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Governing the accommodation of international protection applicants

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Explanatory note

This inform was prepared on the basis of national contributions from 27 EMN Member and Observer Countries (AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, SE, SI, SK, and NO, RS) collected via an AHQ developed by the EMN NCPs to ensure, to the extent possible, comparability. The information contained in this inform refers to the situation in the abovementioned EMN Member and Observer countries up to May 2024.

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1. KEY POINTS TO NOTE

- Effective governance of accommodation for international protection applicants is crucial for responding to challenges such as fluctuating asylum applications, limited housing capacity, and community relations.
- A centralised governance model is in place in most European Migration Network (EMN) Member and Observer Countries, with one authority primarily responsible for the reception of applicants for international protection. This is typically either the Ministry of the Interior or a specialised executive agency or service.
- Several EMN Member and Observer Countries apply a mixed approach to governance, delegating varying degrees of competence to governance structures at national, regional and local level. Only Germany applies a purely decentralised model.
- Contingency planning and preparedness plans are in place in the majority of EMN Member and Observer Countries for responding to sudden increases in demand for accommodation. Typically, a wide range of stakeholders are involved in the development and implementation of such plans.
- The building and acquisition of accommodation centres for international protection applicants is overseen by government ministries and/or agencies, usually resourced from the state budget and/or European Union (EU) funds.
- Managing staffing levels in reception centres and accommodation facilities is a challenge for EMN Member and Observer Countries. The bodies that govern the accommodation of applicants for international protection employ a mix of civil servants, non-governmental organisation (NGO) employees and staff from independent agencies. Temporary staff may also be employed to manage fluctuating demands for accommodation for applicants for international protection.
- Funds from state budgets are typically used to finance accommodation systems. EU funding streams complement the state budget or are used to implement specific projects relating to the accommodation of applicants for international protection.
- Strengths of a centralised governance model include consistency in planning and coordination of activities, uniformity of policies and procedures, and clear accountability. Countries applying a mixed or decentralised approach cited more adaptable responses to the varying needs and circumstances of applicants for international protection.



2. CONTEXT AND SCOPE OF THE INFORM

Effective governance of accommodation for international protection applicants is crucial for responding to challenges, such as fluctuating asylum applications, limited housing capacity, and community relations. Under Directive 2013/33/EU (Reception Conditions Directive, RCD)¹ and its recast (EU) 2024/1346,² EU Member States must provide an adequate standard of living for applicants for international protection, including housing. Ensuring this provision is a challenge, in part due to the unpredictable nature of applicant flows, which requires significant flexibility, the vulnerable nature of the populations, and the need to plan for access to tailored services.

The 2024 recast RCD outlines obligations relating to governance structures. Article 31 requires that EU Member States put in place “relevant mechanisms in order to ensure that appropriate guidance, monitoring and control of the level of reception conditions are established”. Article 33 requires EU Member States to ensure that authorities and other organisations implementing the Directive have received the necessary training on the needs of applicants, including minors, and to allocate the necessary resources to implement the RCD. Article 32 mandates that each EU Member State must create a contingency plan in consultation with relevant authorities and organisations to ensure adequate reception of applicants, including in

disproportionate influx situations, to be submitted to the European Union Agency for Asylum (EUAA) by April 2025.

Research by the EUAA³ and the EMN⁴ found diverse governance approaches in place among EU countries, often for long periods, reflecting varying levels of government involvement, multi-level governance, and partnerships with NGOs, civil society organisations (CSOs) and private contractors.

Considering accommodation from a governance angle provides a crucial framework for understanding and analysing the processes, mechanisms, structures and good practices in this area. For the purposes of this inform, governance refers to “the process of decision-making and the process by which decisions are implemented.”⁵ This definition extends beyond written policies to include institutional organisation and societal interactions.

Effective governance thus involves both policy and actual decision-making and implementation processes, emphasising transparency, accountability, participation, and responsiveness. Addressing these governance aspects is crucial to managing the fluctuating demands of accommodation for applicants for international protection and ensuring adequate living conditions. The added flexibility in Articles 7 to 9 of the RCD allows EU Member States to

1 Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013 laying down standards for the reception of applicants for international protection (recast), <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32013L0033>, last accessed on 5 August 2024.

2 Directive (EU) 2024/1346 of the European Parliament and of the Council of 14 May 2024 laying down standards for the reception of applicants for international protection (recast), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202401346, last accessed on 8 July 2024.

3 EUAA, ‘Overview of the organisation of reception systems in EU+ countries’, 2022, <https://euaa.europa.eu/publications/overview-organisation-reception-systems-eu-countries>, last accessed on 11 January 2024.

4 EMN, ‘The Organisation of Reception Facilities for Asylum Seekers in Different Member States’, 2014, https://emn.ie/files/p_20140207073231EMN%20Organisation%20of%20Reception%20Facilities%20Synthesis%20Report.pdf, last accessed on 11 January 2024.

5 United Nations Economic and Social Commission for Asia and the Pacific, ‘What is Good Governance?’, n.d., www.unescap.org, last accessed on 13 March 2024.

organise their reception systems freely, allocate applicants to specific accommodation facilities or geographical areas for efficient processing, impose residency restrictions for public order or to prevent absconding, and establish mechanisms for monitoring and assessing reception needs, while ensuring applicants' rights and considering individual circumstances.

This inform provides insights into the governance and processes of accommodation for applicants for international protection in EMN Member and Observer Countries. Despite extensive research on governance principles,⁶

little has been done to understand these in the complex context of accommodation for applicants for international protection. The inform maps and analyses the governance structures, processes, and mechanisms for accommodation for applicants for international protection in EMN Member and Observer Countries. It focuses exclusively on accommodation for applicants for international protection, excluding beneficiaries of temporary protection (BoTP), resettled refugees, and other material reception conditions, such as food and clothing.



3. GOVERNANCE MODELS FOR THE ACCOMMODATION OF APPLICANTS FOR INTERNATIONAL PROTECTION

EMN Member and Observer Countries manage the accommodation of applicants for international protection within the frameworks of multiple structures, processes and mechanisms. These include different levels of independence from central government, different approaches to multi-level governance (e.g. division of competence between national, regional and local level), as well as different approaches to partnerships with NGOs and the use of private contractors.

3.1. Overview of governance models

The majority of EMN Member and Observer Countries⁷ have a **centralised governance model**, with authority primarily responsible for the reception of applicants for international protection. This is typically either the Ministry of the Interior,⁸ which oversees the reception system directly through its directorates and offices or through a specialised executive agency or service.⁹ Its core competences may be complemented by other line ministries for specific aspects, such as the accommodation of unaccompanied minors and vulnerable people (e.g. Deputy Ministry of Welfare in Cyprus; Ministry of Labour, Social Affairs and Family in the Slovak Republic). In some EMN Member and Observer Countries, line ministries other than the Ministry of the Interior are fully responsible for the accommodation of applicants for international protection.¹⁰ In Estonia, the Estonian National Social Insurance Board (ENSIB), under the Ministry of Social Affairs, is the state agency responsible for social protection and is also in charge of providing reception and accommodation centre services to applicants for international protection. The EUAA's 'Who is who in international protection in EU+' maps various stakeholders and their role in asylum and reception systems at European, national and local level. It is currently being updated, with a new version due in autumn 2024.¹¹

Several EMN Member and Observer Countries¹² apply a **mixed approach** to governance, typically led at national

level, with varying degrees of competence delegated to governance structures at national, regional and local level. For example:

- In Austria, the federal government is responsible for accommodating applicants for international protection during the admission procedure, while the provinces are responsible for their accommodation after the admission procedure;
- In Belgium, the governance model of accommodation for applicants for international protection is multi-layered and involves centralised coordination under the Federal Agency for the Reception of Asylum Seekers (Fedasil), extensive participation from NGOs and local authorities, and a complex interplay of federal, regional and local regulations;
- In France, the national policy for asylum seekers and targets for the creation of places are defined by the Ministry of the Interior and implemented through collaboration between representatives of the state in departments/regions (prefects) and the French Office for Immigration and Integration (OFII)'s regional offices;
- Italy manages the reception of applicants for international protection through a two-level system overseen by the Department of Civil Liberties and Immigration at the Ministry of Interior. The first level includes first reception centres and, in case of large-scale arrivals, Extraordinary Reception Centres (CAS) under the responsibility of the Territorial Offices of the Government (Prefectures). These centres are managed through public tenders open to both private and third-sector entities and are aimed at initial and primary assistance. The second level, targeting holders of international protection and all unaccompanied foreign minors, involves local authorities and third-sector organisations under the Reception and Integration System (*Sistema Accoglienza Integrazione*, SAI), providing integrated reception projects aimed at long-term inclusion.

6 United Nations Development Programme (UNDP), 'Governance Principles, Institutional Capacity, and Quality' in Towards Human Resilience: Sustaining MDG Progress in an Age of Economic Uncertainty, 2015; Office of the United Nations High Commissioner for Human Rights (OHCHR), 'OHCHR and good governance: About good governance', n.d., www.ohchr.org.

7 BG, CY, CZ, EE, EL, ES, FI, HR, HU, IE, LV, MT, PL, PT, SE, SI, SK, and RS.

8 CY, CZ, HR, HU, LV, SK.

9 BG, EL, ES, FI, MT, PL, PT, SE, SI, and RS.

10 Social Welfare Services of the Deputy Ministry of Welfare (CY); ENSIB, under the Ministry of Social Affairs (EE); Ministry of Labour, Migration and Social Security (ES); Department of Children, Equality, Disability, Integration and Youth (DCEDIY) (IE).

11 EUAA, 'Who is who in international protection in EU+', 2023, https://euaa.europa.eu/sites/default/files/publications/2023-01/2023_WhoisWho_reception_authorities_EN.pdf, last accessed on 4 July 2024.

12 AT, BE, FR, IT, LT, LU, NL, and NO.

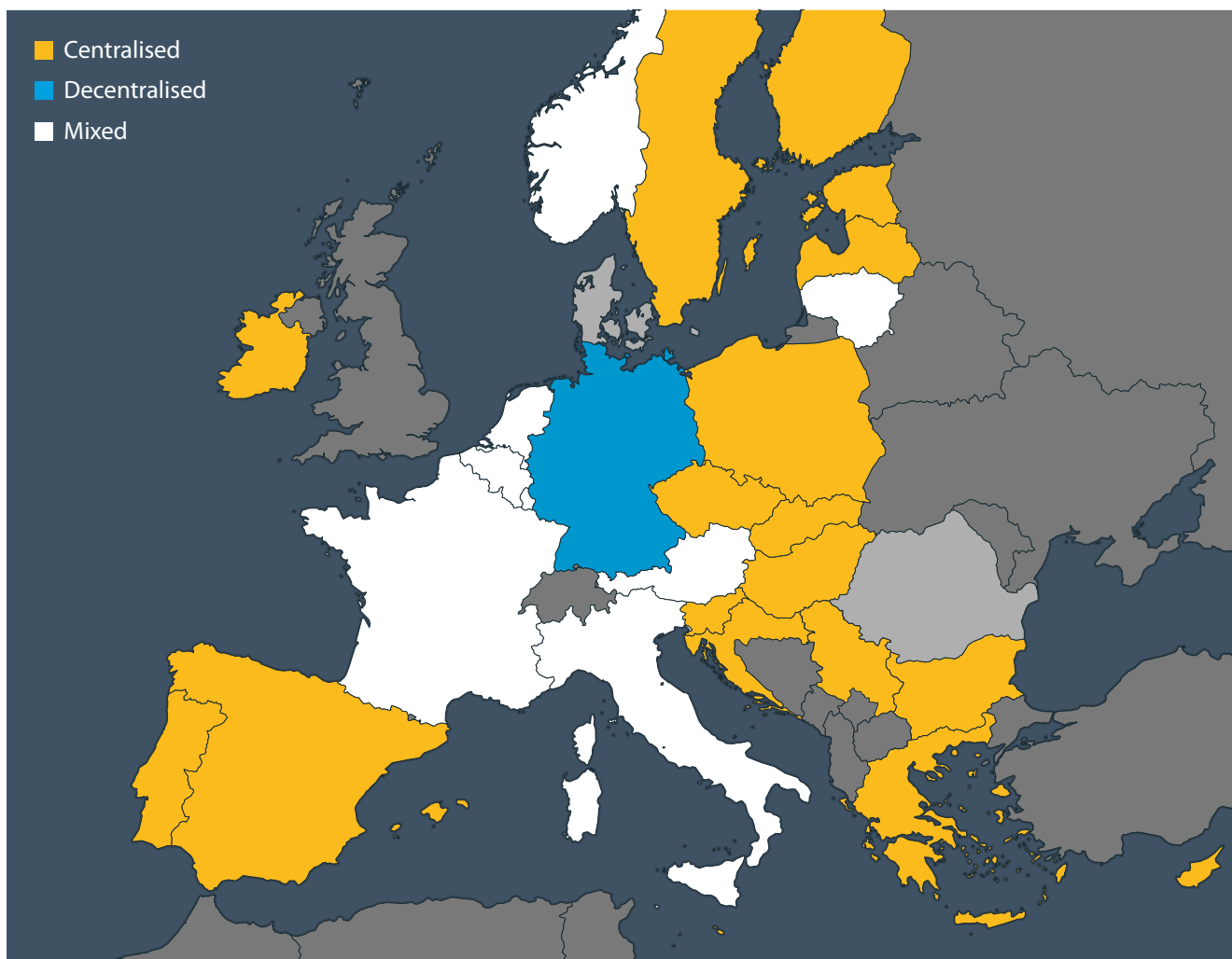
The first level mainly addresses immediate needs and temporary accommodation, while the second focuses on personalised support and integration pathways, funded by national and European resources;

- In Luxembourg, the National Reception Office (ONA) is responsible for coordinating and managing the reception of applicants for international protection. Municipal authorities play a significant role, facilitated through bilateral conventions with local authorities and the ONA, as well as through follow-up working groups with local authorities. Municipal authorities integrate accommodation facilities into communities and leverage local resources. Yearly conventions are signed between the ONA and its social partners (Caritas, the Red Cross, InterActions), which provide social work support in certain accommodation facilities;
- In the Netherlands, municipalities are tasked with establishing reception facilities, since the implementation of the Municipal Task Act Enabling Asylum

Reception Facilities on 31 January 2024.¹³ Either the Central Agency for the Reception of Asylum Seekers (COA) or the municipality operates the facilities.

Only Germany has a purely **decentralised model**, where the 16 federal states and local governments manage and operate reception facilities. Each federal state has a two-level approach, with oversight at ministerial level and state offices tasked with managing reception in the state and operating reception facilities for applicants for international protection. Local governments or contracted third-party organisations operate reception facilities of their own, mainly for beneficiaries of international protection transitioning into private accommodation, or applicants for international protection likely to be granted protection. Applicants for international protection are initially registered at the nearest reception facility, determined by the EASY system, which uses the Königssteiner Key formula to allocate them across federal states, based on economic strength and population (see Box 1).

Figure 1.1 – Overview of governance models



¹³ Senate, 'Wet gemeentelijke taak mogelijk maken asielopvangvoorzieningen', n.d., https://www.eerstekamer.nl/wetsvoorstel/36333_wet_gemeentelijke_taak, last accessed on 8 August 2024.

Box 1: Königssteiner Key and EASY system in Germany

The **Königssteiner Key** is a distribution formula used in Germany to allocate asylum seekers and beneficiaries of international protection across the federal states based on their economic strength and population. This method ensures fair distribution of the responsibility and resources required to support asylum seekers among all 16 federal states.

The Initial Distribution of Asylum Seekers (*Erstverteilung der Asylbegehrenden*, **EASY system**) is the operational mechanism that implements the Königssteiner Key. It is a computerised system that assigns asylum seekers to reception centres in federal states on their arrival. This system helps to manage the initial phase of the asylum process efficiently and equitably among the federal states.

3.2. Inclusion of regional/local level in governance of accommodation

The degree of responsibility and involvement of regional/local authorities in decision-making/governance structures of accommodation for applicants for international protection varies. In some countries with a mixed and decentralised model,¹⁴ regional/local authorities are part of the decision-making process:

- In Belgium, regional and local governments are incorporated into decision-making structures for the accommodation of applicants for international protection through contractual relationships with federal and regional governments. They manage local initiatives autonomously, while adhering to federal legislation, budgets, and quality controls;
- In France, the creation of accommodation places is decided by the Ministry of the Interior and managed by regional prefectures and OFII offices. A strategic committee was set up to implement the national plan for the reception of asylum seekers and the regional guidance system. It meets every six months, chaired by the General Director for Foreign Nationals in France (within the Ministry of the Interior and Overseas Territories) and comprising all central services and state operators involved in integration policy, as well as the General Secretariat for Regional Affairs and the representatives of associations involved in the integration of newcomers. The Regional Plan for the Reception of Asylum Seekers and the Integration of Refugees (SRADAR) sets out the guidelines for the national plan and adapts reception policy to the migration context and the specific characteristics of each region, following discussions between local and regional authorities, government departments, local asylum and integration operators, and associations;
- In Italy, coordination is established between national and regional governments for reception planning

through the National Coordination Table at the Ministry of the Interior,¹⁵ which guides the National Reception Plan, while Regional Coordination Tables implement it locally. Managed by local authorities, with third-sector support, the SAI takes a multi-level governance approach, with projects financed through the National Fund for asylum policies and services and coordinated by the Central Service under the Ministry of the Interior;

- In the Netherlands, regional and local governments are integrated into the governance of accommodation for applicants for international protection. As of 31 January 2024, municipalities have the task to establish reception facilities. Municipalities work together within the province to ensure the distribution of reception facilities through their own provincial accommodation plan, which is approved centrally by the Minister for Asylum and Migration.

While local authorities in other countries¹⁶ do not participate in managing accommodation facilities for applicants for international protection, they are typically engaged or consulted. In some cases, consultations are carried out with local authorities and municipalities if they are being considered as new locations for accommodation centres.¹⁷ In Estonia, local authorities and community representatives are informed and involved in the process of opening new centres, as the direct impact on their community necessitates meetings with mayors and local officials to discuss the plans.

Box 2: Decision-making process in France

The decision-making process for accommodation in France is guided by the Laws of 29 July 2015 and 10 September 2018, which establish a national reception plan for asylum seekers and regional plans to ensure balanced distribution. The Ministry of the Interior sets targets for accommodation spaces, while the OFII is responsible for reception conditions and assesses asylum seekers' needs. The national reception system (DNA) includes emergency shelters (CAES), basic accommodation (CADA and HUDA), and temporary housing for vulnerable individuals (CPH). Regional prefects coordinate implementation with decentralised government departments and OFII's regional offices. A strategic committee, involving central services, state operators, NGOs and experts, oversees the implementation of national and regional plans, ensuring alignment with objectives and capacity.

Accommodation facilities are managed by non-profit associations, which are selected through public procurement and adhere to minimum standards specified by the state. These associations organise accommodation according to their social projects, with costs covered by state funding. Staffing ratios and qualifications are defined to ensure adequate support.

14 AT, DE, FR, IT, LT, LU, NL

15 The National Coordination Table at the Ministry of the Interior includes institutional representatives at central and local government levels, with other governmental international agencies contributing on specific issues.

16 BG, CY, CZ, EE, EL, ES, FI, HR, HU, IE, LV, SE, SI, SK, and NO, RS.

17 CY, CZ, EE, EL, LV, PL, SE, SK.

3.3. Inclusion of other stakeholders in governance of accommodation

In the majority of countries, other stakeholders such as NGOs or CSOs are not involved in decision-making structures and governance of accommodation for applicants for international protection. However, in France and Italy, such organisations participate in high-level strategic committees. In France, SNADAR includes NGO representatives (*La Cimade, Fédération des acteurs de la solidarité*) and the United Nations Refugee Agency (UNHCR). For the revision of the last national plan, an advisory committee of beneficiaries of international protection was consulted. In Italy, the Asylum and Immigration Table (TAI) is a key national coordination tool. Comprising CSOs that promote and protect asylum rights, it aims to influence public and political debates to advocate for effective and sustainable refugee protection policies.

In other countries,¹⁸ NGOs can participate in providing accommodation services under agreements with responsible state institutions. In Norway, NGOs can be involved in various aspects of accommodation for applicants for international protection, including operating reception centres, by responding to calls for tender and advocating for improved reception conditions.

3.4. Recent changes in governance structures

Several EMN Member and Observer Countries¹⁹ reported recent **legislative and/or organisational changes**.

France introduced a mechanism of territorial rebalancing in 2018 to address the concentration of applicants for international protection in certain regions such as Paris. The OFII assigns regions of residence to applicants based on regional quotas from the national plan²⁰ to improve reception conditions and prevent the use of emergency accommodation and the formation of camps. This system involves setting national targets for accommodation places, which are then broken down into regional plans, considering factors such as population, Gross Domestic Product (GDP) per capita, unemployment rates, and existing reception capacity, ensuring better accommodation and support for asylum seekers while rebalancing the distribution from overburdened regions.

In Belgium, three major changes have shifted the focus from financial support to material aid, transitioning from a traditional to a reception model that prioritises collective over individual reception, and entrusting part of the reception to private operators due to capacity shortages. Legislative amendments have aligned national laws with EU directives, while measures such as the Arrival Centre, the Unit for Chain Monitoring,²¹ and the Task Force on Asylum and Reception enhance the reception system's efficiency and responsiveness.

In Ireland, a White Paper²² outlined a new model of accommodation provision and support in 2021, focusing

on state-owned accommodation and integration from day one. While this was delayed by the significant increase in applicants for international protection in 2022 and 2023 (among other factors), a revised strategy was published in March 2024, maintaining the principles of the White Paper but significantly scaling-up the planned accommodation to deliver a mixed model of state-owned and commercial offerings.

Recent **re-organisation and/or transfer of competences** related to the governance of accommodation for applicants for international protection from one national authority to another was reported by several EMN Member and Observer Countries:²³

- In 2019, Austria established the Federal Agency for Reception and Support Services, which is responsible for the operational implementation of federal basic care for applicants for international protection during the admission procedure. The agency is fully owned by the federal government, while the shareholder rights are exercised by the Austrian Federal Minister of the Interior;
- In 2020, Croatia reorganised the Ministry of the Interior and established the Service for the Reception and Accommodation of International Protection Applicants;
- Estonia moved the responsibility for providing reception and accommodation services for international protection applicants to the ENSIB to better align these services with the social services required. This governance model supports a smooth transition from reception centres to independent living, ensures continuity of case management, minimises re-traumatisation, and leverages ENSIB's existing expertise in social services;
- In Ireland, following the 2020 elections, the accommodation of applicants for international protection moved from the Department of Justice to the DCEDIY as part of government formation negotiations. The DCEDIY division handling this remit is undergoing some internal restructuring to manage the significant increase in international protection applications, as well as undertaking a project to optimise its operating model;
- In Lithuania, amendments to the Law on the Legal Status of Foreigners saw the reception system become more flexible through increased interagency coordination, infrastructure expansion, legislative changes, and enhanced emergency preparedness. These measures allow multiple institutions to better respond to varying needs and circumstances, particularly during crises like the 2021 migration influx;
- The Netherlands passed a law in January 2024, tasking municipalities with enabling reception facilities (see Section 3.2).

18 AT (provincial level), DE, FI, LT, LU, NL (not very common), and NO.

19 BE, IE, FR, IT, LU, NL.

20 Established by the Law of 29 July 2015 and supplemented by the Law of 10 September 2018.

21 The Unit for Chain Monitoring ensures coordination and efficiency of the entire migration and asylum process by overseeing the collaboration between various agencies involved in migration management.

22 Government of Ireland, 'White Paper to end direct provision and establish an international protection support service', 2021.

23 EE, EL, HR, HU, IE, NL.

Box 3: Introduction of ANKER centres in Bavaria

In Germany, the introduction of ANKER centres in the federal state of Bavaria in 2018 represented a significant change. It aimed to optimise and accelerate asylum procedures by consolidating the entire process—from arrival to decision and possible repatriation—under one roof. All stakeholders, including accommodation administration, the Federal Office for Migration and Refugees (BAMF), administrative courts, and Bavarian central foreigners' authorities work together in the centres, ensuring quick and comprehensive processing, due to the close proximity and accessibility of all relevant parties. The centres are operated by the district government and managed by Bavaria.

Several other federal states (e.g. Saarland, Saxony) have also introduced ANKER centres or functionally equivalent centres (e.g. Brandenburg, Mecklenburg-West Pomerania).

The BAMF Research Centre evaluated these ANKER facilities and other similar setups and found that they enhance inter-authority cooperation, resulting in faster national asylum procedures and improved measures for establishing the origin and identity of asylum seekers. They also provide extensive counselling and support services, leading to a higher likelihood of voluntary return and overall increased efficiency and effectiveness in asylum processing.

New reception centres and expanded reception capacity was reported in four countries.²⁴ In Lithuania, the Belarus crisis prompted innovative solutions in expanding reception capacity. In Latvia, a new reception centre, 'Liepna', was established to increase accommodation capacity.

Changes in **procurement** were reported by Finland and Norway. In Finland, from 2022, all procurement for new reception capacity is conducted through public tenders, replacing previous direct awards by contract negotiation, necessitating the specification of tender conditions and the development of new rules for monitoring and

collaboration with reception centres. Norway implemented a procurement system with various contract levels and framework agreements to ensure flexible and cost-controlled accommodation for applicants for international protection, featuring pre-agreed terms, ceiling prices, and capacity requirements.

3.5. Contingency and preparedness plans for sudden increases in demand for accommodation

The majority of EMN Member and Observer Countries²⁵ have contingency planning and preparedness plans for responding to sudden increases in demand for accommodation. A wide range of relevant stakeholders are typically involved in the development and implementation of such plans, including government ministries,²⁶ migration or other government agencies,²⁷ regional/local authorities,²⁸ international organisations,²⁹ NGOs and CSOs,³⁰ security and law enforcement authorities,³¹ public health services,³² emergency and disaster management bodies,³³ and private sector partners.³⁴

In the Czech Republic, the national contingency planning strategy for sudden migratory pressure is part of the Ministry of the Interior's complex crisis plan. This is currently being reworked in cooperation with state and local administration, based on the experience with BoTP.

As part of its National Crisis Management Plan, Poland identifies facilities for accommodating a mass influx of foreigners, with the Office for Foreigners focusing on maximising the use of state-owned centres and securing additional places in private centres. The Crisis Object Database currently includes 52 facilities with approximately 6 500 places, and the Office for Foreigners has its own crisis management plan and internal procedures to handle varying scales of influx.

In Serbia, the government adopted the first response plan to the increased number of migrants in September 2015. The plan is revised and updated regularly.

For further information on management of housing capacity in the face of rapid changes in migration flows, see January 2023 EMN inform,³⁵ 'Organising flexible housing in the context of international protection'.

24 CY, EE, EL, LV, LT, SK (new humanitarian centre in Gabcikovo accommodates BoTP only).

25 AT, BG, CY, CZ, EE, EL, ES, FI, FR, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK, and NO, RS.

26 AT, BE, CY, CZ, DE, EE, EL, ES, FR, HR, IT, LT, LV, MT, NL, PL, SI, SK, and NO, RS.

27 BG, CY, DE, EE, EL, FI, LU, LV, NL, SE, SI, SK, and NO.

28 AT, CZ, DE, EE, EL, FI, FR, IT, LV, NL, SK, and NO.

29 BG, EL, LV, SK, and NO.

30 BG, EL, FI, LV, SK, and NO.

31 CZ, DE, EL, FI, LV, NL, SK, and NO.

32 CY, CZ, IE, LT, LV, SK, and NO.

33 CY, CZ, DE, LV, NL, SK, and NO.

34 CZ, EL, FI, NL, and NO.

35 EMN, 'Organising flexible housing in the context of international protection', 2023, https://home-affairs.ec.europa.eu/document/download/90853431-4e37-4741-86cc-3611ff129a25_en?filename=EMN_INFORM_flexible%20housing_010223-final.pdf, last accessed on 22 June 2024.

Box 4: Contingency planning in Latvia

A Cabinet of Ministers Order³⁶ was adopted in July 2012 in readiness for a sudden mass influx of asylum seekers, including increased demand for accommodation. The Order was amended in August 2021 to include a provision that the action plan can be implemented even if the specified number of asylum seekers is not reached in the determined time period.

The action plan outlines a set of measures to be carried out by the responsible authorities if a mass influx of asylum seekers in the State territory is expected or detected and the authorities are unable to ensure the reception of asylum seekers. Organisations involved in developing these plans include the Ministry of the Interior, Office of Citizenship and Migration Affairs (OCMA), State Border Guard (SBG) and the Provision State Agency of the Ministry of the Interior.

3.6. Application of EUAA standards and indicators

The majority of EMN Member and Observer Countries³⁷ apply the EUAA standards and indicators to monitor and evaluate reception systems for applicants for international protection, integrating them into governance and decision-making processes in diverse ways. In Greece and Estonia, EUAA standards and indicators (including the set common standards) are considered when making decisions on infrastructure and service provision. Greece, Malta and Serbia have all introduced the assessment of reception conditions (ARC) tool³⁸ to evaluate reception facilities against minimum standards, serving as a quality assurance mechanism that contributes to improvements in reception conditions.

A limited number of EMN Member and Observer Countries³⁹ do not apply the EUAA standards and indicators. Most have their own standards but aim to incorporate the EUAA standards and indicators in the future or develop general standards for the reception system in line with the EUAA's guide to operational standards and indicators.⁴⁰

**4. OPERATIONAL AND STAFFING MANAGEMENT****4.1. Management of building and acquisition of accommodation centres for applicants for international protection**

In most EMN Member and Observer Countries, the building and acquisition of accommodation centres for international protection applicants is overseen by government ministries⁴¹ and/or agencies,⁴² typically sourced from the state budget⁴³ and/or EU funds.⁴⁴ In Germany, reception facilities are also built or acquired through local-level budgets. In Belgium, rental, acquisition and building of accommodation centres are managed by Fedasil, which searches for suitable buildings in coordination with various entities (e.g. Belgian Buildings Agency, Ministry of Defence, provinces, youth movements, campsites, healthcare institutions, and real estate offices). Fedasil also explores other avenues, such as installing prefabricated housing (containers) for temporary shelter, and continuously consults with both public bodies and the private market. Since a recent legislative change in March 2024, which took effect in June 2024, Fedasil has also been tasked with identifying vacant real estate that can be used as accommodation facilities. In Greece, the facilities are either state properties or under lease agreements.

In Croatia, the Directorate for Material and Financial Affairs at the Ministry of the Interior is responsible for

building or purchasing buildings for accommodation and upgrading existing centres. In Poland, new properties are acquired using state treasury resources. In the Netherlands, funding for the acquisition and establishment of new accommodation centres is provided by the Ministry for Asylum and Migration through its annual budget. In Lithuania, the State Border Guard Service relies on funding from the Asylum and Migration Integration Fund (AMIF) to construct new or renovate existing buildings. For example, in 2019, a new dormitory building for vulnerable asylum seekers was completed using AMIF (80%) and state budget (20%) funds.

Buildings and accommodation centres can be state-owned⁴⁵ and/or rented.⁴⁶ In Sweden, the Migration Agency can obtain collective housing either by renting, where it partially manages the housing, or through tender agreements, where management is handled by the service provider.

The acquisition of new accommodation (e.g. purchasing or construction of new buildings) is typically done through public procurement procedures⁴⁷ for the selection of service providers. In Norway, the Directorate of Immigration (UDI) tenders contracts for accommodation facilities to private companies, municipalities or non-profit organisations. Tenders are open to competitive bidding and contracts are awarded based on cost, quality, and compliance with regulations.

36 Cabinet of Ministers Order No. 312 regarding the Action Plan for Co-ordinated Action of Institutions in Relation to Possible Mass Influx of Asylum Seekers in Latvia from the Countries Affected by Crisis.

37 AT, BE, BG, CY, DE, EE, EL, FI, FR, HR, HU, IE, IT, LV, MT, PL, SI, SK, and RS.

38 ARC tool, <https://arc.euaa.europa.eu/>, last accessed on 12 September 2024.

39 CZ, ES, LU, PT and NO.

40 EUAA, 'Guide to operational standards and indicators', 2024, <https://euaa.europa.eu/sites/default/files/publications/2024-06/practical-guides-tools-catalogue-2024.pdf>, last accessed on 12 September 2024.

41 AT, CY, CZ, DE (state, rather than federal, ministries), HR, HU, IE, IT, LT, MT, PL, SI, SK, and NO, RS.

42 AT, BE, BG, DE, EE, EL, FI, LV, LU, NL, SE.

43 For example, CZ, DE, EE, ES, FR, HR, IT, LU, NL, PL, SK.

44 For example, CY, CZ, EE, HR, IT, LT, PT.

45 For example, CY, CZ, HR, IT, LV, NL, SK, and RS.

46 For example, CY, CZ, FI, IT, NL, SE, SK (Humanitarian Centre for Temporary Protection holders), and RS.

47 For example, CY, CZ, FR, IE, NL, PL, SE, and NO, RS.

Box 5: Building and acquisition of accommodation in France

The construction and acquisition of accommodation centres in France are managed by public or private associations called ‘managers’, which respond to calls for proposals. These centres are created through new builds, site transformations, or extensions of existing facilities, which require budget considerations. Each new capacity must be authorised by the Prefect after departmental review. Managers proposing extensions have a selection advantage due to potential economies of scale. The operational costs of these facilities are funded by the state through a global funding allocation.

4.2. Staffing levels and flexibility measures

This section looks at how staffing is managed to respond flexibly to the fluctuating demand for reception. In EMN Member and Observer Countries, the bodies that govern the accommodation of applicants for international protection employ a mix of civil servants,⁴⁸ NGO employees,⁴⁹ and staff from independent agencies.⁵⁰ Temporary staff may also be employed to manage fluctuating demands for accommodation.⁵¹

In many cases, it is difficult to calculate the number of full-time equivalents (FTEs) dealing exclusively with the governance of accommodation. The overall numbers employed by governments depend significantly on their reception and governance model. For example, those who directly manage reception centres with government staff will tend to have larger numbers of total government staff working on reception. In order to respond to fluctuations in the demand for accommodation, governing bodies in EMN Member and Observer Countries manage their staffing levels with a certain degree of flexibility. The most common measures are described below.

- **Adjusting resources based on demand for accommodation for applicants for international protection.** Government agencies such as Norway’s UDI and municipal authorities have mechanisms in place to allocate resources, including staff, based on the current demand for accommodation. In Poland, the Office for Foreigners delegates experienced staff and hires and trains newly recruited employees when new facilities are established. In Austria, the Federal Agency for Reception and Support Services has a flexible personnel structure at operational level, enabling it to react quickly to changing requirements and developments in the migration situation.

Box 6: Flexibility of staffing levels in France

In France, the staffing rate for accommodation centres is defined as follows:

In reception centres for asylum seekers (CADA), the staffing rate is set at 1 FTE for every 15 people accommodated. This can be adjusted to 1 FTE for every 20 people accommodated once the required services are implemented.

In reception and administrative situation assessment centres (CAES), the minimum staffing ratio is 1 FTE for every 15 people accommodated, with at least 50% of these workers having the required professional qualifications.

In emergency accommodation for asylum seekers (HUDA), the staffing rate is 1 FTE for every 20-25 users, with at least 50% of the workers being qualified.

- **Hiring temporary staff to manage peaks in demand for accommodation for applicants for international protection.** Seven EMN Member and one Observer Country hire temporary staff, including through limited contracts, during periods of increased demand and crises,⁵² or when new reception facilities are established.⁵³ Spain also employs interim civil servants.⁵⁴
- **Creating partnerships with NGOs and mobilising volunteers to supplement staffing needs.** In Cyprus, volunteers from NGOs support the operation of accommodation centres.
- **Using technology and automation to streamline administrative processes and improve efficiency.** The UDI in Norway has improved its use of robots to automate processes previously done manually, introducing digital platforms for processing applications, managing data, and communicating with applicants for international protection and stakeholders.
- **Emergency funding and extraordinary measures to respond to fluctuation of staffing needs during crises and emergencies.** Lithuania has a decentralised reception system, with emergency funding available to ensure flexibility of staffing levels. In Luxembourg, extraordinary measures can be implemented to meet sharp increases in demand (e.g. due to Russia’s war of aggression against Ukraine, or a pandemic). These extraordinary measures may include a direct appeal to the Government Council by the minister in charge of reception, for the authorisation of the recruitment of supplementary temporary staff.
- **Tenders and contracts to adjust staffing levels.** The Asylum Service in Cyprus uses tenders to adjust the number of staff based on needs and according to the occupancy rate of the centres.⁵⁵ In Italy, the new

48 CY, CZ, DE, EL, ES, FI, HR, IE, IT, LT, LU, LV, NL, PL, SI, SK, and RS.

49 AT, CY, FR, IT.

50 AT (including former employees of the Federal Ministry of the Interior, the former support company and employees of NGO), CY, EL, IT, NL.

51 CY, DE, ES, FI, IT, LT, LU, LV, NL, PL, SE, SI, and RS.

52 DE, FI, IT, LT, LU, LV, NL, SE, SI, SK, and RS.

53 DE, FI, LV, PL, SK.

54 An interim civil servant is a temporary employee filling a civil service position on a provisional basis to handle specific needs or cover positions temporarily, such as for short-term projects or leaves of absence. They have similar responsibilities to permanent civil servants but are not employed long-term.

55 The Cyprus Asylum Service adjusts the number of security guards and operational staff at the Centre based on the number of residents. For instance, a Centre with fewer residents has fewer guards, while more residents result in an increase in guards and staff, scaled according to resident thresholds (e.g., 0-500, 501-1000, 1001-1500). The same provider manages these adjustments in staffing levels as resident numbers fluctuate.

tender specifications for reception services must be followed by private and third-sector entities participating in tenders for the management of first reception centres. The minimum staffing level can be adjusted based on the occupancy of the centres.

- **Contingency Plans.** Italy's government and national authorities include a form of flexibility of personnel in the contingency plan, which envisages that the Department of Civil Liberties and Immigration may eventually increase, through a partnership with EUAA, specialised staff to support the Prefectures. In Slovenia, any increased staffing needs within the Government Office for the Support and Integration of Migrants are included in the national contingency plan.

- **Project co-financing to manage staffing levels in response to fluctuations in demand for accommodation.** In Croatia, one of the options is to provide additional staff from a CSO to support the Ministry of the Interior's efforts in the reception and accommodation of applicants for international protection, through the implementation of a project co-financed by AMIF.
- **Adjusting staffing levels by reallocating/redistributing positions as needed.** In Norway, the UDI and municipal authorities may have mechanisms in place to allocate resources, including staffing, based on the current demand for accommodation. This may involve reallocating personnel from other departments or projects to address urgent needs relating to accommodation for applicants for international protection. This is also the case in Germany.

5. FUNDING MODELS FOR THE ACCOMMODATION OF APPLICANTS FOR INTERNATIONAL PROTECTION

Most EMN Member Countries and one Observer Country⁵⁶ use the **state budget** to finance their accommodation systems. Different line ministries are responsible (in whole or in part) for the budgeting process, from the development of budget proposals to the actual allocation of funding.⁵⁷ Some EMN Member and Observer Countries⁵⁸ with a mixed and decentralised approach to the governance of reception and accommodation system rely on multiple funding sources. In Austria, the total costs incurred are divided between the federal government and the provinces, at a ratio of six to four. In France, accommodation places within the national reception system are funded by the state, but the creation of accommodation places is the responsibility of the regional prefects. Locally, the prefects launch calls for projects, informing accommodation operators responsible for asylum of the need to open places at regional level. Since 2020, Belgium's funding for the accommodation of applicants for international protection involves a coordinated forecasting model managed by a number of authorities,⁵⁹ which uses historical data and various critical parameters to predict reception capacity needs. In 2024, a new Asylum Chain Monitoring Unit was established to develop such projections, in coordination with various asylum and reception organisations. In Italy, the Ministry of the Interior provides financial support for first reception to the Prefectures, and for second reception, it draws on the resources of the National Fund for Asylum Policies and Services (FNPSA), as well as from other national and European sources (e.g. AMIF) to support municipalities that join the SAI.

Several EMN Member and Observer Countries use **EU funding streams** to complement the state budget and/or implement specific projects relating to the accommodation of international protection applicants. Member States

use the AMIF⁶⁰ to support the accommodation of applicants for international protection, followed by the Border Management and Visa Instrument (BMVI).⁶¹ Croatia has implemented AMIF-funded projects to improve the living conditions of applicants in reception centres, purchase equipment, pay overhead costs, translation services, and training and professional development of employees. In Cyprus, the funding for the operation of the first reception centre is partially from the BMVI and national funds, together with material support from the EUAA. In Latvia, maintenance expenses and other regular expenses are financed by the state budget and AMIF, while capital expenses are financed by projects supported by AMIF.⁶²

In the EMN Observer Countries, funding is allocated through a multi-level approach (controlled by the state), including the Ministry of Justice and Public Security, the Directorate of Immigration, and municipalities (NO), or through funding of a single authority (RS).

Box 7: Funding allocation process in the Netherlands

In the Netherlands, the funding allocated for accommodation is provided by the Ministry for Asylum and Migration through its annual budget, approved by the parliament. Criteria for the funding of the COA and for child protection for refugees (Nidos) include financial accountancy and responsibility, information exchange between COA and the Ministry for Asylum and Migration, and the handling of unforeseen costs. The funding of first-year asylum reception is partly covered by the Official Development Assistance (ODA) budget, originally designated for humanitarian aid and development cooperation.

56 AT, BE, BG, CZ, DE, EE, FI, FR, HR, HU, IE, IT, LT, LV, LU, NL, PL, SE, SI, SK, and NO. In the case of Germany, the budgets of the federal states bear the costs and not the federal or national budget.

57 For example, the Ministry of Interior (FI), the Ministry of Finance upon proposal of the Ministry of Interior in cooperation with the Refugee Facility Administration (CZ), the Ministry for Asylum and Migration (NL), the Ministry of Migration and Asylum (EL).

58 AT, DE, FR, IT.

59 Fedasil, the Cabinet of the State Secretary for Asylum and Migration, the Immigration Office, the Office of the Commissioner General for Refugees and Stateless Persons, and the Council for Alien Law Litigation.

60 BE, BG, CY, CZ, EE, EL, FI, HR, IT, LT, LV, MT, SK.

61 CY, EL.

62 For one of the accommodation centres, Mucenieki, part of the daily expenses are also financed by projects supported by AMIF. However, for the newly created accommodation centre, Liepna, all expenses are currently financed by projects supported by AMIF.

The estimated budget is primarily based on the Ministry for Asylum and Migration's 'Multiple years Production Prognosis', which forecasts the expected number of first-time asylum applicants. In 2023, the Dutch government decided to stabilise the funding of the organisations involved in the migration and accommodation chain. Based on analyses of the occupation and capacity in previous years and forecasts for subsequent years, it was decided to increase the stable base of long-term reception capacity and better counter fluctuations in reception capacity. Accordingly, the stabilisation of finances meant an expansion of the regular reception stock for COA, with long term agreements, up to 41 000 reception places, and accompanying stable funding.

Box 8: Budget planning in Sweden

Each year the Migration Agency receives directions stating the objectives and financial resources available. The funds that are allocated are based on the Agency's budget estimates and forecasts based on financial resources and the Agency's needs. The Migration Agency produces four complex annual prognoses, based on internal, external, and international indicators. Capacity calculations are included in the prognoses, which form the basis of planning, budget and legislation.



6. STRENGTHS AND WEAKNESSES OF GOVERNANCE MODELS

6.1. Strengths of governance models

Respondents identified advantages with the centralised, mixed, and decentralised models of governance. The EMN Member and Observer Countries applying **a centralised governance model** noted benefits such as **consistency in planning and coordination of activities, uniformity of policies and procedures, and clear accountability**. In Finland, the Immigration Service plays a central role in ensuring the coordinated management of procurement, service quality, capacity levels, and operational costs. In the Czech Republic, the central approach gives the Ministry of the Interior an overview of migration trends, enabling it to respond rapidly to changes in the inflows of applicants for international protection. In Serbia, the benefits are acknowledged through the decision to assign the accommodation system to a specialised organisation, providing it with greater independence.

In Latvia, governance is highly centralised under the Ministry of the Interior, enabling coordinated effort, rapid decision-making, and prompt response measures. Similarly, Poland's centralised management ensures coherent decision-making, efficient resource use, consistent safety and care standards, better coordination and monitoring of actions in all centres, and efficient management and occupancy rates. Since 1985, the Swedish Migration Agency has managed all migration-related matters, including accommodation, enhancing control, holistic decision-making, and policy uniformity.

In Estonia and Ireland, the types of organisations that oversee accommodation for applicants for international protection yield benefits for **social services and integration**. In Estonia, the ENSIB oversees reception centre services, aligning them with social services and facilitating a smooth transition to independent living in local municipalities, ensuring efficient case management and minimising re-traumatisation for beneficiaries. In Ireland, the mandate for accommodation under the Social Affairs

Department, which also manages integration, enables the leveraging of in-house expertise and facilitates coordination with other social affairs areas.

The separation of **accommodation from the asylum process** in Slovenia ensures focused and unbiased management, while Ireland reported that this separation makes it easier for residents to understand that accommodation issues will not affect asylum applications. They also observed that the separation of processes can support efficient management by ensuring that each receives the appropriate attention and resourcing. The location of accommodation services within a government department assures proximity to central government, policy-making and established working relationships for effective policy implementation and oversight.

Conversely, countries⁶³ that apply **a mixed approach** benefitted from more adaptable responses to varying needs and circumstances. In France, local services (prefects) representing the state in regions and department are responsible for implementing national objectives in the most appropriate ways. The introduction of regional schemes setting reception targets, based on a national system of enhanced reception, has enabled adjustment of the distribution of flows of applicants for international protection. In Lithuania, a decentralised system allows for more adaptable responses. In Austria and Italy, a collaborative approach between federal and regional levels has established a governance model based on shared responsibilities. In the Netherlands, new legislation⁶⁴ obliges municipalities to provide asylum reception spaces of sufficient quality, preventing emergency locations from becoming permanent solutions. This new governance model, supported by COA and the Dutch Council for Refugees, aims to ensure sufficient reception places and foster robust and flexible asylum reception systems through national consultation and the Flexibilisation Asylum Chain Implementation Agenda.

63 AT, CY, FR, IT, LT, LU, NL

64 Dutch Act Municipal Task Enabling Asylum Reception Facilities, which came into force on 31 January 2024.

Box 9: Strengths of the multi-level governance model in Italy

The Italian governance model for the reception of asylum seekers is characterised by a state system dealing directly with first reception, with the further reception phase featuring tailored local authority-led integration efforts. Both reception levels are under the overall responsibility of the Ministry of the Interior and are managed through a multi-level governance model that includes local authorities, NGOs and CSOs. The first level of reception (governmental centres, CAS) addresses immediate needs arising from large-scale arrivals. The SAI is then coordinated by the Central Service activated by the Ministry of the Interior and undertaken by the National Association of Italian Municipalities (ANCI), under an agreement with the Ministry. This second level of reception is implemented by municipalities, which involve third-sector organisations (NGOs, associations, etc) on a voluntary basis. Together, they develop projects for reception by participating in public tenders. This second level provides long-term integration pathways for beneficiaries, including unaccompanied minors and vulnerable groups, using a personalised approach supported by multidisciplinary teams. The overall system emphasises the responsibility of public entities for reception at both national and territorial levels, voluntary participation of local authorities, decentralisation of services, and collaboration with third-sector entities to ensure comprehensive support and integration into the host community.

All models view collaboration and coordination between actors as important.⁶⁵ A multi-level approach involving collaboration and coordination between government agencies, municipalities, NGOs and CSOs ensures the provision of comprehensive support and integration services.

Box 10: Benefits of a collaborative model in Luxembourg

Luxembourg's governance model leverages a coordinated approach between multiple organisations, including the ONA, CSOs (Caritas, the Red Cross) and municipal authorities. This model allows the efficient allocation of resources and the delivery of comprehensive support services. Different organisations' expertise enriches the support available to asylum seekers, while municipal involvement promotes community integration, reducing isolation. The flexibility to mobilise temporary staff during crises demonstrates the adaptability of this governance structure, effectively addressing fluctuating demands and emerging challenges.

In Germany, the decentralised model benefits from a flexible, state-specific approach to distributing applicants for international protection through the Königssteiner Key and EASY system, allowing for tailored local solutions while maintaining clear oversight and decision-making structures at federal state level.

Overall, these examples illustrate how various governance models, whether centralised, decentralised, or mixed, can effectively cater to the unique needs of countries' asylum and migration systems.

6.2. Challenges and weaknesses of governance models

EMN Member and Observer Countries⁶⁶ reported issues with capacity limitations and major challenges in ensuring adequate reception in the face of rapid changes in the number of asylum applications. Different governance models are associated with different weaknesses.

The main weaknesses highlighted by several EMN Member and Observer Countries⁶⁷ relate to **capacity limitations, resource allocation, and flexibility issues** in responding to fluctuations in asylum seeker numbers:

- In Austria, challenges arise during crises when capacity bottlenecks occur in federal care centres (due to a lack of timely takeover by the provinces) and when there is an increased demand for adequate accommodation and care for vulnerable groups;
- Belgium has faced a saturation of its reception network, necessitating crisis mode operations and the implementation of temporary measures, such as waiting lists and emergency reception centres;
- Croatia struggled with the lengthy recruitment processes for new employees due to extensive civil service requirements, limiting the system's responsiveness and ability to scale-up resources quickly;
- Finland's system is impacted by a limited pool of service providers, affecting the speed and flexibility of establishing new accommodation units;
- France's governance model suffers from interruptions in material reception conditions (failure to present oneself, refusal of accommodation or abandonment of the place), non-use of a significant proportion of authorised accommodation places in the national reception system (long-term unavailability of places, due to works, matching issues, and referral delays), increasing undue presence in the centres (i.e. rejected asylum seekers who stay on site or beneficiaries of international protection who cannot find independent housing), difficulties in creating new accommodation places due to limited availability of land and scarcity of buildings, and political tensions;
- Norway and Portugal often face prolonged stays in reception centres due to lengthy processing times, limiting reception capacity and the transition to integration institutions;
- Spain faces economic challenges, with insufficient financial assistance for rentals, high housing prices, and a lack of real estate offers, along with cultural challenges such as racism and xenophobia;
- Slovakia's Migration Office lacks flexibility in funding, as it is no longer a separate budgetary organisation, leading to disparities in the quality of material and technical equipment provided.

65 BG, CY, HR, NL.

66 AT, BE, CY, DE, EE, ES, FI, FR, HR, IE, IT, LT, LU, LV, NL, SE, SI, SK, and NO, RS.

67 AT, CY, FI, FR, HR, NL, PL, SK, and NO.

Coordination challenges and fragmentation of services⁶⁸ are reported, especially in mixed and decentralised models. This could result in gaps or overlaps in service delivery, leading to inefficiencies or inconsistencies in the support provided to applicants for international protection. Germany's multi-level approach requires effective coordination among federal, state and local levels, especially during sudden increases in arrivals, and outsourcing necessitates strict oversight and cost control. Greece's model, whereby services are provided by NGOs, also requires additional supervision and coordination. Capacity issues in the Dutch governance model arose from strained cooperation between COA and municipalities, which was previously based on voluntary provision and resulted in insufficient reception facilities and reliance on emergency solutions. Additionally, the tendency to scale-down too dramatically when applicant numbers decreased, coupled with delays in creating enough reception facilities for anticipated increases, undermined cooperation. Advisory bodies emphasise the need for a legal duty for municipalities and a shift from crisis management to a proactive, long-term approach.

In Lithuania, the system may face difficulties in ensuring effective communication and coordination between various institutions, leading to potential delays or inefficiencies. Luxembourg's model, while collaborative, suffers from fragmentation of services, resource constraints, integration barriers, and coordination challenges, due to the large number of actors involved. While the model emphasises integrating accommodation facilities into local communities, the social integration of asylum seekers may not always develop smoothly, due to housing shortages. Italy's dual model, despite its rapid emergency response and tailored local integration efforts, suffers from inconsistencies and service gaps due to its heavy

reliance on voluntary local authority participation. In Norway, the involvement of several agencies under different ministries makes communication and decision-making processes difficult. The demarcation of responsibility between the reception centres, municipalities and governmental actors can be challenging.

Ireland's separation of asylum accommodation management from the asylum process can work against a joined-up approach, as the mandate is spread across two departments with distinct resources and infrastructures. This separation necessitates additional coordination structures. The civil service nature of the managing department poses flexibility challenges, particularly during emergencies requiring rapid response. This challenge was also mentioned by Croatia in relation to staffing, and by Cyprus and Finland in relation to procurement procedures. Serbia's coordination with other state authorities is hampered by the heads of special organisations not being members of the government, requiring the establishment of coordination bodies.

Lithuania noted the **lack of a shared information system** between the different institutions related to accommodation and agreed standards for data collection. Estonia highlighted the need for better coordination and data exchange between agencies, as well as the lack of capacity in organising and supervising healthcare services for asylum seekers.

Managing a mixed or decentralised system may also incur **higher administrative and operational costs**, given that multiple institutions must maintain their own infrastructures and coordination mechanisms.⁶⁹ Lithuania's governance structure may occasionally result in higher costs, coordination challenges, and inconsistencies in service provision.

68 CY, DE, EL, FI, HR, IE, IT, LT, LU, and NO, RS.

69 LT.



For more information

EMN website: <http://ec.europa.eu/emn>

EMN LinkedIn page: <https://www.linkedin.com/company/european-migration-network>

EMN X account: <https://x.com/emnmigration>

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Czech Republic www.emncz.eu/

Estonia www.emn.ee/

Finland emn.fi/en/

France www.immigration.interieur.gouv.fr/Europe-et-International/Le-reseau-europeen-des-migrations-REM3/Le-reseau-europeen-des-migrations-REM2

Germany www.bamf.de/EN/Themen/EMN/emn-node.html

Greece emn.immigration.gov.gr/en/

Hungary www.emnhungary.hu/en

Ireland www.emn.ie/

Italy www.emnitalyncp.it/

Latvia www.emn.lv

Lithuania www.emn.lt/

Luxembourg emnluxembourg.uni.lu/

Malta emn.gov.mt/

The Netherlands www.emnnetherlands.nl/

Poland www.gov.pl/web/european-migration-network

Portugal rem.sef.pt/en/

Romania www.mai.gov.ro/

Spain www.emnspain.gob.es/en/home

Slovak Republic www.emn.sk/en

Slovenia emnslovenia.si

Sweden www.emnsweden.se/

Norway www.udi.no/en/statistics-and-analysis/european-migration-network---norway#

Georgia migration.commission.ge/

Republic of Moldova bma.gov.md/en

Ukraine dmsu.gov.ua/en-home.html

Montenegro www.gov.me/mup

Armenia migration.am/?lang=en

Serbia kirs.gov.rs/eng