

The International Rescue Committee (IRC) welcomes this opportunity to comment on the integration and inclusion of migrants and people with a migrant background. As outlined in the IRC's briefing [Getting Back on Track](#) (October 2019), the IRC believes that **a renewed and improved EU Action Plan on Integration could become a central tenet of the EU's approach to integration and inclusion by providing a clear, principled and targeted strategy that complements and coordinates efforts towards forming a welcoming, inclusive and diverse European society.**

Informed by the IRC's programmatic and policy experience related to the inclusion and livelihoods of refugees and vulnerable populations, this position paper is intended to provide further detail on our non-exhaustive **recommendations for the 2020 Action Plan on Integration and Inclusion**, which should serve as a framework, guide and monitoring tool for the EU's approach to these issues going forward.

#### The 2020 EU Action Plan on Integration and Inclusion should:

1. **Include a strong monitoring framework to review proposed actions;**
2. **Ensure a long-term dialogue inclusive of a range of partners, including the private sector and migrant/refugee-led organisations;**
3. **Focus on early intervention and labour market integration; and**
4. **Prioritise the strengths and needs of refugee women.**

While this paper focuses on this Action Plan, **connections should be made between this and other related EU policies:** notably the Gender Equality Strategy 2020-2025, upcoming EU Action Plan Against Racism, European Digital Strategy and ongoing negotiations on the next Multiannual Financial Framework (MFF) for 2021-2027. These frameworks provide important opportunities to define the future of EU action and funding for the integration of refugees and asylum-seekers.

Likewise, **it is crucial that the EU approach to integration and inclusion recognises and reflects the implications of reforms of the Common European Asylum System (CEAS) as planned in the upcoming EU Pact on Migration and Asylum.**<sup>1</sup> In particular, the negative effects of restrictive migration and asylum policies on integration in the EU should be acknowledged and minimised, including the disproportionate risk of isolation for asylum-seekers separated from family and unable to work for long periods of time. These efforts should form part of an inclusive and structural approach to tackling discrimination and expanding opportunities for refugees and migrants in the EU. It is our hope that the Pact will consolidate a forward-looking trajectory for integration, recognising it as essential to social cohesion and fundamental to a fresh start for a common European approach to asylum and migration.

The COVID-19 pandemic has already had serious repercussions for integration (and in particular employment) outcomes for migrants, refugees, and asylum-seekers in the EU. **Concerted efforts are needed to ensure that refugees and asylum-seekers in the EU are not left behind in the recovery phase.** Overall, the IRC is concerned that the COVID-19 crisis may result in a decline in the social inclusion of these groups, especially for refugee women who face multiple and intersecting barriers to integration and are at increased risk of falling even further behind.

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<sup>1</sup> See IRC, 'A New Pact for a Europe that Truly Protects', May 2020: <https://eu.rescue.org/report/new-pact-europe-truly-protects>

## 1. Evaluating, reviewing and monitoring the EU Action Plan on Integration

The design of the renewed and improved Action Plan should be informed by a robust evaluation of past initiatives and include a dedicated review process to monitor progress under its renewed mandate. In contrast to the 2016 Action Plan, which was limited in its evaluation and reporting, **the 2020 Action Plan should be conceived as a dynamic, inclusive, and sustainable tool, backed by political commitments and robust mechanisms of oversight:**

1. The Commission should, as originally planned, **evaluate the 2016 Action Plan** to assess gaps and identify strengths and successes. This evaluation of past and current measures should be interactive and inclusive, inviting views from actors involved at all levels and stages of the integration process. The outcomes of this evaluation should be published.
2. The Commission should set a clear timeline for the implementation of the Action Plan, ideally five years or in line with institutional mandates, and should strengthen the mechanisms to review priorities and monitor implementation by including a **transparent annual reporting process**, with an interactive and moderated online platform to assess progress. This should be aligned with the annual reviews for the European Semester process and include joint debates in the LIBE and EMPL Committees of the European Parliament.
3. The Zaragoza Indicators should be agreed as a baseline to **identify one common set of indicators to measure progress towards a commonly accepted definition of integration**. These indicators should also be further disaggregated by gender and immigration and/or protection status **to better monitor the integration outcomes of forcibly displaced people**, including refugee women, specifically. Member states should coordinate the collection of relevant data and provide this regularly to the Commission, with a view to monitoring progress towards achieving the Sustainable Development Goals (SDGs) for displaced people specifically.
4. The Commission should ensure that the **functions of the existing inter-service group on integration are extended, more visible and expanded** to include at least annual meetings on integration among Director Generals of all relevant Commission Directorates and regular reporting to Commissioners. DG Home should champion the rights of refugees and asylum-seekers within these structures and should encourage the establishment of specialised taskforces on the social inclusion of displaced populations within other Directorates.

## 2. Partnering for a long-term common approach to integration

The IRC's experience in integration programming has shown that coordination will be crucial to minimise shortfalls for both beneficiaries and providers in the post-COVID recovery phase. As part of and following a robust evaluation of previous measures, **the Commission should expand its efforts to foster an active exchange and common understanding of long-term goals among member states, civil society (and especially migrant/refugee-led organisations), the private sector and other interested parties, throughout the design and implementation of integration policies in the EU.**

EU funding should be used to ensure that more of the relationships and networks that partnership initiatives create between these sectors are sustainable and do not remain ad hoc, taking into account the long-term nature of the integration process.

1. The Commission should **encourage the German Council Presidency to initiate the adoption of Council Conclusions on Integration and Inclusion** at the informal JHA Council in November 2020, both to secure political buy-in for a renewed Action Plan and to reaffirm the need to prioritise the needs of refugee women in the COVID-19 recovery phase. The Commission should also encourage the Presidency Trio (Germany, Portugal and Slovenia) to lead by example in promoting their own national action plans, with a view to all member states adopting national strategies that reflect the strengths and needs of asylum-seekers and refugees in line with the EU Action Plan.
2. The EU institutions should **take concrete steps to tackle racism, xenophobia and discrimination in collaboration with employers, the private sector, equality bodies and authorities.** The IRC warmly welcomes Commissioner Johansson's clear personal commitment to promoting the positive contributions of migrants to the COVID-19 response. It is this kind of principled leadership that could constitute a truly fresh start to the EU's response to asylum and migration and, as such, should be extended to all Directorates and levels of the Commission, to all migrants and beyond the COVID-19 pandemic. Beyond publicly challenging negative misconceptions related to migrants, refugee and asylum-seekers, and promoting their rights and obligations under EU law, the Commission could also coordinate and fund awareness-raising campaigns and trainings on racial and other forms of discrimination.
3. The Commission should continue to propose and coordinate **creative ways to include refugee and migrant voices** in the development of integration policies. The members of the forthcoming Expert Group on the Views of Migrants, other refugee/migrant-led organisations and advocates should be consulted throughout the evaluation, design and implementation of the Action Plan as described above. The Commission should also explore avenues for longer term funding and training opportunities for these organisations and individuals to ensure processes are accessible and truly participatory, so that the perspectives of migrant populations form an integral part of EU integration policies in the future.
4. Encourage all member states to establish joint monitoring committees for EU funding on inclusion. The Commission itself should also **ensure coordination among existing Commission monitoring committees.** The Commission DGs managing integration funding through the ERDF, ESF+, AMIF and Erasmus+ should organise yearly meetings with managing authorities, and joint monitoring committees where relevant, in each member state.

### 3. Focusing on early intervention and labour market integration

The inclusion of refugees and asylum-seekers in European labour markets is central to ensuring their effective integration and the 2016 Action Plan reflected widespread recognition that early labour market integration is key to achieving better overall integration outcomes.

However, refugees and asylum-seekers, particularly women, continue to face significant barriers to labour market integration in the EU. The socio-economic impact of the COVID-19 pandemic has led to further significant job losses for this population.<sup>2</sup> The accelerated digitalisation of our societies has also shed light on the digital divide which risks impairing access to critical services for vulnerable groups, such as the elderly and women with lower digital skills and access.

In this context, it is even more critical for the 2020 EU Action Plan on Integration to **present concrete actions aimed at promoting access to early employment and targeted support services for refugees and asylum-seekers:**

1. The Commission and member states should gather **more recurrent and updated disaggregated data on the employment gaps and job losses related to COVID-19 faced by refugees and asylum-seekers** at EU and national level. In addition, comparable data should be collected on issues beyond employment outcomes (job/no job) to provide insights on the duration of employment, average remuneration, certification, and career progression.
2. In line with the new European Skills Agenda, the renewed Action Plan should support Member States to **target lower skilled or unemployed refugee adults (particularly women) with specific measures designed to help them acquire a minimum level of literacy, numeracy and digital skills and/or to develop a broader set of skills.** To that effect, the Commission should also encourage better matching of available job opportunities in line with the **previous experience and existing skills of refugees** alongside recognition of equivalent qualifications and an awareness that soft skills are also transferable.
3. The Commission should **promote examples from member states that afford asylum-seeker access to the labour market earlier** than the nine-month deadline outlined in the Reception Conditions Directive and issue a specific call for proposals on early integration measures.
4. The Commission should **encourage member states to explore and pilot strength-based and client-focused approaches to refugee and asylum-seeker labour market integration.** The Commission should research and evaluate approaches used in the past five years covering, for example, case management, early intervention and bundled services, and present findings and recommendations in a dedicated handbook.
5. The exclusion of many migrants, refugees and asylum-seekers from existing and expanded social safety nets during the COVID-19 outbreak has again highlighted the need for reform in this area. **Member states must ensure that vulnerable migrant workers, especially those working informally, are included in COVID-19 response plans, as well as social protection schemes more generally.** The Commission can support this by continuing to monitor and support actions aimed at informing migrants about their labour rights and labour market requirements in relevant member states.

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<sup>2</sup> EMN-OECD, 'EU and OECD Member States Responses To Managing Residence Permits And Migrant Unemployment During The Covid-19 Pandemic', 2020: [https://ec.europa.eu/home-affairs/sites/homeaffairs/files/oo\\_eu\\_inform1\\_residence\\_permits\\_and\\_unemployment\\_en\\_updated\\_final.pdf](https://ec.europa.eu/home-affairs/sites/homeaffairs/files/oo_eu_inform1_residence_permits_and_unemployment_en_updated_final.pdf)

#### 4. Prioritising the strengths and needs of refugee women

The COVID-19 outbreak has significantly impacted integration outcomes and access to services and jobs for refugee and migrant women in Europe. Migrant women are overrepresented in low-paid and/or precarious jobs, face increased caring responsibilities and feel the impact of barriers to work more acutely than men or other women.<sup>3</sup> These barriers are structural – racial/gender discrimination, language requirements, limited access to childcare, and limited information on opportunities – but also relate to women’s own agency, at times restrained by social norms, stress and low confidence.<sup>4</sup>

Going beyond mere mentions of a “special focus” on the labour market integration of women present in the 2016 Action Plan, **a renewed and improved EU Action Plan on Integration should prioritise and foster a gender transformative approach to the integration of refugee women:**

1. In addition to being a mainstreamed concern throughout the 2020 Action Plan on Integration, the integration of women, and in particular forcibly displaced women, **should become a priority in its own right**. Any such priority should take a broad approach to tackling gender-based discrimination, violence and trafficking, along with the often intersecting integration barriers faced by women with a migrant background.
2. The Commission should fund and coordinate tools to collect more **recurrent gender disaggregated data** on gaps in employment by, for example, creating more frequent midterm updates as part of the European Labour Force Survey, to better assess progress against the Zaragoza Indicators at EU and national level. A particular focus on the **differential impact of COVID-19 on asylum-seeking, refugee and migrant women** is crucial in this respect.
3. The Commission should continue to **target funding and promote the implementation of projects focused on empowering refugee women** through AMIF Union Actions, prioritising consultation and partnership with refugee and women-led organisations. When sharing best practices, the European Commission should **prioritise the dissemination and support of targeted measures that cater to refugee and asylum-seeking women’s strengths and needs**, such as mentorship programmes, accessible childcare during classes and specially-designed language, vocational and digital skills courses.
4. The EU Agency for Fundamental Rights (FRA) has found “little evidence of action plans and strategies with a particular focus on women or gender issues” across all member states.<sup>5</sup> Member states should **prioritise the integration of migrant and refugee women through national action plans and/or strategies on integration** which include and monitor the implementation of both mainstreamed actions and specific priorities aimed at taking a structural approach to tackling gender gaps. All actors at national level should also promote **the full participation of refugee and migrant women in the development of these strategies**.

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<sup>3</sup> For more information, please see IRC publications: [Unlocking Refugee Women’s Potential](#) (July 2019); [Getting Back on Track](#) (October 2019); and [Ruled out of Work](#) (December 2019).

<sup>4</sup> Please see the findings from our latest research in Germany here: <https://airbel.rescue.org/studies/scaling-economic-opportunities-for-women-refugees-understanding-and-overcoming-obstacles-to-economic-empowerment/>

<sup>5</sup> European Union Agency for Fundamental Rights, ‘Together in the EU: Promoting the participation of migrants and their descendants’, 2017, p. 7: [https://fra.europa.eu/sites/default/files/fra\\_uploads/fra2017-together-in-the-eu\\_en.pdf](https://fra.europa.eu/sites/default/files/fra_uploads/fra2017-together-in-the-eu_en.pdf)

## The International Rescue Committee

*The International Rescue Committee (IRC) is a global humanitarian organisation and refugee resettlement agency founded in the 1930s. Employing around 13,000 staff and 15,000 volunteers in 40 countries, the IRC responds to the world's worst humanitarian crises and helps people whose lives and livelihoods are shattered by conflict and disaster to survive, recover and gain control of their future.*

*In Europe, the IRC supports the integration of refugees and asylum-seekers in Greece and Germany, provides technical assistance to practitioners working in 18 member states through the AMIF-funded [European Resettlement and Integration Technical Assistance \(EURITA\) project](#), and works with businesses to champion refugee labour market integration through the [Business Refugee Action Network \(BRAN\)](#).*