

Local government and migrant integration in Europe and in Greece

By Dia Anagnostou

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Executive summary

Immigrant integration has become an explicit goal of cardinal importance in the policy agenda of the European Union and its member states since 2000. Integrating immigrants and their children into the complex fabric of society has been recognized as crucial for social cohesion and economic growth in the host countries. Their inclusion is an essential precondition for keeping inter-ethnic and inter-racial tensions at bay. While immigration policy is a responsibility of national governments, it has also been increasingly recognized that migrant integration takes place, first and foremost, at the local level. Debates related to migration are conducted and framed at the national and European levels. Yet, local authorities are in practice and by and large administratively responsible for dealing with the demands and effects of migration and integration of migrants into local societies and economies. This report and the project LOMIGRAS explore the role of local government in relation to migrants' integration by empirically focusing on the case study of Greece.

Local and municipal authorities, independently or in cooperation with other public agencies and non-governmental organizations, are providers of a large array of social services. They provide services in the area of health, education and social and child care, and they are also responsible for maintaining the social infrastructure of cities where many ethnic and migrant communities live. Having closer day to day contact, they have better knowledge of local society and conditions on the ground. The involvement of local government is not only in the context of implementing nationally set policies, but also in devising their own immigrant integration strategies, and even in becoming a source of innovation. In the 1990s, cities in countries like Switzerland and Germany developed targeted integration policies when such policies had hardly been developed at the national level. The 2011 EU Agenda for the Integration of TCNs has placed particularly strong emphasis on the active involvement and indispensable role of regional and local authorities in the formulation and implementation of migrant integration policies.

The increasingly proactive role of municipalities in the area of migrants' integration is both shaped by and in turn contributes to redefining, the relationship between local and national levels of government. Despite the highly diverse national models and approaches to immigration and integration policy across countries, the demographic and spatial concentration of immigrants poses a number of similar challenges to local governments and services, especially but not only in large and medium-size cities, across Europe. Between 3/5 and 2/3 of the migrant population in Europe lives in densely populated urban areas or in towns. The ability and potential of local government to manage multi-ethnic diversity and promote integration has been amply recognized. Yet, the conditions and factors that shape local government responses in this regard, as well as their effectiveness in promoting the inclusion of TCNs, have received limited attention in academic and policy-related research in Greece and in Europe.

Existing research has shown that local characteristics, initiatives and arrangements significantly determine the remit of policy opportunities and influence the municipalities' potential for implementing effective migrant integration policies. At the very least, the fact that local authorities and institutions in different states enjoy very different levels of executive and financial autonomy vis-a-vis the central

government endows them with varying capacities and resources to develop their own integration policies. Reports have also highlighted good practices on the basis of specific and ad-hoc projects in particular cities. What is lacking though is an understanding of why and how policy implementation processes at the local level incorporate (or fail to do so) priorities and goals aimed at immigrant integration in the medium and long-term. We have limited knowledge about the variety of ways in which local authorities in Europe affect the prospects for a more inclusive multi-cultural society, as well as the conditions and factors that enable or constrain local authorities' action in this regard.

Towards filling this gap, this report provides an overview of existing literature on immigrant integration and the local government. It then moves on to consider the case Greece and the role of municipalities in migrant integration. The first section reviews different understandings of migrant integration in Europe and it conceptualizes the concept in a practical and policy-relevant manner. It also discusses the role of local government authorities and draws from Alexander (2007) to define four domains in which local government policies related to immigrants are formulated.

First, the *legal-political domain* includes policies regarding the representation and mobilization of migrants, which can strengthen their participation in the host society alongside their sense of belonging in it. Secondly, the *socio-economic domain* comprises reception services, labor market policies, education, welfare, etc. Many cities with a significant migrant population may provide limited, basic or extensive reception services, either as part of a national policy, or as a local initiative. Furthermore, social welfare services are often a major municipal policy with far-reaching indirect effects for immigrants. Thirdly, the *cultural-religious domain* includes policies relating to religious and cultural practices, and generally cultural diversity. This domain is shaped by municipal authorities' attitudes towards religious institutions (i.e. mosques) and practices (ethnic and/or festivals), or towards religious schools. Local cultural policies can also include campaigns to increase the awareness of the local host society to ethnic diversity. Finally, the *spatial domain* comprises policies such as housing, urban planning and development, and other policies with a strong spatial dimension.

The third section of this report provides an overview of migrant integration policy in Greece and discusses the role of municipalities in formulating and implementing relevant measures. While migration policy in Greece is entirely shaped at the national level, the involvement of municipalities of large cities and towns in Greece with migrant integration has grown over the past ten years. In some cases it has become more open and vocal. Within the national legal and policy frame, the largest municipalities have assumed a more active role in migrant integration than in the past.

The fourth section conceptualizes policy assessment in regard to migrant integration policies at the local level, and describes the approach in relation to policy assessment that is adopted in the LOMIGRAS project. The LOMIGRAS project seeks to assess *the appropriateness and quality of integration policies* that are implemented and/or formulated at the local government level, rather than the degree of integration of individuals or migrant groups (outcomes or outputs). The project shall develop a

set of criteria and a methodology on the basis of which local government policies in Greece, but also in other countries, can be assessed. The benchmarking and the criteria provide a basis for assessing a) national laws that directly refer to and are implemented by municipalities, both those that specifically pertain to integration and those more general policies that refer to the general population, but which have substantial effects on immigrants, and b) municipal laws and decisions that in the frame of their competencies and resources institute measures that aim to redress the particular needs and conditions of migrant communities, and c) projects and actions designed and initiated by municipal authorities with the aim of promoting migrants' integration.

1. Introduction

Immigrant integration has become an explicit goal of cardinal importance in the policy agenda of the European Union and its member states since 2000.² Integrating immigrants and their children into the complex fabric of society has been recognized as crucial for social cohesion and economic growth in the host countries.³ Their inclusion is an essential precondition for keeping inter-ethnic and inter-racial tensions at bay. While immigration policy is a responsibility of national governments, it has also been increasingly recognized that migrant integration takes place, first and foremost, at the local level. Debates related to migration are conducted and framed at the national and European levels. Yet, local authorities are in practice and by and large administratively responsible for dealing with the demands and effects of migration and integration of migrants into local societies and economies. This report and the project LOMIGRAS explore the role of local government in relation to migrants' integration by empirically focusing on the case study of Greece.

With the rise and acceleration of migration, municipalities and other local entities (i.e. community councils, local public agencies, etc.) have assumed an increasingly important and direct role in the reception of newcomers, as well as in the long-term integration of legally residing migrants. Their role has shifted from a passive one in the 1990s and earlier to become increasingly proactive. Their involvement is not only in the context of implementing nationally set policies, but also in devising their own immigrant integration strategies, and even in becoming a source of innovation.⁴ A growing number of studies and projects over the past fifteen years have highlighted the salience of the local government level in confronting the social challenges of ethnic and religious diversity, and in implementing measures to promote the integration of third-country nationals (hereby TCNs).⁵ In the 1990s, cities in countries like Switzerland and Germany developed targeted integration policies when such policies had hardly been developed at the national level.⁶ As recognized by a major network of local authorities across Europe on the subject, cities and local authorities have a vital role to play in the development of innovative integration

² I would like to thank Andreas Takis and Alexandra Zavou for their valuable and substantive comments in an earlier version of this report. The usual disclaimer, namely that all remaining errors are mine, applies.

³ OECD/European Union, *Indicators of Immigrant Integration 2015 – Settling In* (Paris: OECD Publishing, 2015), 15.

⁴ See Gunnar Myrberg, "Local challenges and national concerns: municipal level responses to national refugee settlement policies in Denmark and Sweden", *International Review of Administrative Sciences* (2015), 1-18, at 3.

⁵ Maria Schiller, "The implementation trap: the local level and diversity policies", *International Review of Administrative Sciences* (2015), 1-15; Maren Borkert and Tiziana Caponio, "Introduction", in *The Local Dimension of Migration Policy-Making*, Tiziana Caponio and Maren Borkert (eds.) (Amsterdam: Amsterdam University Press, 2010), 9-32; Michael Alexander, *Cities and Labour Migration – Comparing Policy Responses in Amsterdam, Paris, Rome and Tel Aviv* (Aldershot: Ashgate, 2007).

⁶ Rinus Pennix, "Integration of Migrants: Economic, Social, Cultural and Political Dimensions", *The New Demographic Regime – Population Challenges and Policy Responses*, Miroslav Macura, Alphonse L. MacDonald and Werner Haug (eds.), Geneva: United Nations, 2005, pp. 137-151, at 149.

policies on housing, education and cultural diversity.⁷ Last but not least, the 2011 EU Agenda for the Integration of TCNs has placed particularly strong emphasis on the active involvement and indispensable role of regional and local authorities in the formulation and implementation of migrant integration policies.⁸

Despite the highly diverse national models and approaches to immigration and integration policy across countries, the demographic and spatial concentration of immigrants poses a number of similar challenges to local governments and services, especially but not only in large and medium-size cities, across Europe.⁹ Between 3/5 and 2/3 of the migrant population in Europe lives in densely populated urban areas or in towns.¹⁰ In view of the distinctive challenges facing cities, the adoption of integration measures exhibits variation even across municipalities of the same state. At the same time, a trend of convergence in such policies and practices is also observed across European cities of different states.¹¹ Some researchers report that in most European cities, elected politicians show more reluctant and ambiguous attitudes in regard to immigrants' integration.¹² Nonetheless, we have an increasing number of initiatives, policy reports and best practices guides over the past ten years, which show cities taking a leading role in implementing and showcasing immigrant integration programs.¹³

Local institutions are most prone to experience inter-ethnic tensions and inequalities but also far better placed to take effective action to address these. Local and municipal authorities, independently or in cooperation with other public agencies and non-governmental organizations, are providers of a large array of social services. They provide services in the area of health, education and social and child care, and they are also responsible for maintaining the social infrastructure of cities where many ethnic and migrant communities live. Having closer day to day contact, they have better knowledge of local society and conditions on the ground. Some studies argue that local authorities tend to be more accommodative and pragmatic towards migrant groups in comparison to national authorities, a tendency that is seen to inhere in the nature of local government power.¹⁴ In countries like the Netherlands, Sweden, Switzerland and Germany, local authorities in the large cities mobilized to demand

⁷ See on the [European network of cities for local integration policies for migrants \(CLIP\)](http://eurofound.europa.eu/areas/populationandsociety/clipabout). Available at <http://eurofound.europa.eu/areas/populationandsociety/clipabout>

⁸ See *European Agenda for the Integration of Third-Country Nationals* (Brussels: European Commission), COM(2011) 455, pp. 8-9.

⁹ Maren Borkert and Tiziana Caponio, "Introduction", 13.

¹⁰ OECD/European Union, *Indicators of Immigrant Integration 2015 – Settling In*, 40.

¹¹ R. Penninx and M. Martiniello, "Integration policies and processes: State of the art and lessons", in R. Penninx, K. Kraal, M. Martiniello and S. Vertovec (eds.), *Citizenship in European cities. Immigrants, local politics and integration policies* (Aldershot: Ashgate, 2004), 139-163, at 156.

¹² Tiziana Caponio, "Conclusion: making sense of local migration policy arenas", *The Local Dimension of Migration Policy-Making*, in Tiziana Caponio and Maren Borkert (eds.), pp. 188-9, at 179.

¹³ See *Immigrant integration in European Cities*, Background Paper, DG Meeting, Nicosia, Cyprus, 9th October 2012, European Urban Knowledge Network.

¹⁴ Caelesta Poppelaars and Peter Scholten, "Two Worlds Apart – The Divergence of National and Local Immigrant Integration Policies in the Netherlands", *Administration & Society*, Vol. 40, No. 4, (July 2008), 335-357.

more powers and resources from the central government in the field of immigrant integration, or to develop their own integration policies (Penninx 2009, p.7-8). The increasingly proactive role of municipalities in the area of migrants' integration is both shaped by and in turn contributes to redefining, the relationship between local and national levels of government.¹⁵

The ability and potential of local government to manage multi-ethnic diversity and promote integration has been amply recognized. Yet, the conditions and factors that shape local government responses in this regard, as well as their effectiveness in promoting the inclusion of TCNs, have received limited attention in academic and policy-related research in Greece and in Europe. Existing studies have focused on a few long-standing immigration countries such as the Netherlands, Switzerland, Denmark and the United Kingdom, rather than on South European countries.¹⁶ Research has shown that local characteristics, initiatives and arrangements significantly determine the remit of policy opportunities and influence the municipalities' potential for implementing effective migrant integration policies (Alexander, 2007).¹⁷ At the very least, the fact that local authorities and institutions in different states enjoy very different levels of executive and financial autonomy vis-a-vis the central government endows them with varying capacities and resources to develop their own integration policies. Reports have also highlighted good practices on the basis of specific and ad-hoc projects in particular cities.¹⁸

What is lacking though is an understanding of why and how policy implementation processes at the local level incorporate (or fail to do so) priorities and goals aimed at immigrant integration in the medium and long-term.¹⁹ We have limited knowledge about the variety of ways in which local authorities in Europe affect the prospects for a more inclusive multi-cultural society, as well as the conditions and factors that enable or constrain local authorities' action in this regard.

This report provides an overview of existing literature on immigrant integration and the local government. It first reviews different understandings of integration in Europe and it conceptualizes the concept in a practical and policy-relevant manner. Secondly, it discusses the role of local government authorities and defines four domains in which local government policies related to immigrants are

¹⁵ See Gunnar Myrberg, "Local challenges and national concerns", 2.

¹⁶ See for example, Kristina Kallas and Kristjan Kaldur, "Integration Policies and Measures Case Study of Good Practices in Sweden, Denmark and Great Britain", Institute of Baltic Studies, Tartu, 2007.

¹⁷ D. Lüken-Klassen and F. Heckmann, *Intercultural policies in European cities* (Strasbourg: Council of Europe, 2010); W. Bosswick, D. Lüken-Klaßen, and F. Heckmann, *Housing and integration of migrants in Europe* (Strasbourg: Council of Europe, 2007); S. Spencer, *Equality and diversity in jobs and services: City policies for migrants in Europe* (Strasbourg: Council of Europe, 2008).

¹⁸ Indicatively, see Roland Roth, "'Rich and Happy': Good Local Initiatives for the Integration of Migrants", in *Practice to Policy – Lessons from Local Leadership on Immigrant Integration* (Toronto: The Maytree Foundation, 2012), 11-14.

¹⁹ Irene Ponzio, Ben Gidley, Emanuela Roman, Francesco Tarantino, Ferruccio Pastore, Ole Jensen, "Researching Functioning Policy Practices in Local Integration in Europe", Discussion paper published in the context of the project "An integrated research and cooperative learning project to reinforce integration capacities in European Cities-EU-MIA, EC Agreement Nr HOME/2011/EIFX/CA/1996" (2013).

formulated. The third section of this report provides an overview of migrant integration policy in Greece and discusses the role of municipalities in formulating and implementing relevant measures. The fourth section conceptualizes policy assessment in regard to migrant integration policies at the local level, and describes the approach in relation to policy assessment that is adopted in the LOMIGRAS project.

2. Conceptualizing immigrant integration

There is a voluminous scholarship on immigrant integration, a concept that is admittedly difficult to pin down and render concrete. It is especially difficult if we try to conceptualize integration as an end state of an individual or group acquiring a sense of belonging to a host society. Over the past twenty years, scholars from sociology, political science and other disciplines have expounded on the notions of assimilation, incorporation and multiculturalism. They have also examined and analyzed the different national models and policies aimed at integrating immigrants, as well as the effects that various policies have on ethnic-racial conflict, and political engagement or labor market participation, among other issues.²⁰ In a general and somewhat vague sense, migrant integration can be understood as the process of becoming an accepted part of the host society while also acquiring a sense of belonging to it.²¹

Academic and policy debates on immigrant integration have raged over the years with advocates of a multicultural approach pitted against those who take an assimilationist viewpoint in regard to integration.²² Over the past fifteen years, the so-called multi-cultural model of integration, which highlights the preservation of cultural and religious identity of migrant communities as a medium of incorporation into the host society, has been the subject of powerful criticism. Both its underlying assumptions and its empirical and policy manifestations have come under scrutiny and critique.²³ At the same time, the assimilationist approach that is premised on the cultural homogenization of ethnic minorities into the nation-state has also been rejected for some time now, including in the Council of Europe's relevant norms and evolving standards. These broad theoretical-normative approaches, which have been associated with different national models of integration – i.e. multiculturalism with the Netherlands and the UK, the assimilationist approach with France – do not

²⁰ For a review of immigrant integration studies, see Terri E. Givens, "Immigrant Integration in Europe: Empirical Research", *Annual Review of Political Science*, Vol. 10 (2007), 67-83.

²¹ Rinus Pennix, "Integration of Migrants: Economic, Social, Cultural and Political Dimensions", 141.

²² For an overview of multiculturalist and assimilationist perspectives, see Han Entzinger and Renske Biezeveld, *Benchmarking in Immigrant Integration* (Rotterdam: European Research Centre on Migration and Ethnic Relations), August 2003, p. 14. For a powerful defense of multiculturalism, see Will Kymlicka, *Multiculturalism: Success, Failure and the Future* (Washington DC: Migration Policy Institute), February 2012.

²³ Kenan Malik, "The Failure of Multiculturalism – Community versus Society in Europe", *Foreign Affairs*, Vol. 94 (March/April 2015), 21-32. For an empirically based analysis that challenges the effectiveness of cultural policies for migrants' integration, see Ruud Koopmans, "Trade-Offs between Equality and Difference: Immigrant Integration, Multiculturalism and the Welfare State in Cross National Perspective", *Journal of Ethnic and Migration Studies*, Vol. 36, No. 1 (January 2010), 1-26.

capture or accurately depict the range and mixture of policies on the social incorporation of migrants that are formulated and applied in practice in the different member states.

European approaches have sought to strike a balance between the acquisition of civil, political and social rights but also the respect for cultural differences. In the perspective taken by the European Commission in the early 2000s, “integration in a democracy presupposes the acquisition of legal and political rights by the new members of a society, so that they can become equal partners... [but it] can also mean that minority groups should be supported in maintaining their cultural and social identities, since the right to cultural choices is intrinsic to democracy” (European Commission, 2002: 9). Needless to say, the proper balance to be struck between social inclusion and the maintenance of cultural diversity remains subject to disagreement. From a generic policy perspective taken in the European Union’s Common Basic Principles (CBPs) on Integration, integration is viewed as a two-way and dynamic process of mutual adaptation as much of immigrants themselves as of the citizens of member states (CBP no. 1 from the 11 principles). It can be seen to take place at the intersection of national and local regulatory frameworks on the one hand, and the strategies and initiatives of immigrants themselves.

Over the course of the 1990s and especially the 2000s, European states’ approaches and policies have shifted to embrace the notion of social integration of migrants as distinctive from assimilation. Even countries that epitomized the multicultural approach to migrants’ integration, like the Netherlands, have shifted since the second half of the 1990s to an approach emphasizing social and economic inclusion, rather than cultural and economic segmentation.²⁴ The EU’s eleven CBPs on integration mentioned above reflect this shift to a converging set of basic norms and directions followed by several member states in the area of immigrants’ integration policy. Christian Joppke has provided an incisive analysis of the thrust of these eleven principles outlined by the Council of the EU in 2004. Their underlying assumptions and political-philosophical underpinnings of these principles are derived from liberalism. They de-emphasize, albeit far from negating or from seeking to homogenize, immigrants’ cultures and ways of life, which are to be recognized and respected but not supported by the state. At the same time, they place the emphasis on learning the native language, as well as on becoming familiar with the history and political institutions of the host country. These are seen as indispensable tools for participating in the labor market and in social institutions, and therefore, for reducing migrants’ dependency on the welfare state.

Civic integration has acquired a more or less obligatory character, with enrolment in language and civic courses seen as a precondition for (rather than as an end result of) integration – in some countries like the Netherlands, even as a

²⁴ Caelesta Poppelaars and Peter Scholten, “Two Worlds Apart – The Divergence of National and Local Immigrant Integration Policies in the Netherlands”, 340-341.

requirement for reception and legal residence permit.²⁵ Social inclusiveness is supported by the proliferation of legal norms of equal treatment and non-discrimination of all regardless of ethnic origin or religious creed. Equal opportunities may be sought through the prohibition of direct discrimination, but also through positive action programs to promote integration against entrenched and structural patterns of racism. Being fundamentally different from cultural assimilation, this broadly inclusive approach to migrants' integration is permeated by an instrumental logic aimed at rendering the state more competitive in the global economy.²⁶

For the purposes of the research in the LOMIGRAS project, we do not subscribe to a specific vision of what an integrated and multi-cultural in its composition society looks like. Instead, we take a processual approach to migrant integration, in the frame of which at least three aspects appear to be crucial. First, there is little doubt that integration is a two-way process. It is premised both on the adaptation of migrants and their specific characteristics on the one hand, and on the responses and attitudes of the host society and its institutions towards the newcomers, on the other. This process is clearly and inescapably asymmetrical: the infrastructure and resources of the receiving state's institutions are far more influential and decisive in this process and in its outcomes.

Secondly, as it has been recognized time and again, the litmus test of immigrant inclusion in the host society is the integration of the second generation migrants. They have either been born in or arrived at the host country at a very young age, where they attended school. Therefore, the second generation migrants are likely to consider the host society the main country to which they belong and where they can live. A distinctive array of policies are usually formulated to redress the specific situation of second generation immigrants. Thirdly, integration is not only a function of top-down policy priorities, to which local populations must adapt, and of policies that are in principle equally open to them to access; it is simultaneously premised on the bottom-up engagement and mobilization, not by local state institutions alone, but also by the migrant communities themselves and the organizations that represent them. Local authorities implement policies, at times in cooperation with civil society and migrant organizations, and often by taking into account the local needs of immigrants or the city's population more broadly. By engaging in close cooperation with migrant organizations – an approach arguably driven by largely instrumental rationales, the measures pursued by the local government may diverge from or even be at odds with official national policies and discourses, a point to which we turn again in the next section.²⁷

²⁵ Christian Joppke, "Beyond National Models: Civic Integration Policies for Immigrants in Western Europe", *West European Politics*, Vol. 30, No. 1 (January 2007), 1-22.

²⁶ Christian Joppke, "Beyond National Models: Civic Integration Policies for Immigrants in Western Europe", 17.

²⁷ Caelesta Poppelaars and Peter Scholten, "Two Worlds Apart – The Divergence of National and Local Immigrant Integration Policies in the Netherlands", 351-2.

3. Local policy-making related to immigrants' integration

In this study, we take a narrow definition of the 'local' to refer to the policies exercised by local (often municipal) authorities, and which are at least in part a result of their own initiative and priority setting.²⁸ This does not only include projects that are initiated by a municipality. Local policy also extends to the ways in which municipal authorities implement national policies specifically aimed at integration, but also the extent to which immigrants' integration is an objective in the implementation of broader national policies, such as social policy, education and urban regeneration, among others. Local policies towards migrants include a) policies that target immigrants or particular groups among them on the basis of ethnic criteria or on the basis of civic status (i.e. legal residents), and b) general policies that target the public at large, but which have a significant effect on immigrants (i.e. social policies but not transport policies) (Alexander 2007, 38). Besides the existence of different kinds of municipal migrants' integration policies, the lack of policy must also be understood as one policy variant defined by inaction (Alexander 2007, 38).

In regard to local government approaches to migrant integration, one potentially applicable concept is that of mainstreaming. Mainstreaming refers to the diffusion and explicit acknowledgment of integration goals and targeted measures within broader policy instruments and sectors. They are aimed to address the specific needs of diverse ethnic and migrant groups by taking into account their specific conditions in the design and implementation of general policies.²⁹ The notion of mainstreaming has extensively preoccupied other cross-sectoral policy areas like gender equality, where it has been widely applied. It arguably represents an efficacious and sustainable approach to integration, and a preferable alternative to the pursuit of integration as a distinct and separate policy sector. Mainstreaming of integration has also been highlighted by the European Union (hereby EU) in its Basic Common Principles on migrant integration.³⁰ To what extent do local authorities explicitly or implicitly incorporate and define immigrant integration priorities in the frame of implementing their policies in employment, education, social inclusion, anti-discrimination, and civic participation? It must be noted that 'mainstreaming' as it is understood here does not imply the elimination of autonomous migrant integration policy altogether and exclusive reliance on general policy instruments, as it seems to be suggested in some studies.³¹

²⁸ The same approach is taken in the studies included in the collective volume edited by Maren Borkert and Tiziana Caponio, *The Local Dimension of Migration Policy-Making* (Amsterdam: Amsterdam University Press, 2010).

²⁹ Elizabeth Collett and Milica Petrovic, *The Future of Immigrant Integration in Europe – Mainstreaming Approaches for Inclusion* (Migration Policy Institute, March 2014), 2.

³⁰ The Common Basic Principle # 10 states that "Mainstreaming integration policies and measures in all relevant policy portfolios and levels of government and public services is an important consideration in public policy formation and implementation."

³¹ See for instance, Rob Bijl and Arjen Verweij, "Measuring and monitoring immigrant integration in Europe: facts and views", in *Measuring and monitoring immigrant integration in Europe – Integration policies and monitoring efforts in 17 European countries*, Rob Bijl and Arjen Verweij (eds.) (The Hague: The Netherlands Institute for Social Research/SCP, March 2012), 18.

The municipality is not a monolithic agent, but it involves a variety of different actors. A key distinction that can be drawn is between the elected members of the municipal council and the mayor on the one hand, and the administrative personnel on the other.³² Different members of the municipal council or employees in the municipality's administrative services may hold different views on the issue. Yet, it is possible to identify a municipal policy on immigrants' integration that prevails in a given time period. It prevails under the influence of a mayor and/or vocal members of the municipal council, or entrenched views and practices of the administrative services, which give it its distinctive character. As is stated by Caponio, "street-level bureaucrats and policy practitioners represent a crucial category of policymakers insofar as they are able to accommodate the original policy objectives in order to better cope with immigrant needs and/or to overcome obstacles in the delivery of existing services to foreign users".³³ Last but not least, the municipality is not alone in the implementation of national policies. It may engage the actions of other important players such as NGOs and national agencies, which, in this study we see as affecting local (municipal) policy-making.

In order to study local government policies on immigrants' integration, we draw from the classification of the four policy domains, developed by Alexander (2007). The *legal-political domain* includes policies regarding the representation and mobilization of migrants, which can strengthen their participation in the host society alongside their sense of belonging in it. This domain can further be subdivided into three issue areas: civic status defined by the acquisition of legal residence or of nationality of the host country, which is usually a prerogative of the national state; consultative structures, which in a number of countries either substitute for or are supplemented by formal voting rights granted to TCNs; and the local authority's attitudes (support, exclusion, cooptation) towards migrant associations. Consultative structures refer to different kinds of advisory councils and other related structures, in which migrants and their associations participate (Alexander 2007, 49).

Secondly, the *socio-economic domain* comprises reception services, labor market policies, education, welfare, etc. Many cities with a significant migrant population may provide limited, basic or extensive reception services, either as part of a national policy, or as a local initiative. Furthermore, social welfare services are often a major municipal policy with far-reaching indirect effects for immigrants. Within the social policy sector, local authorities can adopt specific programs or services for migrants, or adapt and render more accessible general health, welfare and other services to migrants and their communities. For example, ways to facilitate migrant access to municipal services can range from translation of information brochures to non-native languages to the provision of 'cultural mediators' to help resident migrants and newcomers. Policies to foster migrant participation in the labor market and in the society at large include language instruction, vocational training, and programs to support entrepreneurs, among others. While education is almost

³² Tiziana Caponio, "Conclusion: making sense of local migration policy arenas", 188-9.

³³ Tiziana Caponio, "Conclusion: making sense of local migration policy arenas", 179.

always a competence of the national government, local authorities may support extra-curricular activities to assist students (i.e. tutoring and other kinds of assistance with subjects being taught at school, native and migrant language classes for student and parents), or school desegregation efforts, which are crucial for second-generation migrants (Alexander 2007, 50).

The *cultural-religious domain* includes policies relating to religious and cultural practices, and generally cultural diversity. This domain is shaped by municipal authorities' attitudes towards religious institutions (i.e. mosques) and practices (ethnic and/or festivals), or towards religious schools. Local cultural policies can also include campaigns to increase the awareness of the local host society to ethnic diversity, and they can emphasize anti-discrimination or conversely the acceptance of pluralism and multiculturalism. Finally, the *spatial domain* comprises policies such as housing, urban planning and development, and other policies with a strong spatial dimension, including symbolic use of space evidenced in attempts to discourage or limit physical manifestations of minority religions (i.e. minarets, see Alexander 2007, 48-49). Municipal approaches and responses in these four policy domains can change over time. This classification scheme allows us to study changes over time, and to compare policy responses of different cities and municipalities across the various domains and issue areas (Alexander 2007, 53).

The focus of our study on local immigrant integration policies does not by any means suggest that the national context is irrelevant – on the contrary. National policies and measures set a crucial (and largely inescapable) framework for understanding local migration policy. Yet, existing studies on the local government's role in migrant integration policy have shed new light in understanding how states deal with newcomers and seek to promote their integration into the host society. Such studies have shown that the local government has become increasingly proactive in this sphere. They also show that the relevant policies that cities and generally municipalities in countries like the Netherlands, Denmark, Germany and Sweden pursue, often tend to diverge from official national policy and discourse.³⁴ A trend of decentralizing decision-making and implementation powers in migration policy, and specifically in regard to migration control, to the local level and to municipalities was already noted by Guiraudon and Lahav fifteen years ago. Such a trend was evidenced in countries such as France, the Netherlands, and Denmark, among others.

In the Netherlands for example, the local government's policies towards immigrants' integration have tended to diverge from, and even to be at odds with, national policies that emphasize civic integration. Civic integration treats immigrants as individuals, it is skeptical of group-specific measures, and it emphasizes the host

³⁴ For the case of the Netherlands, see Caelesta Poppelaars and Peter Scholten, "Two Worlds Apart – The Divergence of National and Local Immigrant Integration Policies in the Netherlands" (2012); for the case of Denmark, see Martin Bak Jorgensen, "The Diverging Logics of Integration Policy Making at National and City Level", *International Migration Review*, Vol. 46, No. 1 (Spring 2012), 244-278; on Germany, see M. Borkert and W. Bosswick, "Migration Policy-Making in Germany – Between National Reluctance and Local Pragmatism? IMISCOE Working Paper No. 20 (Amsterdam: IMISCOE, 2007).

country's language and norms, as well as the ability of immigrants to gain employment in the labor market. However, local governments in the Netherlands, have worked with and relied on migrant organizations. They have accommodated ethnic and cultural differences, instead of being blind to these, thereby diluting a basic principle of the national integration paradigm, which is the abandonment of group-based policies.³⁵

Local government policies towards migrants arguably tend to be driven by a logic that is different from national level paradigms and discourses. Because they are confronted directly with the implementation of policy, as well as with the complex problems and challenges of multi-ethnic local societies, their institutional logic is arguably driven by pragmatism and problem solving. In trying to balance between different needs and interests, they may take a more accommodating approach, seek to cooperate with different migrant communities, and pursue group-specific measures and strategies. Migrants' organizations are important actors. They help local authorities acquire knowledge of what actually happens among the diverse ethnic and religious communities in their cities, as well as reach a too broadly defined target population in order to effectively implement policies.³⁶ These organizations may at times be fraught with internal conflicts and inter-ethnic antagonisms. To the extent that it is more pragmatic and accommodating, the approach of the local government diverges from and it may even come into conflict with national discourses around migration, which are often highly politicized and influenced by debates around national culture and identity.

Others, however, disagree about the imputed pragmatism of local decision-makers in regard to immigrants, arguing that their approach can be characterized by substantial confrontation and ideological opposition.³⁷ Historically and contemporarily, local and municipal authorities have arguably been more willing to facilitate migration control than to promote the integration of migrants.³⁸ In this view, the local government is more amenable to the ends of migration control. Municipalities, especially those where large numbers of migrants settle, are the ones that are often called to shoulder the financial and political burden of receiving migrants and more recently refugees, at times resulting in tensions between the local and national level.³⁹ Locally elected officials may also be under pressure from the rise of extreme right-wing parties that are opposed to migration, and which often have a mostly local basis of popular support in large urban centers.⁴⁰

Based on a set of case studies in different countries, Caponio comes to the conclusion that the relevance of the local dimension of migration policy-making

³⁵ Caelesta Poppelaars and Peter Scholten, "Two Worlds Apart – The Divergence of National and Local Immigrant Integration Policies in the Netherlands", 351-2.

³⁶ Caelesta Poppelaars and Peter Scholten, "Two Worlds Apart – The Divergence of National and Local Immigrant Integration Policies in the Netherlands", 350.

³⁷ Tiziana Caponio, "Conclusion: making sense of local migration policy arenas", 164.

³⁸ Guiraudon and Lahav, "A Reappraisal of the State Sovereignty Debate", 183.

³⁹ Virginie Guiraudon and Gallya Lahav, "A Reappraisal of the State Sovereignty Debate", *Comparative Political Studies*, Vol. 33, No. 2 (March 2000), 163-195.

⁴⁰ Guiraudon and Lahav, "A Reappraisal of the State Sovereignty Debate", 181.

varies considerably across European countries. It depends on the different state and territorial structures and the institutional role assigned to the different levels of government, among other factors.⁴¹ Unlike in federated states, in centralized or regionalized state structures such as the Netherlands and Italy, respectively, the influence of subnational levels is significantly less extensive. But even in the centralized state structures, local authorities may still have a far from negligible – indeed substantial in countries like Denmark – discretionary role in matters such as the issuing and renewal of residence permits, but also with concrete policies about the reception and integration of migrants.⁴² The range of competences allocated to municipalities, the existence of adequate funding and public financing and administrative flexibility are relevant here and likely to influence local government approaches and policies on migrant integration.

Existing studies on the role and approach of local government in regard to immigrants' integration gives rise to a number of research questions. Do municipalities have the leeway to develop distinct (their own) migrant integration policies, in view of the fact that migration policy (including integration) is a result of national government and its decision-making? In view of the above, another question that arises is what accounts for the fact that (some) municipalities in a state develop a migrants' integration policy? Why do some municipalities within a state become more proactive in this sphere in a particular point in time? Secondly, do immigrants' integration policies in a given national context diverge across different cities and locales within a country, and if so, why and how do they do so? Thirdly, does the direction of local government policy on immigrants' integration diverge from national policy direction and discourse, whether purposefully, or unintendedly in the course of its implementation? If it does, how and why does it diverge?

4. Who are the migrants who are the target of integration policies?

While it is customary to define immigrants as foreign-born persons who legally reside in a host country, this definition is clearly too general and too restrictive at the same time. As it is well-known, in the EU context, “immigrants” are understood to be non-EU, or third country nationals (TCNs) who reside legally in one of the member states of the EU. Their situation often differs markedly from those of EU citizens moving between or living in EU member states other than their own. TCNs face greater restrictions on mobility in the EU. Their reasons for migrating are partly or largely different from those of EU member state nationals, with large numbers of people seeking asylum or family reunification. It is TCNs who are the target of integration policies in the EU and its member states. Are newcomers, as well as refugees and

⁴¹ Tiziana Caponio, “Conclusion: making sense of local migration policy arenas”, 166.

⁴² Tiziana Caponio, “Conclusion: making sense of local migration policy arenas”, 169; on the case of Denmark, see Martin Bak Jorgensen, “The Diverging Logics of Integration Policy Making at National and City Level”.

asylum-seekers the target group of integration policies too? Should they be a target? Integration policies of member states do not address the situation of these groups.⁴³

Under the present circumstances of mass refugee flows, there is a notable tendency to include such groups in integration policies, both at the EU level (extension of long-term residence permits to refugees, replacement of EU Integration Fund by the Asylum and Migration Integration Fund), and at the national and local levels. In Greece, for example, the mandate of the local Migrant Integration Councils has been extended to refugees and asylum seekers. Generally, state authorities and most actively local and municipal authorities have assumed a central and active role in addressing the needs of these groups, which however, are currently aimed at their reception, temporary accommodation, social assistance, and provision of health services. In so far as the recently (in the course of 2014 and especially 2015 and onwards) arrived migrants and refugees remain in the country of settlement and are granted asylum or some other type of residence permit, they are also targets of migrant integration policies.

The target population of integration policies also encompasses the off-spring of foreign-born persons, who were either born abroad and came at an early age in the host country, or who were born in the host country – that is, the second generation. A significant proportion of the second generation may already be nationals of the host country, excluding them – strictly speaking – from the definition of the migrant population. This poses a problem in how to clearly distinguish the naturalized segment of the second generation as a migrant group. However, they are also a crucial target of integration policies. In fact, according to many, it is the incorporation of the second generation that is the key challenge and also benchmark of successful immigrant integration.

While their integration needs and challenges are clearly different from the first generation, they are not necessarily less daunting – on the contrary. Second generation immigrants also have the role of integration facilitators for their parents and the elderly cohort of migrants more broadly. The attraction that Islamic militancy seems to exert among young native born Muslims in countries like the UK, Belgium, the Netherlands or France, further underscores the salience of pursuing the integration of the second generation. Targeting the second generation is characteristic of policies aimed at intensified integration through participation. Still, whether second generation immigrants, especially if they are nationals of the host country, should be classified as migrants or not is subject to strong controversy. Such a classification can be seen to trigger or intensify a sense of stigmatization and exclusion from the host society.⁴⁴

Legal status is an essential and basic precondition for any foreign-born person to work, have access to goods and rights, live and gradually acquire a sense of belonging in a host society. In some cases though, immigrants who reside in a host

⁴³ Sergio Carrera, *Benchmarking Integration in the European Union – Analyzing the debate on integration indicators and moving it forward* (Gütersloh: Bertelsmann Foundation, 2008), 49.

⁴⁴ Rob Bijl and Arjen Verweij, “Measuring and monitoring immigrant integration in Europe: facts and views”, 19.

country for years may, for longer or shorter periods of time, fall outside of legality. In this sense, the population of undocumented migrants is very diverse, comprising economic migrants who illegally entered a country, but also longer term residents who lost their legal status, who ought to be distinguished from the former group. The lapse of longer term migrants to illegality has frequently occurred in countries like Greece where legal status is dependent on employment and social security contributions. When immigrants cannot secure the minimum requirements of these as set by law, they may be unable to renew their residence permit. Recognizing that such lapses of legality do not for the most part indicate a change in the actual situation of a migrant and his/her family as long-term residents, legal regulations over the past couple of years in Greece have sought to redress this phenomenon and to facilitate the (re)acquisition and extension of legal status.⁴⁵ We therefore include these immigrants among the target population of integration policies. Other categories of undocumented migrants who should come under the remit of integration policies are those who have never acquired some title of legal residence but who have been living long enough (above five years) to forge bonds with the host society. In Greece, many of them are therefore eligible for residence permits for “extraordinary” reasons (*ekseretikoi logoi*).⁴⁶

5. The case of Greece: integration policy between national and local levels

Once known for its large-scale emigration, Greece has transitioned to a country of destination since the late 1980s and the 1990s mainly. The bulk of immigrants came from the Balkans, Central-Eastern Europe and the former Soviet Union after the downfall of communist regimes in the region. Until the first years of 2000, the push factors from abroad coincided with a period of economic growth in Greece and changes in the employment structure and professional opportunities available to locals. Such changes led to a demand for labor from abroad to fill vacancies for unskilled and, often undeclared, jobs (for instance, in construction tourism, agriculture, cleaning services and care), thus leading to a massive migration influx.⁴⁷ During the last decade, and particularly since 2008, Greece has become a transit and destination country for immigrants and asylum seekers arriving from Southeast Asia, Africa and the Middle East.

The number of the total immigrant population in Greece can only be estimated with approximation, rather than near accuracy, by taking into account data from the most recent population census and the issuing of residence permits. During the 2011 census, the resident population of TCNs in Greece was 712,879 (7.5% of the total

⁴⁵ See “Mia alli stratighiki gia to metanastefitiko” [Another strategy for immigration], position paper drafted by the Hellenic League of Human Rights, April 2012.

⁴⁶ In Greece, Article 19 of Law 4251/2014 (Migration and Social Integration Code), as it was replaced by Article 8, parag. 23, of Law 4332/2015 (Amendment of provisions of the Greek Nationality Code, *Greek Government Gazette*, Vol. 76, 9 July 2015), provides for a residence permit on such grounds.

⁴⁷ Anna Triantafyllidou, “Migration and Migration Policy in Greece. Critical Review and Policy Recommendations”, *IDEA Policy Briefs* 3, (2009), 2.
http://ec.europa.eu/ewsi/UDRW/images/items/doc1_22072_928446338.pdf. Accessed May 20, 2014.

population) of which 385,773 (54%) were male and 327,106 female (46%).⁴⁸ Data from the Ministry of the Interior database on valid stay permits, put the number of legally residing TCNs at 501,351 in April 2016. The legally residing population of TCNs in Greece includes mostly individuals with Albanian citizenship (76%). They are followed by individuals coming from the former Republics of the Soviet Union, including Ukrainians, Georgians, Russians and Moldovans, and by people from India, Philippines and Pakistan (see Table 1). Men constitute slightly over half (52.4%) of the total legal immigrant stock, and women make up 47.6% of the legally residing immigrant population (see Figure 1). At the same time, the gender balance in the composition of the various ethnic groups though is very uneven and heterogeneous. Women make up less than 17.6% of immigrants from Pakistan and India while they comprise over 82% of immigrants from Ukraine, 81.3% of those coming from Russia, and 71% and 76% for those from Georgia and Moldova, respectively (Ministry of Interior, 2016, see Table 1).

Table 1: TCNs by nationality and gender in Greece (19-4-2016)

	Male	Female	Total
Albania	209,566	171,190	380,756
Ukraine	3,468	15,945	19,413
Georgia	5,234	12,848	18,082
Pakistan	14,946	1,528	16,474
Russia	2,746	11,944	14,690
India	10,397	3,869	14,266
Egypt	8,938	3,031	11,969
Moldova	2,220	6,920	9,140
Philippines	2,811	7,373	10,184
Armenia	2,365	4,013	6,378
TOTAL	262,691	238,661	501,351

Data is based on the number of individuals in possession of a valid residence permit by country of origin by reference date 19.4.2016, from the 10 main countries of origin. [Source: Ministry of Interior and Administrative Reconstruction]

⁴⁸ The number includes 4,876 foreigners that declared no citizenship or no specified citizenship. Source: HSA. Data provided upon request.

Since 2009 with the onset of the financial crisis and economic recession, the number of residence permits for TCNs issued by the Ministry of Interior declined.⁴⁹ Such a decline is possibly linked to the deep economic recession and austerity measures which have especially affected immigrants⁵⁰, a situation also evidenced in other southern European countries such as Italy and Spain.⁵¹ At the same time, the decline seemed to last only for some years, as the number of TCNs who are residence permit holders in Greece picked up again in 2015 and in 2016. Research has amply demonstrated that the practical difficulty among immigrants to fulfil the requirements necessary to obtain or renew a permit contributes to a continuing or lapsed state of illegality, also due to the largely informal and seasonal character of migrant employment in Greece.⁵² This is particularly the case with immigrant female domestic workers who are largely confined to undeclared work.⁵³

Since immigrants wishing to acquire or renew their legal status need, in most cases, to provide evidence of employment or certificates of payment of social security contributions, the decline in the number of stay permits can be attributed to unemployment and the failure to secure the required social security stamps. Migrants now need proof of employment (not just payment of social security dues) to get the social security (IKA) certificate required for residence permit renewal. As a consequence, many immigrants might have fallen into illegality once unemployed, while still trying to make ends meet in Greece. According to an OECD report, more than 150,000 non-EU citizens were unable to renew their permits in 2010 and 2011 due to unemployment.⁵⁴ It may be that many of them who could not renew their permits, or who were unable to find employment, have left the country, yet data to support this conjecture are not officially collected. While there was an apparently increasing trend of Albanian migrants, the most numerous group among TCNs, to return to their homeland,⁵⁵ this is not corroborated by the more recent 2016 data

⁴⁹ For an analysis of the causes, see Dia Anagnostou and Anna Kandyla, “Review of Existing Monitoring Mechanisms for the Integration of Migrants in Greece”, Report prepared in the frame of the ASSESS Project on the Integration of Vulnerable Migrants, ELIAMEP, June 2015, 5.

⁵⁰ Labour Force Survey (LFS) data for the period 2009-2013 reported in Figure 4 testify to the significant rise in overall unemployment in Greece, with the unemployment rate for TCNs climbing from 12% in 2009 to 37% in 2013. Among TCNs, female unemployment reached 40% in 2013, while for men it was at 35%. Source: HSA, Labour Force Survey, 4th trimester each year. Data provided upon request.

⁵¹ Jonjic, Tamara and Georgia Mavrodi, “Immigration in the EU: policies and politics in times of crisis 2007-2012”, *EUDO Paper*, Florence: EUI, Robert Schuman Centre for Advanced Studies, November 2012, p. 8.

⁵² See indicatively, Maroukis, Thanos. “Irregular Migration in Greece: Size, Features, Causes and Discourses”. In *Irregular Migration in Europe: Myths and Realities*, edited by Anna Triantafyllidou, 93-113. Farnham: Ashgate, 2010, pp. 101-105.

⁵³ See Marouf, Michaela. “‘With All the Cares in the World’: Irregular Migrant Domestic Workers in Greece”. In *Irregular Migrant Domestic Workers in Europe: Who Cares?*, edited by Anna Triantafyllidou, 95-114. Farnham: Ashgate, 2013.

⁵⁴ OECD (2013), “OECD International Migration Outlook 2013. Greece”, (Paris: OECD Publishing, 2013), 256. It can also be accessed at www.oecd.org/migration/imo Last accessed June 20, 2016.

⁵⁵ Triantafyllidou, Anna. “Migration in Greece: People, Policies and Practices”. *IRMA project report* (2013), 8. It can be accessed at http://ec.europa.eu/ewsi/UDRW/images/items/doc1_36858_19016118.pdf. Accessed May 20, 2014.

(provided in Table 1 above), which shows that the number of Albanian migrants in Greece remains high.

Recent data published by OECD on Greece also shows notable gender differences in types of residence permits. Among the non-EU citizens with a residence permit in June 2014, close to one-quarter (23%) of the men held a residence permit for employment purposes and 31% held a residence permit for family reunification. Among women on the other hand, two-thirds of permits were for family reunification, and only 11% were for employment purposes. Ten year indefinite duration permits were held by 45% of men and only 23% of women.⁵⁶ Such data confirms that the position of female migrants is characterized by dependence on the husband and the family, and it is more precarious in the light of the relatively small portion of women holding long-term duration permits.

Greece has also been both a transit and a destination country for large numbers of undocumented migrants from the 1990s until present. The Greek Immigration Policy Institute estimated the number of undocumented immigrants residing in Greece to range between 172,250 and 209,402 in 2008.⁵⁷ Besides immigrants who have failed to renew their legal status, and circular seasonal Albanian migration in Greece taking place outside the legal path,⁵⁸ many undocumented immigrants pass through Greece with the intent of going to another EU country. Estimates put the number of undocumented immigrants at around 350,000 in 2010 and 390,000 in 2011.⁵⁹ Figure 1 illustrates that the number of apprehensions at the borders and within the country was in a constant decline since 2010 until it soared in 2015. The sharp rise in 2015 caused by the large number of refugees from Syria, among a host of other factors, showed that the trend in the inflows of undocumented migrants and asylum seekers in the country is neither steady nor irreversible. The apparent decline in the number of migrants, both legal residents and undocumented migrants after 2009-2010 though, has been offset by the large numbers of refugees and irregular migrants who came into Greece in the course of 2015 and during the first months of 2016. During this last period, over a million migrants and refugees passed through the country.

Furthermore, statistics on irregular migration generally depend heavily upon the practices of controlling maritime and land borders, and other apprehension efforts,

⁵⁶ OECD (2015), "OECD International Migration Outlook 2015. Greece", p. 208 (Paris: OECD Publishing, 2015). It can also be accessed at www.oecd.org/migration/imo Last accessed June 20, 2016.

⁵⁷ IMEPO – Greek Migration Policy Institute (2008), "Ektimisi tou Oykou ton Alodapon pou Diamenoun Paranoma stin Ellada" [Estimate of the Number of Undocumented Migrants Residing in Greece], Athens, p.105.

⁵⁸ Maroukis, Thanos, and Eda Gemi. "Circular Migration between Albania and Greece: A Case Study". *METOIKOS project report* (2011). <http://www.eui.eu/Projects/METOIKOS/Documents/CaseStudies/METOIKOSCaseStudyGreeceAlbania.pdf>. Accessed May 20, 2014.

⁵⁹ See Maroukis, Thanos. (2012), "Update Report Greece: The Number of Irregular Migrants in Greece at the End of 2010 and 2011", CLANDESTINO database on irregular migration, http://irregular-migration.net/fileadmin/irregular-migration/dateien/3.Database_on_IrregMig/3.2.Stock_Tables/Greece_Estimates_IrregularMigration_Ju112.pdf. Accessed May 20, 2014.

which had intensified between 2011 and 2014.⁶⁰ Yet, since detention in most cases does not lead to return or deportation, many migrants who are released with an expulsion decision are likely to remain in the country undocumented.⁶¹ In 2015, with the advent of the Left government of SYRIZA in coalition with the right-wing party of ANEL, the closed detention centers where irregular migrants had been held were closed down and those detained were released. Furthermore, border control policies placed more emphasis on rescue operations and arrival on Greek territory and less on apprehension and deportation, a change that was also prompted by the mass nature of migrant and refugee influx during 2015 and in the first months of 2016.

Figure 1: Irregular migration in Greece

2009	126,145
2010	132,524
2011	99,386
2012	76,878
2013	43,002
2014	77,163
2015	911,471
2016 (January to April)	165,247

Apprehensions at the borders and within the country [Source: Hellenic Police (http://www.astynomia.gr/index.php?option=ozo_content&lang=%27.%27&perform=view&id=50610&Itemid=1240&lang=)].

Despite the sharp increase of migration since the 1990s, Greek policy over the 1990s and the early 2000s primarily focused on controlling migration. The issue of integration of the migrant population in Greek society did not become a concern and an issue in the policy agenda in Greece until well into the 2000s. The only category of immigrants whose social integration was from early on promoted by the government were those who had ethnic Greek descent (*homogeneis*) and who were always considered to belong to the Greek nation. They arrived in the country in the 1990s, primarily from Albania and the countries of the former Soviet Union (i.e. Georgia,

⁶⁰ In 2012, for instance, the government constructed a 10.5 km fence along the land-border with Turkey, a main entry point, and patrolling along the area was enhanced. In 2011-2014, a renewed emphasis on preventing clandestine migration has been coupled with an increase in efforts to arrest and detain irregular migrants and asylum seekers. The detention of migrants upon entry at the border is based on Greece / Law 3386/2005 (23.08.2005). For those detained while within the country it is based on Law 3907/2011 (26.01.2011) which implements the EU Returns Directive.

⁶¹ Triantafyllidou, Anna. "Migration in Greece: People, Policies and Practices". *IRMA project report*, 2013, pp. 13-14. http://ec.europa.eu/ewsi/UDRW/images/items/doc1_36858_19016118.pdf. Accessed May 20, 2014.

Kazakhstan, etc.). Their integration into the country was facilitated by policies and legislative provisions enabling co-ethnic Greeks to acquire Greek nationality, without having to go through a lengthy and demanding naturalisation process, or by acquiring a special residence status. This was in line with the prevailing and historically entrenched principles of *jus sanguinis*.⁶² By contrast, the arrival of immigrants who did not have ethnic Greek descent (*allogeneis*, many of them from Albania too) was seen as an unwelcome and temporary phenomenon.

Since the 1990s, successive immigration laws reflected a perception of temporariness of migrants in Greece. They provided short-term residence and work permits to hundreds of thousands of irregular immigrants living in Greece in the 1990s. Unwelcoming and xenophobic views were reinforced in the media⁶³, and influenced public discourse on immigration, which mainly revolved around issues of crime and border control.⁶⁴ Nonetheless, undocumented migrants provided a source of cheap and unprotected labor, which was vital for certain sectors of the economy such as agriculture and the service sectors.

In the absence of an integration policy, and confronted with the increasing presence of undocumented migrants, i.e. visa over-stayers and illegal entrants, Greek governments sought to manage immigration flows by mainly relying on ad hoc, mass regularization programs (the first one in 1997; the second one in 2001; and the third one in 2005 and 2007), a practice that was followed in other south European countries, such as Spain and Italy.⁶⁵ Such regularization programs, four in total, provided opportunities to large numbers of undocumented TCNs residing in the country to obtain short-term and under conditions renewable residence permits.⁶⁶ Being principally driven by an instrumental view of migration, regularization programs were geared towards providing immigrants with a temporary legal status, renewable as long as the conditions for its granting continued to exist, thus eventually perpetuating residence insecurity.⁶⁷ While those regularization laws cannot be seen as

⁶² See Dia Anagnostou, "Citizenship Policy Making in Mediterranean EU States: Greece". *EUDO Citizenship Observatory*, (2011), pp. 13-18. <http://eudo-citizenship.eu/docs/EUDOCComp-Greece.pdf>. Accessed May 20, 2014.

⁶³ Baldwin-Edwards, Martin. "Greece". In REGINE. Regularisations in Europe. Study on Practices in the Area of Regularisation of Illegally Staying Third Country Nationals in the Member States of the EU. Country Studies, edited by Martin Baldwin-Edwards and Albert Kraler, 41-69. Vienna: ICMP, 2009, p.41. http://ec.europa.eu/home-affairs/doc_centre/immigration/docs/studies/regine_report_january_2009_en.pdf. Accessed May 20, 2014.

⁶⁴ See Baldwin-Edwards, Martin. "The Emerging European Union Immigration Regime: Some Reflections on Its Implications for Southern Europe" *Journal of Common Market Studies*, 35: 4 (1997): 497-519.

⁶⁵ Georgios A. Antonopoulos, "The legal framework of migration in Greece 1991-2001 and its effects". *International Review of Law, Computers & Technology*, 20:1-2 (2006): 135-147, at 137. The first regularization program in Greece was enacted by two presidential decrees 358/1997 and 359/1997, and the second one was introduced with Law 2910/2001.

⁶⁶ Subsequent regularisation programmes took place in 2001, 2005 and 2007 in Greece on the basis of Laws 2910/2001 (02.05.2001), 3386/2005 (23.08.2005), and 3536/2007 (23.02.2007) respectively.

⁶⁷ Baldwin-Edwards, Martin. "Greece". In REGINE. Regularisations in Europe. Study on Practices in the Area of Regularisation of Illegally Staying Third Country Nationals in the Member States of the EU. Country Studies, edited by Martin Baldwin-Edwards and Albert Kraler, 41-69. Vienna: ICMP, 2009, pp. 41-69. http://ec.europa.eu/dgs/home-affairs/e-library/documents/policies/immigration/pdf/general/regine_appendix_a_january_2009_en.pdf.

tantamount to integration policy, the legalization of residence (even if temporary) that they provided formed the basis for an elemental sense of security as a precondition for their social integration. Mass regularization policies were also prompted by the need to include large numbers of undocumented migrants in the registered sector of the economy, and thereby to increase revenue for the country's social security system.

Nonetheless, in the course of the 2000s, it became increasingly apparent that the vast majority of immigrants "were here to stay." The need to promote the integration of immigrants in Greek society began to enter the policy agenda as an inescapable and irreversible reality, even if in a patchy manner and without any consensus across political parties and civil society actors as to what integration meant. Law 3386/2005 on the "Entry, stay and integration of TCNs in Greece" is considered as the first law recognizing the reality of immigration as a long-term and permanent phenomenon, even though it did not explicitly address integration issues. Its main aim was to transpose the EU directives 2003/86 on the right to family reunification and 2003/109 on the status of long-term residents. Basic knowledge of Greek language, history and culture were determined as prerequisites for acquiring long-term residence status. Law 3386/2005 also introduced a new regularization program (continued on a smaller scale with law 3536/2007) for undocumented migrants who had entered Greece before December 2004.

Regarding undocumented migrants, Law 3386/2005 explicitly prohibited such migrants from accessing services provided by Greek public entities, local government bodies, and social security organizations (Article 84). The only exception were a) the provision of emergency health care and health care to minors by hospitals, and b) the enrolment of all children in Greek schools irrespective of whether their parents have legal residence status (the latter was based on the interpretation of the UN Convention for the Rights of Children by the Greek Ombudsman). In practice, however, the legal exclusion of undocumented migrants from access to services was not entirely enforced, and their use of such services was tolerated. This is important to note because such 'informal' kind of inclusion outside the official legal frame most likely preceded subsequent local authorities' initiatives aimed at integration.

At the same time, Law 3386/2005 included two articles that showed a concern with integration (Articles 65-66). These provisions conceived of integration as the equal participation of migrants in the country's economic, social and cultural life, in the provision of rights for migrants but also in their obligation to respect the fundamental norms and values of Greek society. The promise of equal treatment to integrated immigrants was also to be delivered by law with the transposition of the EU's Race Directive that prohibited discrimination on the basis of ethnic origin.⁶⁸ The Action Plan for the integration of migrants that Law 3386/2005 introduced highlighted the principles of non-discrimination and equal treatment of TCNs, along with respect for their cultural and religious identity. At the same time, the same law saw as necessary actions and initiatives for the certified knowledge of Greek language, successful enrolment in courses on history and culture of Greece, integration in the labor market and active social participation (Article 66, parag. 4). These axes of integration policy clearly reflected the EU member states' consensus

Accessed May 20, 2014.

⁶⁸ This was Directive 2002/43 EC, and it was transposed in the Greek legal order with Law 3304/2005.

captured in the Common Basic Principles for Immigrant Integration Policy in the EU adopted in November 2004.

All in all, law 3386/2005 presented the first attempt to promote the social integration of immigrants through a consolidated approach, and to mainstream it as a goal into various and related public policies. The Action Plan (or the ‘Estia’ program) was to be financed through the state budget and the EIF, however, its actions and aims remained largely on paper as no resources were channeled to it. In 2007, a General Directorate for Immigration Policy and Social Integration (GDIPSI) was created in the frame of the Ministry of Internal Affairs, apparently as a response to the establishment of the European Fund for the Integration of Third Country Nationals.⁶⁹

During the same period of 2007-2013, the Multi-Annual Program of the European Integration Fund (EIF) for TCNs was adopted by the Greek government as complementary to the ‘Estia’ Program.⁷⁰ Again here, the influence of EU standards in the formulation of this Multi-Annual Program was diffuse and far-reaching. Its main priorities were to implement the EU Common Principles for the Social Integration of TCNs, with particular emphasis on the development of indicators and methodologies in order: a) to assess the results and progress of integration measures and policies, b) to collect statistical data and create data bases related to integration, and c) to supply the results of assessments and indicators in the process of (re)formulating policies.⁷¹ Although the Multi-Annual Program 2007-2013 aspired to streamline social integration goals into all relevant policy sectors, such as health, education, justice, and social policy, to establish inter-ministerial cooperation, and to actively engage local, regional and national authorities, it did not succeed in meeting these goals. Apart from the fact that the Multi-Annual Program comprised a variety of different actions that were not well interconnected in achieving its highly ambitious objectives, the resources earmarked were obviously insufficient for doing so.⁷² In the already limited budget forecast for the six-year period, the co-funding from the Greek side became increasingly difficult to secure after 2010 when an acute fiscal crisis undercut Greek public spending. Following a request by the Greek government, the EU agreed to reduce the Greek state’s co-funding from 20% to 5%.⁷³

From 2010 onwards, and despite the protracted economic crisis besetting Greece, the social integration of migrants entered more dynamically into the political and policy agenda, largely as a matter of contention rather than as a broadly espoused

⁶⁹ Anna Triandafyllidou, “Greek Immigration Policy at the Turn of the 21st Century. Lack of Political Will or Purposeful Mismanagement?” *European Journal of Migration and Law*, Vol. 11(2009) 159-177, at 173.

⁷⁰ See Anagnostou and Kandyla, pp. 13-14.

⁷¹ See Greece / Ministry of Interior (2007), “Multi-Annual Program 2007-2013”. http://ec.europa.eu/ewsi/UDRW/images/items/doc1_18311_898771966.pdf. Accessed June 1, 2014.

⁷² The forecast budget for the entire period of 2007-2013 was about 26.2 million EUR, with 20 million EU funding, and 6.2 million national funding.

⁷³ The main problem with the continuation of the EIF implementation during the period of the Greek crisis, was not the shortage of funding or co-funding, but rather the fact that it has been spent on disparate and low-impact actions, which have not been subject to follow-up or to results’ evaluation and monitoring. Lack of adequate planning, the absence of clear and rational priorities, and the extremely bureaucratic and therefore dysfunctional rules of public spending and procurement have been serious burdens in the effective implementation of the EIF in Greece. I thank Andreas Takis for bringing this to my attention.

goal. In the first place, this dynamic was set in motion by a controversial 2010 law that for the first time focused on second generation migrants and facilitated their naturalization as a vehicle of integration. Entitled “Contemporary provisions for Greek nationality and the political participation of co-ethnics and legally residing immigrants”, Law 3838/2010 was introduced by the Socialist PASOK government at the time, and adopted by Parliament in March 2010. Along with extending political rights to TCNs at the local level, the Law was the most important and politically challenging attempt to promote their social integration in Greece.⁷⁴

In particular, Law 3838/2010 made it possible for children who were born in Greece and who had at least one non-Greek parent residing legally in the country for five consecutive years, to acquire nationality at birth (Art. 1). Children of immigrants, who had attended at least six grades of Greek school, could also acquire citizenship through a simple declaration by their parents within three years following the completion of the required six-year schooling period (Art. 1A, par. 2). In addition, immigrants who legally resided in Greece for at least seven consecutive years could apply for naturalization (Article 5A, par. 1d). At the same time and in line with the trend for more intensive integration tests in a number of European countries,⁷⁵ the new law also required passing a test verifying an individual’s knowledge of Greek history, institutions and civilization.⁷⁶ Besides facilitating nationality acquisition, Law 3838/2010 also extended to TCNs the right to vote and stand as candidates in local elections.

However, this major reform was short-lived. In 2013, the Council of State (CoS), Greece’s high court in administrative law, declared unconstitutional the above two provisions facilitating nationality acquisition and extending political rights to TCNs (Decision 460/2013). The Court ruled that the formal criteria to qualify for Greek citizenship provided by Art. 1 of Law 3838/2010⁷⁷ could not be taken as sufficient documentation that the applicant has a genuine bond with Greece.⁷⁸ It also argued that the extension of local voting rights – already given to citizens of EU member states via EU law – to TCNs undermined the national character of the state and diluted the composition of the legitimate electorate.⁷⁹ The 2013 ruling of the Council of State plenum suspended the potential for the enfranchisement of TCNs at the local level. As an indirect consequence, it also undermined the possibility for municipalities to play a more dynamic and active role in integration. The CoS

⁷⁴ Greece / Law 3838/2010 (24.03.2010).

⁷⁵ Baubock, Rainer and Christian Joppke (eds), “How Liberal are Citizenship Tests?” EUI Working Papers, no. 41 (2010), *EUDO Citizenship Observatory*, Robert Schuman Center for Advanced Studies.

⁷⁶ Additionally seen to testify someone’s willingness to become a Greek citizen were factors such as participation in political and civil society organizations, and involvement in economic activity, among others, see Art. 5A of Law 3838/2010 (24.03.2010).

⁷⁷ Native-born people who have at least one non-Greek parent residing legally in the country for five consecutive years, could acquire citizenship at birth, while descendants of migrants who had attended six years of Greek schooling were eligible for citizenship provided they had studied at a Greek school for a minimum of six years, upon declaration by their parents.

⁷⁸ For an analysis of the case and the judicial politics behind it, see Dia Anagnostou, “Judicial Activism in the Name of the Nation: Reneging on Citizenship and Political Rights of Immigrants in Times of Crisis.” Paper presented at the workshop “Citizens Coping with Crisis: Rights, Participation, Action”, International Institute for the Sociology of Law, Onati, Basque Country, June 29-30, 2014.

⁷⁹ See Greece / Council of State, Decision No. 460/2013. The decision confirmed the earlier decision of the 4th Chamber of the Council of State, Decision No. 350/2011.

decision was part and parcel of a broader social milieu of disgruntlement, if not hostility with immigrants, in a society disaffected by a deep and protracted economic recession and fiscal crisis.

Under the center-right government of New Democracy that came to power in 2012, the integration of migrants was addressed in a new law that codified all existing migration legislation and emphasized long-term residence status. Even though only two articles⁸⁰ (128-129) in this law directly referred to integration, the mention of it in the title reflected the greater attention that decision-makers gave to it. The Immigration and Social Integration Code (ISIC, or the Code), promoted: a) the status of long-term residents on the basis of the respective EC directive (2003/109/EC), which provides an extended set of rights, and b) a special residence permit for second generation immigrants.

The Code made it easier for those holding permits of long-term duration to acquire the long-term residence status (defined by EU law and accompanied with an increased set of rights that its holders enjoy across EU countries). However, the conditions for qualifying for a long-term residence permit after a minimum of five years of living in the country are very demanding.⁸¹ In addition to an eligibility criterion related to residence and income, the Code requires that applicants meet “the conditions for integration into the Greek society”. These are considered to be fulfilled when they can prove a level of language proficiency and knowledge of history and civilization,⁸² when they hold a residence card as family members of a Greek citizen, and when they have been living in Greece for the last 12 years.⁸³ Legal migrants have equal rights with Greek citizens but also new obligations, the central one being to respect the laws and fundamental values of Greek society.⁸⁴ Policies and actions in pursuit of immigrants’ integration must be based on the prohibition of any kind of discrimination based on constitutional principles, and they should respect the fundamental rights of TCNs and their cultural differences.⁸⁵

The Code also sought to address the issue of the second generation, however by disconnecting their integration from nationality acquisition. As an alternative to naturalization, the Code introduced the right of long-term residence status to second generation immigrants. Second-generation immigrants were defined as ‘adult TCNs who are native-born or who have successfully completed six years of Greek schooling.’⁸⁶ The Code enabled them to acquire a special residence permit for the

⁸⁰ Law 4251/2014 “Code of Immigration and Social Integration and other provisions”, Articles 128 and 129.

⁸¹ See Arts 88-89 Law 4251/2014 (01.04.2014).

⁸² Greece/ Art 67 Law 3356/2005 (23.08.2005) listed certification of knowledge of the Greek language and history among the eligibility criteria for a long-term residence permit. The attendance of a specific 175-hour course was rendered no longer a requirement for taking the exams certifying this knowledge organised by the General Secretariat for Lifelong Learning (supervised by the Ministry of Education and Religious Affairs) by means of Law 4018/2011 (30.09.2011).

⁸³ See Arts 88 and 89(2) and 90 of Law 4251/2014 (01.04.2014). On the proposal of the Special Naturalisation Committee within the Ministry of Interior, see the Greek Nationality Code, Law 3284/2004 (10.11.2004). Beneficiaries of international protection are also, on conditions, eligible for the long-term permit.

⁸⁴ Law 4251/2014, Article 128.

⁸⁵ Law 4251/2014, Article 128.

⁸⁶ Art. 108 of Law 4251/2014 (01.04.2014).

second generation upon reaching 21 years of age, provided that they reside legally in Greece. This permit put them on an equal position and endowed them with all the rights of those holding long-term resident status.⁸⁷ While these provisions sought to grant a secure legal status to second generation migrants, they did not address their exclusion from various professions, where Greek nationality is a prerequisite.⁸⁸ The Code also abolished the right to vote and be elected at the local level, which was introduced with Law 3838/2010, in a controversial attempt to abide by the above-mentioned CoS decision.⁸⁹

The Immigration and Social Integration Code (ISIC) reflected the position of the government of New Democracy to the right of the political spectrum, which brought it and voted for it in Parliament, on immigrant integration. It substituted immediate nationality acquisition for the second generation with the promotion of long-term residence status and the special permit for the second generation. Long-term residence status was meant to pave the way for long term residents with older residence permits of indefinite duration on the tracks of the naturalization procedure. The special second-generation permit was aimed to secure legal residence for the 2nd generation until they become adults, when they could apply for the acquisition of Greek nationality. Access to long-term residence status would also enable those acquiring it to migrate to other EU states.

Many of the provisions that were contained in the Immigration and Social Integration Code (ISIC) were laid out in the National Strategy for the Integration of TCNs (hereby the Strategy), which was formulated by the General Secretariat of the Population and Social Cohesion of the Ministry of Internal Affairs in 2013. The Strategy presented a coherent framework for promoting integration. It acknowledged the importance of the participation of the legally resident population groups in social and economic life on an equal basis to national citizens in a non-discriminatory way. Education and enrolment of foreign migrants in the Greek school system is regarded as the most successful component of the integration policy.⁹⁰ Aside from education, integration in the labor market, the acquisition of a long-term residence status and the participation of immigrants in policy-making at the local level, all feature amongst the Strategy's main priorities. Containing political and programmatic goals, the Strategy aspired to be a complete program to promote the inclusion of TCNs into Greek society. According to the Strategy, targets and recipients of integration policies are legally resident TCNs and those who are entitled to international protection (i.e. those granted political asylum or a permit to stay in the country for humanitarian reasons). It expresses a commitment to mainstreaming immigrant integration across public policies and in all levels of government and public services, with a view to providing

⁸⁷ Art. 108 of Law 4251/2014 (01.04.2014).

⁸⁸ See Gemi, Eda. "Immigration Code: New Solutions to Old Problems?", ELIAMEP Briefing Notes no. 24/2013, November 2013.

⁸⁹ Art. 146 of Law 4251/2010 (01.04.2014).

⁹⁰ Greece / General Secretariat of the Population and Social Cohesion, Ministry of Interior (2013), "Ethniki Stratigiki gia tin entaksi ton politon triton choron" [National Strategy for Immigrant Integration], 46-49. It can be accessed at http://www.ypes.gr/UserFiles/f0ff9297-f516-40ff-a70e-eca84e2ec9b9/ethnikisratig_30042013.pdf. Accessed May 20, 2014.

equal opportunities.⁹¹ Neither the Strategy, nor the new Immigration and Immigrant Integration Code, which came into force in March 2014, make any reference to the immigrants' right to preserve their distinct cultural-ethnic or religious identity.⁹²

The Strategy emphasized what it calls “structural integration” as the preferred model of incorporation. While integration is a common European standard in regard to the immigrants' relationship with the host societies, the prerequisites for achieving it, as outlined in the Strategy, are so thorough and substantive, that they make one wonder how different it is from assimilation. In fact, ‘assimilation’ is the English term that is used in the text to describe the notion of ‘structural’ (as opposed to ‘formal’, or legal) integration. The difference between the two is reminiscent of the distinction between a ‘formal’ and a ‘substantive’ bond with the Greek state, which was drawn by the CoS in its decision on nationality acquisition discussed earlier in this report. In pursuit of the ‘structural’ kind of integration, immigrants are expected to demonstrate ‘a positive’ and ‘active’ will to adapt to the dominant political and cultural frame of Greece, an adaptation that is seen to contribute to “the necessary social cohesion and *cultural homogeneity*” [emphasis added].⁹³

The thorough internalization of the Greek culture and the values that is expected from TCNs in order to achieve integration is further glimpsed in what the Strategy calls “the integration program”, which immigrants seeking to gain long-term residence status must complete. This program includes courses to familiarize them with the basic characteristics of the Greek state, to instill “a positive attitude towards the Greek state by acquainting them with the basic values of Greek society and the political system”, and to promote “the participation of TCNs in the social life of the Greek state. These are seen as achievable only when the immigrants are sufficiently informed about the Greek way of life, the mores and values of the host society, and only when they accept directly or indirectly *the dominant national and European ideology*” (emphasis added).⁹⁴ In sum, a substantive kind of integration is advanced as the main goal in the Strategy. At the same time, the term ‘assimilation’ is elsewhere in the same document referred to as a notion abandoned in European public discourse and as a vestige of the colonial times.⁹⁵ In view of the emphasis on an extremely demanding kind of integration and the abolishing of local voting rights, both the Strategy and the Code have elicited strong criticism by politicians and certain media against the government for “adopting a right-wing agenda”.⁹⁶ Overall though, the

⁹¹ Greece / General Secretariat of the Population and Social Cohesion, Ministry of Interior (2013), “Ethniki Stratigiki gia tin entaksi ton politon triton choron” [National Strategy for Immigrant Integration], 57-58.

⁹² Greece / Art. 128(1) of Law 4251/2014 4251/2014 (01.04.2014).

⁹³ Greece / General Secretariat of the Population and Social Cohesion, Ministry of Interior (2013), “Ethniki Stratigiki gia tin entaksi ton politon triton choron” [National Strategy for Immigrant Integration], 21-22.

⁹⁴ Greece / General Secretariat of the Population and Social Cohesion, Ministry of Interior (2013), “Ethniki Stratigiki gia tin entaksi ton politon triton choron” [National Strategy for Immigrant Integration], 54.

⁹⁵ Greece / General Secretariat of the Population and Social Cohesion, Ministry of Interior (2013), “Ethniki Stratigiki gia tin entaksi ton politon triton choron” [National Strategy for Immigrant Integration], 29.

⁹⁶ “Orgi Papandreou gia tin katargisi tou nomou Ragkousi: I kavernisi dimiourgei chasma pou enteinei to ratsismou” [Papandreou against the abolishment of the Ragousis Law: The government causes a chasm which gives rise to racism]. *Ta Nea*, February 8, 2014; Psara, Anta and Dimitris Koukloumperis.

Strategy's content and conceptualization of integration was in line with the so-called civic turn in migrant integration policy as reflected in the relevant EU norms and in the policies of several member states.

Soon upon coming to power (in January 2015 and then again in September 2015), the left government of SYRIZA (in alliance with the right wing ANEL), reintroduced a reform to facilitate nationality acquisition for the second generation immigrants. The new Law 4332/2015 that was passed in Parliament in 2015⁹⁷ with the support of the center left parties (PASOK, Potami)⁹⁸ has increased the length of parents' residence along with making more stringent (in comparison to Law 3838/2010) the related requirements (i.e. type of residence permit). It also increased the required years of school attendance (from 6 years to 9 years) in Greece, for second generation immigrants to obtain Greek nationality⁹⁹, arguably at the expense of restricting the number of migrants who are immediately eligible for Greek nationality.¹⁰⁰ It possibly did so in order to make more credible the presumed existence of a "substantive bond" with the Greek state and to ensure that it would not be overridden in another legal challenge before the CoS. Significantly, this law did not revert to the discretionary and individualized process of naturalization of the 2004 Greek Nationality Code (GNC), while it entirely left out the issue local voting rights for TCNs.

As it may have become apparent from the hitherto discussion, there are notable differences in how left and right wing parties approach the issue of migrants' integration in Greece. Socialist and left parties have taken a more proactive stance on the question of promoting integration, especially for the second generation. They advocate naturalization of second generation migrants as a vehicle for achieving it – a position with which right-wing parties disagree. However, it is not possible to identify a model of migrant integration that is either characteristic or preferred in Greece – there is no worked out and coherent approach on the issue. The few policy documents on the issue largely reflect the norms and standards found in the EU soft law documents. This lack of a national model of migrant integration, as some note, largely reflects the profound ambivalence of Greek political elites on the subject, and possibly their vacillation between two competing models. On the one hand, Law 3838/2010 had opted for a process of drastic integration via extension of nationality to the second generation and of local political rights to TCNs. Following the CoS decision of unconstitutionality of these provisions, subsequent policy regressed to an alternative model of gradual integration. The latter sees the granting of Greek

"Ithageneia: epikyronoun tin akrodeksia agenda" [Nationality: They confirm a far-right agenda]. *Efimerida ton syntakton*, February 10, 2014. <http://www.efsyn.gr/?p=173325>. Accessed June 1, 2014.

⁹⁷ Law 4332/2015, "Tropopioisi diatakseon kodika ellinikis ithageneias kai alles diatakseis" [Amendment of provisions of the Greek Nationality Code and other provisions], *Efimerida tis Kyverniseos* [Government Gazette], no. 76, 9 July 2015.

⁹⁸ See *Proceedings of the Greek Parliament*, Thursday 9 July 2015, p. 4259.

⁹⁹ Article 1 of Law 4332/2015 provides for the acquisition of Greek nationality for TCNs who are born in Greece, not automatically, but once they enroll in the first grade of the primary school and on the condition that at least one parent legally resides in Greece for five consecutive years. See also Article 2 of same law.

¹⁰⁰ See Niko Ago, "Nomoschedio gia tin ithageneia: atolmo, deilo, ligo" [Draft law on nationality: undaring, timid, too little]. It can be accessed at <http://www.protagon.gr/?i=protagon.el.article&id=41447> (last accessed 3 January 2016)

nationality to TCNs as the culmination of a longer term process, and as the reward for its successful completion, rather than as a vehicle to facilitate and expedite integration. In practice, the Greek state has pursued migrant integration through two complementary routes: access of legal migrants to social goods and services; and the implementation of specific targeted actions to promote the integration of legal immigrants.¹⁰¹

As it becomes evident from the discussion so far, and as is common in many EU countries, integration policy-making in Greece is largely a competence of the national government rather than of local government and municipalities. However, municipalities have an array of competencies that directly as well as indirectly but profoundly affect the position of migrants. Furthermore, they have de facto and over time acquired an increasing role in this area, either by implementing national law on migration, and/or in the frame of providing services to local inhabitants, including TCNs. As early as 2001, Law 2910/2001 gave municipal authorities competencies in the implementation of regularization programs and in matters related to migrants' documentation. Municipal administrations were assigned responsibility for receiving applications and for the issuing and renewal of residence permits. They forwarded applications for residence permits to the decentralized state administration (*apokentromenes dioikiseis*) located in the regions' departments, which represent the central state and its ministries.

The competencies to receive applications for residence permits were removed from municipalities in 2010 and were transferred to the regional administration. The rationale for such a transfer was largely linked to the entrenched assumption that the granting of residence permits to foreigners is a prerogative of the sovereign national state rather than of the local government. Local government authorities were in any case only mediating agents prior to 2010, with residence permits still being issued by the competent national ministry (Ministry of Interior). Still, prior to 2010 when they acted as mediators, local government authorities were able to intervene in the course of processing residence permit applications and occasionally charge extra fees from applicants. The transferred of this competence from municipalities to the *apokentromenes dioikiseis* was also triggered by revelations about the existence of local networks procuring false permits.

The legal frame for municipalities to acquire specific competencies in regard to migrants' integration was established with the Code of Communes and Municipalities (Law 3463/2006, Art. 75). In the 2000s, especially in the second half of the decade, municipalities of large cities, like the capital of Athens, with a high concentration of migrant population, engaged in a variety of actions targeting immigrant residents, such as providing courses teaching Greek language, and vocational training programs, among others. Municipalities also provided a host of basic services for vulnerable groups, such as soup kitchens, medical exams, and day care services, radio news in different languages, among others, on a par to migrants as

¹⁰¹ Andreas Takis, "Koinoniki entaksi metanaston. Diagnosi anagon kai eisigisi entaksiakon politikon apo ta SEM" [Social integration of migrants. Identification of needs and proposal of integration policies by the MICs], *Eniaios Odighos Diamorfosis Topikis Politikis gia tin Koinoniki Entaksi ton Politon Triton Choron*, Giorgos Angelopoulos (ed.), (ASANTE and Aristotelian University of Thessaloniki, June 2015), 12.

to Greeks.¹⁰² Those programs specifically targeting migrants were financed by specific financial instruments, such as the European Integration Fund. Altogether though, they did not amount to an explicitly formulated municipal integration policy, even in the large municipalities, such as Athens.

Since 2010 though, the involvement of municipalities in integration-related matters has grown, especially in the large cities of Greece, for a variety of reasons that are subsequently discussed. In the first place, a major administrative reform of local government structures known by the name of ‘Kallikratis’, which was adopted in 2010, strengthened municipalities by transforming them into entities with potentially augmented capacity, however still without fiscal, administrative and political autonomy from the central state.¹⁰³ The ‘Kallikratis’ reform merged a large number of local government units into a smaller number of territorially and administratively larger local government entities, to which it decentralized a variety of competences and functions. The ‘Kallikratis’ reform also substantially augmented the powers of regional governments, which for the first time in 2010 became elected (as opposed to centrally appointed) bodies.

In the frame of the ‘Kallikratis’ reform, an institutional innovation specifically related to integration was the establishment of the Migrant Integration Councils (*Symvoulia Entaksis Metanaston*, hereby MICs) at the local level. The MICs are intended to promote the political and civic participation of immigrants. Their mission is to inform the municipal government about the problems that the migrants face in the respective region, to present proposals for actions aimed at the integration of the migrants in the local government and policy-making structures, and to assist migrants in accessing the regional and municipal services. They can do so by undertaking a variety of tasks, such as to map the immigrant communities and their associations, to involve them in local government structures and policy-making, and to identify and probe into integration problems that must be redressed in the municipalities with high concentration of TCNs. Even though they have no decisive and decision-making powers, the Migrant Integration Councils (MICs), could also serve as important bodies for coordinating synergies and cooperation between municipal authorities and migrant associations. The MICs were intended to function in tandem with the granting of local political rights to TCNs in 2010, and promote their integration through political participation.

The MICs though have so far remained largely inactive, with the exception of such councils set up in the municipalities of Athens and Thessaloniki, where large immigrant populations are concentrated. In part, an important constraint has been the lack of adequate resources and administrative support, which has not allowed the MICs to perform the role envisioned in the ‘Kallikratis’ reform. In those few municipalities where they exist, they function as a consultative but little active

¹⁰² Panagiotis Psathas, *Topiki aftodioikisi kai metanastefsi. To provlima tis ypersingentrosis allodapon triton choron sto kentro tis Athinas*, MA Thesis, National School of Public Administration and Local Self-government (Athens, 2010), 46-48.

¹⁰³ Article 78 of Law 3852/2010 (07.06.2010) on the “New Architecture of the structure of Local Authorities and Decentralized Administration”.

body.¹⁰⁴ Most importantly though, the main factors that undermined the key role, which the MICs were to have, have been a) the suspension of the right of TCNs to vote in local elections, b) the non-allocation of resources to MICs, which would enable them to formulate policy proposals for integration and to engage in more than a few sporadic interventions, and c) the lack of political will, as well as the lack of political interest and incentives in empowering these councils. The institutional, organizational and other obstacles preventing the MICs from becoming meaningful organs for the integration of migrants have been studied and are well-documented.¹⁰⁵

The MICs were legislated around the same time as the local voting rights with Law 3838/2010, described earlier. They were conceived as a local institutional frame for immigrants, who would have full voting rights and elect their own representatives in local government, and who would in turn be members of the MICs. The suspension of local migrant rights in the aftermath of the abovementioned Council of State decision has undermined those original goals and expectations, alongside the empowerment originally envisioned for the MICs. As TCNs do not have local voting power, they cannot rally the support of, and exercise pressure upon local and national authorities to respond to their problems and demands.

Since 2010, apart from the new institutional frame that “Kallikratis” established for municipalities, a number of other factors have contributed to a more pro-active role taken by some of Greece’s largest municipalities in regard to migrant integration, like Athens and Greece. In the first place, the mayors elected in 2010 and then again in 2014 on an independent from political parties ballot have openly advanced a progressive agenda on issues of immigration and rights. In a mayor-centered system of local government, as the one that exists in Greece, the progressive views and positions of elected mayors and of a significant number of members of the municipal council, have rendered these municipalities more vocal and proactive in regard to migrant integration policies. Secondly, the fiscal, economic and social crisis that ushered in in Greece in 2009-2010 also augmented the role of municipalities in sustaining and in some cases substantially extending the net of social services in order to respond to the rising numbers of people in need, even if central transfers to the municipalities drastically declined.

An important triggering factor that pushed the elected officials in these municipalities, and Athens in particular, to take on a more proactive and vocal stance on behalf of migrants’ integration, was the concern caused by the rising electoral power of the extremist right-wing party of ‘*Chrysi Avgi*’ (Golden Dawn, hereby GD). The GD has voiced strongly anti-immigrant positions, and it has engaged in a variety of violent and aggressive actions against immigrants. In April 2012 a week before Easter, the mayor of Athens refused to grant permission to the GD to distribute food handouts “to Greeks only”, on the grounds that the exclusion of non-Greeks was an unacceptable affront to democracy and its fundamental

¹⁰⁴ Markos Papakonstantis, “Ta Symvoulia Entaksis Metanaston sto Plaisio tis Politikis Entaksis Ypikoon Triton Choron” [The Immigrant Integration Councils in the Framework of Social Integration of TCNs], *Koinoniki Sinochi kai Anaptiksi*, Vol. 8, No. 2 (2013): 107-126, at 111.

¹⁰⁵ See Christofors Skamnakis, “Zitimata diagnosis ton topikon anagon” [Issues regarding the identification of local needs], in *Eniaios Odighos Diamorfosis Topikis Politikis gia tin Koinoniki Entaksi ton Politon Triton Choron*, Giorgos Angelopoulos (ed.), (ASANTE and Aristotelian University of Thessaloniki, June 2015), 19-35, at 23-26.

principles of equality and rule of law, which are safeguarded in the Greek constitution. As a symbolic (apart from substantive) gesture, it signaled that the principle of equal treatment between Greeks and immigrants would be fundamental in the approach and policy of the Athens municipality.

Another factor that has further underscored the role of municipalities in migration matters was the heightening migration and refugee crisis over the course of 2015 and in the beginning of 2016. During this period, Greece became a transit country for over 1,000,000 million migrants and refugees reaching the country through the Aegean islands, and travelling to north European countries. With the closing of the northern border in early March 2016, over 55,000 migrants and refugees remain in Greece. Municipalities, especially in areas which are reception points or where refugees stay, are under increased pressure to set up structures for their reception, accommodation, and possibly for their longer-term integration. The outflow of older migrants, especially Albanians, who returned back to their country of origin due to the high unemployment in Greece, has been compensated by the new inflow of migrants and refugees. Furthermore, in the course of 2015 when the Greek border with the Former Yugoslav Republic of Macedonia (FYROM) was opened, many of the older undocumented migrants took advantage of it and left Greece to reach a north European country via the Balkan refugee route. The vast majority of irregular migrants now in Greece are mostly newcomers from the latest migrant and refugee of 2015-2016.

In sum, the involvement of municipalities of large cities and towns in Greece with migrant integration has grown over the past ten years, and in some cases it has become more open and vocal. In the legal and institutional frame established by national laws and policies, and in view of its firm limitations on decentralized policy-making, the largest municipalities have assumed a more active role in migrant integration than in the past.

6. Integration policy: benchmarking, assessment, and the local government

Besides exploring the role of municipalities in migrants' integration, the LOMIGRAS project also seeks to develop an assessment tool for local government policies in this area. The assessment of integration policies has come into the purview of the European Commission's interests and agenda over the past decade at least. Such an interest has been triggered by the concern to develop empirically informed and effective policies that can positively contribute to migrants' prospects of developing strong ties in, and a sense of belonging to the host society. The EU has advocated the importance of monitoring the integration of immigrants through the collection and use of indicators, and it has commissioned several studies and funded several projects on the subject. It has done so not least with a view to collecting empirical evidence in order to assess similarities and differences in integration policies and their results across countries, as well as their development over time. Monitoring and evaluation are seen as indispensable components of effective policy implementation, particularly in issue areas that are cross-sectoral such as immigrants' integration.

Monitoring and evaluation on the basis of quantitative or qualitative indicators in policy-making reflects and seeks to promote a more technocratic and politically impartial approach to deal with social problems and achieve specific goals. The idea

of “technocratic neutrality” is no doubt controversial and so are views about the extent to which a presumably neutral approach to politically contentious issues as migration is possible at all. At the least, however, an approach to integration should not be partisan but it should seek to build broader alliances and to define goals and priorities that are driven by actual circumstances and needs, even if they cut across political and party-specific position-taking. This is precisely the assumption behind the idea of informed decision-making in tackling controversial social issues and problems. It assumes that the empirical information supplied by indicators can provide a basis for a common understanding and it can bridge, or at least, mitigate partisan divisions and political conflicts by managing immigration through appropriate and effective policies.

Monitoring and assessment on the basis of indicators can be carried out by: a) measuring the existing state of social integration of immigrants, b) monitoring the performance of the relevant policies and the extent to which these achieve the goals, for which they are adopted, c) setting new or modified targets that future integration policies must aim for, and d) more broadly, reformulating policies in order to improve their effectiveness and performance.¹⁰⁶ Assessment often applies to *the outcomes of integration policies*, namely, the effects that the different measures and policy instruments have in facilitating the adaptation and inclusion of migrants in the host society. On the basis of empirical evidence the degree of immigrants’ social and economic inclusion is evaluated. This also allows evaluation of the performance of specific policy instruments seeking to increase immigrants’ inclusion in different social spheres (i.e. employment, health, education, etc.).¹⁰⁷

Eurostat has developed immigrant integration indicators in four different policy areas: employment, education, social inclusion and active citizenship. Indicators are mostly quantitative¹⁰⁸, but also they also include qualitative data used to measure a specific set of conditions; they are so-called ‘proxies’, namely indirect measures that we associate with and believe depict the actual situation of a particular group or phenomenon about which we want to learn.¹⁰⁹ Integration indicators depict the situation of immigrants and compare it to that of the total population in different social spheres. For example, output (or outcome) indicators, such as the rate of unemployment, measure the structural situation of immigrants and their degree of social and economic exclusion. They make it possible to evaluate the performance of a specific policy instrument seeking to increase immigrants’ participation in the

¹⁰⁶ Huddleston, Thomas, Jan Niessen and Jasper Dag Tjaden, *Using EU Indicators of Immigrant Integration*, Report prepared for the European Commission (2013).

¹⁰⁷ Faustmann, Anna. “Migration policy, Integration Policy and Integration Performance: Methodological Challenges of Policy Evaluation”. Paper presented at the conference “Do Performance Indicators Matter? Investigating their Impact on Policy-making”, Grenoble, France, June 26-28, 2013. <http://www.icpublicpolicy.org/Do-performance-indicators-matter>. Accessed May 20, 2014.

¹⁰⁸ These are collected mainly through random sampling and structured interviews.

¹⁰⁹ See Doroshko, Tatjana and Dagmar Kutsar, “Social Indicators between Research and Policy-Making in Estonia”, Paper of the project on “Poverty, Social Assistance and Social Inclusion – Developments in Estonia and Latvia, No. 15 (2006), 11.

labor market.¹¹⁰ A recent OECD study has further developed indicators to assess the outcomes of integration policies in EU countries.¹¹¹

Instead of attempting to measure the degree of integration of individuals or migrant groups (outcomes or outputs), the LOMIGRAS project seeks to assess *the appropriateness and quality of integration policies* that are implemented and/or formulated at the local government level.¹¹² To this end, it shall develop a set of indicators in the four policy domains – social-economic, legal-political, cultural-religious, and spatial – described earlier in this report. There are two sets of reasons that have prompted us to focus on the quality of local government policies, instead of evaluating their outcomes. In the first place, the inconsistent and patchy nature of output indicators has dissuaded us from focusing on this dimension. A recent research project has found that in Greece, systematic monitoring of policy outcomes and empirically-based decision-making are not a central feature of immigration policy formulation, including in regard to migrants' integration.¹¹³ Furthermore, socio-economic or civic integration indicators are not available at the level of municipalities in Greece.

Assessment that is based on benchmarking and pre-determined criteria, as others have argued, is not a neutral tool.¹¹⁴ While do not claim that the policy content and standards, which our benchmarking assumes, explicitly or implicitly, as optimal, are neutral. In formulating such standards, we draw from what in contemporary European law and policy is considered mainstream and well-accepted. For instance, we view the promotion of civic integration (but not their obligatory character) as desirable and appropriate, we agree that the situation of migrant groups who are especially vulnerable must be taken into account, and that the principles of equal treatment and discrimination, among others, must be applied.

Secondly, while indicators, such as unemployment rates, educational attainment or school drop-out rates of foreign born and natives, can provide a picture of the overall socio-economic characteristics of the two segments of the population, they indicate little about the effectiveness of the respective labor or educational policies. As anyone who has studied policy impact knows only too well, changes in social phenomena or in social groups can rarely be attributed to single causes, let alone to particular policies. They instead occur as a result of a combination of

¹¹⁰ Faustmann, Anna. "Migration policy, Integration Policy and Integration Performance: Methodological Challenges of Policy Evaluation". Paper presented at the conference "Do Performance Indicators Matter? Investigating their Impact on Policy-making", Grenoble, France, June 26-28, 2013. <http://www.icpublicpolicy.org/Do-performance-indicators-matter>. Accessed May 20, 2014.

¹¹¹ See *Indicators of Immigrant Integration 2015 – Settling In* (Paris: OECD Publishing, 2015).

¹¹² For a similar approach to assessment of migrant integration policy, but in reference to the national level, see J. Niessen and Y. Schibel, *Handbook on Integration for Policy-Makers and Practitioners* (2007).

¹¹³ Dia Anagnostou and Anna Kandyla, "Review of Existing Monitoring Mechanisms for the Integration of Migrants in Greece", report prepared in the frame of the ASSESS Project, Funded by the European Commission, European Integration Fund, 2013-2015 http://www.assess-migrantintegration.eu/uploads/1/2/3/3/12339284/national_report_-_greece_.pdf

¹¹⁴ Han Entzinger and Renske Biezeveld, *Benchmarking in Immigrant Integration*, 5.

different factors and conditions, only one of which is content of the policies pursued. Assessing the quality of integration measures both in metropolitan areas and traditional neighborhoods can become a crucial tool in achieving social cohesion of the entire society.

The LOMIGRAS' development of an assessment tool is informed by the Migrant Integration Policy Index (MIPEX). MIPEX is a survey taking place across EU Member States and a set of countries outside the EU. For each country, the MIPEX experts rate the current laws and policies against a set of aspirational standards for immigrant integration.¹¹⁵ Drawing from Council of Europe Conventions, European Community Directives as well as policy recommendations, MIPEX essentially seeks to provide a benchmarking assessment of national integration laws and policies, to identify policy gaps and to highlight best practices in Europe. MIPEX provides scores on a number of indicators relating to one of seven policy components of immigrant integration: labor market mobility, family reunion, education, political participation, permanent residence, anti-discrimination and access to citizenship.

In 2014, Greece ranked 17th out of the 38 countries examined in the MIPEX index of integration policies, scoring 44, which is below the EU average (which is 52).¹¹⁶ Greek immigration policy was least favorable (in fact even 'slightly unfavorable') in the areas of education, health, political participation and access to nationality, while it scored as "halfway favorable" in the areas of labor market mobility, family reunion, permanent residence and anti-discrimination. The unfavorable ranking of Greece in the areas of political participation and access to nationality in 2014 signaled a deterioration from the country's position in 2010. The 2010 higher ranking in these areas was due to the fact that the government at the time had passed Law 3838/2010, discussed earlier in this report, which had facilitated access to nationality for second generation TCNs, and had granted TCNs the right to vote and stand as candidates in local elections. Since the Immigration and Social Integration Code adopted in 2014¹¹⁷, following the Supreme Court's 2013 decision, rendered these provisions obsolete, the conditions for integration in Greece have been undermined.

Adopting a similar approach to assessment as the MIPEX tool, the LOMIGRAS project shall seek to develop a set of criteria and a methodology on the basis of which local government policies in Greece, but also in other countries, can be assessed. The benchmarking and the criteria to be formulated will provide the basis for assessing a) national laws that directly refer to and are implemented by municipalities, both those that specifically pertain to integration and those more general policies that refer to the general population, but which have substantial effects on immigrants, and b) municipal laws and decisions that in the frame of their competencies and resources institute measures that aim to redress the particular needs

¹¹⁵ MIPEX is managed by the British Council and the Migration Policy Group, with co-funding from the European Commission under the European Integration Fund. See www.mipex.eu. Accessed May, 20 2014.

¹¹⁶ MIPEX. "Migrant Integration Policy Index III". Brussels: British Council and Migration Policy Group, 2011. See <http://www.mipex.eu/greece> (last accessed 2 April 2016).

¹¹⁷ Law 4251/2014 "Code of Immigration and Social Integration and other provisions".

and conditions of migrant communities, and c) projects and actions designed and initiated by municipal authorities with the aim of promoting migrants' integration. These sets of laws and policies to be assessed shall be subdivided into the four integration domains described earlier in this report: the legal-political, the social-economic, the cultural-religious, and the spatial. These are in accord with a fairly settled range of integration policy dimensions, which most studies on the subject apply.¹¹⁸ Table 1 below summarizes the basic frame of the assessment and benchmarking exercise of the LOMIGRAS project, indicating the municipal policies in Greece, which fall under each of the four policy domains – social-economic, legal-political, cultural-religious, and spatial – described earlier in this report.

Policy Domains	Municipal Policies	Description
LEGAL-POLITICAL	Advisory council	Migrant Integration Council
	Integration strategy	
	Migrant communities participation	Inclusiveness, consultation, engagement
	Equal treatment/non-discrimination	
SOCIAL-ECONOMIC	Social services/provisions	Several kinds of social allowances, and various kinds of support for the poor; provision of health-related services
	Day care	System of municipal day care centers for children of pre-school age
	Employment	Entrepreneurship, vocational training programs
	Education/children	
	Language teaching	

¹¹⁸ See Teresa Juzwiak, Elaine McGregor, Melissa Siegel, *Migrant and Refugee Integration in Global Cities*, The Hague Process on Refugees and Migration (THP) (2014), 9.

CULTURAL-RELIGIOUS	Cultural policy	Activities to support, acknowledge or celebrate non-native cultures
	Places of worship/mosques	
	Sports	
SPATIAL	Urban planning	

The LOMIGRAS research shall explore the extent to which local government authorities in Greece actively implement national immigrants' integration policies or even design their own policies in this area. Furthermore, it shall seek to assess how complete or comprehensive and appropriate local government policies are, as well as how aware of and sensitive to the needs of the ethnically and religiously diverse migrant population residing within the territory of the country's largest municipalities (Athens, Thessaloniki, Patras, and Herakleio). In developing a methodology to assess migrants' integration at the local level, as well as a technological tool for applying it, the LOMIGRAS project addresses a gap in the analysis and evaluation of integration measures. Existing assessment tools have in a large part adopted a more generic approach, tending to be national in scope. By looking at the specific policies and integration challenges faced by immigrants at the local level and the policies pursued by municipalities, the project will offer tailored methodology and specific indicators for monitoring the integration of immigrants at local and city level. The methodology developed by the project will serve as a standardized tool for monitoring the integration of immigrants across local governance in Greece. At the same time, it aspires to become a blueprint for developing assessment tools for municipal policies on migrants' integration in other EU member states too.

In view of the large variety of state structures and the degrees of autonomy and range of competencies that cities and municipalities (or other subnational government-administrative entities) have across different countries, it is not possible to create a 'one size fits all' assessment tool. However, what we aim here is to create one that is as comprehensive as possible, and which can be adjusted in different state, structural and institutional contexts in accordance with the competencies and powers of the different municipalities and other local government entities.

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