HEINRICH BÖLL STIFTUNG
DEMOCRACY

E-PAPER

Policy Paper

A Local Turn for European Refugee Politics

Recommendations for Strengthening Municipalities and Local Communities in refugee and asylum policy of the EU

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Published by the Heinrich Böll Foundation, March 2019

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Contents

Foreword 3

Summary 5

1 Introduction 9

2 The status quo: municipalities in European migration policy 12

2.1 Municipal self-perception – from integration policy to migration policy 12

2.2 Institutions and instruments for the involvement of municipalities in European migration policy 16

2.3 Transnational networks and municipal representation of interests 18

2.4 Financial deficits 20

2.5 Structural deficits: the partnership principle as unused potential 24

2.6 Recommendations for action: Key stumbling blocks on the way to an improved integration of municipalities 25

3 What is to be done – recommendations for action for a better involvement of the municipalities in EU refugee and asylum policy 27

3.1 Reform EU funds 27

3.2 Give the municipalities a greater say 29

3.3 Introduce a municipal relocation mechanism 30

4 Closing remarks 39

List of abbreviations 41

List of references 42

The authors 50

Foreword

The European Union's refugee and asylum policy has reached an impasse. The reception of persons seeking protection from the crisis regions in Europe's surrounding areas is distributed unfairly. Some states refuse to take in any refugees at all, while others are struggling to cope with a large number of refugees as a result of regulations such as the Dublin regulation. The attitudes of the population in the receiving countries are polarised. This impedes coherent political measures on both a national and European level. It is interesting that it is in those places which are shouldering the largest burden of the integration that particular migration and integration policy strategies can be seen, namely in the municipalities throughout Europe. For this reason, new strategies in EU asylum and refugee policy, which will remove the blockades, should start right there. However, besides the European and national levels, until now municipalities have hardly had a say when it comes to migration issues.

In this policy paper «A Local Turn for European Refugee Politics:
Recommendations for Strengthening Municipalities and Local Communities in refugee and asylum policy of the EU», the Heinrich-Böll-Stiftung puts forward proposals for a more active role of the municipalities in refugee and asylum policy.

The proposals focus on refugees and migrants who are already in Europe and have good prospects of remaining. They are aimed at eliminating the financial and structural disadvantages experienced by the municipalities when it comes to receiving persons seeking protection, and to make use of their abundantly available potential by giving them a greater say and involving them to a greater extent. Specifically, it will be demonstrated just what giving the municipalities a greater say could look like in respect of a humanitarian reception policy aimed at protecting refugees. Thus, the authors recommend that the municipalities are granted a more simple and compact access to EU funds, that they are given a say on the allocation of EU funds and that access to EU funding is organised in such a way that it is free of hurdles also for smaller or financially weak municipalities. Further, the communication channels between the municipal and European levels should be improved and European arbitration bodies should be established to deal with conflicts between municipalities and national governments.

At the core of the recommendations is a mechanism which considers both those seeking protection and the receiving municipalities and their preferences, and which involves local support groups. Such a matching process which takes into account the needs and integration requirements of persons seeking protection as well as the receiving municipalities combines long-term integration prospects with regional development strategies. The systematic involvement of support groups would not only enhance the prospects of successful integration and increase the social capital of the refugees, but also strengthen the acceptance of their reception and social cohesion locally. In particular, however, such a

mechanism regulates migration into the municipalities as a municipal decision so as to provide the citizens with their own scope for action at a local level. So far, the national governments (and in Germany also the Länder) have been instrumental when it comes to decisions on the reception and distribution of persons in need of protection. Granting the municipalities flexibility in respect of the reception of persons seeking protection so as to enable them to individually prepare in advance for their reception together with support groups from the local civil society and businesses, and providing them with the financial means necessary to ensure that the reception is not to the detriment of other municipal public welfare functions – such municipal participation could once again boost confidence in local autonomy and in the political system as a whole. It would also contribute towards an objectification of the debate and thereby provide new impetus to the discussion on refuge and asylum throughout Europe. As such, the proposed mechanism, which initially refers to the current legal framework for the relocation of recognised refugees in the country of initial reception, also demonstrates potential for other forms of reception of persons seeking protection (e.g. resettlement).

The voices of the municipalities themselves are becoming ever louder. They are demanding a greater say and are networking to make themselves heard. City networks such as EUROCITIES und Solidarity Cities are evidence of this. Their ventures and ideas for a restructuring of the reception policy and procedures should be listened to if the principle of subsidiarity and consequently democratic participation and local autonomy are to be taken seriously. This policy paper takes up the available potential, incorporates the experiences gleaned from model projects, and from them develops valid recommendations. With these proposals, the Heinrich-Böll-Stiftung provides constructive input on the so urgently necessary restructuring of European asylum and refugee policy. It is important to act now!

We would like to express our gratitude to the authors, Prof. Dr. Petra Bendel, Prof. Dr. Hannes Schammann, Dipl. pol. Christiane Heimann and Janina Stürner M.A.. We would also like to thank the many experts from business, politics and academia who have shared their experiences and expertise with the authors.

Berlin, March 2019

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Summary

The European Union's migration and asylum policy is in deep crisis. Initiatives by individual nation states are the order of the day. A common «area of freedom, security and justice» is still only a distant prospect. In search of new ideas to stop this trend it has increasingly been suggested that the competences of cities and municipalities when it comes to the reception of refugees should be strengthened.At the same time, the EU Commission is promoting the involvement of the municipal level in various policy areas with a range of activities such as the «Urban Agenda for the EU». Ultimately it is the municipalities themselves which, despite a lack of legal competences, are speaking out more clearly on questions of migration policy. In recent years they have coped with the accommodation and care of refugees, despite facing a number of challenges. Now they want to have a say when it comes to the opening or closing of borders and the reception of persons seeking protection. City networks such as Solidarity Cities bear witness to this self-confidence, as do the offers by the mayors of Naples, Barcelona, Bonn and numerous other municipalities to take in the passengers of rescue ships. This initiative failed, however, largely due to the national governments. The municipalities still appear to be in too weak a position institutionally to effectively help shape EU asylum policy. There are still no coherent strategies which are both innovative and feasible.

This is the starting point for this paper. It demonstrates the financial and structural deficits of the municipalities in respect of asylum and refugee policy and develops specific ideas as to how municipalities can be strengthened sustainably, and their potential be used for the further development of a common European asylum system. Municipalities should, for example, be given improved access to EU funds and a say in the reception of persons seeking protection. At the same time, the right to self-determination of and suggestions put forward by persons in need of protection should be taken seriously: secondary movements can only be reduced significantly if refugees are able to participate in the choice of place of residence.

The proposals connect promising approaches from the professional discourse in politics and academia and take them further. Gesine Schwan was a particularly prominent advocate of the call for municipalities to be strengthened as independent actors with an EU fund in EU refugee policy. This and similar demands have recently been taken up by France's president, Emmanuel Macron as well as by Green Party MPs, for example Franziska Brantner. The recommendations have been debated with experts from both researchers and politicians from different political fields. They can be adapted to the structures and processes in the respective member state and implemented in accordance with national policy. The scope of the proposals is based mainly on political feasibility and practicability. The proposals can be divided into three groups: the organisation of European funds, the strengthening of multi-level governance and the development of a municipal relocation mechanism.

The recommendations at a glance:

A. Financially strengthen municipalities by granting unhindered access to EU funds

A.1 *Existing EU funds will be better coordinated. Municipalities can submit* **a single application with a coherent package of measures**, *which is then financed from different funds (for details see page 27).*

A.2 **The co-financing** *of EU projects will be simplified. Municipalities can combine EU funds with other subsidies from, for example, the European Investment Bank. This will better address the needs of cities and communities with little financial means of their own (for details see page 28).*

A.3 *The* **access to subsidies** *will be simplified. National* **one-stop shops** *support municipalities in the submission and processing of applications. Contact persons are clearly designated, deadlines are communicated transparently. This means that also smaller municipalities without any specific EU expertise can benefit more from EU funding (for details see page 28).*

A.4 *Municipalities can* **apply directly for flexible immediate aid from the EU** *without having to go via the nation states, in particular for emergency aid from the Asylum, Migration and Integration Fund. In this way, needs can finally be met quickly and without complication (for details see page 29).*

B. Give the municipalities a greater say

B.1 *In order to to give the municipalities a greater say and enable a better coordination between the levels, the existing* **partnership principle will be strengthened**. *This already gives municipalities and other «partners» more authority to have a say when it comes to EU funds. However, up to now these possibilities have not been fully implemented. The development of new standards should lead to improvements in this respect (for details see page 29).*

B.2 *The European Commission will establish a* **mediation body to deal with disputes between municipalities and national authorities** *concerning the national development of migration policy funding programmes (for details see page 30).*

C. Introduction of a municipal relocation mechanism

C.1 *A new* **municipal relocation mechanism** *takes the needs of municipalities and those seeking protection seriously. To this end, a matching process is proposed, which guarantees human rights standards and takes individual preferences into consideration. In this way, local integration processes are promoted, and secondary movement is reduced (for details see page 30).*

Most of these proposals are relatively easy to implement yet promise to have a large impact. It is certainly the municipal relocation mechanism that goes furthest.
If municipalities are really to be taken seriously when it comes to their competences in respect of refugee policy and strengthened sustainably, it is not sufficient to stop at the reforming of existing instruments. Municipalities with their often highly committed civil society actors need to be directly and actively involved in the reception and relocation of refugees. In doing so they must be given the opportunity to have their locally very different circumstances taken into account when decisions on reception are being made. The same applies to the persons seeking protection themselves.

How does the relocation mechanism work?

The relocation mechanism is based on municipally organised support groups inspired by experiences from privately sponsored resettlement and ideas from political initiatives, for example the Humboldt-Viadrina Governance Platform. **The most important instrument is an algorithm-based matching process** in which both municipalities and refugees have a say and come together without economic interests dominating. To this end, **municipalities** provide information on structural data and integration possibilities (e.g. labour market, education, housing, possibilities for the support of particularly vulnerable persons). **Persons seeking protection** indicate their individual integration requirements (e.g. education, professional competences, previous stays or employment relationships, language skills, family relations, points of contact to diaspora communities, particular needs of vulnerable groups) as well as their expectations and wishes (e.g. rural or urban living environment, public transport, leisure activities). By comparing these with the municipal integration profiles, the person seeking protection will be given **a selection of suitable municipalities**, from which he or she can indicate preferences. Based on these preferences and the availability of places, in a second step in the matching process a municipality will be selected. The **vulnerability** of persons seeking protection is particularly relevant here. In a final step, municipal support groups and persons seeking protection consider the final selection. **Once both sides are in agreement**, the relocation takes place.

Why do we need a relocation mechanism?

With this process, municipalities are given the possibility to play an active role in organising the reception of refugees and individually prepare for the reception and participation of specific persons. In this way, the influx into the municipalities is **more structured** and is perceived as the municipality's own decision. The experience of municipal «sovereignty» can boost confidence in the political and administrative systems both locally and on the levels above. The **positive attitude of the population** towards the granting of protection can also be strengthened in this way. A matching process that takes the needs and integration requirements of both those seeking protection and the receiving municipalities into

consideration can also introduce **long-term integration prospects** and regional development strategies into the relocation process. Finally, the involvement of local support groups increases the social capital of the refugees and improves social **cohesion locally**. As such, the proposed mechanism enhances the scope to act of both municipal decision-makers and refugees. A detailed outline of the mechanism, reflections on financial issues and the possibilities for integration with existing programmes as well as a discussion of potential points of criticism can be found in chapter 3.

Going beyond the specific proposals, this paper therefore intends to send out a **clear signal that cooperation between the political levels needs to be improved**. The recommendations can help to rethink migration policy at the EU level. It is about time that the municipalities become seriously involved in national and EU asylum and refugee policy. They are all set to do so! The EU must not allow this opportunity to pass.

1 Introduction[1]

Cities and communities have always been the destination of migration movements.[2] It is therefore in their very own interest to have a say in how immigration is regulated, and the coexistence of a diverse society can be politically organised. For a long time, both in local political practice and in research into municipal migration policy, the focus was exclusively on questions of integration and not on shaping immigration (Penninx and Garcés-Mascaenas 2018, pp. 838, 846). According to the widely-held assumption, the municipalities have neither the competence nor the ambition to contest the state's sovereign rights in this respect. However, more recent research shows that this assumption is only partly true: cities and municipalities do have room for manoeuvre when it comes to migration policy. They consciously increasingly make use of it and in some cases even oppose migration policy decisions taken by their nation states.

Time and again municipalities fill gaps that have been left by national legislation (Eule 2014, Schammann 2015, Schammann and Kühn 2017) or step in where institutional action on other political levels is temporarily overburdened (Ambrosini and Van der Leun 2015). Mostly, however, such actions and competences of the municipalities are hardly

1 This policy paper is closely linked to the research project «When Mayors Make Migration Policy,» which the authors are conducting between 2018 and 2021 with the support of the Mercator foundation. The authors would like to thank the following academics and experts for their comments on the manuscript: Yasemin Bekyol, Alia Fakhry, Dirk Gebhardt, Andrew Geddes, Felicitas Hillmann, Marek Hojsik, Sabina Kekic, Florian Knape, Sue Lukes, Carlos Mascarell Vilar, Agnese Papadia, Gemma Pinyol, Jan Schneider, Salvatore Sofia, Alexander Wolffhardt as well as Ska Keller, Franziska Brantner and Luise Amtsberg and the commentators of our expert discussions at the Heinrich-Böll-Stiftung in Berlin in February 2019: David Kipp, Gesine Schwan, Malisa Zobel, Miriam Koch andFranziska Brantner. Responsibility for any remaining errors and contentious theses lies, of course, with the authors.

2 The term «migration» is used as a generic term when flight and refugees are not being dealt with specifically. Indeed, it is often difficult to differentiate between the migration motives of refugees and migrants (cf. Angenendt/Bendel 2017): besides recognised reasons for fleeing, many migrants leave their homes involuntarily («forced migration»); negative migration reasons such as environmental and climate changes, however, are, just like poverty, not seen as reasons for being guaranteed refugee status. These migrants must also often rely on smugglers as there are hardly any legal immigration channels into the countries of the global North and these (often for domestic policy reasons) are becoming scarcer. However, only those persons who can prove that they are being persecuted in their state of origin or are having to flee from violent conflict enjoy international protection, whereas the decision as to whether other migrants will be admitted is a matter for the receiving state. The current Global Compacts - the Global Compact for Migration approved on 10th December 2018 and the Global Compact on refugees approved on 17th December 2018 - maintain the distinction between flight and migration. Both, however, seek to reduce negative migration reasons, to support the countries of initial reception, to improve international responsibility in times of increased numbers of refugees and ultimately to grant migrants and refugees the rights that they are entitled to under international law.

appreciated on the national and international level (Acuto and Rayner 2016, p. 1149). Nevertheless, the European Commission is well aware of this commitment.

Already in 2015, Federica Mogherini, High Representative of the European Union for Common Foreign and Security Policy, spoke of an emerging «city diplomacy» in migration policy. Even on the global level, the Global Compact for a Safe, Orderly and Regular Migration and in particular the Global Compact on Refugees, which were adopted at the end of 2018, recommend the strengthening of the municipal level: the global compact on refugees seeks to guarantee that refugees are supported in their independence and resilience. The pact explicitly also mentions the supporting of receiving communities, in particular the municipalities, but further the humanitarian organisations and local economic players.

The demands from the municipalities for a widening of the scope to act on the local level is ultimately due to the lack of a willingness on the part of the European Member States to compromise on a Common European Asylum System (CEAS). Many municipalities are becoming active in migration policy because they feel that the national government is not supporting them sufficiently or even that they have been abandoned (Boni 2016). For this reason, they are increasingly looking for solidarity with the supranational institutions of the EU from which they hope to receive financial support as well as non-material, migration policy impetus so that the national governments will make commitments to consider local needs. Municipalities want, therefore, to demonstrate their expertise in immigration policy but also to have a say when it comes to the governance and reception of migrants and refugees.

How can the potential at the municipal level be better utilised? How can municipalities be better integrated financially as well as structurally in EU refugee policy? How can the distribution of persons seeking protection be put on a more sustainable footing with the involvement of the municipalities? How can European funds be better coordinated to meet the needs of the municipalities and become more easily accessible to them? How can the municipalities be more actively involved in organising the reception of those seeking protection? This policy paper provides initial answers to these questions. It has also identified stumbling blocks and compiled promising proposals for solutions, some of which have been publicly discussed in professional circles for a long time. The paper does not therefore intend to put forward completely new proposals, but rather to take the approaches of

various authors a bit further and combine them to create a coherent, feasible, complete strategy.[3]

3 It is possible in part to determine the origin of the proposals. Some of them, however, appear in different places and with different participants at almost the same time. Sometimes we became aware of the proposals through publications, sometimes only through contact with networks and authors from practice and research. Sometimes ideas were developed during conversations. This shows just how dynamic this field is at the time of publication and that this paper is just another element in the development of viable solutions for a functioning EU refugee policy. It also shows that many participants are currently working on political solutions on levels which seek to overcome the current deadlock on the level of the EU Member States.

2 The status quo: municipalities in European migration policy

2.1 Municipal self-perception – from integration policy to migration policy

How much scope municipalities have when it comes to organising integration and migration varies from state to state. Significant influencing factors are, for example, the respective state's organisation (federal state vs centralised state), the autonomy and distribution of competences across the various political levels and the access to financial resources (Humphris 2014, p. 5; Caponio and Borkert 2010, p. 166). However, also individual and structural differences between municipalities can play an important role. These include local decision-making structures, the socio-economic situation, rurality and settlement structure, the «history of migration» locally, or the more or less intentionally created «branding» of a city (Caponio 2010, p. 189; Dekker et al. 2015, p. 653). However different municipalities might be, it can nevertheless be seen that the local level in all EU Member States contributes significantly towards the shaping of local migration policy reality (Caponio 2010, p. 187).

This is, inter alia, due to the delayed development of national integration policies. Since for a long time many European states did not consider themselves as immigration countries despite immigration actually taking place; up until the turn of the century integration strategies had only been developed in very few cases on the nation state level. Sweden and the Netherlands were the exception. The municipalities there benefited from this development of national integration policy. In most other EU Member States on the other hand, the national level did not want or was unable to make decisions despite the fact that at the local level integration measures were desperately required. The consequence of this was that the municipalities were effectively pushed into a pioneering role. Whether or not they took on this role depended on how many migrants lived within them and how professionally the municipal administration was able to deal with the issue. It is no wonder therefore that particularly big cities characterised by multi-ethnicity are the pioneers of municipal integration policy, among others Berlin and Frankfurt in Germany, Birmingham in the United Kingdom, Vienna in Austria or Zurich, Bern und Basel in Switzerland (Penninx et al. 2014, pp. 26 – 27). A number of medium-sized cities also already have integration models (SVR 2018; DIFU 2018). For example, the competition *Kommunen Hand in Hand - Vielfalt gestalten* which was initiated in 2017 by the Federal Ministry of the Interior in Germany revealed the enormous range of activities and innovations also in the smaller municipalities (BMI 2018) – at least in a federally organised state. Since the beginning of the century when most nation states started to concern themselves more actively with immigration and integration policy, the relationship between the national and local levels has become more complex (Penninx and Garcés-Mascaenas 2018, p. 839). Developed local approaches

increasingly came up against national and regional stipulations. This resulted in a noticeably complex jungle of competences and measures and also in conflicts between the levels: in practice, both can be observed – municipalities that have adopted more inclusive positions than their respective national governments but also some that have adopted more restrictive positions (Caponio 2014, p. 17). Of course, there is much to suggest that municipalities are more likely to prefer inclusive, pragmatic and community-oriented solutions than nation states as they have to have bear in mind the social cohesion of the local population (Penninx and Garcés-Mascaenas 2018, p. 838; Barber 2014, S. 102, Ambrosini and van der Leun 2015).

Municipalities also operate in numerous areas that go beyond the typical integration activities. For example, many European cities themselves offer legal advice and provide information on the asylum process, residence permits, family reunification and voluntary return through non-government organisations and migrants' organisations (European Foundation for Democracy 2018, p. 27; Penninx and Garcés-Mascaenas 2018, p. 855; Caponio 2010, p. 176). Following the significant increase in refugee migration in 2015 and 2016, in many municipalities civic organisations were revived, which until then had worked on different integration policies, but were now increasingly also involved in urban planning processes. Numerous welcome initiatives emerged and promoted networking under the slogans «solidarity cities» or «refugees welcome», partly by recourse to US initiatives such as «Protection Cities» (Bauder and Gonzales 2018; Rast and Ghorashi 2018; Fleischmann and Steinhilper 2017; Togral Koca 2016).

Municipal commitment in respect of irregular migrants and failed asylum-seekers is a particularly sensitive topic. Whilst until recently EU Member States adopted the position that these groups of people had to return to their home countries as long as there were no legal or factual reasons to the contrary, a statement by EUROCITIES in 2015, for example, shows that in practice this has not always been enforced. The European city network made it known that excluding these people from public services was not only highly questionable from a human rights point of view, but also that it had negative consequences for social cohesion and the healthcare system (EUROCITIES 2015, p. 1). Similar arguments come from the *Katholisches Forum* «Living illegally (*Leben in der Illegalität*)», which documents the wide-ranging efforts of the cities (Katholisches Forum 2016). In Utrecht, Amsterdam and other Dutch cities, the city's administration provided money to support failed asylum seekers through the «bed, bath and bread» programme – an initiative which is also commended by the «Cities of Migration» (Cities of Migration 2018; City of Amsterdam 2018).

Some municipalities go even further than organising what happens locally by attempting to influence national and international policy by way of public comment. For example, the refusal by Turin to exclude children without a regular residence status from kindergartens led to a national debate and a reinterpretation of the Italian legislation (Delvino 2017, p. 13). On an international level, in 2014 the first «Global Mayoral Forum on Mobility,

Migration and Development» called for a reduction in the exclusion of irregular migrants (ibid. p. 16; GMFMMD 2014).

It is not just when dealing with irregular migration that the European municipalities are demanding a greater say. The initiative «Solidarity Cities» emerged in 2015 from the city network EUROCITIES which is (just like the «Save-Me» campaign on resettlement in Germany before it) among other things committed to ensuring that European cities offer more places for the relocation of asylum seekers from Greece and Italy (Solidarity Cities 2015). **Cities are also publicly calling on the EU and its Member States to reform the Dublin system and to actively involve the municipalities in decision-making on resettlement quotas and financial support as well as on strategies for return programmes** (EUROCITIES 2015, pp. 2–4).

Indeed, the increasingly active role of municipalities is being fostered by the standstill or even backward steps when it comes to the reception of refugees in many EU states and the cooperation between them: when the compulsory relocation of asylum seekers from Greece and Italy came to an end in September 2017, the European Commission called on the Member States to continue to enable relocation from these countries and promised financial support for this (European Commission 2017, p. 1). Furthermore, the Commission presented a permanent relocation mechanism in its proposal for a reform of the Dublin system. These proposals are currently still being debated in the Council and the Parliament. Already in 2015, a number of Council members had expressed concerns about potential secondary movement from one Member State to another (European Parliament 2018). In light of the very different interests in the Council, consensus on the question of solidarity and shared responsibility among the Member States, even mindful of stricter rules on secondary movement, should not be expected in the near future (Bendel 2018). Municipal action is taking place here once again in accordance with the much-quoted statement «nations talk, cities act» (Curtis 2014, p. 1).

Recently it can, however, be observed that municipalities are no longer just acting in silence but are increasingly intervening in migrant policy debates. When it comes to political declarations of intent regarding the reception and relocation of refugees, they are adopting a more confident position despite not having the legal competences (Colini 2018). As such, in 2016 the city council of Osnabrück in Germany welcomed and supported the civic initiative «50 from Idomeni» (Refugee Council Lower Saxony 2015). In 2016 Barcelona and Athens signed an agreement in which the Catalonian city agreed to take in 100 refugees from Greece. The offer was, however, later blocked at the national level as through this agreement municipalities had overstepped their competences (Sanahuja 2016). Such references to municipal jurisdiction are legally correct but have so far not led to municipalities keeping out of the discussion. When the rescue ship «Lifeline» was looking for a safe haven for 234 people in the summer of 2018, cities such as Naples, Barcelona, Berlin, Kiel and Bonn offered refuge. In an open letter to the German chancellor, the mayors of the cities of Bonn, Cologne and Düsseldorf called for sea rescue operations in the Mediterranean to be

permitted again and promised to support the reception of those rescued (Geisel; Reker; Sridharan 2018).

All of these developments suggest that particularly larger European cities consider themselves less and less to be merely the national governments' implementing agencies for integration. Instead they increasingly appear as independently acting participants in migration policy with a comprehensive agenda which also concerns the conditions for entry. More and more frequently there are considerations as to whether and how cities and municipalities can gain a greater influence on EU refugee policy and possibly even be in the position to «revitalise Europe from the bottom up» as formulated by Gesine Schwan's Humboldt-Viadrina Governance Platform (2017). Instead of just looking on as the commitment of the municipalities continues to be blocked by the respective nation states with reference to their lack of legal competence, the EU could make use of this to overcome the European solidarity crisis concerning the reception and integration of refugees. The local level can contribute towards a softening of the hardened fronts between the nation states. Municipalities within a nation state are faced with various migration policy challenges which can be explained less as being due to the nation state and more as a result of geographic and demographic circumstances. Thus, rural areas are affected more by emigration, metropolises have to deal more with labour migration and cities on external EU borders are concerned more about forced migration and illegal immigration. Individual support for the municipalities by the EU can therefore help to adequately address the different needs at a local level, needs which can often not be met fully at a national level. In this way, the nation states can be supported in the implementation of a differentiated migration and integration policy.

The idea of strengthening the municipal level is not a new one. It has been discussed in both research and practical European politics for more than 15 years: in order to better cope with the challenges of migration and flight, since 2003 instruments have already been developed with the aim of involving the cities and regions more in the political decision-making of the European multi-level system of governance (Caponio and Borkert 2010): in 2004 the European Commission introduced the so-called systematic dialogue with local government organisations, which encompassed several political fields. Regional and local authorities were given more possibilities to express their views on European policies through European and national associations before EU directives and regulations are passed so as to improve interactions and transparency in the European multi-level system of governance (European Commission 2001; Niederhafner 2007). The following sections illustrate the possibilities for municipalities to participate in EU migration policy processes: institutions and participation formats, EU funds and city networks. It will, however, also be demonstrated where the limits to cooperation between the political levels lie.

2.2 Institutions and instruments for the involvement of municipalities in European migration policy

Already today, municipalities are involved in many different ways in the shaping of European integration and migration policy. Various EU institutions and bodies are advised by representatives from the municipalities and regularly exchange views with them. In this way, the EU level gains an insight into the actual implementation of asylum and migration policy at the local level in the Member States and local representatives have the possibility to have their concerns heard.

Thus, cities and municipalities are an important source of information for the **European Commission** when elaborating its proposals. In more informal groups and consultations, municipalities can set agendas. Their input is an important source of legitimacy for the Commission, which is often confronted with the allegation that it is too far removed from the real world. Since the European Commission has the sole right of initiative when it comes to EU legislation, besides the European Committee of the Regions (CoR, see below) it is the most important addressee for the concerns of city networks and regional organisations. However, the Commission has only very limited scope to act on matters of integration policy pursuant to the Treaty on the Functioning of the European Union (Art. 79 (4)) (Bendel 2010; Borkowski and Bendel 2016). The cooperation between the stakeholders at the local level and the Commission serves not only the development of new strategies and regulations but should also make the process of implementing European regulations more efficient. The Commission therefore passes on information on new statutes, regulations and directives to the municipalities. In addition, the Commission can engage the local actors for evaluation purposes so as to determine whether and how EU provisions are being implemented (Niederhafner 2007).

This type of cooperation between the Commission and local actors in the Member States can become more successful; local participants' resources can be better used for guidance on and the implementation and monitoring of EU provisions, which is why in 2016 the **«Urban Agenda for the EU»** was adopted in the Pact of Amsterdam. The Urban Agenda is a new work method with which the cooperation between Member States, cities, the European Commission and other stakeholders should be improved, and new challenges identified (European Commission 2018f). Within the scope of the urban agenda, the **«Partnership on Inclusion of Migrants and Refugees»** was established, which developed an action plan in 2016. The Action Plan includes the areas accommodation, community building and reception, education and employment as well as cross-sectoral topics for groups from third states in need of protection. In 2017 the Partnership started by analysing deficits and potential, in 2018 it identified stakeholders in order to implement the Action Plan, and finally it carried out an evaluation of the results (EU Partnership Inclusion 2018a). In this way, local actors, Member States and the European Commission can develop and evaluate common strategies and methods for integration.

Aa one of the key measures in the EU Action Plan from 2016, the Network of National Contact Points on Integration, established in 2003, was fundamentally reformed and re-established as the **European Integration Network (EIN)**. The EIN consists of representatives of the national governments, usually those responsible for integration and migration. They are sent from all EU Member states as well as from Iceland and Norway and are usually responsible for the planning and implementation of EU financing options such as, for example, the Asylum, Migration and Integration Fund (AMIF) in their respective Member States. The network consults with the European Commission on current developments and the political agenda on integration matters. A regular exchange of information and experiences in the Member States took place from 2003 onwards in the Network of National Contact Points on Integration. With the EIN, the European Commission aims to expand its coordinating role in the area of integration and to specifically support the interaction between Member States on questions of integration (DG/HOME 2018).

Within the structures of the EU, the **European Parliament** generally maintains less direct contact with local participants than the Commission. However, in order to adequately represent the voters in their respective constituencies, the MEPs must consider local needs. For this, inter alia the **«URBAN Intergroup»** of the European Parliament was established, a non-party and cross-committee group which debates city-relevant topics taking a horizontal approach. It consists of 89 members of the European Parliament. It also works together with 118 partners on the local, regional, national and European level, which represent the interests of the European municipalities in the relevant area of urban development (URBAN Intergroup 2018). Their goal is to involve many and diverse participants and thereby achieve legitimation. It has proved difficult, however, to reach consensus on specific positions (Niederhafner 2007). On the topic of migration und integration, the URBAN Intergroup organised the conference «How Europe's towns and cities can address current refugee crises?» in 2016 together with the European Investment Bank (EIB) in the Brussels office of the EIB (DG/HOME 2016).

Compared to the Commission and Parliament, for structural reasons the **Council of the European Union** has the least direct contact with local representatives. It consists of government representatives of the Member States and is only occasionally an addressee for transnational city or regional associations. Influence is mostly exerted at the national level, whereby local associations mobilise their members to gain a grip on political decisions and actions of the national government. This can, in turn, determine the position of the government representatives at the EU level, whereby city and regional associations can be indirectly represented on specific topics in the European Council through the multi-level system (Niederhafner 2007, p. 183).

Besides the organs of the EU, there are also EU advisory bodies which are tasked with representing the interests of local and regional participants in the area of migration and integration. These include the **European Committee of the Regions (CoR)**, which consists of 350 locally and regionally elected representatives from all Member States. As such, the

Committee of the Regions represents regional and local stakeholders from all Member States. This means that the composition of the Committee of the Regions is particularly heterogeneous, and it is therefore difficult to achieve common municipal positions. Nevertheless, notably in the area of migration and integration the CoR has elaborated critical statements and recommendations. In 2015, for example, it issued a statement on the European Migration Agenda and has since then issued statements on the reform of the Common European Asylum System (CEAS), legal immigration and the integration of migrants. Furthermore, it has, inter alia, made recommendations for combatting radicalisation (European Committee of the Regions 2018).

Another EU advisory body is the **European Economic and Social Committee (EESC)**. In January 2015, the EESC introduced the **European Migration Forum (EMF)** in cooperation with the European Commission. The EMF became the successor of the European Integration Forum in order to provide a platform for interaction between the civil population and the EU institutions on the topics of migration, asylum and the integration of citizens of third states. Every year representatives from civic organisations, local and regional authorities, the Member States and the EU institutions meet together. The goal of the EMF is to coordinate the most important participants and connect the different levels (European Economic and Social Committee 2018).

2.3 Transnational networks and municipal representation of interests

After 2003, not only more participation formats for municipalities, but also city networks emerged. These are intended to facilitate and strengthen the cooperation between the cities but also with other levels and participant groups. Today there are more than 200 of these networks, this number having increased significantly since the 1980s; 43 percent of the networks were only founded between 2004 and 2014 (Acuto et al. 2017, p. 15 et seq.). City networks are active in a whole range of different global fields such as environmental and climate protection, poverty and the promotion of peace (Acuto and Rayner 2016, p. 1153). Although in particular larger cities are increasingly organised on the European level, only very few of these networks seem to have managed to establish themselves permanently and become capable of acting collectively. This may be due to the non-binding nature of the associations meaning that common goals are difficult to pursue in the long-term and the fact that no clear mandate exists to represent interests when dealing with EU institutions (Niederhafner 2007). A recurring problem is the often lacking democratic legitimation of the representatives as they are usually not elected, neither do (can) they carry out their work full-time. Two networks stand out, however, when it comes to the local representation of interests on migration and integration: in particular the Council of European Municipalities and Regions (CEMR) and EUROCITIES with its sub-network Solidarity Cities play a prominent role.

The **Council of European Municipalities and Regions (CEMR)** was founded by mayors on their own initiative on the basis of city partnerships. It represents the various interests of the national and local associations and parties in and between the different Member States. The CEMR has a high degree of democratic legitimacy due to the fact that its members are appointed. This also ensures that it is most definately recognised by central EU institutions as an important contact and is able to audibly state the interests of European municipalities accordingly. Additionally, the CEMR has good connections to the national governments of the Member States via its members with their roots in the nation states (Niederhafner 2007, pp. 183–184). In this way, it can in principle also coordinate the representation of the interests of the municipalities and regions interests in the European Council. However, it also represents a large number of different interests and regions, which makes it difficult to achieve a common position, in particular when it comes to politically controversial questions. It is therefore all the more remarkable that the CEMR has drafted a series of common migration policy positions and set up active working groups on the topic. As priorities in their work, in 2016, for example, the CEMR **Taskforce Migration** demanded financial resources for cities and regions, the development of accommodation for refugees and migrants and the greater involvement of the local level.

The second important organisation for the representation of municipal interests in EU migration policy is **EUROCITIES**. The network consists of around 140 large European cities. Small cities and rural regions are not included. EUROCITIES was founded on the self-initiative of a number of cities and has become a strong player on the EU level. The network lacks the broad democratic legitimation of the CEMR but is characterised by a high degree of flexibility (Niederhafner 2007, p. 173 et seq.). EUROCITIES can therefore develop positions on specific topics and act as a common mouthpiece for the large, often economically strong European cities. The EUROCITIES network **Working Group on Migration and Integration** is working towards a greater recognition of the key role of city and municipal authorities in the integration of migrants in the EU multi-level system. The working group is able to profit from its wealth of experience from the cities. The working group has supported the European Commission in creating a database of best practice for integration policy. In addition, since 2007 the working group has been managing projects on migration and integration in cities such as INTI-Cities, MIXITIES and since 2012 ImpleMentoring, which is funded by the INTI programme and the European Integration Fund. Furthermore, in 2006 the working group started the Integrating Cities conference series. In 2010 it drafted the Integrating Cities Charter in order to encourage local authorities to ensure equal opportunities and non-discrimination for all citizens (EUROCITIES 2018, INTEGRATING CITIES 2018).

EUROCITIES supports some of the positions of the CEMR. However, as the network represents solely larger European cities this support is limited to their interests. Apart from this, the members of EUROCITIES wish to preserve the advantage of being able to act autonomously and independently of national municipal authorities. As the CEMR also represents thousands of rural municipalities, conversely it is only able to support the

positions of EUROCITIES to a certain degree (Niederhafner 2007). As part of EUROCITIES it is particularly the **Solidarity Cities** which serves the reception and integration of refugees: interested cities exchange experiences of examples of good practice as well as technical, financial and logistical support. They campaign politically for the participation of cities in this area and access to direct funding and they make offers of guarantees for the reception of more refugees.

2.4 Financial deficits

Overview of existing EU funds

On the EU level, there are a number of funds which are intended to support municipalities and regions with their work on migration. Some funds were created especially to support migration challenges, for example the **Asylum, Migration and Integration Fund (AMIF)** or the **Internal Security Fund (ISF)**. The AMIF can be used for projects from almost all thematic areas, whereas the ISF is available primarily for border protection and visa procedures. Other funds are related to specific areas of work or infrastructure and are not aimed solely at migrants and refugees as a target group. Predominantly available for employment integration and training are the **European Social Fund (ESF)**, the **EU Programme for Employment and Social Innovation (EaSI)** or **ERASMUS+** which provides support for learning mobility whilst studying and training, inter alia specifically for migrants and for refugees. The **European Regional Development Fund (ERDF)** can be used to deal with the infrastructure challenges concerning the care of migrants and refugees on the local level. In the area of health and nutrition, funding can be applied for from the **EU Health Programme** for the medical treatment of migrants and refugees or from the **Fund for European Aid to the Most Deprived** to, for example, facilitate the supply of meals. The cultural participation of migrants and refugees can be strengthened through the **Creative Europe** programme; their political participation can be supported through the **Europe for Citizens** programme. The majority of funds provide emergency aid in the case of an unexpectedly large number of immigrants.

Fund										
Asylum, Migration and Integration Fund (AMIF)		✔	✔	✔	✔			✔		✔
Internal Security Fund (ISF)							✔			
European Social Fund (ESF)	✔		✔		✔			✔	✔	✔
EU Programme for Employment and Social Innovation (EaSI)	✔				✔			✔		✔
Fund for European Aid to the Most Deprived (FEAD)				✔				✔		
European Regional Development Fund (ERDF)	✔	✔	✔		✔					✔
Justice Programme					✔		✔			
Creative Europe						✔				
Europe for Citizens								✔		
Rights, Equality and Citizenship					✔				✔	
Erasmus+					✔			✔		
EU Health Programme			✔							
European Agricultural Fund for Rural Development (EAFRD)	✔	✔			✔			✔		
European Maritime and Fisheries Fund (EMFF)	✔				✔			✔		

Occupation & labour market, Living & infrastructure, Heath & care services, Material support, Education & training, Culture & media, Justice & security, Inclusion & integration, Rights & freedoms, Public administration & government

Source: Guide to EU Funding on Migration and Asylum

Most funds are distributed by means of **shared management**, i.e. the European Commission entrusts the Member States with the implementation of the programme on the national level. The approved projects are not completely financed by the EU fund, but merely co-financed. The rate of EU co-financing is between 50 percent and 90 percent depending on the project and fund. Applications are encouraged by way of various calls for proposals and invitations to apply which are advertised via websites and organisations.[4]

Criticism of existing EU Funds by municipalities

Criticism of the financing of cities and municipalities through EU funding is diverse and concerns different areas. The impeded and complicated access to the funds plays a

4 Further information on funding possibilities can be found, for example, in the publication «Guide to EU Funding on Migration and Asylum» by the der Green European Foundation for the Greens/ EFA Group in the European Parliament (Blas 2016).

significant role. The Action Plan of the Urban Partnership for the Inclusion of Migrants and Refugees criticised the fact that under the AMIF and ESF cities have **no direct or only inadequate possibilities to apply for funding**, as these are primarily channelled through regional or national authorities. Whilst some cities benefit from a good cooperation with the national level, others report experiencing difficult or even a complete lack of access to EU funding. This can be due to very different factors (EU Partnership Inclusion 2017, p. 22).

In the course of the Commission's public consultation on future financing in the area of migration, the **complexity of the rules and the significant administrative burden** that comes with applications for EU funding were mentioned as the main points of criticism (European Commission 2018c, p. 5). Both on the national and regional level, a lack of capacity and knowledge on the part of the authorities responsible can lead to funding not being applied for in the first place, or, from the local perspective, being applied for too late. In its final report, the «High Level Group on Simplification for the post 2020 Cohesion Policy,» established by the Commission, determines that the sheer number of regulations and directives in cohesion policy (currently more than 5000 pages of text) overwhelms local authorities, and that a simplification of the access to EU funding is urgently necessary (High Level Group 2017, pp. 1-2). Here it should be mentioned particularly that besides the EU provisions, in some instances the nation states also establish their own financing conditions and thereby further increase the complexity of the application process (EU Partnership Inclusion 2017, p. 22; 2018b, p. 3).

The to some extent **faltering top-down flow of information** and the resulting challenge, in particular for small cities, of battling their way through the regulations, is reflected in the completely erroneous assumption of some municipalities that EU funding is applied for by the nation states and then utomatically distributed to municipalities at their own discretion. This has come to light in background interviews based on municipal experiences. The joint study by the UNHCR and the European Council on Refugees and Exiles (ECRE) criticises the fact that Member States are regularly failing to comply sufficiently with their information obligations under the AMIF (Westerby 2018, p. 26). Nevertheless, there are examples of good practice, e.g. from Portugal, where every year a calendar with calls for proposals is published, or Slovakia where every new call for proposals is accompanied by an information day and comprehensive online documentation (ibid. p. 25). Also establishing a «carer» in this area could lead to more transparency and put the municipalities in a position where they can take up more opportunities.

66 percent of those asked during the Commission's public consultation also mentioned a **lack of flexibility** in reacting to changes locally as being a difficult challenge (European Commission 2018c, p. 5). Even when the coordination between the local and national level works well and the necessary experience in submitting proposals is available, multi-step procedures mean that it is not usually possible to react to new local developments quickly.

The situation for the municipalities is aggravated by the fact that the possibility of applying for funding directly under the AMIF emergency mechanism remains closed to them. However, due to the difficulty in predicting forced migration, the municipalities have only a short timeframe in which to apply for funding via the usual channels in good time. For example, the city of Athens had to apply for emergency financing from a UNHCR fund which in turn had received funding from the AMIF's emergency mechanism (EUROCITIES 2016, S. 8).

The partial **thematic overlap between AMIF, ESF, ERDF and EAI** in the financing of integration **at the same time with different application conditions** and deadlines also contributes towards the complexity in this area (EU Partnership Inclusion 2018b, p. 3). Numerous municipalities also criticise the fact that calls for proposals are difficult to find, and that the abundance of funds seems confusing. Several municipalities also lack the necessary know-how for the complex application process and accounting procedures.

Criticisms of existing EU funds:

- *Complexity of the rules and extensive administrative burden*
- *Lack of flexibility (deadlines and agendas)*
- *Inadequate flow of information towards the municipalities*
- *Lack of access to the emergency mechanism*
- *Thematic overlap between the individual funds*
- *Mandatory co-financing through the municipalities despite a lack of own funds*

Ultimately, in particular for underfunded cities, the necessity of co-financing from AMIF funding (up to now usually 25 percent, in future according to the Commission's proposal 10 percent, European Commission 2018b)) constitutes an additional hurdle. If these cities have no funding of their own available, they often experience difficulties obtaining grant funding from private financial institutions because integration measures do not directly generate revenue (EU Partnership Inclusion 2017, p. 17). Financing through the European Commission's Urban Innovative Actions is therefore popular with municipalities as these provide direct access to EU funding. However, municipalities point out that, in particular in the social sector, the condition that a project must test an approach not already present in Europe is too limiting because having successfully carried out projects once, cities are forced to find follow-on financing via other means (EU Partnership Inclusion 2018b, pp. 4-5).

2.5 Structural deficits: the partnership principle as unused potential

Some of the criticisms of EU funds described here are related to an **incomplete implementation and utilisation of the so-called partnership principle**, which provides for a close cooperation between all levels of the EU. The limited adoption of this principle leads to a situation whereby the municipalities are often not sufficiently involved in the processes and the cooperation with the EU level remains reserved to the national level. Whilst European funding to support integration and migration management is decided on at the supranational level and, as in the case of the AMIF, allocated via national calls for proposals, the integration of refugees and migrants as well as the preparations for return to countries of origin take place at the local level. Coherent cooperation between the various levels and project partners should be guaranteed in the European context by partnership agreements. These are set out in the European Structural and Investment Funds as well as in the Asylum, Migration and Integration Fund (European Commission 2016; European Union 2014a; European Union 2014b; Westerby 2018). The specific details are left to the Member States, which especially in the case of the IMIF leads to considerable national differences in their implementation (Westerby 2018, p. 38). In general, however, the framework for this collaborative cooperation and joint governance across various political levels is rather weak (EU Partnership Inclusion 2018b, p. 3). This is due not least to the predominantly inter-governmental regulation in these areas. Although Regulation 514/2014 of the European Parliament and the Council obliges Member States to form a «partnership drawn from relevant public authorities at national, regional and local level, where applicable» (Article 12(1)) and to involve them in «the preparation, implementation, monitoring and evaluation of national programmes» (Article 12(3), European Union 2014b), a joint study by the UN High Commissioner for Refugees (UNHCR) and the European Council on Refugees and Exiles (ECRE) points out that national interpretations differ significantly, for example in respect of the requirements for consultations, and that the implementation of the Partnership Principle was not part of national evaluation reports. **Furthermore, the Partnership Principle limits interaction to the national and sub-national levels, but does not specify any direct interaction between the sub-national and European levels** (Westerby 2018, pp. 37, 38).[5] In the absence of a uniform implementation and evaluation of the Partnership Principle, municipalities cannot exploit their full potential in the area of migration and

5 The new proposal by the Commission for a regulation with common provisions for the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund and the European Maritime and Fisheries Fund as well as with budget provisions for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument is a step in the right direction here. The proposal emphasises the principle of partnership agreements and provides that the Commission shall consult «the organisations which represent the partners at Union level on the implementation of programmes» at least once a year (European Commission 2018e, Title I, Chapter II, Article 6(4)).

integration. **The empowerment is focused on the national governments which function as «gatekeepers» for the formal process of financial assistance and for its organisation.**

For municipalities, this deficit in the cooperation in planning and organising of integration funding is reflected, for example, in the narrowly defined target group of the AMIF. Although municipalities have increasingly discovered the added value of comprehensive and social-environment-oriented strategies for the financing of integration and the strengthening of society, the AMIF limits its funding to third-country nationals and thereby excludes an inclusive funding of projects which are directed towards persons with a migration background and the indigenous population. For such purposes, the municipalities have to apply for different funding (EU Partnership Inclusion 2018b, p. 4).

2.6 Recommendations for action: Key stumbling blocks on the way to an improved integration of municipalities

The preceding statements show that municipal interests and experiences do already have some influence on the development of EU migration policy instruments today. However, as has been shown, there are also all manner of stumbling blocks to overcome: first and foremost, the **complexity of EU funds**. A structural challenge is also the **diversity of the European municipalities**. Cooperation is hampered by different, to some extent contrary positions which can vary according to the nation state, party affiliation, population, rurality, or geographic location. Furthermore, in the area of migration the positions are divided between cities and regions located on the EU external borders, and therefore points of entry for asylum-seekers, as well as regions and metropolises which due to their wealth and/or their labour market situations are destinations for immigrants on the one hand, and municipalities in which there is hardly any influx of migrants or those which are affected by emigration on the other.

A further hurdle consists in the fact that representatives of the municipalities are generally involved **only in an informatory and advisory capacity**. With its legislative proposals, the Commission is able to refer to the opinions of municipalities. It is not, however, obliged to incorporate the priorities, positions and suggestions of the municipalities. As such, know-how can remain unused and issues requiring urgent action can be neglected or deferred.

The proposals developed in the following will take account of these challenges. They illustrate a way in which the instruments of European asylum policy can be developed further in order to tap into the potential of the European municipalities for the management of migration policy responsibilities.

Most of the recommendations follow on from proposals made by municipalities and city networks over the years. For example, within the framework of the Urban Partnership, EUROCITIES coordinated the development of specific recommendations for better urban access to EU financing; together with the European Commission, the city of Amsterdam created the ideas workshop «Urban Academy on Integration,» and, in cooperation with further partners, the «European Investment Bank Group» developed proposals for new combined grant funding («financial blending facilities») for cities and small and medium-sized companies (EU Partnership Inclusion 2017, pp. 12-14). Furthermore, from January to March 2018 the European Commission carried out an online consultation to gather feedback and suggestions for the area of migration as part of the EU budget 2021 – 2017. Specifically, this concerned predominantly the Asylum, Migration and Integration Fund and the European Social Fund. From a total of 350 responses, 18.4 percent came from regional or local authorities. Amongst others, EUROCITIES, the Council of European Municipalities and Regions and various European municipalities took part in the consultation (European Commission 2018c). On the level of the OECD as well, in 2018 interesting proposals were submitted for the improvement of municipal access and a better use of financial resources on all political levels. According to the OECD, these resources should be tailored to the local responsibility for integration. Flexibility in respect of financing and exact suitability were emphasised in particular. Furthermore, the OECD study demonstrated a series of already existing instruments in different states (OECD 2018, p. 98 et seq.). The public consultation by the Commission and also the recommendations of the Urban Partnership illustrate obvious deficits in urban access to as well as the content and organisation and the collaborative planning and structuring of EU financing in the areas of migration and integration. In the following we develop, inter alia, recommendations to address these shortcomings.

3 What is to be done – recommendations for action for a better involvement of the municipalities in EU refugee and asylum policy

If municipalities are to be better integrated in migration policy and in particular in the reception of refugees, political action is recommended in three areas: first, the financial deficits must be overcome so as to facilitate access for all, in particular smaller municipalities and enable coherent local action; second, the structural deficits must be tackled and, inter alia as part of the funds, the municipalities must be given a greater say so that municipal expertise can influence EU migration policy; third, a new relocation mechanism must be introduced which grants municipalities and also persons seeking protection active roles in the process of distribution within Europe.

Simpler access to EU funds through:

1. *One municipality, one application*
2. *Simplified co-financing*
3. *One-Stop-Shop for advising municipalities*
4. *Possibility to apply directly for emergency assistance*

3.1 Reform EU funds

In the following, four proposals for a reform of EU funds will be put forward, which would solve the majority of the problems mentioned above. With a bottom-up process we take into account the proposals put forward by municipalities and local authorities and combine these in a coherent package.

1) **Coherent package of measures instead of project chaos:** As the transitions from «initial integration» to more long-term integration on the municipal level are often smooth, a close linking of the financing possibilities is necessary. Synergies between the European Structural and Investment Fund (ESIF) and the future Asylum and Migration Fund (AMF) should be strengthened both in terms of their thematic orientation as well as in respect of the application process so as to increase the complementarity of the funds for maximum effect locally. In the current proposals by the Commission, the Asylum, Migration and Integration Fund (AMIF) is to be transformed into the Asylum and Migration Fund (AMF). Whilst the AMF finances measures for reception and «initial integration», long-term integration should be supported above all through the new European Social Fund+ (ESF+) as well as the European Regional Development Fund (ERDF) (European Commission 2018b). The

Urban Partnership and the CEMR recommend greater flexibility and the combining of funding through so-called "block grants" (EU Partnership Inclusion 2018b, p. 6). We find this idea promising. An idea which would appear to be even quicker to implement is that **municipalities can submit a single application for the funding of a package of measures which is then financed from different funds**. The decision as to which funds will be used for which aspects should be taken by the national authorities in consultation with the European Commission. In this way, municipalities would think more in terms of coherent packages of measures than in terms of individual projects. They would not be overwhelmed by bureaucracy and could also retain flexibility.[6]

2) **Simplify co-financing:** Difficulties with co-financing, follow-on financing or the funding of projects with a wide target group must not constitute an exclusion criterion for municipalities and must be avoided by way of third-party funding. Insofar as co-financing is still considered necessary and the preferred option as opposed to full financing, the European Investment Bank (EIB) should play an important role. **It should be possible for the municipalities to combine grants and financing from EU funds with instruments of the European Investment Bank.** The initiative which is currently being developed by the Urban Partnership on the Inclusion of Migrants and Refugees, the initiative of the European Commission, under the coordination of the EIB, and which put forward the proposal, is therefore to be supported (Urban Partnership 2017, p. 17; 2018b, p. 7) as called for by the Urban Partnership (2017b, p. 7). Further, Urban Innovative Actions should also be made available beyond the first realisation of innovative approaches as examples of good practice in order to help the municipalities to react to challenges sustainably, flexibly and creatively.

3) **Simplify access to funding:** What is meant by this is above all the simplification of the application process and an improvement in the access to knowledge of all EU funding opportunities. However, at the moment also the execution of an EU-funded project still ties up far too many resources, in particular for smaller and medium-sized municipalities. In accordance with the recommendations of the «High Level Group on Simplification for the post 2020 Cohesion Policy,» a simplification of the access to EU funding is urgently necessary. The Commission and the nation states should make use of the expertise of municipal actors in jointly developing the application process further so as to make access more efficient. Furthermore, the national level should ensure that EU minimum requirements for applying for funding are not made even more complicated or bureaucratised due to national conditions («gold-plating»). Despite the existence of various information portals, and advice offerings in respect

6 The idea of establishing a completely new fund which would combine the integration and development functions of the municipalities has most certainly come up time and again. This comes up in particular in connection with the proposal for a municipal relocation mechanism which is mentioned several times below (Humboldt-Viadrina Governance Platform 2017, 2018). However, since the immigration of people and the structural development of municipalities would affect a large number of EU funds, the proposal to draw on several funds with just one application appears more feasible at this time.

of EU funding on the European, national and regional levels, particularly smaller cities with fewer personnel resources are insecure when it comes to applying for and executing EU projects. **For this reason, national one-stop shops should be established as unified information and contact points that can fully support municipalities at all phases of the application process and assist them with all necessary information and advice.** This already happens to a certain extent through the national authorities but can be expanded significantly. Additionally, on the national level **an annual calendar with national calls for proposals** should be issued based on the Portuguese model.

4) **Enable municipalities to apply for emergency assistance:** As long as there is no European resettlement programme to a significant extent, there are only limited possibilities to plan reactions to forced migration in the long-term. We therefore support the calls by Urban Partnership (2018b, p. 7), for **municipalities to be given the opportunity to directly apply for emergency assistance from the AMIF if the need arises**. Further, more flexible possibilities with a lower threshold, for example quicker innovation funds, would be conceivable.

3.2 Give the municipalities a greater say

Giving the municipalities more of a say

1. *Strengthen the Partnership Principle*
2. *Establish an EU body to mediate between municipalities and the national level*

Discrepancies between the conceptual planning «around the table» on the European level, the acts of national authorities, and the requirements of local practice are not entirely avoidable, though structural deficiencies in the involvement of the municipalities can be reduced relatively easily. Two measures to structurally strengthen the municipalities will be proposed to this end:

1) **Strengthen the Partnership Principle in the AMF:** In order to appropriately deal with local challenges in the areas of migration and integration, the already existing Partnership Principle should be strengthened considerably so that early and collaborative coordination lies with the European Union, the Member States and the local and regional authorities when it comes to the preparation and implementation of measures on the EU level. This is also being called for by, inter alia, EUROCITIES, the Council of European Municipalities and Regions and the Regional Association Ruhr (European Commission 2018a) UNHCR and ECRE (Westerby 2018) as well as MEPs from the Green party. From the perspective of this paper, this applies in particular to the future Migration and Asylum Fund (AMF). Since the Principle is legally binding but the Member States are nevertheless free in its implementation, **the European Commission should organise an exchange of good practice in cooperation with the**

European Integration Network which is aimed at Member States and their municipalities and based on this develop obligatory components for the structuring of the Partnership Principle. Particular consideration should be given to the involvement of the municipalities in the development of national programmes on the basis of EU funds and in their evaluation at the earliest possible stage.

2) **Establish an EU body to mediate between municipalities and nation states:** In the event that the dialogue between the national and local levels leads to conflicts, the municipalities must have the formally stipulated possibility to communicate their position and their needs on the European level. To guarantee this, and at best to mediate between municipalities and nation states already in advance, a neutral mediation body should be established in the relevant Directorate General of the European Commission. **In addition, establishing a universal mediation body responsible for all funds would be conceivable.**

3.3 Introduce a municipal relocation mechanism

The recommendations made so far are important components to give the municipalities a greater say on the European level as well as strengthening their access to European funding. With these, important financial and structural deficits in the involvement of the municipalities in the EU's refugee policy would be overcome. However, if the municipalities are really to be taken seriously and sustainably strengthened when it comes to their migration policy and their specific refugee policy competences, it is necessary to go further than reforming existing instruments: municipalities with their often highly committed civil societies must be directly and actively involved in the reception and relocation of refugees within Europe. In doing so they must be enabled to have their locally very different circumstances taken into account when reception decisions are made. This also applies to the persons in need of protection themselves, and whose decision-making competence should also be taken seriously. The municipal relocation mechanism proposed below, and formed during current professional discourse, fulfils these requirements. It extends and expands on existing approaches.[7]

7 To be mentioned here are on the one hand numerous, mostly hardly formulated positions of cities and city networks, but in particular the proposal by the Humboldt-Viadrina Governance Platform (2017, 2018). Besides further suggestions from municipalities and experts this serves as inspiration for the statements to follow. Naturally, in its function as an initiative of political practice it does, however, leave a number of questions unanswered or choose different paths than this paper. Particularly similar or different ideas in this paper and that of the HVGP will be pointed out in the respective section. Besides such documented approaches, reference should be made to the ongoing initiatives within the nation states, for example a workshop in Germany at the beginning of 2019 which brought together inter alia sea rescue organisations, the «safe haven» initiatives, church organisations and the refugee and welfare associations to discuss practical and feasible requirements for sea rescue, EU relocation and municipal reception.

3.3.1 Process of the municipal relocation mechanism in four steps

Step 1 – Municipal application

Municipalities discuss their interest in participating in the programme with the responsible national authority and then develop concrete plans for the reception and integration of a specific number of persons in need of protection together with partners from the civil society and the private sector. This includes the decision on the number of places, coordination with other levels as necessary (e.g. the federal state due to competences/resources being situated there) as well as the **formation of local support groups consisting of full time and voluntary representatives from municipalities, the civil society and the private sector** who agree to make themselves available as sponsors at least during the first year.[8] Many municipalities are already successfully gaining experience with such mixed sponsorship systems in which full-time participants and volunteers are actively involved and the responsibilities of the various actors are clearly defined. Private supporters do not enter into any financial commitments. The municipality applies with its concept directly to the European Commission or alternatively to organising actors of the relocation programme (e.g. EASO). Provided that the concept is evaluated positively, the municipality will be admitted to the programme.

Step 2 – Registration of persons seeking protection

Recognised refugees and persons from states with a good prospect of remaining who are already in the EU, for example in Greece, Spain, or Italy, will be informed by national authorities and the EASO of the existence of a municipal relocation programme.[9] **Registration is voluntary:** The ideal of «free choice» from the refugees' perspective can only be achieved at least to some extent if the programme is voluntary. The necessary trust in the mechanism must be sought with a high standard of data protection and maximum transparency with regard to the process and the actual freedom of choice. As was the case with the compulsory relocation mechanism between 2015 and 2017, the registration could be carried out by the authorities in the country of initial reception with the support of the EASO, whereby the same guidelines on the protection of personal data would apply as in the current process of relocation und resettlement. The strict adherence to and control of these guidelines is a crucial aspect of the observance of the right to the protection of personality of those in need of protection and their willingness to take part in the programme. Ideally admission to the programme follows the recognition of the need for protection (EASO 2012, p. 1) as was

8 Similarly to this the Humboldt-Viadrina Governance Platform (2019, p. 4): «The preparations for decisions on settlement take place on the municipal level through a multi-stakeholder committee (politicians, businesses, organised civil society and refugee councils), in which the citizens jointly deliberate on the number of refugees to be received and then present the results to the city. They thereby establish a firm basis for the acceptance and success of integration and development.»

9 The introduction of the mechanism for refugees with good prospects of remaining takes account of the assessments of municipal representatives questioned during background interviews. For them an acceptance of the mechanism is dependent on the new citizens actually being able to stay.

the case in the EUREMA pilot project on the relocation from Malta. For this, countries of initial reception need considerably more operative and financial support in order to fulfil their legal obligations to safeguard human rights and to conduct procedures efficiently (Enderlein und Koenig 2016, p. 10). So long as the national asylum systems of the countries of initial reception are overwhelmed, an earlier admission to the programme would be possible, even before the recognition of the need for protection – possibly linked to the prospects of remaining as is common with other relocation programmes.

Step 3 – Matching process

The matching process functions via an **Online App** coordinated by the European Asylum Support Office (EASO), which **revolves around the needs and possibilities of both sides. Municipalities** enter information on structural data and integration possibilities (e.g. labour market, education, housing, possibilities for the support of particularly vulnerable persons). **Persons seeking protection** indicate their individual requirements (e.g. education, (professional) competences, previous stays or employment relationships, language skills, family relations, points of contact to diaspora communities, particular needs and expectations / wishes (e.g. rural or urban living environment, public transport, leisure activities).

By comparing these with the municipal integration profiles, the person seeking protection will be given a selection of suitable municipalities, from which he or she can indicate preferences.[10] Persons seeking protection are supported in their decision-making by employees from IOM, EASO or the UNHCR. Once they have made their individual choice, they will be allocated to one of their chosen municipalities depending on the availability of municipal reception places. **To counter the risk of discrimination and cherry-picking, a matching algorithm will be developed** which aims to weigh up different categories (family connections, and social points of contact to diaspora communities, previous stays or employment relationships, language skills, previous stays or employment relationships, vulnerability, language skills, and (professional) competences which fit local needs, etc.). In conformity with the corresponding EU Directive, particular emphasis will be placed on the vulnerability of persons in need of protection. According to the EU Reception of Applicants Directive, these are persons such as minors, unaccompanied minors, disabled persons, elderly people, pregnant women, single parents with underage children, victims of human trafficking, persons with serious physical diseases, persons with mental disorders, and persons who have suffered from torture, rape or other serious forms of mental, psychological or sexual

10 The matching process suggested here is already advocated in its fundamental orientation by a number of political actors. As possibly the first organisation, in the summer of 2018 during a phase in which also the proposals in this paper were being developed and discussed with the first experts, the Humboldt-Viadrina Governance Platform published a revised version of its strategy which outlines basic principles of a humanitarian-focused matching process. The result should be that persons in need of protection have a choice between several municipalities: «If possible, at the end of the matching process each refugee receives a list with more than one match and can then choose between one of the offers.» (HVGP 2018, p. 7)

violence, such as, for example, victims of female genital mutilation (European Union 2013/33/EU, Articles 21 and 22). Such a matching process could, for example, constitute an extension of the EASO pilot process, which will be explained in more detailed further below (EASO 2018).

Additionally, and so as to guarantee the legitimacy of the selection locally, committees can be formed in the municipalities which are well-balanced consisting of various actors from the administration and social society – comparable to the German Hardship Commissions on the level of the Länder. It would also be conceivable to introduce «Stakeholder Councils» as suggested in a paper by the Humboldt-Viadrina Governance-Platform (2017). These committees check that the proposed allocation corresponds to the integration requirements and current local situation and in the case of discrepancies can once more consult with the coordinating body (EASO). **By way of this involvement of local multipliers, a personalisation of the process is achieved on both sides as opposed to the usual method of allocation based on an allocation formula. This could increase the willingness to receive the selected persons locally.** The profiles of the persons in need of protection are subsequently passed on to the national level which retains a veto right on the grounds of possible national security concerns. The result of the national decision is in turn notified to the municipalities. **The municipalities are thereby able to not only prepare for a certain number of people, but instead individually prepare for the reception and integration of specific persons.** The special contingency for municipal relocation in the AMF or the ESF+ also receives the necessary information to be able to provide funds (financing, see below).

Step 4 – Relocation

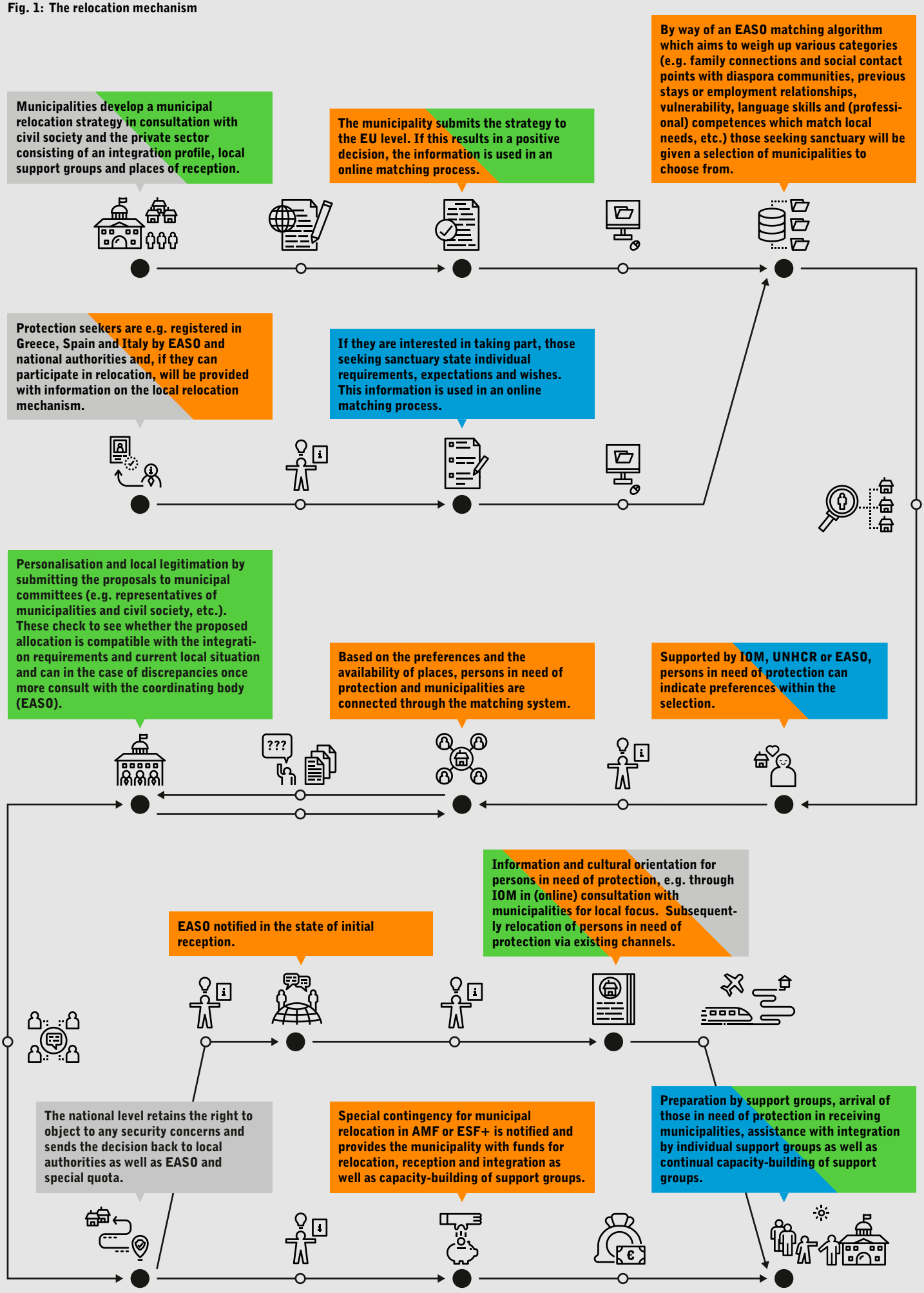
Just as the participants in national relocation programmes, selected persons in need of protection are given further information and preparation courses (for example on standards and values, rules of conduct, structures and contact points in the destination country) with an additional local focus. This could, for example, be conducted by the IOM with the help of information from local support groups so that personal contact can happen even before the relocation takes place.

Via the means established under the compulsory relocation mechanism 2015-2017, the persons are then taken to the receiving municipalities where they will be welcomed by their support group. They are given support with initial orientation and are assisted individually with their integration for a certain period of time so that they can access education systems, the labour market, cultural orientation and private accommodation.

Lessons learned from experiences with similar programmes

The proposal described here is based on findings from the compulsory European Relocation Programme 2015-2017, the EASO Matching Tool for Relocation and the EUREMA

Fig. 1: The relocation mechanism



Action taken by:

European institutions/international organisations | Member States | Municipalities | Persons in need of protection

Source: own representation.

Pilot Project on Relocation from Malta.[11] The mechanism introduced here follows on from that but requires that a state programme continues to operate in parallel. In this case, the municipal places would constitute an additional contingent, however, the state obligation to relocate continues to exist.

A crucial further development of the mechanism introduced here from EUREMA and the EASO Matching Tool is on the one hand the involvement of the municipalities and on the other hand the strong focus on an individual matching process in which persons in need of protection have a say. Experiences from the EUREMA pilot project show that information events and cultural orientation do not always result in realistic expectations on the part of the persons in need of protection (EASO 2012, p. 13). **An individual, multi-step matching process** which takes account of the needs of both the refugees and the municipalities in line with agency approaches would therefore appear to be more promising (Schneider und Büchsel 2016, p. 31). Contrary to the EUREMA project, the coordination of the programme should be placed in the hands of the EASO in cooperation with UNHCR, IOM and ECRE. As such, international and European, official and civil society actors will be involved. For the development of the individual matching process we therefore rely on the lessons learned from the EASO Pilot Instrument. Towards the end of the Relocation Programme 2015 – 2017, the EASO introduced a matching process based on an algorithm.[12] This process should promote integration and reduce the risk of secondary migration in the interest of the refugees and the receiving EU Member States. In the course of the matching, on the one hand various needs and competences of the asylum seekers (family, social or cultural ties, language skills, professional experience and vulnerability) and on the other hand characteristics and preferences of the Member States were considered, thereby observing the principle of non-discrimination. So as to prevent, for example, highly qualified asylum seekers being given preferential treatment, the EU Member States had the

11 The idea was to combine the relocation programme with the strengthening of the municipalities (specifically: the suggestion by Gesine Schwan and the Humboldt-Viadrina Governance Platform) also already put forward by Helene Heuser (2018). Additionally, lessons learned from domestic systems for matching refugees with municipalities (Sweden, Netherlands) and coordination mechanisms in multi-level systems (Italy - Protection System for Asylum and Refugees SPRAR) were considered that were presented in a current study by the OECD (OECD 2018; p.107 et seq.).

12 In a cooperation of Oxford and Lund University as well as the Worcester Polytechnic Institute currently a KI-based software, Annie MOORE, is being developed and tested in oder to match refugees and municipalities in a resettlement process (Oxford University 2018, Jones und Teytelboym 2016). Also through the Immigration Policy Lab (IPL), a cooperation between the ETH Zurich and Stanford University, an innovative algorithm was developed using big data, which was intended to improve the resettlement of refugees and according to tests by IPL could increase the likelihood of refugees finding work by 40 – 70 percent: «IPL's data-driven approach to refugee resettlement presents a creative solution that can be implemented in any country that resettles refugees across domestic locations, offering a way to improve outcomes not only for refugees but also for the communities in which they live» (IPL 2018). This algorithm could also provide further inspiration, but does not solve the problem of allocation perceived to be imposed by others.

possibility to indicate those economic sectors in which there was a shortage of labour but were unable to state a preference for specific professions. The algorithm gave preference to particularly vulnerable persons in the relocation (EASO 2018). Whilst IOM advocates the introduction of a matching process to support the subsequent integration in principle, it is criticised that this instrument was integrated very late in the process and did not adequately consider possible inter-personal and occupational connections the asylum seekers may have to the different Member States (IOM 2018, p. 4). **This proposal takes account of this criticism by strengthening the role and decision-making ability of persons in need of protection and giving them an active role in the choice of location.**

A further important cornerstone of the proposal put forward here is the involvement of civil society actors and local support groups. A country comparison by the European Resettlement Network shows that initiatives for «community sponsored resettlement» produce better integration results than exclusively state-organised resettlement (ERN 2017, pp. 11, 15). This is mainly due to the fact that through private sponsors refugees build up social capital and networks and are to some extent united with family members. Private networks and civil society initiatives offer support with orientation on the labour market and the search for private accommodation (European Foundation for Democracy 2018, pp. 25, 29). All of these can be big incentives to stay in a location (Fratzke 2017, p. 7). The example of Canada shows that privately sponsored resettlement can also contribute towards a greater acceptance of the reception of refugees in society (ERN 2017, p. 15). Pilot concepts for so-called public-private partnerships for the relocation of refugees are also being trialled in Europe, for example in the United Kingdom, Italy and Germany (ERN 2017, p. 35). Experiences in Germany show that supporting roles of private individuals (social, emotional or financial) need to be kept to a moderate level so as not to expect too much of the supporting actors. **The mechanism proposed here therefore provides for a combination of resources from private individuals, NGOs and (municipal) authorities**, as recommended by the European Resettlement Network (ERN 2017, p. 38). This demand has so far not been implemented in the pilot projects mentioned, in which the municipalities play only a small or no organisational role. One exception is the «UK Full Community Sponsorship Scheme» in which sponsors and municipalities plan the reception of refugees together and are supported by municipalities and the state (ERN 2017, p. 26).

How should the programme be financed?

To finance the municipal relocation mechanism, the European Commission should supplement its current proposals for the budget 2021-2027 with a **municipal special contingent for relocation within the scope of the AMF or the ESF+. Municipalities that have expressed their willingness to receive refugees from European countries of initial reception should receive financing from this special contingent amounting to more than the sum that the Member States have already received under the compulsory relocation programme per asylum seeker** (currently 6,000 Euros). Further, municipalities receive additional funding for capacity building in private support groups. It could certainly be discussed, as provided for in a proposal by the Humboldt-Viadrina Governance Platform for a municipal support fund

(Humboldt-Viadrina Governance Platform 2017), whether additional funds could be paid out for municipal development and infrastructure projects. However, there is a risk that the perception of persons seeking protection as a municipal source of income could displace humanitarian obligations. Questions as to a potential repayment of investment funding in the case of onward migration (see below) are also as yet unanswered. Nevertheless, the proposal in itself should not be discarded. Instead, we suggest that the precise form and amount of the financing should be determined by a Working Group of the European Commission consisting of representatives from interested Member States, European municipalities, EASO, IOM, UNHCR and other relevant actors (inter alia ECRE). This working group should also work out further details of the mechanism.

What if people want to migrate further?

An important question as regards any relocation is how to deal with secondary migration. What happens then if persons seeking protection and municipalities come together but the persons in need of protection want to move on shortly after their arrival for various reasons? This would place responsibility on other municipalities which may not want to participate in the reception. Besides, the question would arise as to what should happen to any grants already paid to the municipality.

First of all, it can be said that through the proposed process the necessity of an exact matching between the integration requirements of refugees (e.g. education, professional competences, vulnerability, family or other social connections) and the integration conditions (e.g. the employment, education and housing market situation) locally is already taken into consideration. This is an important criterion for good prospects of remaining in the chosen location (Schneider und Büchsel 2016, p. 31). If this does not suffice, it might be possible to also consider a specific form of the time-limited requirement to reside in a particular area, which the persons seeking protection would agree to before relocation. When they register, participants must agree to live in the chosen location for a specific length of time. A suggestion as to the duration of this time period and possible exceptions should be part of negotiations in the above-mentioned cross-level working group of the European Commission. Two or three years would be conceivable as stipulated in the German requirement of residence in a particular area.

Why a mechanism for relocation and not for resettlement?

Relocation means the relocating from one place in the EU to another either of refugees who are already recognised in the EU, or – as a general rule – persons in need of protection already situated in an EU country with a high protection rate but who have not yet obtained recognised refugee status. Resettlement, on the other hand, means the reception of persons from third states outside the EU recognised by the UNHCR as refugees. The mechanism proposed here deals only with relocation from one EU state to another. There is essentially a pragmatic reason for this: it appears more realistic that municipalities will initially be involved in the urgent matter of redistribution within the EU before they are given a say

on the immigration of refugees from third states. It seems reasonable, however, that the mechanism could be used for relocation as well as resettlement.

Experts have long been in agreement that a coherent resettlement framework for the relocation of refugees from countries of origin or countries of initial refuge must be the goal of European migration policy. Even in such a construct, an active role of municipalities could be imagined. The European Commission has dealt in depth with the issue of private support for relocation from third states (resettlement) and also carried out a feasibility study (European Commission 2018d). However, judicial aspects have to be discussed, for instance the idea if municipal visa would be a viable (Heuser 2019).

4 Closing remarks

This policy paper started from the observation that numerous cities and municipalities in Europe are dealing with migration policy challenges more pragmatically, progressively and with more solidarity than the nation states are doing at the moment. However, there are, of course, municipalities that refuse to receive refugees and migrants. They will not be forced to do so as a result of the proposals made here, as these require voluntary commitment from the municipalities. As such, it is not so much about leading restrictive municipalities and nation states to rethink their positions, but rather about strengthening progressive municipalities, as it is these that currently lack access to financing, as well as say, and involvement in relocation decision-making. Seven proposals could change this.

A. Financial strengthening of the municipalities

A.1 Existing funds will be better-coordinated. Municipalities can submit a **single application with a coherent package of measures** that will then be financed through different funds where appropriate (for details see page 27).

A.2 **The co-financing** of EU projects will be simplified. Combined grants will be enabled so that municipalities can combine financing from EU funds (e.g. AMF and ESF) with other grants, for example from the European Investment Bank (for details see page 28).

A.3 The **access to funding** will be simplified. This involves above all better transparent access to information, for example on deadlines, and a clearly defined point of contact for municipalities in a «one-stop shop» (for details see page 28).

A.4 Municipalities can **apply directly for flexible immediate aid**, in particular for AMIF emergency assistance (for details see page 29).

B. Giving the municipalities a greater say

B.1 In order to give municipalities a greater say and improve coordination between the levels, the existing **Partnership Principle will be strengthened, guaranteeing the municipalities a right to participate.** This applies especially to the new AMF(for details see page 29).

B.2 The European Commission makes use of an **arbitration body to deal with disputes between municipalities and national authorities** in respect of the national organisation of migration policy funding programmes (for details see page 30).

C. Introduction of a municipal relocation mechanism

C.1 A new **municipal relocation mechanism** takes the needs of municipalities and persons in need of protection seriously (for details see page 30).

Some proposals are almost certainly easier to implement than others. The recommendation which goes furthest politically is undoubtedly the municipal relocation mechanism which promises a fundamental change by actively involving the municipalities **and** the persons in need of protection. Firstly, in this way immigration into the municipalities will be more structured and perceived as the municipality's own decision. Thus, reports of municipalities being unable to cope or of a relentless «flow of refugees» can be effectively countered. The experiences of municipal «migration policy» can boost confidence in the political and administrative system locally as well as on the levels above. A positive attitude on the part of the population towards the granting of protection can also be strengthened in this way. Secondly, a matching process that takes the needs and integration requirements of both the persons in need of protection and the receiving municipalities into consideration can incorporate long-term integration prospects and regional development strategies into relocation processes. Thirdly, involving local support groups ultimately increases the social capital of refugees, strengthens social cohesion locally and makes the success of integration procedures more sustainable.

Going beyond the specific proposals, this paper aims to send out a clear signal for a better cooperation between the political levels. It is about time that the EU and nation states seriously involve municipalities in European migration and refugee policy. They are all set to do so! The EU must not allow this opportunity to pass.

List of abbreviations

AMF	Asylum and Migration Fund
AMIF	Asylum, Migration and Integration Fund
CEAS	Common European Asylum System
CEMR	Council of European Municipalities and Regions
CoR	European Committee of the Regions
DIFU	German Institute of Urban Affairs
EaSI	EU Employment and Social Innovation Programme
EASO	European Asylum Support Office
ECRE	European Council on Refugees and Exiles
ERDF	European Regional Development Fund
EIB	European Investment Bank
EIN	European Integration Network
EMF	European Migration Forum
ERN	European Resettlement Network
ESF	European Social Fund
ESF+	New European Social Fund
ESIF	European Structural and Investment Funds
EUREMA	Pilot Project for intra-EU Relocation from Malta
EESC	European Economic and Social Committee
GMFMMD	Global Mayoral Forum on Mobility, Migration and Development
IOM	International Organization for Migration

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Imprint

Publisher: Heinrich-Böll-Stiftung e.V., Schumannstraße 8, 10117 Berlin
Project manager, contact, editor: Dr. Christine Pütz, Department EU / North America
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Place of publication: *www.boell.de*
Date of publication: March 2019
License: Creative Commons (CC BY-NC-ND 4.0)
https://creativecommons.org/licenses/by-nc-nd/4.0
DOI: *https://doi.org/10.25530/03552.5*

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