into force of the Amsterdam Treaty and the adoption of the Tampere Programme. This dealt with the Commission Communication on a Community Immigration Policy.\textsuperscript{43} It highlighted the importance of integrating TCNs at national, regional and local levels, and stressed the "undeniable need for local societies" to engage in this process. For that to succeed, the Opinion argued, a distribution of costs between the different governmental levels would be necessary. Furthermore, the CoR saw its own role as "particularly important, since in the final analysis the local authorities are those which are responsible for guaranteeing such rights to immigrants and ensuring their smooth integration into local society". Point 1.7 stressed the importance that any national framework needs to be formulated and implemented at local/regional

\textsuperscript{42} Article 6 also states that "It will be for each national Parliament or each chamber of a national Parliament to consult, where appropriate, regional parliaments with legislative powers".

\textsuperscript{43} CoR Opinion on the Communication on a Community Immigration Policy, Brussels, 28 September 2001, CdR 90/2001 fin, Rapporteur: Theodoros Georgakis, point 1.3.
level, while taking into account the features and priorities of the local communities at times of implementation of immigration policy. The CoR also considered it essential that it should be consulted on each initiative covering this domain, to allow it to highlight “potential problems and the best practice, and guarantee basic rights to immigrants”.

The next Opinion of June 2003 focused on Immigration Policy. It dealt with the Communication on an Open Method of Coordination for the Community Immigration Policy along with other instruments. The CoR welcomed “the recognition of the role of local and regional authorities...in integrating migrant workers into civil society and the labour market in the EU”. It also proposed that local and regional authorities should contribute to the development of the NAPs proposed by the European Commission. This, in the CoR’s view, “would facilitate comparing and identifying best practice and analyzing the real impact and the results of strategies adopted by Member States”. The CoR addressed the Commission Communication on Immigration, Integration and Employment in an Opinion of March 2004. It started by signalling the importance of practicing “an approach in line with the principle of subsidiarity in which the Union, the Member States, the regional and local levels, as well as the social partners and civil society, will be actively involved”. The Opinion highlighted concerns about:

… the lack of recognition in the Communication and in the Extended Impact Assessment of the crucial role local and regional government play in the successful implementation of integration policies, in their capacity as direct service providers, partners with other statutory and voluntary service providers, and community leaders, at the point of service provision to immigrant communities, and the closest point of political accountability towards our respective electorates….regrets the lack of consultation of local and regional government in drawing up the Extended Impact Assessment…(Emphasis added).

The CoR believed that local authorities play a crucial role in integration as they often had competences in the area of service provision in relation to housing, planning, education, health and the labour market, which “impact directly on

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45 Point 6 of the Opinion.
46 Point 5.
integration and can promote social inclusion and sustainable communities”. It stated in Point 1.10 that it:

Firmly believes that a successful implementation of integration policies can only be achieved by detailed attention to local and regional agencies, particularly those with a democratic mandate, since the latter behaves them to be sensitive to their people’s concerns.

An important recommendation put forward by the Opinion was the need for active involvement/participation of immigrants themselves in the development of local and regional services, which would ensure relevance and effectiveness. The CoR also urged the Commission

To recognize to a greater extent the role of local and regional authorities in implementing and promoting successful integration and employment initiatives, due to their role as community leaders and main service providers with on-the-spot knowledge of immigrants’ problems, not least because of their direct relationship with immigrants and their delegations. (Emphasis added).

The CoR delivered an Opinion on the First Annual Report on Migration and Integration by the European Commission in May 2005. First, the CoR stressed that “the national level is responsible for implementing legislation, while the task of facilitating immigrant reception, settlement and integration falls to the regional and local level”. It continued by underlying the central role of local and regional authorities which perform responsibilities that have a direct impact on integration and the promotion of ‘social cohesion and sustainable societies’. The Opinion argued that the EU’s failure on integration policy “is partly due to the fact that local and regional authorities have not been involved in policy framing … [they] are the tier of government that is closest to citizens, but the consequences of implementation” have not been taken into account. It also drew attention to a lack of consultation of local and regional authorities in the statistics and analysis of the situation before a new policy instrument was drafted. It highlighted the ‘disparity’ between central-State policy initiatives and the needs and efforts of the local level “to combat exclusion, marginalization and xenophobia”, which called for more “dialogue and cooperation between the different levels”. A key criticism of the Annual Report was that the information concerning initiatives developed at the

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local level was ‘inadequate’ and that no information was provided relating to “implementation, practice and results”. Further, the Opinion recommended that the Commission should foster cooperation with the CoR in the adoption of any policy measure on integration “to discuss how local and regional experience of integration efforts can best be taken on board” and

To exploit expertise local and regional authorities have acquired after decades of hands-on experience of integration efforts and implementing immigration policy. In order to facilitate and to improve integration-related exchanges of information, ideas and experience, the national contact points should be encouraged to consult regional and local authorities and major towns and cities in order to benefit from their experience.49

The Opinion went even further by proposing for the first time that the network of national contacts points on immigrant integration should be “backed up by local and regional equivalents”. 50

In November 2005, the CoR gave its views on the European Integration Fund.51 The Opinion underlined that while ‘the national level’ is responsible for the design and implementation of legislation, the regional and local levels are the ones that deal with the facilitation of immigrant reception, settlement and integration. It stressed “the important role of the local and regional authorities, whose responsibilities include planning, housing, education and the labour market, which impact directly on integration and can promote social cohesion, social integration and sustainable societies”.52 It also underlined that the local and regional authorities’ competences over migration and integration, as well as their privileged positioning as “operators and owners of infrastructures”, place them in a perfect position “at the forefront of processes to prevent, finance and manage migration flows”.53 The Opinion drew attention to “the economic burden of dealing with immigration-related exclusion”, and stressed that a lack of ‘vertical consultation’ between the relevant public authorities prevented efficient use of economic resources. As in its previous Opinions, which have already been presented above, it called on the Council and the Commission “to further exploit the expertise local and regional authorities have acquired after decades of hands-on experience of

49 Point 2.1.
50 Point 2.8.
52 Point 1.4 of the Opinion.
53 Point 1.5.
implementing migration policy”. Another important point was the need to ensure flexibility in the approach taken by local and regional levels:

Initiatives designed to ensure that economic support for a common immigration policy is effective must take account of regional differences. Support should encourage flexible solutions, and the local and regional levels must be given the freedom to choose their approach. (Emphasis added).

The CoR adopted its Opinion on the Hague Programme in March 2006. On the topic of integration, it stressed that “Local authorities should be assisted in managing the integration process – with information and funding as well as the development of best practices” and proposed that:

Support be given to city debates, dialogues, language instruction, naturalisation courses, employment schemes, equal opportunity courses and anti-discrimination schemes, etc, and that systematic exchange and monitoring of experience, new approaches, successes and failures be ensured at local level.

While welcoming the first edition of the Handbook on Integration (See Sections 3.1 and 3.2 above), the CoR expressed regret about the lack of awareness of the Handbook in local and regional authorities. Finally, it expressed ‘strong’ support for the organisation of a European Forum on integration, and recommended that local and regional authorities be closely involved in this.

The next important step was the Opinion on the Commission Communication A Common Agenda for Integration – Framework for the Integration of Third-Country Nationals in the EU of May 2006. After highlighting the importance of establishing an EIF, and that the CoR should be invited to take part, it underlined that many of the measures proposed by the European Commission to implement the CBPs “are to be delivered by local bodies. It is crucial therefore, that these be given the necessary resources. The same is true at regional level (establishment of

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54 Point 1.8.
56 Point 2.44.
information instruments, induction and cultural programmes, etc)”.\(^{58}\) In point 2.17 the Opinion stated:

Regional and local levels perform a major and indispensable role in integration and can contribute comprehensive knowledge and know-how. They should therefore be heavily involved at a very early stage in developing strategies and in the whole process. (Emphasis added).

The Opinion underlined the importance of

... interest group involvement, and the idea of establishing a European integration forum of EU umbrella organisations (consultation, recommendations, close contact with National Contact Points for Integration – NCPI). The European Parliament (EP), the European Economic and Social Committee (EESC) and the Committee of the Regions (CoR) should be invited to take part. (Emphasis added).\(^ {59}\)

The next Opinion, adopted in February 2007, dealt with the European Commission’s Policy Plan on Legal Migration, Fight against Illegal Immigration and the Future of the European Migration Network.\(^ {60}\) Among the views and recommendations included in the Opinion the following stand out: First, it acknowledged the key role of local and regional authorities “owing to the experience they have gained through their relations with countries of origin and their measures to integration migrants, particularly in the fields of healthcare, housing, education and employment”.\(^ {61}\) Second, the CoR proposed to create “a mechanism for following up opinions on immigration” to ensure the representation and ‘active involvement’ of the CoR in the different stages (the pre-legislative phase (consultation as interested party, impact analysis) or in the policy evaluation phase) comprising the various European Commission’s initiatives in this field. Third, the Opinion ‘urged’ Member States to work together with the local and regional authorities in drawing up migration-related policies and in setting up ‘national plans’ on integration and employment.\(^ {62}\) Fourth, it acknowledged the role of the European integration fund in supporting the involvement of local and regional authorities “in the negotiation of national programmes and the relevant

\(^{58}\) Point 2.14 of the Opinion.

\(^{59}\) Point 2.13.


\(^{61}\) Point 1.6.

\(^{62}\) Point 1.14.
operational programmes”, while taking into consideration the needs of the local and regional levels.  

The CoR Opinion on A Global Approach to Migration: Developing a European Policy on Labour Immigration in Conjunction with relations with Third Countries was adopted in June 2008. The Opinion called on the EU to respect the competences of different levels of government (principle of subsidiarity) and to strengthen the ‘territorial dimension’. The CoR stressed once again that the European Commission should ensure a more proactive role for the CoR at the initial stages of Community action. It then highlighted the role of local and regional authorities in integration policies (especially their role in guaranteeing mechanisms that give access to the labour market and training), as well as in the provision of public services, reception conditions, health care, education and housing policies. The Opinion pointed out that ‘new methods’ should be developed in order to facilitate a more relevant role “in implementing national strategies and initiatives”. Point 18 of the Opinion stressed the role that these authorities may play in data gathering/collection. Finally, the CoR called for the establishment of:

a network of local and regional authorities to develop common statistical tools and indicators that help provide a more accurate picture of migration...[and that it wishes] to highlight the importance of promoting the establishment of permanent working groups and forums (conferences, seminars, etc) for the exchange of experiences and good practice with regard to the receipt of migrants and their integration into society and work.

In its Opinion on A Common Immigration Policy for Europe of November 2008 the CoR for the first time acknowledged that better cooperation with the European Commission had been achieved. It also underlined that the CoR is “ready to face new challenges and promote exchange of approaches that have proved effective in this area at local and regional level”. It welcomed the ‘partnership-based approach’ adopted by the Commission, which should include coordinated and coherent measures involving local and regional players. The Opinion pointed out

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63 Point 1.20.
65 See Points 12 and 13 of the Opinion.
that local and regional authorities “have to be fully involved” in the development of the EU Framework on cooperation. In the integration domain the CoR recalled the active role of local and regional authorities, and indicated how the ‘specific needs’ of municipalities and regions should be taken into consideration in the implementation of future policy measures. One of the examples given was the European integration fund and its operation on the ground. In point 31, the Opinion called for “financial support for integration policy and especially educational tasks at local and regional level”. Referring to the Opinion at the CoR's plenary session, the President of the European Commission, José Manuel Barroso acknowledged the need to involve local and regional authorities ‘more closely’ and gave assurances that “he would work to ensure that municipalities and regions would in future have direct access to the European Integration Fund", which as we have explained above is administrated by national governments of the Member States in their respective domestic arenas with the exception of projects falling within the scope of Community actions.67

The CoR entered into the domain of the so-called ‘Intercultural Dialogue’ with an Opinion adopted on 26/27 November 2008,68 where it also expressed some views and recommendations related to integration. The CoR called upon the European Commission and the Member States to set up ‘a permanent European Platform for Intercultural Dialogue’ that would include local and regional authorities in order to develop "a systematic dialogue starting out from our cities and regions”. It highlighted the prominent role and ‘powers’ of local and regional authorities in promoting ‘best practice’ and ‘exchange of experience’ on “intercultural dialogue”, as well as in awareness raising. Point 14 makes reference to the need to respect the subsidiarity principle and acknowledges that in many Member States regional and local authorities have the competence to legislate on integration-related policies.69 It argues: “This also means that local and regional authorities should apply an integrationist model depending on their specific circumstances”.

The Opinion also raised several important points/recommendations. First, there is a need to ensure funding or ‘adequate resources’ for integration measures at the local and regional levels, and these levels “should be assisted in managing the


69 Point 16 of the Opinion.
integration process – with information and funding as well as the development of best practices”. Second, it acknowledges the ‘special role’ that they play in service provision (such as housing, healthcare, education and learning programmes for skills and languages). Third, it calls for the setting up of a system of networks of local and regional authorities in each Member State to increase cooperation and “integrate immigrants in an informed way by means of local projects promoted by these authorities”. Fourth, it urges the development of integrated programmes and ‘further research’ on housing provision, and encourages local and regional authorities to make use of EU funding. And fifth, it supports collaboration with local media and associations of ‘cultural interest’ in conducting information campaigns.

The most recent Opinion adopted by the CoR on integration, entitled Local and Regional Authorities at the Forefront of Integration Policies, was adopted in February 2009. The Opinion offers, amongst other things, very interesting views and ideas on the way in which the role of local and regional authorities could be strengthened in the domain of integration. First, it stressed that integration policies “must comply with fundamental European values such as respect for human rights and diversity, combating discrimination and promotion of equal opportunities and tolerance. They must also be consistent with basic EU policies on cohesion, employment, development, external relations and freedom, security and justice”.

Second, the Opinion called for the implementation of a ‘multi-tier governance approach’ to integration that would include cooperation at the various governance levels (EU, national and local), while respecting the principle of subsidiarity, as well as a collective approach including all relevant stakeholders.

Third, the Opinion expressed support for the Vichy Declaration (November 2008), regarding the need to include regional and local authorities in “planning, implementing and evaluating integration policies” and the recognition of their ‘special and essential role’ in the integration of TCNs.

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70 Point 18.
71 Point 23.
73 Point 11 of the Opinion. It also refers to the Tampere European Council (Point 35) and equality of treatment (Point 12).
74 Points 15 and 16.
Fourth, it acknowledged the key role played by projects funded from Community programmes (e.g. CLIP, ERLAIM, ROUTES, City2City, INTI-CITIES) in ‘harnessing European experience’, by exchanging information and ‘best practices’ as well as the role played by transnational regional networks.75

Fifth, the Opinion called upon the Commission and Member States to match the “national contact points for integration with corresponding points, or to replace them at local and regional level”.

Sixth, it called for the European integration fund to focus on improving the appropriateness and support for local and regional integration initiatives.76

Seventh, the CoR expressed its willingness to be fully involved in the European Integration Forum.

Eighth, the Opinion recommended the establishment of integration awards for third country nationals, which are awarded to migrants and or bodies who get involved in the migrant integration process.

The CoR organised a seminar on ‘The Role of Cities and Regions in Integrating Immigrants’ in Athens on 16 October 2008. The Conclusions of the seminar stressed that the regional dimension should be heavily involved “at a very early stage in developing integration policies and throughout the whole process”, and also highlighted the value of “cooperation, communication and information exchange between local and regional authorities” as well as civil society organizations. They underlined recalled that the specific needs of municipalities and regions should be taken into consideration in the operation of the EIF. Finally, they insisted on the need for the CoR to contribute to the Handbook on Integration with ‘best practices’ from local and regional authorities and for it to be fully involved in the European Integration Forum. The integration of TCNs is is in the process of becoming central political priority for the CoR. The CONST Commission (Constitutional Affairs, European Governance and the Area of Freedom, Security and Justice) has identified in its work programme for 2009 European policies in the field of integration.77 The work programme states that

75 Point 32.
76 Point 47.
In 2009, the CONST Commission will pay special attention to the multi-annual post-Hague Programme and will pursue its efforts for better recognition at the European level of the role of local and regional authorities in the further development of the area of Freedom, Security and Justice, especially with regard to the design and implementation of policies…it will also continue to encourage the exchange of best practice and information at the local and regional level in these areas.
Part III. Practices, lessons and tools for local and regional authorities on ‘Better Governance’ of integration Policies

5. Practices and lessons by European networks of local and regional authorities: State of the Art

This Section provides a state-of-the-art overview of the main results coming out of a selection of key European networks of local and regional authorities. Any assessment of the role of the local and regional governance dimension at EU level would be incomplete if it did not properly address and reflect on the contribution by transnational networks which provide platforms for learning processes, exchange of information and academic research focusing on the local and regional dimensions of integration. This section does not aim to provide a full overview of all the networks of cities and regions active in the field of integration at EU level. Instead we aim to offer an overview of the main results coming out of a selection of transnational projects run by three of these networks (EUROCITIES, CLIP and ERLAI) which involve a selection of local governance players, civil society organizations and academics from which important lessons and ‘good governance-practices can be drawn.

5.1 CLIP: Cities for Local Integration Policies for Migrants’

The European Foundation for the Improvement of Living and Working Conditions (Eurofound), the City of Stuttgart and the Congress of Local and Regional Authorities of the Council of Europe in 2006 set up the ‘Cities for Local Integration Policies for Migrants’ (CLIP) Network. The cities of Vienna and Amsterdam later joined the network’s Steering Committee. The network gets support from the CoR and Council of European Municipalities and Regions.

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78 Other important networks include, for instance, CEMR (Council of European Municipalities and Regions), which is the largest organisation of local and regional government in Europe. It covers over 50 national associations of towns, municipalities and regions across 37 countries. For more information about CEMR and its activities on integration of TCNs refer to http://www.ccre.org/champs_activites_liste_news_en.htm?ID=3119

79 http://www.eurofound.europa.eu/areas/populationandsociety/clip.htm
It has also formed a partnership with ENAR (European Network against Racism). The network is made up of 30 large and medium-sized cities. The collaboration with six Universities and research centres across Europe provides a scientific/academic dimension to the network. CLIP aims to foster ‘shared or joined learning processes’ between the participating cities, the researchers/academics as well as policy makers at the various levels of governance. “By encouraging the structured sharing of experiences through the medium of separate city reports and workshops, the network enables local authorities to learn from each other and to deliver a more effective integration policy”. The specific stated objectives of the network are the following:

1. “Collecting and analysing innovative policies and their successful implementation at the local level.
2. Supporting the exchange of experience between cities and encouraging a learning process within the network of cities (benchmarking and peer review).
3. Assessing the role of companies, social partners, migrant/religious organisations, NGOs and voluntary organisations at local level in supporting successful integration policies.
4. Providing objective assessment of current practice and initiatives and discussing their transferability.
5. Communicating good practice to other cities in Europe and developing guidelines for good practice to help cities cope more effectively with the challenge of integrating migrants.
6. Supporting the further development of a European integration policy by communicating the policy-relevant experiences and outputs of the network to: European organisations of cities and local and regional authorities; the

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80 Regarding the financial framework, the project will last for five years (2006-2011). Eurofunds financial support totals EUR 1.6 million. Each city contributes EUR 300,000 per year. Additional funding is provided by private organisations such as the Robert Bosch and Heinrich Böll Foundations.
81 http://www.enar-eu.org
82 In particular it includes Amsterdam (NL), Arnsberg (DE), Antwerp (BE), Athens (GR), Diputació de Barcelona (ES), Bologna (IT), Breda (NL), Brescia (IT), Budapest (HU), Copenhagen (DK), Dublin (IE), Frankfurt (DE), Helsinki (FI), Istanbul (TR), Izmir (TR), Kirklees (UK), Lisbon (PT), Liège (BE), City of Luxembourg (LU), Mataró (ES), Malmö (SE), Prague (CZ), Sefton (UK), Stuttgart (DE), Sundsvall (SE), Tallinn (EE), Terrassa (ES), Torino (IT), Turku (FI), Valencia (ES), Vienna (AT), Wolverhampton (UK), Wroclaw (PL), Zagreb (HR), Zurich (CH).
83 They include: European Forum for Migration Studies (EFMS), Institute for Urban and Regional Research (IST), Institute for Migration and Ethnic Studies (IMES), Forum of International and European Research on Immigration (FIERI), Institute of International Studies and Centre for Migration Policy Research.
84 P. 2 of the 2008 report.
European and national organisations of the social partners; the Council of Europe, and the various EU institutions”.

Regarding the methodology, the project has been organized around four thematic research modules: 1) housing; 2) equality and diversity policies in relation to employment within city administrations and in the provision of services; 3) intercultural policies and intergroup relations; and 4) ethnic entrepreneurship. The first two thematic modules have been finalized. The final reports of these two modules have been already published, in 2007 and 2008 respectively. They provide an examination of current practices and initiatives in participating cities and study their ‘transferability’ to other cities. They also “investigate the development of guidelines for good practice to help cities to cope more effectively with the challenge of integrating immigrants into the local community”.

The first report entitled ‘Housing and Integration of Migrants in Europe’ was published by Eurofound and the Council of Europe in 2007. It focused on local policies on ‘housing’ and in particular on an analysis of residential segregation/concentration, access to, as well as affordability of decent housing for migrants, ethnic minorities and other vulnerable groups in the 20 cities under study at that phase of the project. The report provides an analysis of policies and examines their ‘successful nature’ or ‘good practices’ at the time of their implementation at city level. The report points out a first important finding:

Empirical evidence from the CLIP case studies suggest that the majority of practices which are important for migrants are in fact more general measures. Therefore, local policies on segregation and housing for migrants can in many cases be considered as a particular aspect of general social policy and city development measures. (Emphasis added).

The following recommendations put forward by the report should be highlighted:

First, “a cross-departmental / integrated / interdisciplinary approach within the municipality’s structures, and a strong partnership and cooperation with other local actors”. This, it was argued, could be accomplished through the organization of internal working groups in municipalities involving relevant departments of the city administration, meetings with experts and civil society addressing housing issues, the setting up of a central coordination unit in the municipality dealing

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86 European Foundation for the Improvement of Living and Working Conditions and the Council of Europe (2007), Housing and Integration of Migrants in Europe, CLIP Network (Cities for Local Integration Policy).
exclusively with integration issues and “the development of a long-term local integration policy with a strong emphasis on an integrated and holistic approach to housing matters”. The Report also conferred great relevance to the need for local governments to establish strong partnerships and cooperation with other key local actors, including civil society, chambers of commerce, churches, associations of landlords and tenants, etc.

Secondly, adequacy of information for policy planning and evaluation/monitoring mechanisms. The report underlines, for example, the importance of good information on housing conditions and monitoring the quality of housing. It therefore recommends cities to develop evaluation mechanisms, such as indicators, to carry out an assessment of the housing situation of migrants, as well as issues of access to housing, spatial distribution, etc. It also proposes to carry out opinion surveys, and complement the results with scientific studies and research.

Thirdly, social housing under public influence. The report concludes that “providing access to and supplying affordable social housing under public influence is an important means for most CLIP cities of ensuring decent housing for migrants”.

Fourthly, anti-segregation policy. The following measures are recommended in order to reduce segregation: spreading social housing across the city and building smaller social housing units; allocation of public institutions and services in these areas, urban renewal programmes, policies aimed at fostering middle-class native population in these areas, etc.

The second CLIP report was entitled ‘Equality and Diversity in Jobs and Services: City Policies for Migrants in Europe’ and it was also published in 2008. The report examines city policies aimed at fostering equality and diversity policies in services provision and access to employment in the city administration, on the basis of 25 city reports. It starts out by highlighting that some of the cities under study constituted one of the main employers in the municipality, and that a majority of them had the main competence as regards service provision.

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87 P. 86 of the report.
88 P. 88.
89 European Foundation for the Improvement of Living and Working Conditions and the Council of Europe (2008), Equality and Diversity in Jobs and Services: City Policies for Migrants in Europe, CLIP Network (Cities for Local Integration Policy), Dublin.
Stuttgart has drawn up a Pact for Integration in cooperation with public and private sectors and civil society organizations which sets out its integration policy. The pact defines integration as “The active creation of a common basis for mutual understanding. This encompasses a two-way process requiring investment by migrants and the host community.” The Pact aims to promote equal opportunities and participation of every person in all aspects of life, to capitalize on cultural diversity to and foster peaceful cohabitation.  

As the Report explains, the city intends to improve the quality in service provision by “an intercultural orientation of the city administration” which takes place in practice through: “enhancing the intercultural competence of staff (training) and creating intercultural team structures; developing intercultural and integration guidelines and monitoring municipal services for migrants”. Refer to http://www.stuttgart.de

Another interesting case highlighted in the Report is Brescia, which has developed a concept of “shared or proximity citizenship” in which any individual is considered an ‘active subject’ irrespective of their legal or national status, and is therefore entitled to the principle of equality (The only condition is to be registered as a resident at the local registry office).

The general conclusion of the report is that cities need to give clear priority to promoting employment of migrants in the municipal administration as well as to overcoming the obstacles that they face with regard to access to public services. The following recommendations put forward for local authorities should also be underlined: Firstly, the need to guarantee consistency across the different departments in order to ensure quality of policies and a coherent approach in service delivery was stressed once more. The report recommends that cities carry out an evaluation of their own strategies on hiring migrants to work in their administrations, and more particularly as regards public service delivery.

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90 Information Quoted from D. Luken-Klaßen (2008), Case Study on Diversity Policy in Employment and Service Provision, Stuttgart, Germany, CLIP Network, European Foundation for the Improvement of Living and Working Conditions, Dublin.

91 For an in-depth study of the integration strategies of this city see A. R. Torr and A. Cangiano (2008), Case Study on Diversity Policy in Employment and Service Provision, Brescia, Italy, CLIP Network, European Foundation for the Improvement of Living and Working Conditions, Dublin.
Secondly, the report recommends cities to store information on the progress in employment and service delivery implementation to assess the impact of current policies. It also calls for internal and external evaluation mechanisms “on performance and opportunity”.

Thirdly, it recommends building “diversity and equality standards into contracts with external providers”, which would require that cities include in their contracts with external service providers guarantees and protection for equal treatment and access for TCNs to the service provision and even employment in the delivery of that service.

Finally, the report highlights the importance of ensuring consultation and participation of TCNs “when new policy approaches and service reforms are under consideration”. It also called on cities to go beyond mere ‘consultation’ of TCNs and actually involve them in the policy-making processes.

5.2. EUROCITIES and INTI-CITIES

EUROCITIES constitutes a network of 130 large cities across 30 European countries. Created in 1986, it aims to provide “a platform for its member cities to share knowledge and ideas, exchange experiences, analyse common problems and develop innovative solutions through a wide range of Forums, Working Groups, Projects, activities and events”. Its activities cover a wide range of policy areas affecting cities, such as ‘social affairs’ for which the has set up a Working Group on Migration and Integration. The latter has actively put forward its views on the EU Framework on Integration and has presented interesting recommendations on the basis of cities contributions and concerns. The relationship between EUROCITIES and the CoR is framed in the CoR-EUROCITIES Action Plan 2008-2009, which states:

Drawing from local knowledge and experience and making better use of urban expertise, EUROCITIES will contribute actively to the work carried out by the Committee of the Regions on specific topics in order to support

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94 Eurocities (2006), EUROCITIES Response to the Communication on a Common Agenda for Integration – Integration: Cities make the difference, February 2006, Brussels. Here it was proposed “…the establishment of advisory platforms at each level of government”, p. 6 of the report.
the appointed rapporteurs or to organize the follow-up of specific projects. This contribution can take the form of written contributions, of participation in so-called “task forces” with CoR rapporteurs, and of participation in CoR commission meetings and thematic working parties. (Emphasis added).

The INTI-CITIES project (Benchmarking Integration Governance in European Cities) was co-financed by the INTI Funding Programme for Preparatory Actions of the European Commission’s DG JLS. The project was coordinated by EUROCITIES in cooperation with the Migration Policy Group (MPG) and ‘Ethics etc’. The Final Report of the Project was published in January 2009 and is entitled ‘Benchmarking Integration Governance in European Cities: Lessons from the INTI-CITIES project’. The network was made up of 12 cities: Amaroussion, Belfast, Barcelona, Düsseldorf, Genoa, Helsinki, Lyon, Malmö, Milan, Rotterdam, Tampere and Utrecht. The rationale of the project was “to assist cities in developing and improving their integration policies and linking the local level to policy-makers at national and European level” and “by assessing (their) integration policies by using the method of peer review”. One of the project’s key goals was the development of “a benchmarking model for multi-dimensional integration governance intending to overcome fragmentation of policy-making and service-delivery and actively involving immigrants”.

As regards the methodology, six of the twelve participating cities were first asked to conduct an initial self-assessment report benchmarking their progress towards “ideal performance in integration governance” (or ‘the ideal city’) identified in a set of indicators called “INTI-cities benchmarks”. The assessment aimed to incorporate quantitative as well as qualitative data. It provided information about the city's general characteristics, the role of the latter in the delivery of public services and policies, the division of tasks between the different governance levels, political decision making arrangements, strategies or plans on integration, joint work between relevant stakeholders and the financial/budgetary framework. Each

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97 http://ethicsetc.co.uk
99 See project leaflet available at www.inticities.eu/en
100 Quoted from the presentation delivered by Jan Niessen at the second INTI-Cities Conference of 5/6 November 2007 in Milan. Retrievable from http://www.migpolgroup.com/events/3836.html
101 See Guidance on How to Prepare the Initial Report, INTI-Cities Project, retrievable from www.inticities.eu/en The following six cities have been included: Düsseldorf, Genoa, Helsinki, Lyon, Malmö and Rotterdam.
The city was requested to report on the following five dimensions: municipality profile; general governance; individual empowerment; administrative cooperation and working in partnership. These dimensions were attributed a number of indicators covering what the project called ‘transversal values’.\textsuperscript{102} ambition, leadership, resources, implementation and evaluation.\textsuperscript{103} (See Annex 1 of this report for a sample of the indicators in each of the dimensions corresponding to some of the ‘transversal values’).

The INTI-Cities project used a benchmarking model aiming at generating ‘best practices’ through:

\begin{quote}
\textit{…a peer review approach} which goes beyond a simple good practice collection to deliver expert-validated comparative knowledge on integration practices in European cities as well as on the necessary supportive policy environments at local, national, and European levels. (Emphasis added).
\end{quote}

The peer-review methodology aimed at assessing the urban integration governance (horizontal/vertical fragmentation of policy-making and service delivery; and the exclusion of immigrant from society and decision making processes).\textsuperscript{104} A group of peer-reviewers evaluated the self-assessment reports of the cities against “the ideal municipality” and the set of ‘INTI-cities benchmarks and indicators’ through desk reviews of the reports and visits to all six cities (gathering evidence and conducting interviews with the authorities and key stakeholders).\textsuperscript{105}

The Final Report presented a set of ‘good practices’ in relation to the different themes addressed by the project, some of which can be synthesized as follows:

\begin{itemize}
\item All indicators except the one dealing with ‘municipality profile’, which is being tested against the following indicators: location, structure and services, decision-making, strategies and plans, implementation, resources, provenance. See Guidance on How to Prepare the Initial Report, INTI-Cities Project, retrievable from www.inticities.eu/en.
\item See pp. 18-19 of the Final Report for a full overview of the indicators.
\item The Final Report states that “peer review visits acted as the testing ground for the indicators which were subsequently revised in light of their application on the ground, and taking into account the comments made by host cities and peer reviewers” (p. 17 of the report). This “standardised peer review method” aims at providing “feedback on successes and potential improvements or gaps [areas of weaknesses] between the actual performance of the city partner and the benchmark” and coming up with a collection of ‘good practices’ destined to what the project calls “the European integration Community” as “guidance on innovative integration governance”.
\item For this purpose the project created a set of operational guidelines for implementing Peer Reviews that included detailed instructions on content and organization of Peer Reviews and training on Peer Review (practical application of the methodology). See Peer Review Methodology: Training Manual, Workpackage 2b, retrievable from www.inticities.eu/en The training manual was carried out by “Ethics etc” to assist and support the 6 peer review teams.
\end{itemize}
1. **Needs Assessment and Data Collection to develop Integration Strategic Plans.** The report identified as a ‘good practice’ the development of **local strategic plans of integration** which would be grounded on a proper assessment and data on the evolving social needs. The Report concluded that a substantial majority of cities under study had already developed their (pluri-annual or long-term) strategic plans setting out objectives and actions. In order to ensure the adequacy and quality of the ‘needs assessment’ it was recommended that local authorities would establish partnerships with universities, research centres, immigrants’ associations, statistical offices, etc. This, the report states, would ensure a proper monitoring, examination and interpretation of the local social dimension. In a similar context, the report suggested setting up **networks of ‘Community Contact Persons’** that would be made up of persons/actors performing a key role in the local setting.

Another recommendation was the establishment of a ‘transversal drafting/coordination committee’ that would be in charge of elaborating the strategic plans on integration. This, the Report argued, would ensure that the interests of all the relevant committees would be taken on board and promote a “sense of ownership” and a common strategy promoted among them. The Report referred to an Immigration and Integration Coordination Group in **Helsinki** composed by head of relevant departments.

2. **Working on Integration within the Municipality.** In this section of the Final Report issues related to the concept of ‘mainstreaming’ were addressed. It identified as a ‘good practice’ the role of ‘**integration focal point**’ which, in the report’s words, would “act as the administrative head of integration policy; s/he leads an inter-departmental committee on integration, which is composed of the heads of the relevant departments…, and carries responsibility for over-seeing the implementation of the municipality’s integration policy”.

3. **Target-Setting, Resource Allocation and Evaluation.** Under this heading the Report focused mainly on evaluation and monitoring mechanisms of local policies and practices on integration. It referred to the use of ‘indicators’ and ‘benchmarking’ as central mechanisms.

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106 According to the report this is the case, for instance, in Malmö, Helsinki and Düsseldorf.
107 For more information see p. 23 of the report.
4. **Promoting Diversity within the City Administration.** The importance of ‘intercultural awareness training’ and ensuring equal access to public/civil servants posts in the municipalities was stressed. It was emphasized here how cities, which are constrained by national rules, face various options to improve workforce diversity without transgressing laws.

The Report stated that “In France, for instance, unlike fonctionnaires titulaires, fonctionnaires non-titulaires hold contract-based positions for which there are no nationality requirements. Given that they represent almost 15% of municipality’s total workforces, it makes sense to concentrate on diversifying this group through recruitment campaigns encouraging applications from candidates in disadvantaged neighbourhoods”.

The case of Lyon was highlighted as it takes into consideration ‘social criteria’ in public procurement. A majority of public procurement contracts include a clause stipulating that a number of jobs emerging from the contract have to be reserved for persons residing in disadvantaged areas or facing particularly difficult social situations, including (yet not specifying) third country nationals. Refer to [http://www.lyon.fr](http://www.lyon.fr)

5. **Empowering Migrants to Participate in Society.** Here the report gives prevalence to the role of language and language learning schemes “at the municipality’s own initiative or in the framework of national programmes”. The report recommends partnerships with immigrant associations.

Malmö offers language courses in a flexible manner so that those third country nationals “who have other commitments during working hours (such as job, children, etc) can attend courses at a convenient time”. It also provides services helping applicants with the process of getting their diplomas recognised; as well as in job-searching. Refer to [http://www.malmo.se](http://www.malmo.se)

The INTI-CITIES project was succeeded by the “Diversity and Equality in European Cities” (DIVE) project, also co-financed by DG JLS and the EFI, which aims to ‘capitalize’ on the results of the former. It is also coordinated by

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108 P. 27 of the report.
EUROCITIES, MPG and ‘Ethics etc’. This project focuses in particular on “how municipalities use diversity and equality considerations when acting as policy-makers, employers, service providers and buyers of goods and services” and involves the cities of Amsterdam, Berlin, Leeds, Rome and London.\textsuperscript{109}

5.3. **ERLAI and ERLAIM**

ERLAI is a Brussels-based network of regional and local officers on asylum and immigration which has been operating since October 2003. The network aims at to share ‘good practices’ of local and regional authorities and liaise with the EU institutions on normative and financial opportunities. Integration is one of the key areas covered by its work. Among the ERLAI objectives there is the promotion of awareness of ‘good policy and practice’ in other regions and local authorities in Europe.\textsuperscript{110} It currently involves ‘more than’ 30 regions, cities and local authorities across eight EU Member States.

ERLAI’s activities were backed up, developed and supported by the ERLAIM project (European Regional and Local Authorities for the Integration of Migrants).\textsuperscript{111} The project was coordinated by the Regione Emilia-Romana and included eight partners from various areas of governance at the local and regional levels and amongst stakeholders.\textsuperscript{112} It lasted from December 2006 until July 2008, and was also funded by the INTI Preparatory Actions 2005 of the European Commission's DG JLS. The project was aimed, on the basis of ERLAI’s experience, at “improving the quality of the action of regional and local stakeholders when participating in the design and implementation of policies concerning integration of third country nationals”\textsuperscript{113} and “to promote a wider transnational partnership representing a platform for dialogue on integration of migrants”.\textsuperscript{114}

\begin{itemize}
\item \textsuperscript{109} For more information See [http://www.migpolgroup.com/news/4234.html](http://www.migpolgroup.com/news/4234.html)
\item \textsuperscript{110} [http://www.emiliaromagnasociale.it/wcm/emiliaromagnasociale/home/immigrazione/Erlai/Presentation.htm](http://www.emiliaromagnasociale.it/wcm/emiliaromagnasociale/home/immigrazione/Erlai/Presentation.htm)
\item \textsuperscript{111} [www.erlaim.eu](http://www.erlaim.eu)
\item \textsuperscript{112} The partners were: Nicosia Municipality (CY), Beauftragte des Senats von Berlin für Integration und Migration (DE), Junta de Andalusia - Consejería de Gobernación DG Pol. Migrantorias (ES), Diputació de Barcelona - Service "Diversity and Citizenship Pol." (ES), Fundación Comunidad Valenciana - Región Europea (ES), Nomarchiaki Aftodiikisi Ileias (GR), Slovenian Business and Research Association (SL) and Yorkshire and Humber European Office (UK).
\item \textsuperscript{113} ERLAIM Project Summary, retrievable from [www.erlaim.eu/wcm/erlaim/sezioni/Mission/objectives.htm](http://www.erlaim.eu/wcm/erlaim/sezioni/Mission/objectives.htm)
\item \textsuperscript{114} See ERLAI Newsletter, Special Edition, Issue 8, Autumn/Winter, 2006, which was specially dedicated to the presentation of the ERLAIM Project and the different project partners.
\end{itemize}
Regarding ERLAIM's research dimension, the partners were engaged in an assessment of regional/local integration strategies and projects including the following thematic streams: citizenship, political participation, intercultural communication, minors, gender perspective, public/private partnerships. From a methodological point of view the project collected information using a questionnaire designed by ‘external experts’ which was completed by all the partners in the network. The questionnaire contained different sections on the different local policy strategies and themes covered, as well as on existing projects and ‘good practices’ at local level. Annex 2 of this report presents some of the questions that were addressed to the partners. On the basis of this information, the comparative task was conducted. In addition, the information provided in the questionnaires was complemented by data provided in local publications and websites and “Whenever necessary, further information has been collected through telephone interviews with experts, policy makers and NGOs”. In the final report of the project, published in April 2008, the following issues, among others, were underlined which might be relevant to further debates and measures at local and regional levels.

Firstly, General Strategies and Incremental Actions. The report pointed out that some local authorities presented ‘special plans for immigrants’ (e.g. Andalucía in Spain, Regione Emilia-Romagna in Italy, etc) in the study, while others included the issue of migration in “less target-specific and more generalized policy tools”. The Report recommended finding ways to bridge special plans for immigrants “towards the universalistic inclusion of migrants in the general system of local life and services”.

Secondly, among the various issues covered by the report perhaps the section on “Public-Private Partnerships” was amongst the most interesting ones. Under this heading the following aspects were underlined: the scarcity of financial, personnel and organizational resources for dealing with migration policies and service provision. The report recommended finding opportunities to find venues for cooperation with philanthropic institutions and applying for extra EU or national funds.

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115 The events dimension of the project was also important to identify and study ‘best practices’ (policies, programmes and projects). There were six events and two conferences in Brussels which allowed for ‘informed dialogue’ among practitioners.

116 Sections E, F and G of the questionnaire were of particular importance.

117 P. 3 of the report.


119 P. 18.
extra funding. Public-private partnerships were identified as a path already taken by some of the ERLAIM partners for implementing integration policies and also for overcoming this lack of financial resources. These partnerships, the report argued, would overcome many current obstacles currently faced by regional and local authorities, such as “knowledge gap” (partnerships with universities and research centres).

6. Tools for local and regional authorities on integration policies

This Section identifies and examines key tools arising from the ‘lessons’ and ‘practices’ gleaned from the projects carried out by the European networks of local and regional authorities summarised in the previous Section. We complement these with additional views, proposals and thoughts put forward by other policy actors (e.g. the European Economic and Social Committee (EESC) and instruments (Handbook on Integration for Policy Makers and Practitioners), as well as key academic sources. These ‘tools’ aim primarily at improving the quality of institutional structures and the provision of public integration policies to individuals by local and regional governmental actors. Some of them are also of special relevance to discussions on future policy scenarios and potential EU configurations and structures on the ‘local and regional dimensions of integration’, under the upcoming multi-annual programme on AFSJ (succeeding the Hague Programme to be adopted under the Swedish Presidency of the EU in the second half of 2009) and the possible entry into force of the Treaty of Lisbon. While assessing the tools, special consideration will be also given to potential shortcomings and open questions that their practical implementation may raise, in particular when considering the potential progressive formalisation of the EU Framework on Integration into a European joint coordination mechanism or an OMC.

6.1. Better governance and integration policy strategies

International human mobility and diversity are not only presenting fundamental challenges and dilemmas to the premises and configurations of the nation-state; they also have far-reaching implications, transforming the traditional allocation of competences and responsibilities between the different levels of governance represented by the nation-state's structures. The local and regional dimensions, and more particularly the cities, represent the venue where these dilemmas have
become most visible and intense. It is also ‘there’ where their most immediate social, economic, cultural and political realms display their full effects. At least in Europe, cities are being increasingly given a pivotal status as regards the implementation and provision of integration-related policies. They are the stance/spatial point at which the phenomena of human mobility and heterogeneity of lives, cultures and identities are most acutely experienced. Indeed, cities have faced the need to develop integration-related policies even before this was deemed a necessity and political priority by certain nation-State governmental authorities. The evolving role and status of ‘localities’ is also changing the relationships and interactions between the national governmental agents and local and regional bodies in relation to the limits of the allocation of ‘responsibilities’. This often goes hand in hand with debates about the recognition of decentralised national identities in plural and decentralised national contexts.

The administrative decentralisation of tasks from the national to the regional and local levels, and more precisely ‘local self-government’, is indeed subject to tensions and struggles in many of the liberal democracies that make up the European Union. Setting aside discussions about the actual scope for decentralising, or not, more ‘powers’ and autonomy to regions and cities on immigration-related policies, what interests us in this report is the potentials for the degree of discretion or margin of manoeuvre that local and regional authorities have de facto in terms of not only ‘directly implementing’ national immigration and integration laws and policies, but also as key actors holding the potential for devising and practising innovative, informal and flexible approaches and governance strategies better suited to evolving social struggles, inequalities and needs at urban levels.120 Europe is experiencing a process of ‘localising’ integration, where ‘the city approach’ is becoming determinant. The increasing powers granted to regional and local authorities in relation to legislative areas covered by immigration and integration policies develop, diversify or in some cases even challenge traditional strategies and the monopoly of conceptions upon which ‘national policies and conceptions of integration’ are founded. They often enrich the whole processes of policy-making and policy practice covering social processes of inclusion and exclusion at the local level. It is precisely this flexibility and innovativeness that allow for the emergence of alternative forms of ‘urban

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citizenship’ and the participation of individuals regardless of the legal status conferred on them by national immigration law. As Bauböck (2003) has put it,

Cities provide a space not only for transnational cultural diversity but also for cosmopolitanism within the nation-state…an urban citizenship that is emancipated from imperatives of national sovereignty and homogeneity may become a home base for cosmopolitan democracy.\(^\text{121}\)

While these processes of localising integration might occur to varying degrees across the EU’s urban governance landscape, or not at all, depending on the local context, there has been a recognition by the academic literature that this ‘new distribution of tasks’ and policy-making processes coming ‘from below’ are complex and rather sensitive, especially in relation to the politics of immigration and inclusion/exclusion.\(^\text{122}\) One of the crucial questions for local and regional authorities is, therefore, constantly seeking out, exploring and implementing ‘better and different ways’ to reflect their ever-evolving societal diversities, interests and demands, heterogeneities and identities within their own governance structures and social affairs policies.\(^\text{123}\) The ‘governance or institutional dilemmas’ posed by processes and dynamics emerging as a consequence of transnational human mobility and diversities have been raised and addressed by the projects analysed in Section 5. Among others, the following three multidimensional tools have been recommended for local and regional authorities to better implement and deliver integration policies:

First, the development of local strategies, integration plans and annual/multi-annual integration programmes providing their own priorities, goals, projects

\(^{121}\) Bauböck argues that as long as provinces and municipalities apply as a rule for membership the ius domicili (the connecting factors is residence, and not ius soli or ius sanguinis), cities could develop a new concept of ‘urban citizenship’ according to which full local citizenship rights and privileges would be granted to all residents within their jurisdiction regardless of their nationality. This, in his view, could be attained by adding a non-discrimination clause preventing nationality-based exclusion to have access to local rights and benefits. See R. Bauböck (2003), ‘Reinventing Urban Citizenship’, *Citizenship Studies*, Vol. 7, No. 2, pp. 139-160.


and actions (e.g. ERLAIM and INTI-CITIES). The suitability of such an approach has been further confirmed by EU institutions such as the EESC, which in its Opinion on Immigration in the EU and Integration Policies: Cooperation between Regional and Local Governments and Civil Society Organisations stated that local authorities are the ones suffering and having to deal with the detrimental impacts of “mistaken government policies”. Consequently, it went on to argue, many local and regional authorities have developed their own integration policies. The Opinion therefore called local and regional authorities to draw up their own integration plans and programmes, in close cooperation and consultation with immigrant organisations and the social partners.

Second, the setting up of internal working groups involving different departments dealing with integration-related policies within the city administration, in order to ensure policy coordination, consistency and coherency, as well as cross-fertilisation between the experiences and strategies put forward in each of the dossiers. Some of the projects have also recommended a more formalised institutional approach by establishing, for instance, central coordination units and a specialised inter-department committee/department on integration (e.g. INTI-CITIES and CLIP). This should be seen from the perspective of transversality and ‘mainstreaming’ between the different departments and local/regional bodies. The considerable capacity of local authorities to link all the relevant departments with regard to the integration processes was also highlighted by the first edition of the Handbook on Integration for Policy Makers and Practitioners, published in November 2004. Furthermore, the second edition of the Handbook (May 2007) recommended including “a concern for immigrant integration” in the “development, implementation, monitoring and evaluation of policies across all relevant portfolios”. It also suggested designing a

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124 For a study as to the ways in which many cities in Spain have already developed their own plans see M. Pajares (2004), ‘Las Políticas Locales en el Ámbito de la Inmigración’, in E. Aja and J. Arango (eds), Veinte Años de Inmigración en España, Fundació CIDOB, Barcelona, pp. 369-393. For an overview of plans by several European cities see the Conclusions of a Conference hosted by the EESC in Barcelona attached to the Annex (titled ‘New Strategies for Local and Regional Authorities’ of the EESC Opinion, Immigration in the EU and integration policies: Cooperation between Regional and local Governments and Civil Society Organizations, SOC/219, Brussels, 13 September 2006.


126 Furthermore, as regards general vs. targeted integration policies, the EES Opinion underlined that “Some cities also provide examples of specialist services for immigrants, which implement practical aspects of integration plans...There is an ongoing debate about the risk of segregation arising from immigrants being dealt with by specialist services set up for them. The EESC believes that segregation in the use of public services is to be avoided, although dedicated services may sometimes be necessary, especially in the initial reception of immigrants on arrival”.

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“mainstreaming unit” at the local level within the municipal administration. Another initiative put forward by the INTI-CITIES project and the second edition of the Handbook on Integration was the creation of an Integration Focal Point or Agent in the municipalities (See Sections 3.2 and 5.1 above).

Third, the promotion of interculturalism and diversity in local and regional authorities' administrative bodies and personnel policy, as well as awareness-raising campaigns have been also identified as important tools. Initiatives include, by way of illustration, ‘intercultural awareness training’ for officials and local practitioners, ensuring equal access to public/civil servants' posts in the municipalities, strategies on hiring TCNs to work in local and regional administrations and more particularly in service provision, ‘social criteria’ and ‘diversity and equality standards’ to be taken into account in public procurement and included in contracts with external service providers (private sector), etc (e.g. INTI-CITIES and CLIP).

Whatever new institutional structures are set up at the local/regional levels, the prevailing focus should not be an immigration control policy approach but rather a social affairs and equal opportunities/intercultural logic, steering the provision of services (health, housing, education, employment, etc.) towards individuals regardless of their administrative residence status, and the voluntary nature of (language) training, as well as the provision of advice, assistance and reception for new arrivals. Such an inclusive approach would perfectly reflect an understanding of integration as a complex social process involving all individuals in the receiving State and the public authorities themselves, and not as an immigration norm/rule aimed primarily at ‘managing’ the legal channels of international human mobility and the identity of individuals, and at limiting the group of people having access to fundamental rights and security of residence. The driving policy rationale should also be flexible enough to adapt the quality, level of protection and accessibility of services and programmes to changing political and social circumstances (such as the current ‘financial instability’ in Europe and elsewhere), challenging anti-discrimination and the equality of rights and freedoms of TCNs and other vulnerable groups. In addition, the plans and strategies should be substantiated in scientific/objective evidence and not in political/subjective and short-term policy priorities.

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6.2. Partnerships and networking

The results of the project ‘Multicultural Policies and Modes of Citizenship in European Cities’ (MPMC)\(^\text{128}\), funded by UNESCO in 1996, provided fundamental elements to take into consideration when examining the relationship between local government policies in cities with large migrant communities and the political participation of immigrants and ethnic minorities at the local level, as well as the importance of local authorities developing ‘partnerships’.\(^\text{129}\) Among the various project results, Penninx and Martiniello (2004) highlight the following three essential premises constituting what they call ‘lessons for policy-making at local level’:\(^\text{130}\) First, ‘transparency’ in admission and residence immigration policies. While acknowledging that the remit for these domains often falls to the national authorities and therefore local authorities depend on the nature, goals and limits of these, they could nevertheless “develop effective alternative channels for immigrant participation, thereby creating city-based forms of inclusion and citizenship such as local consultative bodies”;\(^\text{131}\) Second, integration policies should include the interests of all individuals, including those of vulnerable groups (such as immigrants), and not only those considered to be ‘the native and privileged majority’. Therefore, they concluded, while the socio-economic aspects are central, those of a political and cultural character also need to be appropriately addressed and taken into consideration in a long-term perspective. Thirdly, local policy strategies should engage with all the partners involved in integration-related fields.\(^\text{132}\) These three ‘lessons’ are also reflected directly or indirectly across the findings and recommendations of the projects summarised in Section 5 of this report, as well as in the CoR and EESC Opinions and the Handbooks on Integration, which identify ‘partnerships’ and ‘networking’ as key ingredients for better local and regional integration governance structures and policies. The

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\(^\text{129}\) The project was coordinated by the University of Amsterdam (Institute for Migration and Ethnic Studies), University of Liege (Centre for Ethnic and Migration Studies) and the University of Oxford (Centre on Migration, Policy and Society). Researchers conducted empirical comparative research in 17 cities across ten European countries and Israel.


\(^\text{131}\) See p. 147.

\(^\text{132}\) In their view, “This process should combine ‘top-down’ activation elements with ‘bottom-up’ mobilisation. It should define the process of integration as ‘open’, within the rules of liberal-democratic societies, leaving room for a more diverse, but more cohesive society as a result. The diversity achieved in this way is neither predetermined nor static, but negotiated, shared and dynamic”, p. 148.
following key players/partners have been identified as central to local and regional integration policy networking settings and strategic partnerships:

First, the **different levels of government**. Most of the projects call for strong *vertical* partnerships between local authorities with upper levels of ‘integration governance’ *(regional and national)* as well as *horizontal* ones with *other local authorities* *(cities)* nationally and at the EU level in order to ensure better coordination and cooperation between the relevant authorities involved in integration-related fields. This was also one of the items highlighted by the first edition of the Handbook on Integration in 2004 which, as we have seen in Section 3 of this report, stressed the importance of consultation between the different authorities involved in the adoption and implementation of integration policies as well as developing “Partnerships between various levels of government [which] are governed by shared responsibilities and consultations on policy design and budget allocations”. Further, in addition to the positive experiences arising from the exchange of information about ‘local lessons’ and ‘practices’,

133 and as INTI-CITIES Final Report specifically highlights, it is also very important that cities liaise with other cities, as well as with associations or EU umbrella organisations of local authorities at the EU level in order to ensure that they are fully aware of the impact of EU policies, and how they can benefit from them (such as the EFI) and *influence* EU policy developments.

Second, **immigrants’ organisations, civil society and social partners**. A similar common ground between the sources consulted has been the need to develop a local and regional integration partnership involving TCNs, non-governmental organisations and the social partners in the various phases of policy-making (planning and evaluation) and actively support their work. The CLIP project has even stressed the desirability of TCNs not only playing a consultation role (as advisory or consultative bodies)

135 but also being recognised as partners in the

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133 As Gregou (2005) stated in a previous study conducted for the CoR, “networking is sharing information, ideas, resources and opportunities…Making good use of a network means that the local and regional development partnership acquires access to information and knowledge, becomes visible, gets channels to influence management, new ideas, new contacts and in other words “power”. It is often good, and very beneficial, to reach beyond one’s own region or nation and network internationally…”, S. Gregou (2005), *Local and Regional Authorities and the Immigration Challenge*, Committee of the Regions, CoR Studies, European Communities: Brussels, p. 92.

134 See p. 28 of the report.

different phases of policy-making processes dealing with integration-related issues. The INTI-CITIES project, for example, calls partnerships to be established with immigrant associations in order to ‘empower migrants’ especially as regards language courses.

Third, the private sector. The ERLAIM project underlined the importance that public/private partnerships already have in the provision of local and regional integration policies. Indeed, the role and impact of the involvement of the private sector in integration-related tasks and policies needs to be carefully discussed and given serious consideration. Before embarking on any new partnership or deepening an existing partnership, an assessment should be made of its implications for local and regional bodies working in the fields of social affairs and integration, as well as for the nature of the service provision (see, for example, the CLIP project’s conclusions on equal treatment and access to TCN access to service provision). The EU Member State governments are increasingly channelling substantial amounts of national and EU funding to the private sector and to ‘external providers’. What are the effects of this shift in service delivery in terms of equal treatment, diversity and guarantees of fundamental rights? This question is particularly pertinent when considering the privatisation of service delivery and integration/management policies such as the introduction of integration courses, mandatory integration programmes and civics and language tests. Discrimination and ethical implications need to be seriously addressed in terms of the conditions under which these services and policies are being provided by private actors and as regards the privatisation of immigration control. As highlighted by Guild, Groenendijk and Carrera (2009), the level of trust in the discretion of local officers has been progressively replaced by a strong confidence and reliance in private actors who develop, carry out and administer integration tests and programmes and promote ‘nationalism’ in the form of integration exams obliging TCNs to have ‘knowledge of (the values and way of life) of the receiving society’.  

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6.3. **Evaluation and monitoring**

6.3.1. **Benchmarking**

‘Benchmarking’ is one of the key policy priorities in the EU Framework on Integration. This, as we have seen in Section 3 above, has been confirmed by the various policy measures put forward by the European Commission's DG JLS, by the CBPs on immigrant integration policy and by the European Integration Fund. In particular, CBP 11 identifies as one of the features of ‘the European approach to integration’ the development of “clear goals, indicators and evaluation mechanisms to adjust policy, evaluate progress on integration and to make the exchange of information more effective”. Also, the JHA Council Conclusions of 19 November, which adopted the CBPs stated:  

The purpose of such evaluation is *to learn from experience*, a way to avoid possible failures of the past, adjust policy accordingly and showing interest for each others efforts. When Member States share information about their evaluative tools at European level and, where appropriate, develop *European criteria* (indicators, benchmarks) and gauges for the purposes of comparative learning, the process of knowledge-sharing will be made more effective […] Exchanging information provides for taking into account the different phases in which Member States find themselves in the development of their own integration policies and strategies. (Emphasis added).

A study carried out by the MPG and funded by the European Parliament's Directorate General for Internal Policies of the Union (Policy Department C) entitled *Setting up a System of Benchmarking to Measure the Success of Integration Policies in Europe*, identified the following elements as features of benchmarking: 1. Identifying key areas to be improved; 2. Setting standards according to “best/good practice”; 3. Examining how actors meet the standards, and 4. Adapting and applying the “lessons learned” to meet or exceed standards.  

There seems to be a broad consensus amongst the EU institutions (Council, European Commission, European Parliament, CoR and EESC) and civil society

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organisations (especially the MPG, through the Handbooks on Integration and the MIPEX), as well as projects such as INTI-CITIES, that developing benchmarking and indicators in the field of integration should be further promoted and developed at the EU level. A study conducted for the Bertelsmann Foundation in 2008 entitled ‘Benchmarking Integration in the EU: Analysing the Debate on Integration Indicators and Moving it Forward’ has, however, provided an in-depth examination of the main vulnerabilities inherent to the technique of benchmarking the integration of TCNs in the EU, on the basis of ‘state of the art’ key projects and academic studies that have attempted to benchmark integration. The main deficits identified by this study can be grouped under the following overarching themes: the lack of a common approach, the non-neutral nature and the personal and territorial scope and methodology, which we now summarise, while bearing in mind their relevance and impact for local and regional authorities:

Firstly, the study starts by highlighting the lack of a common approach when conceptualising integration in the EU, both at policy level and in academia. Any benchmarking exercise needs a common conceptual understanding of ‘the standard’ against which the integration policy in question will be evaluated. The conceptual approach will actually determine the focus given to each of the constitutive phases making up the evaluation processes. The EU’s CBPs on integration constitute an excessively broad and flexible list of tenets for any sort of understanding, interpretation and ideology about integration to be implemented and developed. They therefore do not overcome ‘the conceptual gap’. When the local and regional dimensions of integration are concerned, these debates become even more diversified and plural. Furthermore, as the study points out, “The plurality inherent to the activities and programmes carried out by some local and regional authorities...favours a “social inclusion and services-approach” to integration instead of one driven by an immigration control-oriented logic”.

Secondly, benchmarking is not a neutral or ideology-free tool. It is dependent - and therefore vulnerable - on a certain ideological setting, embracing what integration means and how this should be successful. This leaves the door open for ‘the benchmarker's’ discretion to choose the goals and the evaluation approach.

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139 S. Carrera (2008), Benchmarking Integration in the EU: Analysing the Debate on Integration Indicators and Moving it Forward, Study Commissioned by the Bertelsmann Foundation, Berlin.
140 In particular, the study focused, among others, on the following ‘benchmarking’ initiatives: A. Geddes and J. Niessen (with A. Balch, C. Bullen and M. J. Peiro) (2005), European Civic Citizenship and Inclusion Index, British Council Brussels, Foreign Policy Centre and Migration Policy Group; J. Niessen, T. Huddleston and L. Citron (2007) (in cooperation with A. Geddes and D. Jacobs), Migrant Integration Policy Index, British Council and Migration Policy Group. See www.integrationindex.eu
The study also highlights the large degree of subjectivity inherent in the selection or qualification of certain practices as ‘good or best’ or as ‘bad or worst’. It is said that “‘Best' or 'ideal' are malleable adjectives often attributed according to a certain ideology on 'the common standard' against which to test the norm, practice or public authority'. The extent to which a certain practice or policy can be at all considered to be “best” across the entire EU is actually rather unclear, even more so in the local and regional arenas. The technique of benchmarking integration at the local level shows an even larger and more diversified setting of integration approaches and strategies, which often do not necessarily match those pursued at the State or EU levels. What is ‘good’ for one city might be ‘bad’ or ‘worst’ for another, depending on their various situations, circumstances, social contexts, etc. ‘Common solutions’ are also difficult, if not impossible, to achieve in the ‘social affairs field’ (employment, housing, education, etc).

Thirdly, another problem with benchmarking concerns its personal scope. As we have underlined in Section 2 of this report, the personal scope of the EU Framework on Integration advocated by DG JLS of the European Commission only includes those individuals labelled as ‘legally residing third country nationals’, a very limited group indeed, ignoring other legal categories such as irregular immigrants, asylum seekers, refugees, etc. As local authorities well know, social practices and experiences clearly show that such a narrow personal scope does not reflect their local social realities and is far from easy to apply on the ground when implementing “integration-related policies”. It is at the local level that such narrowly constructed categories of individuals become blurred and illusory. This is also where alternative and informal channels of participation and inclusion reflecting the heterogeneity, complexity and diversities of the urban contexts are developed. In this regard, Penninx et al. (2004) have expressed their disagreement with

… the romantic idea that cities were homogeneous, uniform entities in the past. Cities have always brought diversity in all shapes and forms. Particularly in larger cities, heterogeneity has always been the rule. Hence, the oft-made distinction between the ‘native culture’ and that of newcomers is – from a city point of view at least – too facile, if not illusory and false.  

Further, the study points out that it is not entirely clear who ‘the benchmarker’ is going to be. As shown in Section 5 of this report, Projects such as INTI-CITIES might come up with interesting results and practices for how to apply the benchmarking technique to evaluate the adequacy and appropriateness of public services and policies of local authorities, and improve their quality and engage with “migrant communities”, on social affairs issues. Indeed, when giving the debate on benchmarking integration the role that it might play at times of evaluating the performance of local and regional authorities, a somehow different scenario arises. The “integrating cities process” aims at fostering dialogue and the exchange of experiences between cities on the relationship between the EU Framework on integration and the local dimension. In so doing, this process intends to promote “innovative models of integration governance” by local authorities across the EU. The added value of EU initiatives and transnational networks in this context should be the development and promotion of better standards and quality in service provision, local policies and institutional structures. Indeed, the INTI-CITIES project did not intend to measure or ‘benchmark’ the integration of TCNs per se, but rather to assess “integration governance structures” in those selected European cities. This is a benchmarking technique for evaluating cities’ policies and strategies related to integration policy. A somewhat similar approach has been implemented by the CLIP network, which has also called for mechanisms to evaluate and monitor the implementation phase of integration policies, in order to assess, for instance, local authorities’ own strategies for hiring migrants to work in their administrations, and more particularly as regards public service delivery.

This benchmarking approach of focusing on better standards and quality in service provision would be also very much in line with another pivotal aspect underlined in the CoR Opinion on Local and Regional Authorities at the Forefront of Integration Policies of February 2009. That document stressed that integration policies themselves “must comply with fundamental European values such as respect for human rights and diversity, combating discrimination and promotion of equal opportunities and tolerance. They must also be consistent with basic EU policies on cohesion, employment, development, external relations and freedom, security and justice”.142 The compliance of governmental policies on integration with fundamental rights and their consistency with closely-related policies is indeed of central importance, particularly when taking into account the impact on fundamental rights of mandatory integration programmes and courses forcing

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142 Point 11 of the Opinion.
TCNs to show adherence to and ‘knowledge’ of national values as a condition for having access to visa, security of residence and family life.

A final question is ‘Who will form the “Benchmarking Community”?’ The local and regional authorities, and more particularly the cities, are the best placed to become a central piece of that ‘Community’. As we have seen in many instances throughout this report, there is wide recognition by EU institutional actors, academia and EU umbrella organisations/networks, that the ‘local and regional dimensions’ could play a central role in evaluating national and EU policies directly or indirectly falling under the legislative heading of “integration”. Implementation of the EU Framework on Integration, and more generally the common EU immigration policy, will remain vulnerable as long as the local and regional dimensions are not further strengthened in this regard at the EU level. This applies not only to the absolute need to examine ‘from a practitioners perspective’ whether current national and EU policies on integration are relevant and adequate to meeting local social realities and demands. The European Union is furthermore already suffering the detrimental consequences of the weaknesses and inability of the current institutional and substantive enforcement mechanisms to ensure a timely and appropriate implementation of EU law by the national authorities of the Member States (good examples of this include Council Directives 2004/38, 2003/109 and 2003/86). A similar situation cannot be allowed, for example, in respect of the European Fund for Integration and, indirectly, the implementation the Strategic Guidelines set up by the European Commission for its transposition by national authorities. One way of implementing a proper evaluation of the adequacy and consistency of what is really happening ‘on the ground’ in respect of EU policies is to involve more decisively, in a structured and sustainable way, the local and regional levels (especially independent practitioners from cities, town and municipalities) in EU monitoring and evaluation mechanisms. Benchmarking and peer review (see below) could play a role here, if developed appropriately, to ensure independence from politics and objectivity from agreed policy objectives.


Fourthly, the study finally underlines the **methodological weaknesses** inherent to any benchmarking exercise. To start with, benchmarking is predominantly a normative or legalistic task. Most existing benchmarking initiatives are mainly regulatory in nature, concerned primarily with the implementation of certain laws and policies. As local authorities are also well aware, the law says little, if anything, about the 'best' way policies work on the ground in terms of social inclusion and equal participation. Also, the measurement, monitoring and evaluation of social issues from a qualitative perspective always presents a challenge. This is perhaps why **better standard-setting and quality in the service provision approach** might well be the most adequate one to be considered for implementation in future local practices and policy strategies falling within the umbrella of integration. Furthermore, any benchmarking needs a set of ‘indicators’ for it to function (e.g. INTI-CITIES). The indicators are used as a measuring instrument to mark a specific issue related to a policy or law, and to examine whether the latter complies with the approach set by “the ideal standard” or “the ideal city”.\(^{145}\)

Moreover, all evidence-based policy-making needs a **strong relationship with the academic community in the fields of social sciences and humanities**. There is wide agreement among the projects referred to in Section 5, that cooperation and **close partnerships** with universities and research centres are extremely important for successfully assessing and interpreting the local social situation and needs. Having access to reliable, objective and up-to-date information about access and participation in socio-economic dimensions might, however, be a difficult undertaking. Surveys and interviews might be useful to substantiate certain assessments. However, their limits should also be acknowledged. The projects call for the need to involve civil society, migrant organisations, the social partners and other key stakeholders in these sorts of information-gathering activities. In addition, while many voices have underlined the importance of having ‘good’ statistics, the ethical and human rights implications of this ‘need’ for gathering sensitive data have to be properly addressed and taken into account. To conclude, the **combination of the pivotal role of local and regional authorities in channelling ‘practical knowledge’ with academic work often results in**

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\(^{145}\) The use of indicators is not straight-forward neither from a methodological point of view. As the study states, for instance, “there might be a considerable diversity at times of identifying, classifying, selecting and constructing a list of indicators at the various levels of governance that exist in the EU. This heterogeneity increases substantially when bringing into the picture indicators developed by and for local authorities” and it continues by saying that “the question then would arise as regards the way in which these indicators would be used to conduct a qualitative and quantitative evaluation in a reliable and accurate manner”, pp. of the Report.
masterpieces for informing policy-making processes on integration at the national as well as the EU levels. Network activities such as that of CLIP (which includes six Universities and research centres across Europe) are good examples of this assertion. One of the key deficits of this and other research projects and networks, however, is that they are short-term initiatives, and in a majority of cases are dependent on an EU open call for tender, instead of constituting sustained and formalised platforms for structured dialogue with the EU.

6.3.2. Peer Review

An interesting initiative put forward by the INTI-CITIES project was that of using peer review, which is described as:

a tool for mutual learning whereby local policies, programmes and practices are evaluated by colleagues from other cities – peers who act as ‘critical friends’. Peers face similar issues, work in similar structures and with similar means. Each peer is familiar with integration issues and brings her/his own perspective and expertise to the exercise.\(^{146}\) (Emphasis added).

The INTI-CITIES project advocated that using this tool for carrying out the evaluation and monitoring of integration governance and service delivery brings about ‘better results and quality of the exercise’, primarily for the following reasons: First, as long as they are practitioners themselves dealing with similar aspects, they bring “first-hand-knowledge about the issue under evaluation”; Secondly, the authorities under evaluation are ‘more receptive’ to the questioning and recommendations of peers because they are closely attached to the local dimension's realities and practicalities; Thirdly, their impartiality brings “quality” and “credibility” to the results; Fourthly, “the recommendations will be ground to hearth and highly relevant at the practical local/regional level”, etc.\(^{147}\) The development of a European peer review mechanism might be an interesting initiative to be further explored as part of determining the role of local and regional authorities in the future formalisation of the EU Framework on Integration and in relation to ensuring better standard-setting and quality in the service provision approach highlighted above.

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\(^{146}\) P. 8 of the report.
\(^{147}\) See pp. 8 and 9 of the final report.
Part IV. Future outlook, conclusions and policy recommendations

7. Conclusions and final reflections

This report has addressed the role that the CoR and key EU networks/platforms are playing in the EU Framework on Integration. It has also identified and examined ‘tools’ resulting from experiences and the lessons of European projects involving local and regional governmental bodies from various EU Member States as well as academics. This section offers some conclusions and final thoughts arising from the assessment made in the report as whole.

Local and regional authorities and the EU Framework on Integration

The ways in which the role of local and regional authorities have been framed by the various normative measures comprising the EU Framework on Integration has experienced several transformations since 2002. We have witnessed an increasing official recognition both by the European Commission (DG JLS) and the Member States of the fundamental nature of ‘the local and regional governance dimension’ of integration policies. This recognition becomes directly visible in some of the CBPs (especially CBPs 6, 7, 9 and 10) and the ways in which the European Commission has proposed to put these principles “into practice” (Communication COM(2005)389 (See Section 3.2 of this report). The European Fund for Integration and the Strategic Guidelines adopted by the Commission have also expressly identified a number of ‘eligible actions’ relevant to local and regional authorities. They have agreed additional specific priorities where their direct involvement could be central. Nevertheless, there are two main ‘fundamental policy gaps’ currently affecting the substantive, financial and institutional structures of the EU Framework on Integration:

The first one concerns a lack of formalised involvement of local and regional authorities in the decision-making processes. The EU Framework on Integration has been mainly centred on fostering the exchange of information and policy coordination of Member States’ national integration policies and programmes in the context of the NCPs, which we reiterate are representatives of the Member States’ Ministries responsible for the integration dossier. The national/EU scenario prevailed during the period 2002-2008. While it needs to be acknowledged that
dialogue between the NCPs and representatives of local/regional authorities has taken place, and that some NCPs are even in regular dialogue with cities, through their contributions to the Handbook on Integration exercise, there is a lack of a sustainable and structured dialogue with local and regional authorities. While it is true that the European Commission (DG JLS) has since 2006 supported the activities of EU networks of municipalities and regions under what is known as the ‘Integrating Cities Process’, this has been exclusively based on available funding under what are known as ‘Community Actions’ (7%) of the EFI, and therefore very much dependent on (very competitive) open calls for proposals/tenders. An example of the vulnerability of this dependency pattern of the Integrating Cities Process on short-term projects was that during 2008 no funding was available for the organisation of the Integrating Cities annual conference. The current ‘process’ does not guarantee a solid and long-term strategy for the local and regional dimensions of integration. This, we argue, would be highly necessary in light of the potential formalisation of the EU Framework on Integration into an OMC and the possible entry into force of the Treaty of Lisbon.

The second fundamental gap relates to the way in which the EFI is working in practice in Member States’ national arenas, and here we are referring in particular to the current 93% of the Fund that goes directly to Member States’ hands through the annual distribution of resources for eligible actions. There is not at present a convincing and efficient way for the European Commission to duly ensure that this dimension of EU funding actually reaches the appropriate local and regional levels under those eligible actions and specific priorities, where they are considered to be of the utmost relevance. It falls to each Member State’s national authorities to manage the funding granted under the EFI as they see fit. It is difficult, to say the least, to have a clear picture as to the actual ways in which Member States are channelling EU money to local policies and strategies on the integration of TCNs, what ‘kind’ of policy actions are being funded and the extent to which funding these very actions is truly ‘complementary’ (or overlaps) with the European Social Fund and the European Refugee Fund. The overall consistency of national, regional and local implementation is very much at stake.

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2 Refer to Article 29 of the same Decision about ‘Responsibilities of the Member States’.
3 Recital 11 of the Council Decision 2007/435 of 25 June 2007 which says that “To ensure the consistency of the Community’s response to integration of third country nationals, actions financed under the Fund should be specific and complementary to actions financed under the ESF and the European Refugee Fund. In this context, specific joint programming arrangements to ensure the consistency of the Community’s response to integration of third country nationals through the ESF and the Fund should be developed”. See also Recital 12 of the Preamble.
public information available as regards the conclusion of the ‘partnership’ that Article 10 of Council Decision 2007/435 on the Fund called on each Member State to organise with the authorities involved in implementing the National Programmes, and the degree of involvement of regional and local authorities.

The CoR and integration

To conclude Section 4, we can highlight the following elements: A general view expressed across CoR Opinions has been the need to strengthen the role of local and regional authorities (the territorial dimension) in relation to EU policies on integration, on the basis that they hold primary responsibility for guaranteeing integration and some of them are responsible for the provision of integration measures, especially those of public service measures. The CoR has also consistently expressed concerns the need to improve cooperation between the different levels of government involved in integration and has called for a ‘multigovernance approach’. Generally, we can see how the opinions have progressively evolved from expressing concerns about ‘a lack of recognition’ and ‘a lack of consultation’ of local and regional authorities towards a lack of actual and effective involvement in the EU policy processes and structures on integration, as well as the absence of a long-term strategy. The CoR Opinions on integration have put forward several proposals to implement the role of ‘local and regional dimensions’ in practice. Among others, four can be highlighted in particular.

Firstly, the CoR has often called for ensuring “financial solidarity” with local and regional authorities in order to duly guarantee ‘the means’ deemed to be necessary for implementing integration policies at the local and regional levels. The CoR has repeatedly advocated making the European Fund for Integration's local and regional integration initiatives more appropriate and better supported.

Secondly, the Opinions have sustained the need to ensure the involvement of local and regional authorities in the various phases of policy-making (from the pre-legislative phase to policy evaluation), and has proposed to devise and develop ‘new mechanisms and methods’ for it to effectively take place. It has stressed the need to ensure that the opinion of local and regional authorities is heard at an earlier stage of the EU policy-making processes and in relation to each and every initiative in the EU Framework on Integration.

Thirdly, the CoR has also called for better use to be made of the expertise and experience of local and regional authorities (evidence-based policy-making) in
providing information and in helping to compare and identify practices and analysing the real impact of policy strategies implemented at the national level.

Fourthly, the Committee has proposed, first in 2005 and subsequently in its 2007 and 2009 opinions, that a European network of local and regional contact points equivalent to that already existing at Member States level (NCPs) be established. It also proposed that a system of networks of local and regional authorities be set up in each Member State.

**Practices, lessons and tools for local and regional authorities for ‘better’ governance in the field of integration**

On the basis of the 'state-of-the-art' practices and lessons arising from projects run by and involving European networks/platforms of local and regional authorities referred to in Section 5, as well as views expressed by other policy actors and academics, Section 6 has offered an overview of the potential ‘tools’ available for local and regional authorities to improve current institutional governance structures and the provision of public services. The set of tools has been structured around the following three overarching headings:

The first one deals with **‘better’ local and regional governance and integration policy strategies**. In this respect, several mechanisms have been proposed, some of which already exist or are being applied across the local landscape of the EU, consisting of: the adoption of local policy strategies/plans on integration, the establishment of central coordination units and specialised departments for integration, or even the creation of integration focal point agents. An additional compendium of tools relates to the promotion of inter-culturalism and diversity within the internal administrative structures and personnel policy of the local and regional authorities. It is argued that ‘better’ governance in the field of integration means developing these kinds of mechanisms from a prominent employment and social affairs perspective, and not from a narrow migration-control one. That perspective should further develop imaginative ways to improve assistance and advice to and the voluntary training of vulnerable groups. The local and regional dimensions of integration offers the potential for developing innovative policy strategies and ambitious institutional settings allowing for the emergence of new forms of participation and citizenship (*urban citizenship*), going beyond the formal legalistic status granted by the nation-state to ‘the acting individual’. It often facilitates more creative ways for individuals to become citizens as claimants of
justice, rights and responsibilities. Further, local policy strategies should allow for a large degree of flexibility and adaptability to evolving social vulnerabilities and needs, and should especially focus on guaranteeing non-discrimination and equal treatment at times of political or financial instability.

The second set of tools concerns **partnerships and networking**. A majority of ‘voices’ involved in the local and regional dimensions of integration considers that strengthening vertical and horizontal partnerships between the various levels of government at the national and EU levels should be further improved and promoted for the sake of consistency and policy coherency. Partnerships and networking between cities at European level has been also regarded as crucial to ensuring that local authorities are fully aware of, can benefit from and may exert influence over national and EU integration policies. The development of partnerships with immigrants’ organisations, civil society and social partners beyond mere consultative roles and towards ‘real representation’ in the various phases of policy-making has been also identified as ‘a practice to be promoted’. Furthermore, the provision of public services and immigration-management measures (e.g. integration courses or mandatory integration programmes) by the private sector raises a whole range of open questions and implications concerning fundamental rights and non-discrimination in need of further reflection and study.

The third main set of instruments which were presented in Section 6.3 of this report are those dealing with **evaluation techniques**, particularly benchmarking and peer review. After signalling a number of important weaknesses characterising benchmarking, we have argued that the added value of benchmarking projects such as INTI-CITIES has been to use a certain kind of methodology whose nature facilitates overcoming some of these inherent weaknesses. Indeed, this project is intended to study and promote ‘better models of integration governance’ at the local level. The focus was, therefore, on better standards and on improving the

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4 We make here reference to the theory of ‘acts of citizenship’ which is been further developed under the ENACT research project (*Enacting European Citizenship*), a project funded by the Seventh Framework Programme of DG Research of the European Commission and coordinated by the Open University. Isin and Nielsen (2008) have argued that “To investigate citizenship in a way that is irreducible to either status or practice, while still valuing this distinction, requires a focus on those acts when, regardless of status and substance, subjects constitute themselves as citizens or, better still, as those to whom the right to have rights is due. But the focus shifts from subjects as such to acts (or deeds) that produce such subjects. The difference, we suggest, is crucial”. This innovative theoretical framing of citizenship stresses the need to shift the focus from the institution of citizenship (already-held status) and the citizen as an individual agent (embedded practice) to “acts of citizenship” understood as “collective or individual deeds that rupture social-historical patterns” containing overlapping and interdependent components and shifting “established practices, status and order”. See Isin, E.F. and Greg M. Nielsen (2008), Acts of Citizenship, London: Zed books London Ltd; For more information about the project visit: [http://enacting-citizenship.eu/](http://enacting-citizenship.eu/)
quality of service provision, local policies and institutional structures. This benchmarking approach focusing on public authorities and policies, we have argued, could be the one promoted in the future EU Framework on Integration. Finally, the local and regional dimensions could play a fundamental role in the evaluation of national and EU integration policies as well as in the development of an evidence-based policy-making by bridging knowledge and experience ‘from below’ to the EU through transnational networks of local and regional governmental practitioners.

Is there, therefore, a credible EU policy strategy for the role of local and regional authorities in common integration policies? On the basis of the results of this report, the answer appears to be in the negative. We have identified key structural and policy elements missing within the EU Framework on Integration as regards the local and regional dimensions. The latter lacks a policy setting or platform where formal and informal actors representing local and regional authorities actually do play a role in current and future EU policy processes going beyond the interests of the nation-State and the European Commission (DG JLS). While it is true that these levels of governance are supposed to be represented in the CoR, and that there are also networks/platforms of local and regional authorities already working actively in this area, official recognition of their pivotal status has not materialised to the extent that would have been expected if indeed integration is considered to be predominantly a ‘local phenomenon’. The use by Member States’ governmental authorities of the principle of subsidiarity in their strategies to limit Europeanisation in this field might have paradoxically also prevented the ‘localisation’ of integration at EU level.

There are important ‘policy gaps’ as regards the involvement and partnership of local and regional bodies in the various policy instruments and venues making up the EU Framework on Integration. The local and regional dimensions could play a decisive role in channelling knowledge and experiences to the national and EU arenas as well as in the evaluation of the adequate, timely and consistent transposition/implementation of common EU policies on integration. The EU could, therefore, promote the local and regional dimensions and a ‘post-national approach’ on integration more decisively in the next phases of the EU Framework on Integration. That approach would perhaps facilitate a return to the more traditional EU regulatory understanding of the integration of TCNs as social inclusion, equal and fair treatment, security of residence and the public authorities' respect for individuals' fundamental rights. Furthermore, it should favour the common European interest, which goes beyond national opportunistic interests and short-term politics of certain governments, calling for more restrictive immigration
laws and integration policies, thus limiting those very principles of the rule of law, interculturalism and diversity, as well as fundamental rights that the EU is committed to observe and promote. In this endeavour, the role of local and regional authorities could be fundamental. The ‘localization of integration’ in the EU would also favour better governance structures and the rule of law in the implementation of common policies and EU law on immigration and integration of TCNs. Local and regional authorities are very well positioned to fill in the transposition gaps adversely affecting the EU legal system. They would help ensure that EU and national policies (and domestic administrative practices) are adequate, efficient and consistent with common goals and objectives. Finally, it is only by combining and bridging the political and advisory role of the CoR as recognised in the Treaties with the ‘sound knowledge’ and ‘down-to-earth policy experiences’ of networks of local and regional practitioners and experts/academics that the role of the local and regional dimensions will be able to achieve its full potential and benefits for the future EU Framework on Integration.

8. Policy recommendations

This section puts forward a set of policy recommendations aimed at achieving the ‘policy optimalisation’ of EU policies on integration, as well as at developing potential policy scenarios enhancing the role of ‘the local and regional dimensions’ within the EU Framework on Integration. The recommendations are structured according to the main target audiences: the European Commission, the Member States, the CoR and the local and regional authorities in light of the adoption of the Stockholm Programme by the Swedish Presidency of the EU in the second half of 2009:

- The European Commission (DG JLS) should further develop the local and regional dimensions of integration by strengthening, setting up and supporting a structured dialogue and partnership with formal and informal supranational structures of ‘local and regional authorities’ at the EU level. This is certainly most needed in the prospect of the potential entry into force of the Treaty of Lisbon and of the EU Framework on Integration potentially being formalised in a European joint coordination mechanism or an OMC, which is expected to happen under the auspices of the Spanish Presidency of the EU in 2010. The local and regional dimensions should consist of the following general and specific strategies:

Firstly, strengthening cooperation with the CoR. On the basis of the Protocol on the Cooperation Arrangements between the European Commission and the
Committee of the Regions, the European Commission could foster innovative actions in the context of ‘optional cooperation’ within the remit of the Advisory role of the CoR. This could include, for example, exploring new areas of cooperation with the CoR by carrying out targeted studies and reports on the impact of integration-related EU policy and legal instruments at the local and regional levels or downstreaming impact reports on EU policy measures to local authorities, such as for example, the EFI, the CBPs as well as the administrative practices of integration-related articles in Council Directives 2003/109 on the status of third country nationals who are long-term residents and 2003/86 on the right to family reunification.

Secondly, setting up a structured and sustainable role for networks of local and regional authorities. The ‘Integrating Cities process’ needs to become a formalised and sustainable networking and partnership process for local and regional authorities. The ‘knowledge, lessons and experiences’ emerging from the work of local practitioners, and combining these with independent academic research could be of the utmost relevance to improving the adequacy, quality and overall coherency of public policies and governance structures for ‘integration’ in an enlarged EU. The Integrating Cities process could provide a perfect venue for formalising a platform exploring innovative supranational mechanisms and tools bridging ‘the knowledge and experiences’ of ‘the local and regional dimensions’ with the different phases of decision-making processes for the integration of TCNs at the EU level.

The formalisation of that ‘process’ could lead first to the setting-up, with the cooperation of the CoR, of an EU platform of Local and Regional Authorities where the role of EU umbrella organisations/networks of cities and regions would have a direct and proactive contribution to EU initiatives, and where further ‘better’ governance and rule of law mechanisms serving the objectives of the EU Framework on Integration could be devised. The creation of such a European Platform would ideally also encourage the development of similar platforms/observatories for exchange and consultation across the national arenas of the Member State, which could be also supported by the EU. In addition to ‘bridging and channelling information’, this EU Platform could perform a crucial function in the context of policy evaluation of the EU Framework on Integration.

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5 See Protocol on the Cooperation Arrangements between the European Commission and the Committee of the Regions, Brussels, 17 November 2005. Retrievable from www.cor.europa.eu Integration is indeed a policy which “comes under regulatory or implementing powers attributed to decentralized authorities, whether regional, local or intermediary” and these policies are certainly “going to affect the operation of regional and local administration”.

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Indeed, a key issue of concern in the current phase of the EU Framework on Integration, and more generally in the common EU immigration policy, is that of the type of implementation and transposition into Member States' national legislation. The local authorities could be given the task of evaluating national implementation of EU policy measures. They could act as peer reviewers and conduct local impact assessments of social integration policies, measuring the social adequacy and consistency of national policies in the context of EU policies and law. This would not only be closely in line with the fundamentals of the principle of subsidiarity, but would also show the actual commitment by Member States to duly fulfil their obligations under the Treaties and to actually develop integration as a local process.

Thirdly, supporting the local and regional dimensions: The European Fund for Integration. The European Commission should make sure that national implementation of the EFI reaches the activities and strengthens the capacity of local and regional authorities in those areas where their role and ‘partnership’ has been considered to be a priority for the success of integration-related policy initiatives.

- **The Member States.** The principle of subsidiarity implies that integration policies are not the sole responsibility of national governments, but are fundamentally ‘local’. On the basis of this principle, the Member States should better ensure and support the close and active involvement of local and regional authorities in the various phases of policy-making as well as in the implementation and evaluation. They should not continue using the concept of subsidiarity as an excuse for holding the monopoly of ‘national’ integration policies and European strategies on integration of TCNs. On the basis of subsidiarity, regional and local authorities need to be responsible for monitoring integration policy and funding.

- **The Committee of the Regions.** The CoR should benefit more from ‘knowledge, experiences and information’, and cooperate in a more structured manner, in its internal working methods with EU networks and platforms of local and regional authorities. These networks constitute a great source of knowledge that would significantly reinforce its policy statements and recommendations put forward in the opinions. A mutually beneficial partnership dealing with the integration of TCNs should be further developed between the CoR and these networks. Furthermore, it would be advisable to set up a permanent group of key external experts and academics engaged in the local and regional dimensions of immigration, asylum and integration policies that would further sustain and inform its work.
The CoR should also further exploit its key position as an intermediary between the European Commission and other EU institutions and associations representing local and regional authorities. It could also bring more visibility to the excellent role and groundbreaking activities/results carried out by projects run by these organisations. The common action plans between the CoR and some of these organisations should be better monitored and implemented in practice. There needs to be a common ‘local and regional strategy’ guiding all the key EU actors involved (including most importantly the European networks) before the next phase of the EU Framework on Integration takes place under the next multi-annual programme on AFSJ.

The CoR could be also more ambitious in its agenda when drafting (own-initiative) Opinions that do not necessarily depend on the Commission’s policy agenda and taking a forward-looking stance before any policy decision has been already taken. Stronger partnerships with the other EU institutional actors involved with integration should be also further promoted and common interests should be found and encouraged. It is very important to establish stronger partnerships with EUROFOUND, the European Integration Forum and the EESC, the EU Fundamental Rights Agency etc. Joint projects, initiatives and strategies focusing on the local and regional dimensions of integration could be developed.

- **Strengthening the role of local and regional authorities in building the EU Framework on Integration** needs to boost a common European approach to integration where the paradigm of social inclusion and a sound provision of public services and structures take priority over the use of integration as a mandatory criterion limiting TCNs' legal channels of regular migration and access to rights. Social inclusion in the Member States depends on an understanding of integration as a right of TCNs to equality and participation rather than an obligation to abandon her/his identity(ies). As enshrined in Article 151 TEC⁶ and Article 22 of the Charter of Fundamental Rights of the EU, diversity is one of the EU’s strengths. Local and regional authorities are the first manifestation of that value and strengthening their role in the EU Framework on Integration will further guarantee and promote its relevance for Europe’s social cohesion.⁷

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⁶ Article 151.1 TEC provides that “The Community shall contribute to the flowering of the cultures of the Member States, while respecting their national and regional diversity and at the same time bringing the common cultural heritage to the fore”.

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#### Annexes

**Annex 1 - Table 1: The INTI-Cities Benchmark**

<table>
<thead>
<tr>
<th>General Governance</th>
<th>Individual Migrant Empowerment</th>
<th>Administrative Cooperation</th>
<th>Working Partnerships</th>
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</thead>
<tbody>
<tr>
<td><strong>Ambition</strong></td>
<td><strong>Leadership</strong></td>
<td><strong>Resources</strong></td>
<td><strong>Evaluation</strong></td>
</tr>
<tr>
<td>1. The municipality adopts a strategic plan for the integration of migrants, based on a needs assessment, and which serves as a blueprint for policy measures.</td>
<td>1. Migrants and migrant associations and civil society organisations are regularly consulted by the leaders and the elected members of the municipality.</td>
<td>1. Each department and company has the necessary resources to carry out its planned contribution to the strategic plan.</td>
<td>1. All partnerships between the municipality and external organisations are subject to a regular evaluation by the municipality and/or independent organisations.</td>
</tr>
<tr>
<td>2. The strategy is integrated into all relevant policy portfolios and at all stages of the policy development process.</td>
<td>2. The staff and financial resources of the permanent inter-departmental committee on migrant integration are sufficient to carry out its planned contribution to the strategic plan.</td>
<td>2. The municipality evaluates the continued representativeness of migrant associations with which it enters into a partnership, in order to guarantee quality standards and build up trust.</td>
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<td>3. An officer is appointed as the integration focal point (‘Integration Agent’) and leads the interdepartmental committee on integration.</td>
<td>3. The inter-departmental committee benefits from regular exchanges of knowledge and practices with counterparts in other national and European cities.</td>
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</tr>
<tr>
<td>General Governance</td>
<td>Individual Migrant Empowerment</td>
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<td><strong>Resources</strong></td>
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<tr>
<td>4. The Integration Agent is effective in promoting and ensuring the mainstreaming of migrant integration in the municipality’s policy work.</td>
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<td>5. The municipality adopts a strategy for liaising with regional, national and European levels of governance.</td>
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<td>6. The municipality collects specific data on migrant communities, including settlement patterns.</td>
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<td>3. As part of the evaluation, performance management mechanisms are in place that make clear the responsibilities of all parties of the partnership in delivering the programmes and progress against targets.</td>
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<td>4. The municipality and its partners individually and collectively review performance within a culture of open debate and constructive challenge with a view to improving outcomes for all citizens.</td>
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*Source: Eurocities (2009), *Benchmarking Integration Governance in European Cities: Lessons from the INTICITIES project*, retrievable from [http://www.inticities.eu](http://www.inticities.eu)*
Annex 2 - Table 2: ERLAIM Questionnaire

<table>
<thead>
<tr>
<th>Section E: ‘Regional Level: Policy Intervention’</th>
<th>Section F: ‘Regional Level – Specific Intervention Areas’</th>
<th>Section G: Regional Level – Further Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Who are the main actors involved in integration policy in your region? Please list the main European projects concerning immigration and integration implemented in the area. What are the areas of policy intervention where the partnership between public and private bodies is most systematic and fruitful? What are the areas of policy intervention where the partnership between public and private bodies is less developed? etc. Is there any experience of public-private partnership in your region that could be considered as a best practice for at least some other regions in the EU?</td>
<td>What kind of activity is carried out in your region concerning the political participation and political rights of immigrants? Is/are there any activity(ies) in your region, concerning the political participation and political rights of immigrants that could be considered as a best practice for at least some other regions in the EU? What kind of activity is carried out in your region concerning intercultural communication and understanding? Is/are there any activity(ies) in your region, concerning intercultural communication that could be considered as a best practice for at least some other regions in the EU? Is/are there any activity(ies) in your region, concerning housing for immigrants that could be considered as a best practice for at least some other regions in the EU?</td>
<td>Besides those in the areas listed in section F, are there experiences in your region that should be considered as potential best practices for at least some other regions in the EU? What are the main structural problems in the process of immigrant integration that are not adequately addressed in your region?</td>
</tr>
</tbody>
</table>

Source: retrievable from http://www.erlaim.eu
Annex 3 - Relevant Priorities developed by Decision COM(2007) 3926 in relation to Article 4

**Priority 2:** Development of indicators and evaluation methodologies to assess progress, adjust policies and measures and to facilitate the coordination of comparative learning. The Decision encourages the development of indicators and evaluation methodologies at ‘all levels of integration governance, i.e. national, regional, local and European’. This priority corresponds especially with Article 4.3 which includes the following possible actions:

- ‘Evaluation Studies and Surveys’ – Contributing to the evaluation of admission procedures or (integration) programmes and activities by supporting representative surveys among TCNs having benefited from them or among other relevant stakeholders such as local and regional authorities (Article 4.3.e),
- Developing ‘indicators and evaluation methodologies’ to review introductory/integration programmes/courses/activities, such as benchmarking, high quality monitoring tools and evaluation schemes (Article 4.3.e, f and i),
- Surveys, indicators and benchmarking to evaluate integration programmes, actions or measures destined to ‘special groups’ – Article 4.3.f.

**Priority 3:** Policy capacity-building, coordination and intercultural competence-building in the Member States across the different levels and departments of government. In this regard, the Commission considers that “strengthening the capacity of national, regional and local level is essential for the design and implementation” of integration policies. It also includes “mainstreaming” in all the relevant portfolios and “all levels of government and public services”. Finally, it also calls for the development of instruments to coordinate and exchange information and experiences among the different stakeholders. This priority corresponds in particular to Article 4.1 and some paragraphs of Article 4.3 and would include actions such as:

- Setting up Platforms of Exchange and Consultation involving local and regional authorities – Article 4.1.a, which includes facilitating the development and implementation of admission policies “by supporting consultation processes with relevant stakeholders and expert advice or information exchanges on approaches”.

80
- Training (education) of officials responsible for integration-related activities in the local/regional level on ‘intercultural competences’ and qualifications – increasing quality of procedures and service provision. Article 4.1.b says:

    Render the implementation of admission procedures more effective and accessible to third-country nationals, inter alia, by using user-friendly Communication and Information Technology, information campaigns and selection procedures.

Article 4.3a which calls for ameliorating TCNs access to public and private goods and services “by intermediary services, interpretation and translation services and by improving the staff’s intercultural capacities”, and Article 4.3.c reads as follows:

    Develop and implement intercultural training, capacity-building and diversity management, training of staff within public and private service providers, including educational institutions.

- Supporting networks of local/regional level – Article 4.3.b states:

    Build sustainable organisational structures for integration and diversity management, promote durable and sustainable participation in civil and cultural life, and develop modes of cooperation between different relevant stakeholders **enabling officials at various levels** to swiftly gain information about experiences and practice elsewhere and, where possible, to pool resources.

**Priority 4:** Exchange of experience, good practice and information on integration between the Member States. The Decision states that a priority should be to foster cooperation between regional and local authorities in the “development and implementation of integration policies” as well as involving civil society. Here, possible actions could include:

    - Joint pilot projects implemented by local and regional authorities of the Member States on the ways in which access to goods and services by TCNs and integration programmes can be improved. Article 4.2.b (“develop and improve the quality of such programmes and activities at local and regional level”). See also Article 4.2.d which says:
Increase the flexibility of such programmes and activities, in particular through part-time courses, fast-track modules, distance or E-learning systems or similar models, enabling third country nationals to complete the programmes and activities while at the same time working or studying.

- Networks of local/regional authorities – Article 3.d states the EFI can contribute to the exchange of information, ‘best practices’ and cooperation in developing, implementing, monitoring and evaluating integration policies and measures as well as existing organizational structures. It needs to be read in conjunction with Article 4.3. b and d.
Annex 4 - List of Abbreviations

AFSJ: Area of Freedom, Security and Justice
CBPs: Common Basic Principles
CLIP: Cities for Local Integration Policies for Migrants
COM: European Commission
COR: Committee of the Regions
DG JLS: Directorate General Justice, Freedom and Security
EC: European Community
ECJ: European Court of Justice
EESC: European Economic and Social Committee
EFI: European Fund for Integration
EIF: European Integration Forum
EMMI: European Modules for Migration Integration
EP: European Parliament
ERLAIM: European Regional and Local Authorities for the Integration of Migrants
EU: European Union
EUROFOUND: European Foundation for the Improvement of Living and Working Conditions
INTI-CITIES: Benchmarking Integration Governance in European Cities
MPG: Migration Policy Group
NAPs: National Action Plans
NCPI: National Contact Points on Integration
NGO: Non-Governmental Organisation
OMC: Open Method of Coordination
TCNs: Third Country Nationals
TEC: Treaty establishing the European Community
TEU: Treaty on European Union
TFEU: Treaty on the Functioning of the European Union

Source: Eurocities (2009), Benchmarking Integration Governance in European Cities: Lessons from the INTI-CITIES project, retrievable from http://www.inticities.eu