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**THE ROLE
OF EUROPEAN FUNDS
IN SUPPORTING
THE INTEGRATION
OF MIGRANTS IN POLAND**



The objective of this report is to describe the problems that result when non-government organizations (NGO's) limit or stop implementing activities that support the integration of migrants. Such was the case recently in Poland when the Ministry of the Interior and Administration (pol. Ministerstwo Spraw Wewnętrznych i Administracji) decided to limit NGO's access to European funds, thus forcing them to reduce or stop their initiatives related to integration support. This decision was taken despite the fact that, for years, it has been primarily NGO's that provide support for integration between migrants and Polish citizens.

The below report aims to raise awareness about the conditions in which NGO's specializing in migration issues function in Poland. We hope that it will encourage broader support for Polish NGO's in the current challenging circumstances and indeed for any activities that foster integration of migrants in Poland.

Migrants in Poland¹

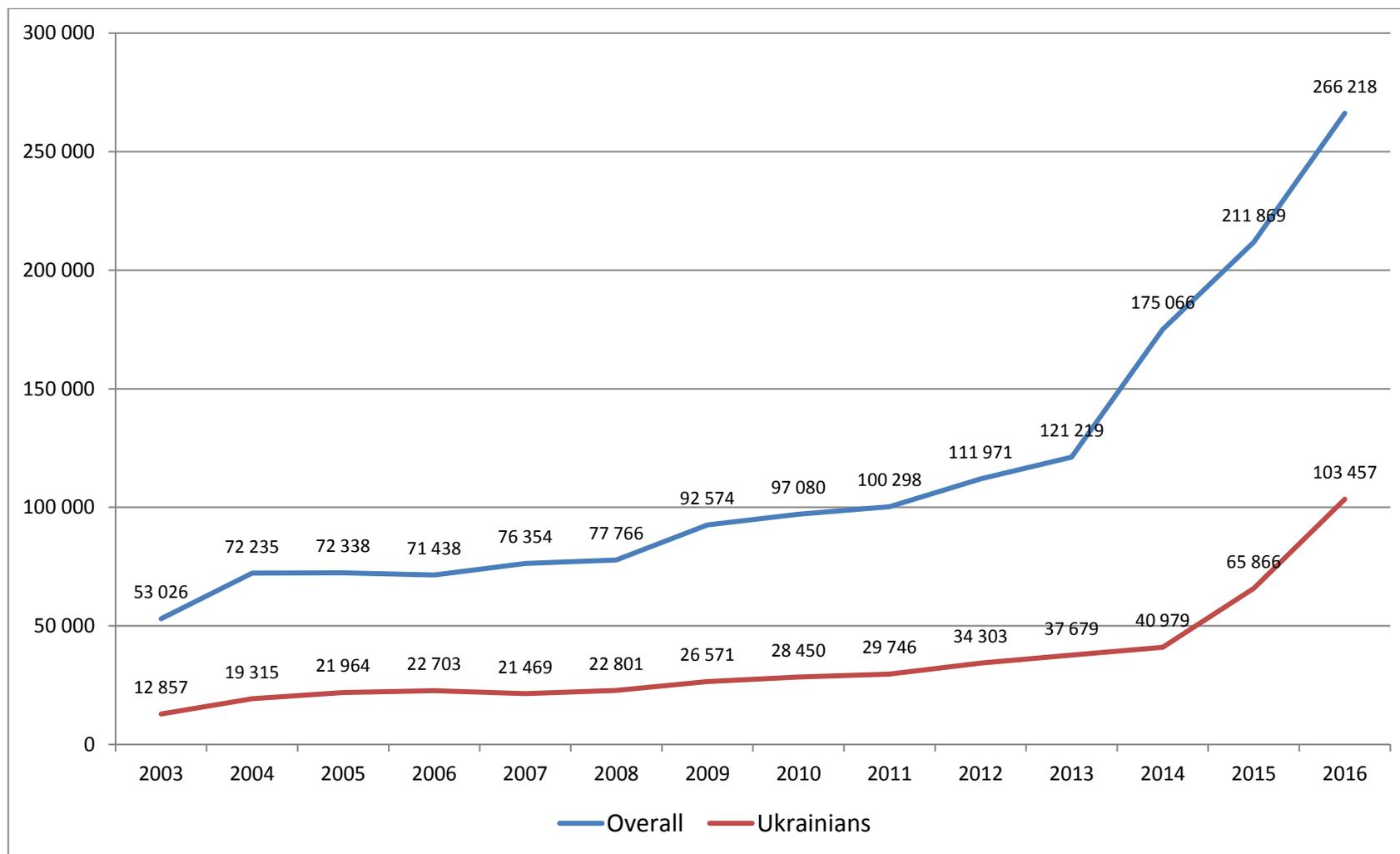
The population of foreign nationals in Poland has steadily grown since Poland joined the European Union in 2004. Most are citizens of other EU member states (in 2017, Germans constituted the largest group, followed by Italians, French, British, Bulgarians, and Spaniards); however, the number of third country nationals living in Poland is also growing rapidly, the majority of them being Ukrainians. Graph no. 1 below illustrates the migrant population changes over time.

As of July 1st 2017, there were 302,263 foreign nationals holding valid residency cards (pol. karta pobytu) in Poland.

Citizens of EU member states and their families constituted slightly over one-fourth of the population of foreign nationals overall, while 222,722 were third country nationals, of which 128,300 were Ukrainians. In the first half of 2017, over 773,000 thousand applications were filed for temporary residency permits (pol. zezwolenie na pobyt tymczasowy) and nearly 10,000 for permanent residency permits (pol. zezwolenie na pobyt stały), which is significantly higher than in 2016.

¹ The statistics are from the Polish government Office for Foreigners (pol. *Urząd ds. Cudzoziemców*) (<https://udsc.gov.pl/statystyki/raporty-okresowe/zestawienia-roczne/>) and the Ministry of Family, Labour and Social Policy (pol. *Ministerstwo Rodziny, Pracy i Polityki Społecznej*) (<http://www.mpips.gov.pl/analizy-i-raporty/cudzoziemcy-pracujacy-w-polsce-statystyki/>).

Graph no. 1. The number of valid residency cards (pol. *karta pobytu*) granted to foreign nationals in each calendar year for the years 2003-2016.



Moreover, a significant number of migrants, mostly citizens of Ukraine, enter and remain in Poland based on long-term visas. Many such individuals have a right to work in Poland without having to secure additional permits and live in the country for most of the year. This is possible because of simplified procedures for employment of foreign nationals from select countries (like: Armenia, Belarus, Georgia, Moldova, Ukraine and Russia). Citizens of these countries can apply for a visa and, once in Poland, work legally based on a “Declaration of Intent to Hire” (pol. *oświadczenie o zamiarze zatrudnienia*), which they secure from a potential employer in Poland. Since 2014, the number of such Declarations registered by potential employers in Poland has consistently and significantly risen,

owing in a large part to the armed conflict that developed in Eastern Ukraine then. In 2016, more than 1,31 million such Declarations were registered by potential employers in Poland, while in the first half of 2017 alone, the number reached near 950,000². An estimated 70% of foreign nationals enter Poland based on such a Declaration.

People seeking asylum in Poland are also consistently arriving into the country. Between 2015-2016, the annual number of individuals submitting an application for asylum

² We note that the number of foreign nationals legally residing in Poland on the basis of such a Declaration is lower than the number of Declarations actually issued by employers. This is due to the fact that not all foreign nationals ultimately choose to come to Poland, even if they have an interested employer. In most of the cases the Declaration is registered practically immediately and free of charge.

was 123,000. However, since 2016, this number drastically changed because the border crossing between Poland and Belarus in the town of Terespol was closed and Polish Border Authorities refused to accept asylum applications.³ In the first half of 2017, only 2,988

³ More on this topic can be found in reports published by the Association for Legal Intervention (pol. *Stowarzyszenie Interwencji Prawnej*) (e.g. <http://interwencjaprawna.pl/docs/ARE-216-na-granicy.pdf>) and by the Helsinki Human Rights Foundation in Poland (e.g. <http://www.hfhr.pl/wp-content/uploads/2016/11/A-road-to-nowhere.-The-account-of-a-monitoring-visit-at-the-Brze%C5%9B%C4%87-Terespol-border-crossing-point-FINAL.pdf>). The situation was also relatively well documented in international media (e.g. coverage by Al Jazeera: <http://www.aljazeera.com/indepth/features/2016/09/asylum-seekers-stranded-europe-dictatorship-160919191015494.html>).

individuals were able to submit applications.

Government support for integration in Poland is available exclusively to people who have been granted international protection (i.e. refugee status or subsidiary protection – pol. *ochrona uzupełniająca*). This support is offered within the frame of Individual Integration Programs (pol. *Indywidualny Program Integracji*),

which last for only one year from the date that protection is granted. It must be emphasized that the number of refugees in Poland is small compared to the overall number of foreign nationals in the country. As of July 1st, 2017, the number of individuals who were granted international protection and were holding residency cards on that basis was 3,340. Most had already completed the Individual

Integration Program. In the first half of 2017, just 259 individuals were granted protection in Poland. This means that the vast majority of foreign nationals living in Poland cannot benefit from any kind of government integration support. For this reason, integration support offered by NGO's is the only support that most individuals can count on.



A History of (not) Funding – the Fund for Asylum, Migration and Integration

NGO's that provide a range of support to migrants in Poland have, since Poland's entry into the EU, been funded primarily by EU Funds. Between 2004-2007, NGO's could receive funding from the European Fund for Refugees (pol. *Europejski Fundusz Uchodźczy-EFU*) and, in subsequent years until 2014, also from the European Fund for the Integration of Third Country Nationals (pol. *Europejski Fundusz na rzecz Integracji Obywateli Państw Trzecich-EFI*) and the European Return Fund (pol. *Europejski Fundusz Powrotów Imigrantów-EFPI*). Starting 2014, these three EU Funds were to be replaced by a single funding scheme: the Fund for

Asylum, Migration and Integration (AMIF).

The financial resources available within the frame of these EU Funds are not disbursed directly from EU institutions to local NGO's, but are transferred by the European Commission to member state governments, which then disburse the funds to local entities through competitive, open calls for funding. The EU thus funded and helped shape member states' policies on asylum, integration and migrant returns. In Poland, it was the Ministry of the Interior and Administration, which was responsible for disbursing the funds to local NGO's, through a specially

created unit, the Centre for the Administration of European Projects (pol. *Centrum Obsługi Projektów Europejskich-COPE*⁴). For over ten years (since 2004), these EU Funds have been the main (and at times the only) sources of funding for NGO activities related to migration and integration in Poland. At the same time, these Funds were demanding in terms of management and administration. Recipient NGO's were required to comply with a range of stringent and detailed criteria related to documentation and financial administration, which

⁴ The Centre's name changed several times over the years. We are here using the current name.

was a challenge. Moreover, the funding scheme within the frame of these EU Funds covered only 75% of the budget of a given project. Even though the Polish government co-funded 10% of project budgets for NGO's, NGO's were still required to contribute 15% toward the project budget (for example by securing funding from other non-EU sources, through donations, etc.).

Funding for projects granted was disbursed through competitive open calls, in which NGO's (and other institutions such as local government entities, educational institutions, etc.) could apply for funding for a specific project proposal. The proposed projects usually involved a range of activities, for example: teaching Polish as a foreign language, legal counseling, integration support, vocational counseling, psychological support,

educational trainings, public information campaigns.

Relations between NGO's, selected in the open calls, and the Centre for the Administration of European Projects, which was responsible for overseeing the implementation of projects (both in terms of activities and finances), were not always smooth. For example, contracts between NGO's and the Centre, which outlined the terms and conditions for project implementation, were often delayed, even by several months. Disbursement of funds to NGO's for project implementation was also frequently delayed. Calls for project proposals were announced relatively regularly and in accordance with a publicized schedule. This was also the case for the first open calls within AMIF, announced in the first half of 2015.

The situation changed, however, with call number 3/2015 for project proposals funded from AMIF. The Centre for the Administration of European Projects changed, several times, the date of announcing decisions regarding applications submitted in the call (i.e. which projects would receive funding and how much), and on April 25th 2016, the Ministry of the Interior and Administration ultimately annulled the call, but announced that calls 4/2015 and 5/2015 would both have submission deadlines in June 2016. Although those subsequent two calls were announced as promised, decisions on the submitted project proposals were still not released by end of August 2017 (the time of preparing this report).⁵ The Ministry

⁵ For more details, see the website of the Foundation for Social Diversity (FSD), which has documented the history of open

of the Interior and Administration also announced call 6/2015, which focused on projects offering legal counseling for individuals applying for refugee status and returns⁶. Proposals were to be submitted by September 23rd 2016, but budgets could include costs incurred between July 2016 and June 2018. At the time of writing, no decisions had been released regarding this call either.

The delays with calls for applications and the cancellation of calls resulted in an overall decrease in both the number of projects selected for implementation and the value of

calls within AMIF:
<http://ffrs.org.pl/reagujemyfami/>

⁶ See the Ministry of the Interior and Administration website:
<http://fundusze.mswia.gov.pl/ue/aktualnosci/14167,OGLOSZENIE-O-NABORZE-WNIOSKOW-nr-62016-FAMI.html>

those projects' budgets. Based on information from the Ministry of the Interior and Administration, among projects focused on refugee and migrant integration, during the period including all of 2016 and the first half of 2017, 49 projects were selected for implementation with a total value of 31,038,000 PLN (all funded from AMIF). While in 2014, there were 122 projects selected with a total value of 59,120,151.36 PLN (funded from EFU and EFI⁷).

⁷ This information is based on official responses from the Department for Border Policy and International Funds (pol. *Departament Polityki Granicznej i Funduszy Międzynarodowych*) within the Ministry of the Interior and Administration (dated August 1st 2017) and from the Centre for Administration of European Projects (dated July 28th 2017) to queries made by the Association for Legal Intervention and the Helsinki Human Rights Foundation (dated July 19th 2017).

In June 2017, in advance of the 8th open call for funding from AMIF (call number 8/2017/OG-FAMI, which specifically focused on “Integration Issues/Legal Migration”), regional Voivode authorities⁸ announced

⁸ See official information on Voivode websites:

<http://www.poznan.uw.gov.pl/konkursy-dla-organizacji-pozarzadowych/fundusz-azylu-migracji-i-integracji-fami>,
<http://www.gdansk.uw.gov.pl/urząd/wydzialy/26-wydzial-polityki-spoecznej/ogloszenia-i-komunikaty/2042-ogloszenie-na-nabor-partnera-w-celu-wspolnej-realizacji-projektu-w-ramach-funduszu-azylu-migracji-i-integracji>,
<http://luwwlublinie.bip.gov.pl/konkursy/otwarty-konkurs-na-partnera-w-sprawie-realizacji-zadania.html>,
<http://puw.bip.gov.pl/inne-ogloszenia/wynik-naboru-na-partnera-partnerow-do-wspolnej-realizacji-projektu-wpisujacego-sie-w-fundusz-azylu-migracji-i-integracji.html>,
<https://www.szczecin.uw.gov.pl/?type=article&action=view&id=7697>,
<https://duw.pl/pl/biuro->

calls for institutional partners with whom they would implement projects. Because regional authorities were not required to have an NGO partner in the projects they submitted for funding, not all announced such calls. The deadline for project submission in the 8th call was in early August 2017, which is why calls for partners were announced in June 2017.

Five regional Voivode authorities did not announce calls for partners (we

prasowe/aktualnosci/13338,Rozstrzygnięcie-konkursu-w-ramach-projektu-FAMI.html,
<https://rzeszow.uw.gov.pl/komunikaty/podkarpacki-urzed-wojewodzki-uzyskal-dofinansowanie-na-bliski-690-tys-zl/>,
https://bip.lubuskie.uw.gov.pl/wojewoda/komunikaty_wojewody/st:1/idn:112.html,
<https://www.opole.uw.gov.pl/informacja-o-wynikach-otwartego-naboru-na-partnera-projektu-wspolfinansowanego-z-funduszu-azyłu-migracji-i-integracji>

were not able to confirm exactly why not), while seven did: (Mazovia (pol. *mazowsze*), Greater Poland (pol. *wielkopolski*), Lublin (pol. *lubelski*), Lower Silesia (pol. *dolnośląski*), Pomeranian (pol. *pomorski*), West Pomerania (pol. *zachodniopomorski*), Warmia-Mazuria (pol. *warmińsko-mazurski*), and Podlaskie. The following NGO's were selected as partners: the Foundation Linguae Mundi, the Polish Migration Forum (pol. *Polskie Forum Migracyjne*), the Foundation for Somalia (pol. *Fundacja dla Somalii*), the Foundation for Ukraine (pol. *Fundacja Ukraina*), the Foundation Vox Humana, the Foundation Dialogue, the Rule of Law Institute (pol. *Fundacja Instytut na rzecz Państwa Prawa*), as well as Caritas. The latter organization, which is well-established with a network of regional offices, was

selected as a partner in five Voivodeships. Higher Education Institutions were chosen as partners by some Voivodes (including: Silesia, Opole, Lubusz, and Lublin): The University of Silesia in Katowice (pol. *Uniwersytet Śląski*), the Management and Administration School in the city of Opole (pol. *Wyższa Szkoła Zarządzania i Administracji*), the University of Opole (pol. *Uniwersytet Opolski*), the Jacob of Paradies University (pol. *Akademia im. Jakuba z Paradyża*), and the Catholic University of Lublin (pol. *Katolicki Uniwersytet Lubelski*). In Pomerania, the municipal government of the city of Gdańsk was selected as project partner. In the region of Silesia, the partner was the regional educational administration unit (pol. *Kuratorium Oświaty*). Five Voivodes chose one partner, five chose two partners,

and the Mazovia Voivode selected four partners. In Pomerania, the call was closed and the decisions publicized, but annulled without justification.⁹



⁹ See the website of the Voivode: <http://www.gdansk.pl/wiadomosci/Urzed-Wojewodzki-wycofal-sie-ze-wspolpracy-z-Miastem-w-projekcie-dotyczacym-imigrantow,a,83501>

The Consequences of Lack of Funding from AMIF

In order to document and better understand the consequences that lack of funding from AMIF has for NGO's, which provide support to migrants, in July 2017 we ran an on-line survey among NGO sector professionals. The aim was to document the current state of NGO's focused on migration and integration issues, what activities they currently run, which activities they had to limit or stop offering entirely as a consequence of lack of funding from AMIF. In order to have a comparable dataset, we asked NGO's to provide information concerning the year 2014 (the last full calendar year when the EFU and EFI Funds were in operation) and for the year 2016 (some NGO's were then funded from AMIF, while some were excluded from this funding due to formal criteria regarding the nature of activities that could be funded by AMIF¹⁰).

¹⁰ For example, the first two calls for project proposals within AMIF were focused on projects that provide legal counseling to migrants, which *de facto* disqualified NGO's that offer other forms of needed integration support, but do not specialize in legal counseling.

We invited over 40 NGO's to take part in the survey. The invitation was directed to a group of organizations that actively participate in a discussion forum and mutual support network that was created in 2015 as a response to the delays with AMIF funding. The organizations in the group had wanted to exchange information and share updates about the outcomes of special meetings between NGO representatives (selected democratically from NGO's in the group) and the Ministry of the Interior and Administration. The group included the majority of NGO's that had been receiving funding for projects from EFU and EFI Funds. In 2017, the group was not very active due to lack of funding from and contact with AMIF. Some NGO's in the group were forced to stop their activities due to lack of funding. Thirteen NGO's completed the survey, eight of them with offices located in Warsaw (although their activities were not necessarily limited to the capital) and five of them from other parts of the country.

The first question in the survey was about the NGOs' budgets in 2014 and in 2016.¹¹ Out of thirteen NGOs, only four reported that their overall budget remained unchanged.¹² Five reported that their overall budget was lower, while four reported an increase (this was the case for NGOs that, in 2014, were relatively young, with low budget and only since then had started developing their activities and, as a consequence, their budgets). In 2014, seven NGOs reported an overall organization budget of over 1 million PLN, and three had a budget over 2 million. No NGO reported a budget below 100,000 PLN. By contrast, in 2016, only two NGOs had maintained the earlier level of their organizational budget and only one NGO reported a budget over 2 million. The number of NGOs with an organizational budget over 1 million PLN

¹¹ Because some NGOs also run activities for Polish citizens, we asked that in the survey they only provide data regarding activities focused on migrants or related to migration issues.

¹² The survey offered respondents the following choices regarding the scale of overall organizational budget: below 100,000 PLN; between 100,000-300,000 PLN; between 300,000-600,000 PLN; between 600,000-1 million PLN; between 1-2 million PLN; and above 2 million PLN. Respondents were asked to choose the range that best matched their real budget. It is possible that an NGOs' budget did change over time, but still remained in the same range (e.g. between 1 and 2 million).

was unchanged. One NGO had a budget in the lowest range – below 100,000.

The NGOs were not reliant solely on funds from EFU and EFI or AMIF; however, because these funds constitute the most significant source of funding for integration support to migrants in Poland, it can be assumed that these EU Funds made up an important part of the NGOs' budgets in 2014. By contrast, in 2016, in response to lack of funding from AMIF, many NGOs sought other sources of funding for their activities related to migration and integration, including: private funding (i.e. donations, grants from private foundations), Norway Grants,¹³ which were available through the first half of 2016, as well as local government funding. Submitting grant applications to a more diverse range of funding sources was the main strategy on the part of NGOs to resist rolling back activities. Twelve NGOs reported seeking new sources of funding to replace the EU Funds; ten initiated campaigns to solicit donations from private individuals; while six began to develop or expanded their for-profit activities (mostly as a form of social enterprise – profits are

¹³ The Norway Grants and the European Economic Area Grants are a form of international aid offered by Norway, Iceland and Lichtenstein to new EU member states.

channeled to fund activities that support migrants). Some NGO's reported plans to develop for-profit activities.¹⁴ One NGO began to charge clients for services to cover costs.

Reducing costs was another strategy adopted by some NGO's: ten reduced the number of permanent employees, seven lowered employees' salaries. One NGO gave up having an office in order to reduce administrative costs. Seven NGO's increased efforts to involve volunteers as a way of making up for the loss of salaried employees. Eight NGO's were forced to reduce the number of clients they could service and/or the range of services they offered.

The survey included an open question in which respondents were asked to name three of the biggest problems they currently experience. The responses included:

- Lack of financial fluidity and a general lack of financial resources for activities directed to migrants and integration. Also small chances of securing funding from other sources, which would allow long-term and complex forms of support (as

¹⁴ Respondents could indicate multiple choices as relevant, so the results do not always add up to 13.

was the case in EFU, EFI and AMIF). These problems result, above all, from the lack of funding from AMIF. Respondents indicated these problems 15 times in their responses in a range of contexts.

- Too few employees vis-a-vis the number of clients requiring services, as well as for staff on rotation. Loss of highly qualified staff due to lack of funding. As one respondent noted: „Our employees can't wait for a year while the Ministry takes its time to decide.” These problems were noted by eight respondents.
- Four respondents noted a rise in aggressive or negative attitudes toward migrants and/or toward NGO's that support migrants (and especially those NGO's that openly critique current government policies) – noted in four responses.
- Inability to make long-term plans, lack of stability (a feeling that work is without purpose given current precariousness), and lack of security in a long-term perspective were noted in three responses. Two respondents also mentioned problems related to the unpredictability of the current government.

- Rising numbers of clients who need support and a lack of resources to provide the support (three responses).

The survey was also concerned with the question of whether NGO's had reduced their support to migrants between 2014 and 2016, and if the number of migrants able to benefit from NGO support had consequently also decreased. Overall, the number of clients was higher in 2016 compared to 2014 (although it must be noted that the overall number of foreign-nationals in Poland also rose significantly during this time – see above discussion). In 2014, an overall number of 13,223 people benefitted from the NGO's services (the survey question related to any form of direct support, such as legal counseling, psychological counseling, training programs, etc.). In 2016 – that number was 14,396.¹⁵ This overall growth in client numbers includes the fact that in 2014, three NGO's out of 13 taking part in the survey did not offer support services to migrants at all, and only started to offer such services in 2015 or 2016. Six NGO's reported an increase in the number of clients they serviced in 2016 compared

¹⁵ Data from one NGO was excluded because it reported servicing 200,000 clients in 2014 and 400,000 in 2016. Such figures seem unrealistic.

to 2014. Five NGO's decreased the services they offered between 2014 and 2016, while one NGO reported no changes.

We also asked whether NGO's reduced their support activities related to migration and integration, or stopped them completely due to lack of funding; and if so, then which activities were reduced or stopped. Nine NGO's reported reducing some part of their activities (depending on their area of specialization and experience) in the following areas:

- Direct integration support, legal counseling and/or other forms of counseling – 9 NGO's;
- Various educational and training programs for migrants (e.g. Polish language courses, vocational trainings, workshops on legalization issues) – 7 NGO's;
- Activities directed to the receiving population in Poland (e.g. educational programs, integration events, on-line resources, etc.) – 4 NGO's;
- Research and advocacy activities – 3 NGO's.

Four NGO's reported that they had not reduced any services; two of them, because they were receiving funding from local government through the end of 2017

(although one was starting to reduce services at the time of the survey in anticipation of reduced access to funding). The third, because it was funded by AMIF through October 2017, but will be forced to stop most activities due to lack of other sources of funding after October. The fourth NGO reported that, because it was only recently created, lack of funding from AMIF will not impact on its services, but rather will mean that they cannot continue to develop and, most importantly, keep up with a growing demand for support from clients.

In the survey, we also asked an open question regarding the biggest problems that the NGO's clients currently face. The following answers were provided by respondents:

- Lack of or low level of knowledge among clients about the legal ramifications of their stay in Poland and generally about life in Poland, whilst simultaneously having limited or no access to legal advice (9 responses);
- Long-lasting administrative procedures related to various issues (4 responses);

- Difficulties with integration, including language barriers and psychological problems (e.g. trauma, stress) (5 responses);
- Limited or no access to services (4 responses);
- Poverty and lack of access to housing (3 responses);
- A rise in negative attitudes and aggression among Poles toward migrants, leading to incidents of discrimination and hate crimes (3 responses).

The NGO's taking part in the survey work with diverse groups of migrants, who face different challenges and problems in Poland. Some of the challenges faced by clients, which NGO's reported in the survey, are systemic and not related to limited or lack of services offered by NGO's (due to lack of funding for NGO's). Some of the reported issues, however, are a direct consequence of the lack of access to funding for NGO's. The NGO's ability to run activities at full capacity would significantly improve the situation of clients in regard to many issues, including also mitigating the negative impact of systemic problems.

Summary and Conclusion

Lack of funding from AMIF has had significant consequences for migrant integration in Poland. For many years, EU Funds (EFU, EFI and AMIF) were the main (and currently the only) source of funding for integration support offered by NGO's to migrants. These Funds were important not only for NGO's, but also for local government and other public institutions (e.g. Higher Education institutions). Stopping and/or limiting funding from AMIF (e.g. disbursing only to Voivodes):

- Reduces legal counseling and integration support to migrants;
- Hinders the possibility to monitor whether migrants' rights are respected and to launch strategic legal cases that can set standards for protection of migrants' rights;
- Jeopardizes the stability and long-term availability of integration support for migrants from NGO's;
- Weakens or breaks highly qualified teams of professionals, which include lawyers, legal councils, therapists and psychologists, integration advisors, translators, etc.

Translation: Katarzyna Kubin