

# Evaluation of EPIM III

Emerging insights from the evaluation so far

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## Grantees

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AIRE Centre	Advice on Individual Rights in Europe Centre
CIR	Consiglio Italiano per i Rifugiati
ECRE	European Council on Refugees and Exiles
ENoMW	European Network of Migrant Women
FRA	Flemish Refugee Action
IRC	Irish Refugee Council
MDM	Médecins du Monde
Migreurop	Migreurop
PICUM	Platform for International Cooperation on Undocumented Migrants
SIP	Stowarzyszenie Interwencji Prawnej (Association for Legal Intervention)

## CHAPTER 1 Introduction

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This report sets out some emerging insights from the ongoing evaluation of the European Programme for Integration and Migration (EPIM) 2012-2015 programme. The activities of EPIM and this evaluation lie at the very heart of EPIM's efforts to strengthen the capacity of NGOs active in migration and integration issues, to engage with and influence decision-making at EU and Member state levels, and to do so by drawing on a rigorous evidence base, and through a pragmatic approach. Founded in 2005 as an activity of the Network of European Foundations (NEF) in a unique effort to fund European migration and integration organisations, EPIM's activities include strategic grant-making as well as networking, capacity-building, supporting advocacy and policy work. The Programme has now disbursed over €3m to more than 24 grantee organisations.

Drawing on experience and learning from previous phases, EPIM's current three core areas of focus are asylum seekers, undocumented migrants, and equality, integration and social inclusion of vulnerable migrants.<sup>1</sup> Recognising the importance of the role played by civil society, one of EPIM's key goals is to strengthen the advocacy capacities of NGOs at the European level. This goal reflects the fact that over the past decade the EU has become an important actor in the field of immigration and asylum, as well as that the majority of countries face some challenges in this area.

The evaluation, being conducted by RAND Europe, looks at the project, theme<sup>2</sup> and overall programme levels and includes formative and summative dimensions. The objectives of the evaluation are to:

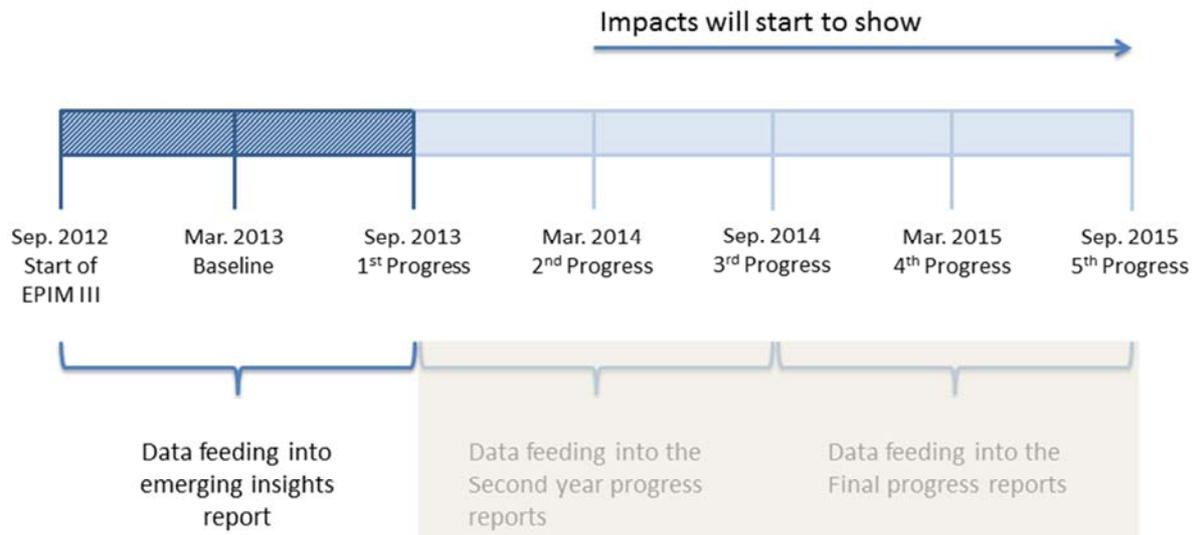
- clarify accountability
- capture achievements and advocacy
- identify learning about pathways to impact
- enable grantees and EPIM to act on learning during the course of the programme

In addition to the evaluation's focus on learning about what works (in context) and capturing impacts, it also examines the contribution of the EPIM programme to strengthening capacity and enabling networking among grantees in the NGO sector. The evaluation commenced in 2012 and will conclude in 2015.

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<sup>1</sup> EPIM's definition of 'vulnerable' means at risk of marginalisation, and includes refugees. UNHCR's definition encompasses, in addition to refugees, migrants fleeing economic, social and natural disasters in their countries of origin and irregular migrants in need of protection as a result of the move itself (Betts 2008).

<sup>2</sup> Asylum seekers; undocumented migrants; equality, integration and social inclusion of vulnerable migrants.

**Figure 1.1: Timeline for EPIM evaluation**

This report is based upon information provided to the evaluation team by the nine grantees funded by EPIM. Each grantee completed a progress reporting template in September 2013, in which they recorded ongoing impacts of their EPIM-funded project and highlighted areas for learning (both for the grantee and for others in the wider EPIM consortium).<sup>3</sup>

This progress reporting exercise was repeated in March 2014, and further progress reports will be submitted by grantees in September 2014 and March and September 2015. This approach allows the evaluation team to identify impacts in an ongoing way, throughout EPIM's 2012-15 programme. As illustrated above in Figure 1.1, it is anticipated that impacts of the grantees' activities will increasingly start to materialise towards the end of the evaluation period.

**This report is based on information in the September 2013 progress reporting templates**, completed by the grantees. The completed templates were reviewed by the evaluation team to see if any cross-cutting themes or issues could be identified. As a result of this review, three interrelated strategic issues emerged which were common to several grantees and in relation to which some emerging insights from the evaluation to date can be identified. They are:

- Building consensus through stakeholder engagement
- Influencing policy and practices in the integration/migration context
- Delivering a proactive approach to media and communications

Having been identified from a review of grantee documentation, these three issues were further explored in a workshop involving representatives from each of the nine grantees, held in Brussels in June 2014. Each grantee gave short presentation, outlining a particular experience relevant to one of these three issues. The presentations were followed by a discussion of each issue, where further learning was shared between grantees. This report draws on the discussion during the workshop, to add more detail to information provided in the progress reporting template.

<sup>3</sup> In March 2013 the evaluation team developed a baseline with each grantee, from which to measure the implementation and impacts of each EPIM-funded project.

This report is divided into three further chapters, each exploring one of the three emerging insights from the evaluation so far. The strategic issues and their underlying themes have emerged during RAND Europe's review of the yearly progress reports completed by the grantees. Together with the strategic issues, the themes are therefore reflective of the reports of grantees and aim to capture the diversity of grantee activity and where possible, grantee impact.

## 2.1 Introduction

Shaping the views of policy makers at EU and national levels, and providing them with information, is central to the mission of EPIM and its grantees. The EPIM logic model developed at the outset of the evaluation<sup>4</sup> (see Appendix A) includes providing support ‘to projects with clear potential to influence policy’. Similarly, the logic models of several grantees reflect this aim.<sup>5</sup> For example, PICUM aims to ‘raise awareness among EU and national policymakers of PICUM and the issues it promotes’ and Migreurop outputs include ‘increased opportunities to engage with high level expertise and decision makers’. This engagement is important in its own right, but also as a first step to achieve longer-term changes in policy and practice which directly impact migrants and asylum seekers.

In their reporting templates, grantees were able to describe the ways in which they had sought to engage a range of stakeholders – including policy makers, other NGOs, and migrants themselves. Barriers to the implementation and effectiveness of these activities were noted in most of the progress reports. These included lack of awareness among policy makers about complex issues such as unreturnable migrants and on occasions, reluctance among key audiences to engage with information and messages from grantees. During the workshop, approximately half of grantees reported on the reluctance they had sometimes encountered in engaging a range of stakeholders, from border police to migrants, who might be reluctant to get involved with NGOs.

Migrants themselves can also be difficult to reach. In the experience of SIP and its partners migrants are often reluctant to access services because they fear it will bring them to the attention of the authorities. The work is further complicated by the fact that the locations where migrants can be contacted are not always safe.

However, despite these barriers and the challenges in generating evidence of impact, and even though grantees’ projects are still in progress, there are some emerging examples of grantee activities which have reached and engaged relevant stakeholders. Building on activities pre-dating the EPIM-funded project, AIRE provided the European Commission with evidence on the UK’s deportation policy for EU migrants who have been sentenced to over two years’ imprisonment. This led the Commission to bring infringement proceedings against the UK. Similarly, PICUM reported ‘considerable exposure with high-level stakeholders’ and MdM highlight the committees, conferences and other events they have organised or at which they have been represented. ENoMW pointed to the fact that they are regularly asked for

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<sup>4</sup> At the outset of the evaluation a workshop was held with EPIM funders to identify the ‘theory of change’ behind the EPIM III programme and to map the inputs, activities, outputs, outcomes and impacts. The logic model in Appendix 3 sets out these elements.

<sup>5</sup> Workshops were held with each of the nine grantees to develop individual logic models for each of the EPIM-funded projects.

inputs to policy documents as evidence of the success of their engagement with stakeholders: for example, they contributed to the Women's Rights and Gender Equality Committee's (of the European Parliament) opinion on the directive 'on measures facilitating the exercise of rights conferred on workers in the context of freedom of movement for workers'.

The following six themes may offer useful lessons for individual grantees and at the EPIM program level, regarding how to engage policymakers and stakeholders.

## **2.2 A range of types of outputs provide potential opportunities for discussions on migration issues**

The progress reports show that the products of grantees' work (reports, documents, databases and even short films) often facilitate engagement by providing a starting point for discussions, a reason to hold meetings or events, and a reason to pro-actively contact stakeholders.

For example, ECRE noted that representatives from EU Institutions such as the Asylum unit of the European Commission and the European Asylum Support Office (EASO) attended launch events for their project and annual reports, and that the launch generated a number of press articles and social media activity. Furthermore, ECRE's Asylum Information Database (AIDA)<sup>6</sup> is of interest to the EASO because the database is relevant to the development of an Early Warning and Preparedness System. ECRE notes that an EASO communication acknowledges that information provided by NGOs about Member States' practice is one of the sources upon which the System must be built. AIDA was also mentioned in a UK House of Commons advisory note for British MPs (EASO, 2013).

Four grantees gave examples of using less traditional outputs as tools for engagement, and the use of film was mentioned several times as a way of engaging the general public and the media. Migreurop organised events in ten locations around France based on a film about their Open Access campaign. In 2012, ENoMW produced a film documentary, together with the EWL, called 'This Is My Home Now' (also mentioned below in section 2.3). ECRE provided video editing training for media officers from national member organisations involved in AIDA: 'Each participant recorded interviews with an asylum seeker or refugee and started editing it at the training'. When finalised, these were uploaded on ECRE's YouTube channel and AIDA website. Similarly, one of FRA's UK partners, Detention Action, used a professional theatre production to raise awareness of the issues related to those held in detention centres who are classified as 'un-returnable'. In both these examples the audience for awareness-raising was primarily the general public.

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<sup>6</sup> AIDA aims to inform legal practitioners, policy makers, the media, researchers and the general public on asylum procedures, reception conditions and detention of asylum seekers in 14 EU Member States (AT, BE, BG, DE, FR, GR, HU, IE, IT, MT, NL, PL, SE, UK) through country reports, comparative indicators, news, advocacy resources and video testimonies. See <http://www.asylumineurope.org/>

**Key lessons**

- In order to implement the strategic objective of stakeholder engagement grantees can capitalise on data and reports they have produced as opportunities to engage with stakeholders.
- Engagement based on products can be through specific events which bring people together or proactively taking steps to ensure these reports come to the attention of policymakers and stakeholders, including the use of social media, traditional press, and publicising through existing networks.
- Chances for engagement may be enhanced when the outputs can be used by stakeholders in their work – for example, the AIDA database can be used by the EASO.
- For general public audiences, film, theatre and other non-traditional formats might be useful modes of engagement.

**2.3 Targeting stakeholders at national, European and international levels**

Engaging at different levels of policy making (national, cross-national, regional, international) can allow grantees to leverage work and findings at one level and potentially provide added value at other levels.

Given the range of levels at which policy making relevant to grantees' work occurs, grantees engage with representatives national authorities, European institutions and organisations (the European Parliament, European Commission, European Union agencies, Council of Europe) and international fora (for example, the International Organisation for Migration and the United Nations High Commissioner for Refugees). Several of the grantees work at all these levels simultaneously, and the individual progress reports show that depending on the core focus of their activities, grantees communicate with and/or inform stakeholders at national, European and international levels.

One example comes from PICUM. According to the original grant application and logic model developed at the outset of the evaluation, PICUM's advocacy strategy targets the EU level. Accordingly, most of the activities set out in the progress report are addressed at the EU level (albeit involving national members). An exception to this is a series of national events which PICUM ran in Greece. PICUM reports that 'those working in Greece considered PICUM's position as an EU level advocate as particularly beneficial to bringing about visibility and change' thus the EU focus of PICUM's work facilitated engagement with domestic policymakers and other stakeholders. However, PICUM notes that these domestic events also facilitated EU-level stakeholder engagement. Following the national events PICUM made plans to bring a number of Greek organisations to Brussels for a series of events and key meetings, worked with Greek organisations to develop targeted EU policy recommendations, organised a half-day hearing in the European parliament and arranged a series of strategic, bilateral and multilateral meetings with MEPs and representatives of the European Commission and Council COREPER II (Committee of Permanent Representatives) working group.

Another example comes from Migreurop's Open Access project, from which two examples of targeting national stakeholders can be drawn. The main target of the campaign (according to the grant application) is European policy. One of the activities reported by Migreurop relates to attempts to inform policy development on the Return Directive, and specifically to inform an evaluation of the Directive commissioned by the EC. Migreurop sent a letter to Commissioner Malmström and the head of the Unit in charge of the evaluation, providing information about national procedures and practices which are

non-compliant with the Directive, and the effects of the Directive on detention. Following this, a meeting was scheduled with the relevant officials at the Commission. At this meeting it was made clear that the EC's focus was not on changing the Directive, but on the application and implementation of the Directive at member state level. This caused Migreurop to 'adapt' their awareness-raising work from the European level, to a more national focus.

A related example was provided at the workshop of the importance of targeting stakeholders within relevant national-level institutions. Also under the Open Access campaign, Migreurop organises visits to detention centres. In order to gain access relationships of trust need to be built with staff at detention centres. Through both personal contacts and by explicitly inquiring into the viewpoints of staff at these centres, Migreurop has been able to establish relationships with staff, some of whom now provide Migreurop with field data. In countries where longstanding relationships have been built with staff at detention centres, visits have been easier to organise.

SIP provided an example of targeting stakeholders at the appropriate level during the workshop, as part of their work to engage with migrants. To facilitate contact, SIP cooperated with labour inspectors, Border Police, other NGOs and social workers in reception centres (who disseminated information about SIP's project among asylum seekers), in a similar way to Migreurop's work with detention centre staff.

#### Key lessons

- EU-level activities and focus can add value to work at national levels, and vice-versa. Grantees might identify opportunities to coordinate domestic and EU-level activities on a particular project or issue to maximise credibility and impact.
- Good links with policymakers at EU level allow grantees to understand where to focus their awareness raising efforts – on which issues there is the possibility for change and reform at EU-level, and where the national level is the most promising target for change.

## 2.4 Ambassadors help amplify the message and pass it on to others

Securing the support of individuals who are well-known or influential in the field to present, publicise and promote grantees' messages can increase the chance that grantees can engage key policymakers and stakeholders. Two grantees make explicit mention of working with ambassadors in this way.

MdM provide examples of this in their progress report. They arranged for an article to be written in the British Medical Journal about access to healthcare for undocumented migrants, secured support from key individuals to retweet important messages, and asked the European Public Health Alliance to put up postings on the issue of migrant health on their website (EPHA, 2013). To strengthen their advocacy efforts with real professional experience, MDM have engaged with field volunteers (e.g. doctors, health professionals, etc.) to act as ambassadors in meetings with policymakers. Field volunteers speak with an authentic voice and can draw on their own experience to deliver the message. However, as many of them are not familiar with such advocacy activities, MDM noted in the workshop that support and preparation beforehand and debriefings afterwards are crucial to help the volunteers and ensure they are comfortable with the activities and can make the most of advocacy opportunities. MDM have also successfully developed a relationship with an MEP who included many of MDM's recommendations in a report which was approved by the European Parliament in July 2013. MDM report that 'an interesting way to raise

awareness is to rally the support of other, more important actors whose voice is better heard across Europe’.

The engagement of ambassadors is central to one element of Migreurop’s Open Access campaign. Migreurop have arranged visits to 23 different detention centres by parliamentarians and journalists. This both generates media coverage, and is intended to encourage parliamentarians to make public announcements about access to detention centres. The challenge in this method of engaging ambassadors, highlighted by Migreurop during the workshop, is that it can be very time consuming both in the preparatory stages and in the follow-up activities required.

Losing the support of ambassadors can hamper grantees’ work. For example, CIR reported the consequences of the German Federal Office for Migration and Refugees (Bundesamt) cancelling its involvement in a September 2013 roundtable. CIR reported that the withdrawal of the Bundesamt ‘created a domino-effect whereby the other participants in the roundtable also cancelled their participation’. CIR tried to organise an alternative roundtable with representatives of Bundespolizei and UNHCR, but both of these made their participation dependent on the presence of the Bundesamt.

#### Key lessons

- Securing support from influential individuals who have a voice and can publicise the message of grantees can be an effective way to raise awareness.
- At the same time, it is important to mitigate the risk of over-reliance on individuals or particular organisations, perhaps through developing a number of such relationships.

## 2.5 Multiplier effects of using networks

Just as key individuals can strengthen grantees’ messages, joining networks and forums can increase the range of audiences reached by awareness raising activities. Three grantees specifically mentioned benefits of membership of other networks and associations in terms of raising profile and engaging with EU decision makers. All EPIM grantees collaborate, to some extent, with other NGOs and partners.

PICUM described the gains in terms of stakeholder engagement from joining the European Year of Citizens Alliance,<sup>7</sup> and as a result of their role in creating the Social Platform on Migration.<sup>8</sup> The Platform gave a presentation to Commissioner Malmström at a joint meeting in September 2013 (Social Platform, 2013). PICUM reported that it benefitted from the high-level institutional standing of the Social Platform and as result was able to engage with Ms Malmström on issues concerning the human rights of undocumented migrants. PICUM reported:

In contributing to the development of the Social Platform’s common position on migration, PICUM learnt to carefully negotiate ways to exert its influence, yet in a participatory and supportive way. Representing a broad coalition of European NGO networks, the Social Platform

<sup>7</sup> European civil society organisations and networks members of the EESC Liaison Group have created a civil society Alliance aiming to advocate for a broad understanding of active European citizenship: the European Year of Citizens Alliance (EYCA). <http://ey2013-alliance.eu/about-eyca/>

<sup>8</sup> ‘A platform of European rights and value-based NGOs working in the social sector.’ <http://www.socialplatform.org/who-we-are/#sthash.phaCBAMn.dpuf>

has very much become the ‘to go to’ civil society voice in Brussels on many issues. The release of this joint position paper has now opened several significant opportunities for Social Platform.’

PICUM also point to their engagement with the European Anti-Poverty network as having ‘increased understanding amongst several national organisations working on anti-poverty initiatives about the policy framework serving to push migrants into destitution.’

ENoMW also mentioned that they were a member of the Social Platform, and as a result had made contributions to the Platform’s response to the Commission’s consultation on the Post-Stockholm Agenda.<sup>9</sup> ENoMW noted that ‘contributing to the Post-Stockholm Agenda is key groundwork ... to ensure that we can be as ambitious as possible and make as much progress with our advocacy in the next five years’. Contributing to the response of the Platform (rather than responding as an individual NGO) was more time-effective for ENoMW and gave greater weight to their message.

MdM noted that they had learned the importance of coordinating advocacy with other EPIM-funded NGOs and describe how they use their membership of a number of networks to increase the dissemination of their messages. For example, they presented at events organised by the European Public Health Association, and actively participated in a European Public Health Alliance conference (including contributing to a joint declaration on access to medicines).

To strengthen their message a number of grantees, such as PICUM and ENoMW have brought together a range of stakeholders to speak on an issue with one voice. During the workshop, PICUM reported on their experience of building a coalition of 38 European and international migrants’ rights and children’s rights organisations to sign a joint letter to the European Council, with the objective of influencing the Council Communication on future justice and home affairs policies, and ensure the adoption of a more coherent and rights-based policy approach towards migrant children.

One of the most challenging aspects, as reported by PICUM, was achieving consensus across the different organisations, each of which had their own priorities, in a timely way. Gaining sign-off from all partners took a considerable amount of time (especially in the case of some larger ‘established’ organisations where approval was needed from different levels of management). Another risk was that incorporating the preferred wording and key points of all signatories could obscure the main message. PICUM reported that an element of successfully delivering the letter was to take time to listen to and negotiate with each signatory to secure support for uniting behind a key message.

A different but related example comes from IRC who reported at the workshop on an approach for engaging with policy makers to ensure buy-in to their reports. Selected policy makers were asked to read and comment on ICR reports before they were published to generate a sense of engagement and thereby create possibilities for IRC to work more directly with policy makers. In some instances, those invited to comment on pre-publication versions of reports were from institutions which had previously been criticised by IRC. By taking into account comments (where appropriate) IRC were able to improve the content of their reports and ensure that their key advocacy messages were tailored to their intended audiences. One challenge was managing the expectations of those invited to comment as to how much scope there was to change report content. To maintain relationships, IRC responded to explain why certain suggestions were not incorporated. For the future, IRC noted that they will be clearer in how they communicate with policy makers to manage expectations and to clarify that certain elements of content (e.g. research findings) cannot be altered.

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<sup>9</sup> The broad framework centring the next five-year plan with guidelines for DGs Justice and Home Affairs.

**Key lessons**

- Networks and partnerships can be used to publicise key messages so that they reach a wide range of audiences.
- Networks can provide links to key officials in EU institutions, for example press and communications officers.
- Networks add value because they demonstrate that a particular point is more broadly supported than just by an individual NGO or grantee.
- Building large coalitions of organisations and stakeholders can be powerful way to communicate a message.
- However, reaching consensus within a large coalition is time-consuming and requires extensive communication with all parties involved to retain engagement and to avoid estrangement.

**2.6 Building a reputation as a trusted source of information**

Some of the grantees see the provision of accurate information to migrants, policymakers and stakeholders as a central part of their role.

In relation to engagement with migrants as key stakeholders, in the workshop SIP observed that a way forward could be the approach adopted by their project partner Menedek, who combine the provision of legal advice and other social services to migrants. Delivering a trusted and reliable service and providing tangible help provides a route to contact and engagement with migrants.

At the national level, ECRE had received feedback and examples of the use of their national reports by experts and lawyers. The AIRE Centre believe that they are seen as an ‘important provider of information regarding the legal status of migrants’ among stakeholders at the Commission, Politicians and NGOs’, as well as the media. Stakeholders have incomplete knowledge on this technical topic and turn to AIRE for information. For example, the AIRE Centre were contacted by an official from the European Commission about the UK’s policy of automatically issuing deportation orders to EU migrants who have been sentenced to two or more years’ imprisonment. AIRE also capitalise on their expert knowledge through running training sessions, and these have been attended by NGOs and agencies such as local councils and housing providers in the UK. AIRE report that they have been able to use training events with stakeholders as a means of building networks and as a springboard for EU advocacy work.

ENoMW describe how their first-hand experience of the daily issues and challenges migrants face lends weight to their inputs:

Every member [of the European Network] has first-hand experience of migration ... starting there, we become credible interlocutors on broader topics, even those we are not currently focusing on in depth. On some of the more divisive and controversial topics, such as policy developments concerning prostitution, anti-trafficking, or violence against women, the authenticity of us being “migrants speaking for migrants” proves key in our voice being foregrounded – of course this is then substantiated by genuine expertise.

To gain acceptance among ministries and policy makers as a credible source of information, CIR reported during the workshop on their efforts to remain impartial by stating clearly what the shortcomings of policies are and by suggesting solutions. It was noted in the workshop that CIR explicitly tries not to exaggerate their messages in order to remain credible. It is in part due to this that CIR has been asked to provide training to border police.

Another way of enhancing the extent to which grantees' provide robust and trusted information is to integrate inputs from partners. For example, AIRE reported that a document prepared for the European Commission on the scope of Article 7(3) of Directive 2004/38 benefited from several partners' involvement – both in terms of technical knowledge and because the partners lent their reputation to the document. Similarly, CIR report that they had collaborated with partners (for example, ECRE) in making approaches to EU stakeholders. CIR believe that as a result of this effort, they and their consortium partners are increasingly seen as reliable sources of information (by lawyers, European institutions and other NGOs).

Not all grantees are proactively approached by policy makers in the way CIR has been, but Commission consultations were mentioned in several grantees' progress reports as an opportunity to provide specialist knowledge to policymakers. For example, SIP found that the best opportunity to influence legislation lies in participating in the consultation process (e.g. in the drafting of law on aliens).

#### **Key lessons**

- Grantees should capitalise on the knowledge they have which policymakers do not.
- Most commonly this is 'on the ground' information about experiences of migrants and asylum seekers, but might also stem from legal expertise.
- A grantees' reputation might mean they are pro-actively approached for information by policymakers.
- Consultations on proposed policy change are a key way in which grantees are able to use their knowledge to inform policymaking and demonstrate their expertise to policymakers.

## 3.1 Introduction

This section discusses the methods by which grantees have achieved success with delivering changes to policy and practice. For most grantees making, or at least contributing to, a change in migration policy and practice is the desired impact towards which they work. As this report covers the first year of grantee activities it is likely to be too early for any of these impacts to have already been achieved as a consequence of the work undertaken under EPIM III. Still, the efforts to generate changes in policy and practice are already underway, and one of the main means to do so is advocacy.

Advocacy here refers to grantee activities directed at bringing about change on a specific issue or area of legislation. The diversity of grantees funded and the different activities that they are undertaking means that advocacy efforts are similarly diverse. All advocacy activities however, aim to contribute to changes in the ways in which different countries treat, or procedurally deal with, asylum seekers, undocumented migrants, or vulnerable migrants. As changes to legislation are often crucial to fundamentally alter policy and practice, the vast majority of the advocacy efforts are directly targeted at policy makers at various levels.

In their progress reports, grantees highlighted a number of ways that they believed that they were making progress and achieving impact through their advocacy work. These included organising and conducting meetings in particular formats, methods of effective engagement with the Commission and deploying strategic litigation. Each of these is discussed briefly below.

## 3.2 Tailoring meeting formats according to stakeholder and topic

The use of different kinds of meetings was mentioned by several grantees and was noted to be achieving some results in terms of bringing about changes. A range of views were articulated on how meeting size, format and organisation can impact and effect change in policy or practice.

Two grantees described how private meetings with stakeholders were most effective when the issues under discussion were particularly sensitive. It was noted for example by CIR that having a relatively private meeting with key stakeholders seems to work best when the issues are politically charged. Policy makers were potentially less concerned about their participation in such meetings when the numbers of people involved was smaller.

IRC noted during the workshop that in order to overcome reluctance by both policy makers and migrants, it is sometimes necessary to ‘move into the shadows’. Grantees have many audiences for their work, some of whom hold very different viewpoints on migrant issues. For example, being seen to be working with policy makers might mean migrants are less likely to engage with a grantee, yet campaigning too openly against certain policies may harm the ability to influence policy makers. To balance these pressures and ensure that an impact can still be achieved, it can sometime be necessary to avoid publicity

and work in the background. ECRE similarly noted that politicians may want to work with NGO's and make use of their knowledge, but do not want it known more widely that they have done so. Balancing publicity with diplomacy is therefore a crucial element of working with a range of stakeholders.

Roundtables are considered useful modes of engagement by several of the grantees. CIR has organised a series of roundtable meetings. Feedback received by CIR from attendees at these events indicated that this kind of meeting format is considered, by some stakeholders, to be more useful than larger conferences. This was because roundtables typically involve a smaller number of qualified experts which 'allows high-quality and franker discussions'. Roundtable-type events were thought by the grantees to be particularly well-suited to dealing with sensitive topics which were best discussed face-to-face.

The AIRE Centre also reported on roundtable events they had hosted for UK policy makers. Following a roundtable event in July 2013, they were approached by representatives of an influential think tank in the UK – the Institute for Public Policy Research – to investigate potential joint work. IRC mentioned that these smaller meeting settings created an opportunity for capacity building, for example, among legal professionals working in the migration field. Discussion groups involving small numbers of attendees provided a safe and relatively confidential forum for participants to exchange views and discuss the ongoing challenges of particular aspects of their professional work in the sector.

Regardless of the type of meeting undertaken, several grantees (AIRE, CIR, MdM, Migreurop) mentioned the importance of following-up after meetings and activities to sustain and develop stakeholder engagement. For example, CIR believed that it was helpful to follow up discussions with stakeholders such as MPs by providing ad hoc papers on related issues to help to inform and guide their ongoing thinking. SIP advised that any meetings with a key stakeholder should be followed by email exchanges, (for example, following a meeting they contacted the National Immigration Authority with information about the Directive and project services).

FRA made use of lunch meetings with politicians to inform them about the issue of unreturnable migrants. Each lunch meeting hosted one politician who was provided with a range of materials (for example, a Dutch translation of the stories of five migrants and summary of findings from a research report). Following these lunch meetings (although we cannot say whether this was directly as a result of these meetings) the Green Party and the Christian Democrats called for measures to improve outcomes for migrants (such as residence permits).

Finally, two grantees mentioned how interviews, primarily to gather information, had led to follow-on opportunities for advocacy. IRC reported that it successfully influenced a key stakeholder 'as a result of conducting an interview with them to inform the project'. As a result, this stakeholder supported IRC by advocating that they should receive state funding. CIR found that their contact with the border police at Rome airport through an interview generated an opportunity for CIR legal officers and doctors to provide training to the police on issues such as the identification of asylum seekers, unaccompanied minors and victims of torture. They remark that 'This is a great opportunity to train police on fundamental rights'.

**Key lessons**

- Conducting a variety of different types of meetings in a range of formats can offer specific benefits for grantees when trying to engage stakeholders.
- Smaller settings and groups can offer stakeholders an informal and relatively 'safe' discussion forum. These can also facilitate ongoing relationship-building.
- Meetings involving stakeholders present an opportunity for follow-up interactions initiated by grantees to provide notes, materials, articles, summaries etc.

### **3.3 Methods of effective engagement with the European Commission – responding to information needs**

Some grantees described the methods that they had deployed to engage effectively with the European Commission and maximise the chances that their voices were heard and taken into account. PICUM noted that they continue to search for effective ways to engage the Commission, as even with funding from DG Employment under the PROGRESS fund to support EU networks active in social inclusion and anti-poverty initiatives, they have found that simply writing to the different Directorates General can produce limited results.

Using their project consortium and drawing on the specialist knowledge and expertise of partners was noted as important by grantees (also mentioned above in Chapter 2) in positioning themselves to respond to the information and consultation needs of the European Commission. Migreurop noted that it was a useful approach for them to have working groups that operate thematically, as this creates new ways for members to engage in different parts of the project.

Providing a useful tool for the European Commission to access the data that they might need was noted by ECRE to be working well for them with their AIDA website. They observed, however, that for the Commission it seems to be very important to focus on what actually is working within the systems, as well as what is not. For example, they say:

As regards the AIDA annual report<sup>10</sup> some remarks were made by Commission officials on the fact that [an] emphasis on what is not working in Member States and the limitations of the new legal framework may not be helpful in the implementation of the Common European Asylum System from an advocacy perspective. Such remarks ignores the many examples of good practice that have been included in the annual report but raises the need to look into the way the findings are presented for next year's report.

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<sup>10</sup> ECRE (2013)

#### Key lessons

- Developing a specialist profile and being supportive and responsive to the European Commission can generate engagement.
- Promoting a tool that policy makers and other stakeholders might find useful can help to build engagement.
- Apart from highlighting areas for improvement, emphasising what is working well can be important in relationship-building with the Commission.

### 3.4 Using strategic litigation

Several of the grantees use strategic litigation to effect policy and practice changes in the migration field. The concept of strategic litigation refers to selective pursuit of legal action to challenge the legality of a particular policy or practice. Most grantees who mention this approach believe it can be effective, although acknowledge that it is complex, requires specialist knowledge and skills and can be slow and expensive. AIRE has developed a common approach to strategic litigation that is shared between their project partners and made available to non-partner NGOs. The framework helps partners identify cases which have potential for strategic litigation – i.e. test an important legal principle or provision. They found that using a common framework for selection of strategic litigation helps to:

- build confidence in decisions about which cases to take forward;
- ensure that all aims of the project are met;
- identify and address any gaps in the work / identify stakeholders who can make or contribute in making changes in legislation and practices;
- make fair and efficient decisions on how to spend money.

This common approach has also generated synergies and complementarities with related AIRE strategic litigation projects on promoting EU law and ECHR rights of Roma communities (funded by the Strategic Legal Fund and the Joseph Rowntree Trust respectively). Other grantees using strategic litigation include IRC and SIP.

AIRE noted in the workshop that it is preferable, although not essential, to select cases for strategic litigation which are ‘strong on facts’- have a story which is easy to tell and which appeals to the public.

#### Key lessons

- Strategic litigation can be a slow and expensive approach to bringing about legislative change – but can be effective.
- The use of strategic litigation can result in challenging laws and their application, which can directly affect policy

## **4.1 Introduction**

The media, to some extent, plays a role in the activities of all EPIM grantees. For example, ECRE's logic model includes a group of media-related activities such as launching annual reports and developing a communications and media strategy with the objective of producing 'improved advocacy and media tools for civil society'.

The media can be an ally of grantees - a way of promoting messages – as well as a target for engagement strategies – for example, to challenge terminology used by the media and expressions of anti-migrant sentiment. The challenges of working with the media are mentioned throughout grantees' progress reports. For example, SIP reports that engaging with the media is not easy in countries where there may be a 'negative public opinion towards immigrants'. They note:

A ... challenge remains the relatively hostile climate surrounding the topic of (undocumented) migrants. In general public opinion is somewhat unfavourable towards migrants which makes a change to public opinion difficult and tends not to make the media receptive of general statements on migrants.

PICUM take issue with terminology commonly used by some sections of the media:

The way terminology is used when referring to undocumented migrants in international, EU level and national media is in most cases still not in accordance with PICUM's principle and directly shapes public opinion on criminalising undocumented migrants.

Across the work of grantees, examples can be found of successful and useful media engagement. From the analysis of grantee reports several themes emerged under which the examples can be clustered. The five themes identified relate to the diverse aspects of engaging with the media, ranging from interactions with journalists, to the framing and publishing of reports and opinion pieces.

## **4.2 Coordinating national and EU-level media engagement**

Earlier, the potential value of targeting stakeholders at national and EU levels to optimise engagement was discussed. Engaging with the media at both of these levels is an important part of this.

ECRE coordinated the active engagement of contact points at national level and EU level, both in the press and partner agencies, around the launch of national reports in September 2013. For instance, the UK contact person was described as 'very active', leading to a lot of media coverage and other publications in that country. Thomson Reuters covered the launch, and was in contact with both ECRE's press officer and the UK press officer. ECRE suggest that in these kinds of activities it is particularly important to take into account the national context and debates to ensure that coverage is tailored to national interests.

CIR gave the example of the response to the Salamis incident,<sup>11</sup> where they worked with the People of Change Foundation to ‘jointly and simultaneously engaged journalists ... at national level involving other networks at national and EU level (through ECRE)’.

#### Key lessons

- Links between national issues and European level media are important to ensure relevance and retain interest.
- It can be useful to have a coordinated plan for engaging with the range of different media points.

### 4.3 Being proactive by publishing articles and opinion pieces and offering support to journalists

One way in which grantees might secure media presence is by drafting articles and opinion pieces themselves, to be published in other media and news outlets, rather than (or in addition to) waiting for requests for information or for opportunities to react to specific incidents. The advantage here is that the grantee has more control over the language and the way in which the message is communicated, compared to providing information to be included in a story by someone else. Furthermore, a proactive approach means that the grantee can be ready to respond to potentially tight media deadlines and timelines, since text will have been written in advance.

For example, one of SIP’s members, Menedek, published two articles on a specialised website of the Multicultural Centre Prague. PICUM reported that they had published opinion pieces in EU-level (EurActiv) and national-level media (Inside Housing UK). PICUM recommended being proactive and consultative in order to produce high quality drafts and have them published in a timely manner. CIR reported that they regularly interact with media and individual journalists in order to draw ‘continuous attention’ to migrants and refugees rights, not only when incidents occur but also inviting them to conferences, seminars, roundtables or public events.

Migreurop noted during the workshop the importance of focusing energy on media communications during their visits to detention centres rather than on final reports after the events. Final reports proved useful only for internal purposes and were less useful in reaching the media.

#### Key lessons

- Getting ahead of media requests by being proactive can offer opportunities to grantee organisations.
- Offering opinion pieces and media articles can help grantees to keep control over the messages published in the media and can also enable and facilitate relationship-building with journalists.

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<sup>11</sup> In August 2013 a ship carrying migrants from Libya was rescued by a oil tanker, MV Salamis. There followed a disagreement between the Maltese and Italian government about where the migrants should be taken.

#### 4.4 Personal stories and ‘friendly’ journalists as routes to media coverage

Many of the grantees’ progress reports discussed challenges of securing media coverage for the issues they cared about and securing the interest of the media. A common experience among grantees was that media interest tends to be captured by narratives around personal stories. SIP observed that when writing or reporting about migrants the media ‘need concrete cases to show to the public’.

The compelling nature of personal narrative was part of the thinking behind the decision of ENoMW to produce a documentary (mentioned above) entitled ‘This is my home now’, which they hoped would lead to engagement with the mainstream media. ENoMW developed a communications strategy for wider dissemination of the film, including subtitling in different languages, arranging screenings through national members in a range of countries, and contacting national media to test interest in broadcasting the film on TV. (The film was around 5 minutes long, designed to fit within a one-hour broadcast slot).

While this kind of narrative provides a route into media coverage, it brings its own challenges: SIP reported that ‘migrants are not willing to reveal their personal situation, in particular when they do not comply with national laws (illegal employment is a typical situation).’ SIP noted that they were not in a position to provide personal stories information to the media at the time of the progress report. Another challenge, in the experience of Migreurop, is that journalists prefer to interview migrants directly, and it is not always possible to arrange this at short notice.

CIR reported that they and their partner organisations engaged with journalists already ‘sensitised’ on migration and asylum issues and they try to sensitise other journalists who are not familiar with these topics. Migreurop noted their links with trusted journalists, but said it had proved harder to engage with journalists other than those who are already to some extent sympathetic to their message. Migreurop thought it was helpful to group the ‘friendly’ journalists into two categories in order to guide engagement and target resources:

‘One of the possibilities is to work on two different levels: on “first circle” of militant journalists with whom to engage in longer term collaborations ... and a “second circle” of journalists interested in the topic, but mainly for “sensationalist” purposes to contact and solicit when [there is] a specific event’

##### Key lessons

- Personal stories and narratives, although sometimes difficult to source, are very popular with the media and can offer a useful way of raising the profile of an issue.
- Building a network of interested journalists can assist with raising media profile.

#### 4.5 Overcoming challenges of the time and resources needed for ‘continuous’ media presence and rapid response to incidents or stories

Given the challenges of interesting the media in migration stories, many grantees described responding to news stories as a central part of their approach,

CIR notes that part of their wider tactic in relation to the media is to engage with journalists at other times aside from in the context of particular incidents or events - for example, inviting journalists to attend conferences, seminars, roundtables or public events. Migreurop talked of the need to ‘facilitate’ journalists’ work, providing them with ‘news’, with data or other material that will allow them to produce

a story (for instance, a visit to a detention centre). However, when there is a specific incident CIR, Migreurop and PICUM all believed that the most effective responses are those which rapidly provide information (from NGOs, lawyers or migrants themselves) to the media.

While current affairs provided opportunities for engagement, Migreurop noted that it can be very challenging to meet journalist's timetables and quickly gather information needed to respond to a story. Other grantees spoke of the importance of having the necessary facts and figures to hand when undertaking this 'rapid response' activity. ECRE found their national reports and the comparative information they contained were 'extremely useful' for day-to-day media work, enabling them to have prepared examples and relevant data ready for use at short notice.

Analysis across grantees' progress reports highlights the number of different facets needed in a comprehensive media strategy; 'pushing' information proactively; being ready to react to incidents and current affairs; building longer-term strategic relationships with journalists; having a presence on the web, social media, broadcast media and traditional printed press. Undertaking all these different elements of media engagement requires time and resources, and a requirement to find, as Migreurop put it, an 'equilibrium between [journalists'] need for 'scoops' and our willingness to communicate regularly on migrants' detention related issues'.

AIRE noted the challenges of engaging with the media without a press officer or resources for media engagement. PICUM said that in their experience, it was also helpful if key staff within the organisation were available to work alongside the communications department so that a high quality opinion piece could be produced within a tight deadline, which also has resource implications.

Two grantees mention the role of social media in enhancing visibility and therefore reaching out to stakeholders. PICUM note the importance of using social media as part of a strategy of stakeholder engagement. They gave the example of Commissioner Malmström's using Twitter to comment on the rights of undocumented migrants and referring to PICUM's work.

ENoMW report an increase in the number of times they are mentioned on Twitter and Facebook as an indication of their increased visibility. ENoMW provides an example of how even small organisations, with very limited resources, are able to generate media exposure. ENoMW briefed the European Parliament in a two-hour lunchtime event which included a roundtable panel discussion. About 50 participants attended and the event was used to launch a pamphlet series on access to employment for migrant women. Together these forms of outreach helped to improve the visibility of ENoMW.

PICUM noted that one way to ease the burden of responding to requests for information would be to restructure its website, so that journalists and others could more easily identify information themselves. As they state in their progress report: 'Optimising search functions, facilitating access to archived resources and improving visibility of its membership network will help PICUM's website to become a useful information and networking resource for journalists.'

#### Key lessons

- It can be useful to engage with journalists in general as well as in specific contexts – e.g. inviting them to conferences and meetings.
- The ability to respond quickly to the publications requirements and timetable of the media is critical to developing a media presence. This requires resources in terms of staff time and expertise.
- Social media can clearly play a role – especially when coordinated with other media contexts.

## 4.6 Using public relations companies to increase media impact

During the workshop two grantees shared their experiences of working with public relations companies.

ECRE has worked with a large, international PR company and shared learning about how to manage the content of media messages produced by PR companies and the process of working with PR companies. In terms of content, ECRE reported being reluctant to approve more 'sensationalist' media content (which might have increased attention) in order to preserve accuracy. In terms of the processes, the importance of a clear contract with a PR company, clearly stating deliverables and timeframes was noted by ECRE – even when the PR company is doing some of the work pro bono.

CIR had also worked with media companies on two campaigns, and they noticed that the media companies focused on phrasing of the message, whereas CIR had traditionally focused on the content of the message.

### Key lessons

- Working with media companies provided grantees with useful insight into new ways of engaging with media, but should be entered into with the expectation that there will be negotiation about the nature and content of messages. The agreed approach and deliverables should be set out in writing.

## CHAPTER 5 **Next Steps**

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The current report provides a bird's eye view of some of the grantee achievements over the first year of EPIM III funding. It shows the breadth of the on-going grantee activities and in some cases, such as CIR's engagement with the Italian border police, real impacts on policy and practice. With regard to the project plans of the grantees, as captured by their logic models, it is clear however, that the majority of grantees have focused on the production of outputs (see progress report). It has been on the basis of the production of these outputs, and the lessons learned while producing them, that most of the emerging insights captured in this report are based. Hence, the emerging insights in this report relate to the 'early' experiences and struggles in the delivery of outputs.

As EPIM III progresses, the grantees will (have to) move towards generating wider policy outcomes and impacts. The insights that will emerge over the next year are therefore likely to be of a different nature. More explicit engagement with stakeholders and policy makers is expected as the grantees aim to leverage the outputs they have produced over the course of the first year. While such actions, activities and experiences may be more difficult to capture as insights due to their less tangible nature, they are crucially important to the success of EPIM III. Only if grantees are able to move from outputs to outcomes and impacts, can EPIM III move towards fulfilling its mission to:

1. Uphold and defend the European commitment to Universal Human Rights and social justice, to ensure the dignity of all people in the European Union;
2. Promote a pragmatic approach to European and national policies on migration and integration;
3. Influence, through a grants programme, EU policies and their national implementation in one of three focus areas (Asylum seekers, Undocumented Migrants, and Equality, integration and social Inclusion of vulnerable migrants).<sup>12</sup>

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<sup>12</sup> EPIM mission statement, <http://www.epim.info/epims-mission-statement/>

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## APPENDIX A: EPIM logic model

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Figure A:1 EPIM logic model

