INTEGRATION BEYOND MIGRATION:

Kicking off the debate

european network against racism

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Foreword

As a reflection of the debates in the Member States, the current EU discussions on integration repeatedly maintain a restrictive approach to integration policy by focusing primarily on the integration of third-country nationals[1]. But people from a migrant background born in Europe or people from a European minority ethnic or religious background can no longer be considered as migrants since they face an entirely different set of challenges and hurdles in their integration process. The 2004 EU Common Basic Principles on integration (CBPs) were developed within the broader framework of the management of migration and its consequences, and therefore primarily concern migrants and third-country nationals. Many of the challenges of integration such as poverty, underachievement in education, language, etc. are similar to those confronting disadvantaged socio-economic groups in the majority community. The linkages between anti-discrimination, integration and social inclusion therefore need to be rethought to develop a new, viable approach to this important policy area, and strengthened to enhance policy coherence. It is important, therefore, that EU integration policies not focus only on new arrivals, but also address the social inclusion of all migrants and minorities, irrespective of when they arrived in the EU and considering that some have been established in the territory for decades or even centuries.

At a time when EU institutions are developing a new strategy for integration in the EU, and especially as integration is explicitly mentioned as part of the EU's broader strategy for jobs and growth for the next 10 years, it is important to avoid discrimination between vulnerable communities. ENAR therefore advocates for a departure from the current EU and national approaches to integration and to embrace an approach to integration as a cross-cutting field that can be applied in specific policy areas: migration, social inclusion, citizenship, intercultural dialogue, education and employment creation. ENAR in this way proposes an understanding of integration that is freed from institutional restrictions that undermine the realities at the grassroots. Consequently, ENAR seeks to devise better paradigms, tools and measures to foster the development of integration paths most relevant to the specific needs of particular communities and their members. As a first step, ENAR has commissioned the Migration Policy Group (MPG) to kick off this debate by providing some 'food for thought' on the problems with the EU's current approach to integration. MPG outlines potential new concepts that could remedy some of the current policy inconsistencies and bridge gaps between integration and social inclusion. This publication therefore provides a first reflection on a progressive approach to integration with the view to start a deeper conceptual rethinking of the issues.

With the aim of developing its own definition of 'integration', ENAR is in the process of conceptualizing a progressive narrative that addresses racism and the need to promote equality for all. ENAR is thus exploring the various ways in which a whole society vision can be articulated, taking into account the multiplicity and diversity of actors as well as the national and regional

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1   The EU Framework for National Roma Integration Strategies was adopted by the Council of the European Union in 2011, hereby widening the focus of groups included in contemporary integration discourses.

contexts, historical traditions, popular culture, and contemporary multicultural realities. This is necessary to counter the tendency of political systems that seek to construct basic homogenous national identities.

With increasing populist rhetoric affirming the proliferation of the notion of a common political and cultural identity, any form of 'otherness' has been increasingly emphasised in an attempt to suppress any divergence from the national homogeneity since this is viewed as 'threatening'. Questions automatically abound revolving around nation and identity and how they are constituted, maintained and reinforced, and the topic of immigration or any analysis on the merits of immigration systems and models of integration are thus inevitably raised. This is particularly important since the way in which migrants and minorities are perceived and treated is impacted by how Europe views itself.

Against this background, ENAR intends to reconstruct the existing normative idea of Europe's homogeneity to embrace and promote the notion of a heterogeneous, inclusive society, which acknowledges and values diverse cultures, ethnicities, races, religions, genders, physical capabilities as well as other distinguishing characteristics. In this early phase, ENAR's new narrative fostering security, prosperity, and equality for all is an intentionally dynamic and inclusive process rather than a finalized concept.

The methodology of this approach has so far been to involve ENAR's members to find a common language, articulate individual and collective experiences, acquire and share new knowledge and expertise, and contribute to a collectively articulated process of a progressive narrative from an anti-racist perspective. The ENAR narrative incorporates cross-cutting issues that respond to the intersection of racism and discrimination as well as the intersection of biography and social history, folk tradition, healing processes, and individual and collective experiences. By encouraging individuals to reconstruct their identities in line with the goals of ENAR's new narrative, ENAR aims to create a new consciousness, depicting a vibrant European society and economy. This vision aims to lead and steer society towards democracy by unifying and pooling varying narratives into one progressive ENAR narrative that represents a more honest depiction of modern day European culture and that recognises the value and legitimacy of equality. As ENAR's narrative unfolds, let us not surrender to populist rhetoric but rather join forces in resistance to ensure communities of equality.

Chibo Onyeji
ENAR Chair

Executive summary

This publication presents a reflection on the integration concepts and approaches currently in use across Europe, with a view to exploring whether conceptual changes in European policy debates should be introduced that would lead to a better understanding of and more effective policies on integration. It proposes defining integration policies in terms of the engagement of citizens and residents in the promotion of the well-being of all in a diverse society, and accordingly describes and analyses examples of promising approaches and effective instruments.

European migration and integration concepts and approaches

Different types of migrants exist in the EU: intra-EU 'migrants'; EU nationals exercising their right to free movement; and 'third country nationals' coming from outside the EU. The admission and settlement conditions for these two categories differ considerably. Two main policy frameworks, the Europe 2020 Strategy and the Stockholm programme for justice and home affairs, which are weakly connected both conceptually and programmatically, discuss integration issues in different ways and in relation to distinct and differently defined groups of people. Immigrants are seen more as a vulnerable group and as victims of racial and ethnic discrimination than as active residents and citizens in European socio-economic policy co-ordination mechanisms. In the Stockholm programme and the EU's migration policies, integration has been primarily used in reference to legally residing third country nationals, focusing on newcomers at the expense of established migrants and minorities.

Participation in creating and sharing prosperity and well-being

The 'capability approach' emphasises the ability of individuals to pursue and realise the goals they value and can be used to underpin approaches to address integration challenges. Integration can then be described as the development and use of capabilities for participating on an equal footing in the production and sharing of prosperity and well-being. Applying such an approach considers citizens with and without an immigrant background as actors, whereas depriving them of their capabilities leaves them vulnerable to exclusion, racism, sexism, poverty and powerlessness.

On the road to open and inclusive organisations

This chapter describes and analyses promising approaches and instruments used by organisations when they act as employers, buyers of services and service providers. It describes the steps to be taken to prepare, implement and review actions in order to become open and inclusive organisations.

Key recommendations for EU policy makers

1. Apply the approach used for EU citizens crossing internal borders - i.e. equal treatment, social inclusion and 'European citizenship' - to third-country nationals in policies promoting their integration.

2. Ensure that integration policies encourage and facilitate active citizenship among both citizens and residents, making integration not only a matter of incorporating individuals into society but also of keeping societies dynamic, open and inclusive.

3. Show commitment to integration through:
   • Robust anti-discrimination law and equality proofing of existing general policies and laws
   • Policies and practices facilitating effective access to employment, education and other public services (such as health and housing), decision-making and citizenship
   • Strategies incorporating complementary general and specific integration measures.

4. Push for the acceptance of the fact that integration is a multi-faceted, long-term and open-ended process in which all persons contribute to and benefit from prosperity and well-being on an equal footing.

5. Acknowledge that integration is and can be more driven by competent and empowered individuals and organisations acting toward the goals they value and negotiating on the means to achieve them. This will emphasise their role in integration processes by calling on their responsibilities and building on their capabilities.

6. Identify key policy areas and frameworks as well as the main public, private and third sector actors and analyse their mandates, roles and the concepts they use. This will help to assess the merits of an approach that values equality, diversity, openness and inclusion.

Key recommendations for employers, buyers of services and service providers

1. Understand the legal requirements related to employment, procurement and service provision, as well as the equality measures permitted by law, in order to identify areas of potential progress.

2. Map the diversity of staff, suppliers and service users, without restricting individuals to forever invariable categories, in order to improve understanding of the needs and potentials of the evolving population.

3. Secure leadership and commitment, match ambitions with available resources and develop assertive communication strategies in order to link an organisation's purpose and functioning with its diversity goals and targets.

4. Improve recruitment outreach, objectify selection procedures and unlock the potential of employees who have what it takes to rise to managerial positions.

5. Ensure that under-represented businesses have an equal chance to bid for contracts and mainstream the use of equality clauses in such contracts.

6. Believe in the capabilities and potential of individuals, provide services holistically, offer support in the long-term and work with mainstream partners in order to guide the provision of adapted services.

7. Develop a robust, comprehensive and transparent monitoring tool in order to learn from experiences.

Introduction

This paper presents a reflection on the integration concepts and approaches which are currently very much in use across Europe. The European Network Against Racism (ENAR) commissioned this publication to the Migration Policy Group (MPG) with a view to exploring whether conceptual changes in European policy debates should be introduced that would lead to a better understanding of and more effective policies on integration.

The meaning of the terms used in policy debates and how they apply to everyday life is subject to frequent change. The term 'migrant' is sometimes primarily associated with job seekers and, at other times, with asylum seekers. 'Minorities' can refer to both new minorities emerging from international migration and to traditional national minorities. The meaning of the term 'integration' is also constantly changing, depending to a great extent on how it is used, and by whom. At certain times, integration refers to the incorporation of specific groups of individuals into society, while at others it is used more in the context of keeping society together. Policy actors may phrase integration in legal terms (equal treatment and anti-discrimination), whereas societal actors may (also) phrase it in social terms (diversity and inclusiveness).

Europe's increasingly urban population is declining in number. It is also becoming more mobile, as well as manifestly diverse. Responses to the challenges and opportunities that accompany these developments are becoming an integral part of economic, social, cultural and civic policies. It is therefore a good time to reflect on integration concepts with a view to keeping integration firmly on the European agenda.

We begin with a brief chronological assessment of the concepts and approaches to integration used in European policy debates. The strong link made in these debates between migration and integration may suggest that integration relates only to immigrants and does not concern other groups of persons or society as a whole.

We argue that individuals have different backgrounds and multiple affiliations that shape and reflect their identities. They interact in many different ways in constantly changing societies according to both their own capabilities and to the means and opportunities available to them.

This paper proposes defining of integration policies in terms of the engagement of citizens and residents in the promotion of the well-being of all in a diverse society, and accordingly describes and analyses examples of promising approaches and effective instruments.

European policies are guided by the values of equal treatment, equal opportunities and equal access to services - values that are at the heart of any diversity policy. Society's openness and inclusiveness depends on how these values are applied by public, private and third sector organisations operating at various levels of governance.

1. European migration and integration concepts and approaches

As it has become more difficult for individuals remaining in just one location to access opportunities and challenges, governments, civil society and private sector organisations have increased their cross-border activities enormously over the last twenty years. The European Union has gradually grown in membership and expanded its mandate to address a wide range of economic, social, cultural, civic and political issues. Ranking prominently among them are the promotion of prosperity and well-being and of justice, freedom and security. These goals now fall under two major operations, each with their internal and external dimensions and engaging a significant number of governmental and non-governmental actors: the Europe 2020 Strategy and the Stockholm Programme. Institutional arrangements link various levels of governance and reflect a division of labour according to responsibilities and competences. This chapter explores how issues of migration and integration are conceptualised and addressed in these two policy frameworks.

1.1. Migration and freedom of movement

People are inclined or forced to look for and move to places with more promising living and working conditions. They are called international migrants or refugees when they cross international borders and internal migrants or internally displaced persons when they do not. Their journeys are long, challenging and often rewarding. Policy can both facilitate and hinder their movement and settlement, sometimes simultaneously.

Migration has long occupied an important position on the European agenda. In the early days of the European Communities, the forerunner of the European Union, it concerned the movement of migrant workers from one of the then six Member States to another. The free movement of goods, services, capital and persons was the cornerstone of the establishment of a common market which was to be completed in 1992. To that end, all kinds of barriers were removed. Nationals of Member States were granted the right to move to, look for and take up work, deliver services and settle with their families in a Member State other than their own. Physical barriers such as border checks were also gradually removed, facilitating movement between countries.

The number of people benefiting from the right to free movement has increased tremendously over the last 50

years, with the successive enlargements of the European Union from six to 27 members and the association of Norway, Switzerland and Liechtenstein with the free movement regime. In addition, free movement rights are not limited to workers but were also extended to pensioners, students and other non-economically active persons - in fact, to all nationals of Member States.

The strong economic drivers behind freedom of movement account to a great extent for its success, although there are many issues still to be resolved, including the transferability of social security entitlements and the recognition of qualifications. It is for this reason that, at European level, the European Commission's Directorate-General for Employment and Social Affairs[1] was very much in the lead, engaging national labour and social affairs ministries in the making and harmonisation of European migration policies and law. National ministries of justice and home affairs were responsible for the adaptation of national laws on citizenship, immigration and asylum.

The free movement regime was based on the assessment and recognition of needs, namely those of persons wanting or needing to move, of countries of origin wanting to support their nationals with this effort, and of receiving countries that were in need of workers.

The overlapping interests of migration stakeholders make a strong case for intra-European mobility and can also be used to advocate for extra-European migration, as long as these interests are convincingly articulated and communicated.

This may be easier when it concerns migration between countries with strong economic ties, for example those that are or are becoming part of a single market (such as the European Union), countries that are at a similar stage of economic development (such as the European Union, North America and Japan), and countries whose nationals have specific and desired skills and competencies (for example from South Asia). Even without or before policies explicitly calling for it, selective migration is taking place.

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1   The Directorates-General (DGs) were originally known by numbers but are now named. The total number of DGs, and their mandates, usually changes every five years, the mandate period of the European Parliament and the European Commission.

1.2. Admission of third-country nationals and refugee protection

With international migration between EU Member States increasingly resembling internal migration, the term 'migrant' was no longer used for nationals exercising their right to free movement. It could, therefore, have been used exclusively for those migrating to an EU Member State from a non-Member State. Instead, however, the term 'third-country national' was coined. This term serves as a reminder that, for the European Union, there are different types of international migrants: those who cross the soft internal borders between EU Member States and those crossing the hard external borders of the EU.

This distinction should be kept in mind for two main reasons. Firstly, the admission and settlement conditions and associated entitlements differ considerably between the two cases. Secondly, while in the former case the European institutions wield a great deal of power and are the leading policymakers, in the latter, national governments hold most power and claim the leadership position for their own.

Policies concerning third-country nationals could be modelled on EU free movement policies. The idea is to begin by removing barriers where this is relatively easy and then, applying equal treatment principles, press for the application of the same rules to more difficult cases.

In the 1990s another type of migrant, namely those in need of international protection, dominated the migration agenda in Europe. To respond to the growing number of refugees and asylum seekers, European co-operation increased, led by national justice and interior ministries and very much focusing on refugee reception. With high unemployment rates across Europe, labour ministries kept migration for employment reasons successfully off national and European agendas. Family reunion was restricted. As a result, migration policy debates were approached more in human rights than in socio-economic terms.

Although the general public and policymakers reluctantly started to acknowledge Europe as an area of immigration attracting migrants from across the world during the 1990s, refugees were considered a burden and migrant workers as not really needed. This changed somewhat from 2002 onwards, when reports on Europe's declining and ageing population began to influence European policy debates. Migrants may be needed after all, not so much to reverse but to at least delay this process.

At the same time, labour market mismatches in Member States raised interest in recruiting specific categories of skilled workers in the high-tech industries and health services, and low-skilled workers in agriculture, hotel and catering and tourism. In some cases, Member States competed for the highly-skilled and, in others, students became the most desirable immigrants. This competition partially explains why migration is barely covered by major EU policy mechanisms, and why efforts to adopt common immigration European rules met with little success.

Legislative proposals put forward by the Commission's Directorate-General for Justice and Home Affairs were invariably watered down in negotiations with Member States or torpedoed by them altogether. The DG was systematically forced into the role of restrictively regulating migration and, after the terrorist attacks in the early 2000s, of policing migration. The security dimension which is part of any immigration policy became over-emphasised out of the fear of potential terrorists within migrant populations.

1.3. Citizenship, equal treatment, social inclusion and integration

Immigrant integration slowly made its way on to European policy agendas, and concepts and approaches developed over time. European law demanded that nationals of Member States who exercise their free movement rights are treated equally to nationals and without discrimination, in addition to being entitled to educational and social support. The 1990 Maastricht Treaty introduced the concept of European citizenship, granting mobile EU nationals additional rights, including the right to participate in local and European elections. From then onwards, issues related to the mobility and inclusion of EU nationals became part of the EU's developing social policies.

Applying the approach used for EU citizens crossing internal borders to persons crossing the EU's external borders makes citizenship, equal treatment and social inclusion central concepts for policies promoting their integration.

This approach would also expand and foster European co-operation, enabling the adoption of legislative and other policy measures. Indeed, the Tampere European Council of 1999 and the Amsterdam Treaty of the same year seemed to be heading in that direction. The former called for equality and comparable rights for immigrants and nationals, while the latter expanded the mandate of the European institutions in areas relevant to immigrant integration. But how did that work in practice?

Matters related to the acquisition of national citizenship were excluded from European co-operation and remained the exclusive domain of Member States. The European Commission's Directorate-General for Justice and Home Affairs supported some policy exchanges and research on national citizenship and introduced the term 'civic citizenship.' The adoption of two pieces of European

legislation concerning long-term, better-protected residence status for immigrants and family reunification could be seen as an elaboration of the latter concept. The term 'active citizenship' is occasionally used by this DG, but is more forcefully and concretely employed by the Directorate-General for Education and Culture, although not in relation to immigrants. The related issues of political and civic participation and immigrants' voting rights were basically kept out of the scope of European co-operation.

The European Union's robust anti-discrimination legislation is designed to promote equal treatment. Direct and indirect discrimination on the grounds of race and ethnicity are outlawed in the fields of employment and training, education, social protection, membership of organisations and access to goods and services. Discrimination on the grounds of religion and belief is forbidden in the fields of employment and training. Despite the fact that nationality is not included as ground of discrimination, Europe's anti-discrimination laws are nevertheless invaluable instruments for immigrant integration. The implementation of EU law has led to many changes in and the reinforcement of national anti-discrimination laws. The responsible department of the European Commission has put in place a reasonably strong monitoring mechanism and facilitates the building of civil society's capacity to use anti-discrimination law.

Europe's socio-economic co-operation and policies, the world's strongest and most developed, currently fall under the Europe 2020 Strategy (also including the Education and Training 2020 Strategic Framework). This policy framework, launched in 2000 as the Lisbon Strategy, sets ambitious and interconnected goals in employment, education, social inclusion and sustainability. The open method of co-ordination is the major vehicle for their achievement and engages public, private and third sector actors at local, regional, national and European levels.

Social and educational policies are ordinarily aimed at the whole population. When general measures do not sufficiently address specific needs, or when certain categories of person are not able to access general services, then policies must dynamically combine general and specific measures (for example, in the form of positive action). The way in which general measures are complemented by specific measures depends on how particular categories of persons (for example migrants) can make a strong case for them and have the power to bring about their adoption.

While the open methods of co-ordination on employment, social inclusion and education are very relevant to the economic, social, educational and civic inclusion of immigrants and their descendants, they deal with these issues to a limited extent only.

Immigrants are seen more as a vulnerable group and as victims of racial and ethnic discrimination than as active residents and citizens in European socio-economic policy co-ordination mechanisms. Their residence status and nationality do not seem to matter as much as their specific needs, or their ethnicity and skin colour.

With the start of a new European Commission in 1999, the Directorate-General for Employment and Social Affairs retained its mandate on the free movement of EU nationals, equal treatment and anti-discrimination. It did not (and still does not) consider labour migration to be an important issue, and integration is already covered by its work on employment, social inclusion and anti-discrimination.

In the wake of the 1997 European Year Against Racism and the adoption a few years later of the Amsterdam Treaty, a series of legislative and other measures were taken, including the adoption of EU anti-discrimination laws, the establishment of the European Network Against Racism and a network of equality agencies, the launch of an action programme and the creation of a fund to sponsor anti-racist and anti-discrimination activities.

Responsibility for migration and integration was given to the newly established Directorate-General for Justice and Home Affairs. It was thus strategically connected with Europe's overall goal to establish an area of justice, freedom and security, conceptually linked to fundamental rights and programmatically integrated into what is now known as the Stockholm Programme. Under this Programme, a new communication specific to integration issues - the successor of the 2005 Common Agenda - will be released by the Commission in 2011.

In European policy debates, integration has been primarily used in reference to legally residing third country nationals, defined predominantly in legal terms and addressed notably by legal means. Indeed, integration requires secure residence status and family life, equal access to and opportunities in employment and education, civic rights and responsibilities and facilitated citizenship.

Policies very much focused on newcomers at the expense of established migrants and minorities (second- and third-generation immigrants, national ethnic minorities such as Roma and Sinti etc.) and specified that integration is applicable only to those who are legally resident in the European Union, excluding those without valid papers from EU actions on integration.

The Directorate-General for Justice and Home Affairs (now split into two separate DGs) also assumed a mainstreaming role. This entailed keeping integration on the European agenda and producing instruments for the use of all kinds of

integration actors. Although no open method of coordination on integration has been put in place, similar instruments are used to shape European integration policies (such as legislation, policy exchange and learning and dialogue with civil society). The Directorate published three Handbooks on integration and established as a follow up the website on integration. The European Fund for the Integration of Third-country Nationals sponsored governmental and non-governmental projects and facilitated the European Integration Forum.

1.4. How long is one an immigrant?

The Europe 2020 Strategy and Stockholm Programme, which are weakly connected both conceptually and programmatically, discuss integration issues in different ways and in relation to distinct and differently defined groups of people.

Europe 2020 and the Stockholm Programme each employ their own concepts and strategies and often engage different actors. The presence of a variety of actors in these two major policy frameworks corresponds to their power, interests and responsibilities, while the division of labour between them corresponds to their missions and mandates. This has resulted in manifold and diverse approaches to integration which can, as such, be seen as being of value. Ongoing dialogue and reflection should help to avoid unacceptable fragmentation of and contradictions between the various approaches.

The goal of immigrant integration policy is to turn foreigners into citizens. From a legal point of view, the necessary steps for immigrants and their children to acquire full citizenship in a limited number of years can be clearly identified and any obstacles removed. To deal with the social and cultural dimensions of citizenship, other approaches and more time are required. Both reasons for migration and admission conditions impact on immigrants' socio-economic position well beyond the period necessary for their naturalisation, and also affect their children.

There will increasingly be fewer differences between subsequent generations and nationals in terms of social position and social mobility. However, their belonging to an ethnic group and the colour of their skin may or cannot change, which can make their participation in society more challenging.

Ultimately, integration policies aim to encourage and facilitate active citizenship among both citizens and residents, making integration not only a matter of including individuals into society but also of keeping societies dynamic, open and inclusive.

Framework	Orientation	Criteria	Target group	Who do they miss out?
Europe 2020	Socio-economic	Economic and social needs	Disadvantaged people	Active immigrants with high potential
Stockholm Programme	Legal	Legal status	Legally residing third-country nationals	Second- and third-generation immigrants, undocumented migrants, national ethnic minorities such as Roma and Sinti

2. Participation in creating and sharing prosperity and well-being

Europe is undergoing fundamental economic and social transformations. The global mobility of goods, services, information, knowledge and persons has increased enormously. Industries such as manufacturing, agriculture, forestry, fishing and mining are in long-term decline, while there is a substantial growth in the service sector and knowledge-based industries. With economic changes comes societal change. Many institutions are losing much of their traditional meaning or taking on other functions, and new societal arrangements are emerging. At the same time, Europe's population is changing, both in composition and in size: it is getting older and could well shrink. It is also becoming increasingly culturally and ethnically diverse.

These changes are posing serious challenges to the cohesion of European societies; to how they are integrated. Can sufficient income be generated and the same level of productivity and standard of living be maintained? Are the same services needed, available and accessible, and will they be delivered in the same way and by the same people? How will solidarity be organised and social cohesion take shape? How will citizens (old and new) be engaged in shaping society? This chapter describes the wider challenges of integration and explores the concepts that can be used to underpin approaches to address these challenges.

2.1. Diverse societies and multiple affiliations

In 2010, the European Union's population stood at just over 500 million, with two per cent more women than men. For many years, natural growth was the major component of population increase, but this has been in decline since the 1960s. In the EU, the total fertility rate has declined to about 1.5 children per woman, with a lower rate in 15 Member States (a fertility rate of 2.1 is considered to be the replacement level in developed countries). As a result of improved socio-economic and environmental conditions and better medical treatment and care, life expectancy has risen by about 10 years over the last 50 years. The life expectancy at birth of women in the EU-27 is around 82 years and around 76 years for men. Many countries in the EU are currently at a point in the demographic cycle where natural population change is close to being balanced or negative. Nowadays, 15 per cent of the population is below 15 years of age, almost 68 per cent is between 15 and 64, and 17 per cent is over 65. There are significant differences between Member States and even between regions.

In recent decades, migration has become increasingly important for maintaining population size. The total number of immigrants[2] in the EU on 1 January 2009 was 31.9 million (6.4 per cent of the total EU population). Two thirds (20 million) were citizens from outside the European Union (4 per cent). The largest group of non-EU nationals came from other European countries, namely Turkey, Albania and Ukraine. The second biggest group was nationals of African countries, with significant numbers from Algeria and Morocco. Asians from South and South-East Asia (notably India and China) made up the third largest group. In 2008, EU Member States received a total of 3.8 million immigrants, and at least 2.3 million emigrants were reported to have left EU Member States. Compared with 2007, immigration to EU Member States was estimated to have decreased by 6 per cent and emigration to have increased by 13 per cent. Since 2001, only around 5.5 million people have become EU citizens. In 2008, the number was 700,000. The scale and patterns of immigration differ from one Member State to another.

The diversity of Europe's population is a fact. This is not a new development; Europe has always been a diverse continent in terms of ethnicity, culture and religion, to which migratory movements have added and continue to add.

This can be demonstrated by the way Europe's cities have grown over the centuries and how they have absorbed new inhabitants who came by the hundreds in relatively short periods of time, or in smaller groups over longer periods of time (urbanisation). Fifteen cities in Europe have a population of over 100,000 foreign-born residents, eight cities have a population of over 250,000 foreign-born residents and two cities have a population of over 1,000,000 foreign-born residents. On average, cities across Europe have 5.86 per cent of non-EU nationals as a proportion of total population.

Societies are made up of individuals interacting with each other in societal entities, of which there are many and different types. Their nature is defined by common sense, by how they describe themselves and/or by general agreement or law. They range from groups to communities, from public

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2   The term 'immigrant' refers here to non-nationals, i.e. persons who are not citizens of their country of residence, including persons of unknown citizenship and stateless persons.

to private institutions, from civil society organisations to businesses. These interacting entities differ in nature, size, importance and power. They are dynamic and undergo change, or are static and remain the same. They can be more or less formal and can function by design or default, by written or unwritten rules.
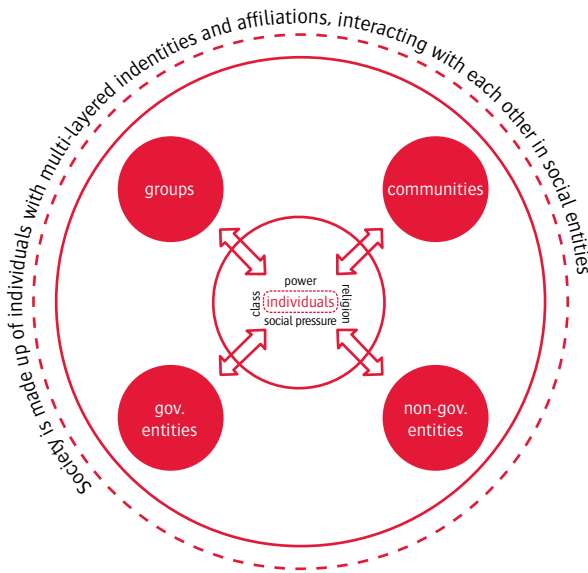
Affiliations with societal entities shape and reflect a person's identity. Individuals may distinguish themselves or be distinguished as being a member of or belonging to one or more entities. The question is how mutually exclusive and static these entities are, and how open or closed; whether belonging is determined by birth (for example gender and family) and descent (for example nationality and class), or rests on individual choices (for example belonging to a social movement or cultural, religious and professional groupings). Economic and cultural distinctions (such as class and ethnicity) may cut across many other distinctions and can influence and even condition the choices made by individuals.

How and when people are categorised depends on, among other factors, the purposes for which categorisations are made, and who is making them.

It is rather artificial, if not impossible, to reduce people's identities to their affiliation with a limited number of societal entities.

Nevertheless, such categorisations are made regularly and for a range of reasons, both good and bad. For example, people may be excluded because they belong to a certain category (when they belong to one or more minority groups), or receive preferential treatment for that same reason (by means of temporary positive action measures which aim to remedy historic disadvantages or persisting inequalities). People may define their identities in terms of association with a limited number of entities as a strategy to achieve their goals

(interest groups), or they are defined by others as part of their own strategies (to protect access to certain professions). At certain times economic categorisation is predominant (when immigrants are defined as workers), and at others, cultural categorisation is seen as more important (when immigrants are defined as belonging to a religious group).

In diverse societies, freedom of choice, equal treatment, the respect of differences and dignity, tolerance and solidarity are core values, with dialogue and negotiation invaluable mechanisms. These values and mechanisms are fundamental for the creation and enjoyment of prosperity and well-being.

It is important to understand why people are classified, by whom and in what terms, to establish the necessity and usefulness of such classifications and to identify their unintended effects. It is also necessary to take into account the limits of the data on which classifications are based and to decide whether they can and should be used.

For example, policies which aim to close the gaps in employment and service uptake among various groups in society may benefit from monitoring employees' and service users' national and ethnic backgrounds. However, in a changing political climate, such data could also be used to demonstrate the under-performance of these groups and may lead to claims that their integration has failed.

2.2. Integration and participation

Europe's population has led it to occupy the position of the world's largest economy. The EU is the biggest exporter and second biggest importer of goods and services. The total employment rate for people aged 15-64 in the EU-27 rose steadily from 62.4 per cent in 2002 to 65.9 per cent in 2008, but fell to 64.6 per cent in 2009. The employment rate for women, which increased continuously from 53.7 per cent in 2002 to 59.1 per cent in 2008, dropped for the first time in 2009 to 58.6 per cent. In 2009, 217.8 million EU-27 residents aged 15 years or over were in employment. The unemployment rate was 9.6 per cent in 2010, meaning that there were an estimated 23.179 million men and women unemployed in December 2010. In 2008, there were over 20 million enterprises in the European Union, of which the vast majority were SMEs. 92 per cent of all enterprises provided 30 per cent of total private employment. Public authorities in the EU employed just over 22 per cent of the workforce and bought goods and services to the value of 17 per cent of the EU's gross domestic product.

A large proportion of the figures presented above can be disaggregated by gender and age, by Member State and often by region and city. It is sometimes also possible to break them down further on the basis of nationality, national origin and ethnicity.

The availability of aggregated statistics allows for the socio-economic position and power of particular groups in society to be established, as well as their contribution to and sharing of prosperity and well-being.

There is obviously a relationship between economic prosperity and well-being, but it is increasingly acknowledged that economic growth does not necessarily lead to greater well-being, and that well-being can be measured by means other than economic indicators. Discussions on the nature of the relationship between the two take place in such policy forums as the UN Development Programme and the OECD[3], and involve economists, philosophers, sociologists and political scientists.

The underpinning 'capability approach',[4] with its roots in the philosophy of social justice, emphasises the ability of individuals to pursue and realise the goals they value. This approach is a rejection of an economic model in which individuals act purely to maximise their economic self-interests.

Nowadays, many fora are developing indicators of well-being and collecting statistics to measure progress and allow comparisons over time and between countries. While the best-known example is the UNDP's annual Human Development Report, other agencies such as the World Bank and the World Economic Forum also produce assessments of (components) of well-being. At European level, Eurostat presents statistics relevant for the achievement of the European Union's goals, which are increasingly defined in more than economic terms. Surveys provide information on how the population values policies and their outcomes. Governmental and non-governmental organisations compare situations, policies and outcomes and present them in qualitative reports and indices.

The redistribution of prosperity not only contributes to well-being but also makes economic sense. Equal access to employment, equal opportunities for pursuing a career and equal access to such services as health and education are beneficial for all, not only for those who are most successful.[5] The political debate focuses very much on how to create such an environment, address unjustifiable differences and reverse exclusionary practices. Governments have an active role to play in this regard. Governments' commitment to the equality agenda as applied to immigrants is measured by the Migrant Integration Policy Index (MIPEX), which includes an anti-discrimination strand. [6]

Integration can be described as the development and use of capabilities for participating on an equal footing in the production and sharing of prosperity and well-being.

In addition to balancing economic prosperity with well-being, the capability approach focuses on people's 'functionings' (the 'beings and doings' that make up a person's well-being, such as being educated, being in employment etc.) and capabilities (what is effectively possible, such as a person's ability to increase their knowledge, grow as person in a job, getting engaged in decision-making, etc.).

So-called 'conversion factors' constitute the relationship between the two; namely, how opportunities are realised. People have or are given varying degrees of choice to act and change their situations and positions. Three types of conversion factors can be distinguished, namely personal factors (gender, physical condition etc.), social conversion factors relating to the society in which one lives (social norms, public policy, race and class etc.) and environmental factors, such as physical circumstances (climate, urban or rural location etc.). It goes without saying that these diverse factors can significantly influence the degree to which goals can be achieved.

These conversion factors can help to assess the extent to which people are successful in achieving their goals by explaining the varying degrees of success experienced by different groups in society, and the different timescales needed to achieve this. Applied to the current debate on integration indicators which are supposed to measure integration outcomes, the capability approach can be used to explain why it takes longer for refugee children to achieve the same school results as their peers, why it is easier for nationals than it is for immigrants and established minorities to accumulate the financial and social capital necessary for full societal participation, and so on.

This approach can also be used to establish the effectiveness of policies: the extent to which they remove barriers (for example, by fighting against racism) for people to make their 'life choices' on what they want for themselves and for others. There is much debate among scholars about whether a list of basic or principle capabilities should be drawn up. Such lists ordinarily include matters of life, health, culture and creativity, and of decision-making and political participation. These matters easily amount to what can be phrased as socio-economic, cultural, civic and political rights.

In conclusion, applying the capability approach considers citizens with and without an immigrant background as actors. Depriving them of their capabilities leaves them vulnerable to exclusion, racism, sexism, poverty and powerlessness. Policies aim to remove barriers and create and build on opportunities.

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3   See the OECD Better Life Index, launched on 24 May 2011: http://www.oecdbetterlifeindex.org/ .

4   See annex for references to the philosophy underpinning this approach and examples of where this approach is being used.

5   R. Wilkinson and K. Pickett, The Spirit Level: why more equal societies almost always do better (London: Penguin, 2009).

6   Migration Policy Group and British Council: http://www.mipex.eu/.

2.3. Integrating societies

Interestingly, the Council of Europe's work on social cohesion seems to be influenced by the capability approach. The four core elements of social cohesion as developed by the Council of Europe can be used for conceptualising integration and shaping policies. The first element is equality and non-discrimination, the second is dignity and recognition, the third is autonomy and development and the fourth is participation and commitment.

Societies' commitment to integration is expressed in policies of equal opportunities, equal treatment and equal access to services. Individuals' commitment to integration is expressed in their resolve to develop their skills and competencies necessary for active participation. Progress can be measured in terms of openness and inclusion, namely the degree to which opportunities are offered and seized to be part of society.

Parliamentary debates and negotiations, both among interest groups and between such groups and governments, as well as active monitoring by civil society, help to shape these policies.

The purpose of non-governmental entities is often described in acts establishing their legal status and in mission statements. The former provide organisations with a proof of existence and licence to operate as, for example, a commercial firm, a social enterprise, a welfare organisation or a foundation. The latter describe an organisation's aims, the means to achieve them and the values on which these goals are based. The commitment to integration finds an expression in the acknowledgement of society's diversity, which inspires:
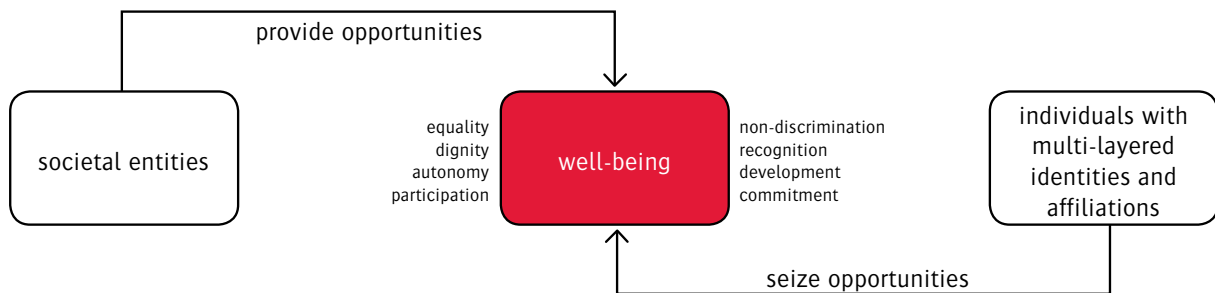
Societies' commitment to integration affects the policies and activities of public, private and third sector organisations, while individuals' commitment affects the aspirations and responses of all citizens and residents. For each actor, indicators can be developed that measure their efforts and input, obstacles and facilitators and results and impact.

The purpose of governmental agencies should be (and often is) to create an environment that is conducive to the prosperity and well-being of all. Rule of law principles codified in international treaties, constitutions and laws define the role of government as a regulator and policymaker. The commitment to integration finds an expression in the promise of and dedication to equal treatment, anti-discrimination and the sharing of opportunities and solidarity, which inspire:

- Robust anti-discrimination law and equality proofing of existing general policies and laws;
- Policies and practices facilitating effective access to employment, education and other public services (such as health and housing), decision-making and citizenship;
- Strategies incorporating complementary general and specific integration measures.

- Compliance with anti-discrimination and equality policies and laws;
- The screening of by-laws and internal regulations on provisions preventing or facilitating the participation of specific groups of individuals;
- Programmes, projects and products that are designed to be beneficial to a diverse population;
- Clear integration targets for specific categories of people within the population.

Governmental and non-governmental organisations whose work is directly related to integration can (although often need to be convinced to) set general and specific integration targets and work towards their achievement. Both these organisations and those whose main purpose is not directly related to integration can also promote integration by the way in which they function and operate.

Different as they may be in many respects (including size, purpose and legal status) many organisations are employers as well as consumers and providers of goods and services. By adopting workforce and supplier diversity policies, organisations contribute to the socio-economic integration of all citizens and residents, thus enhancing
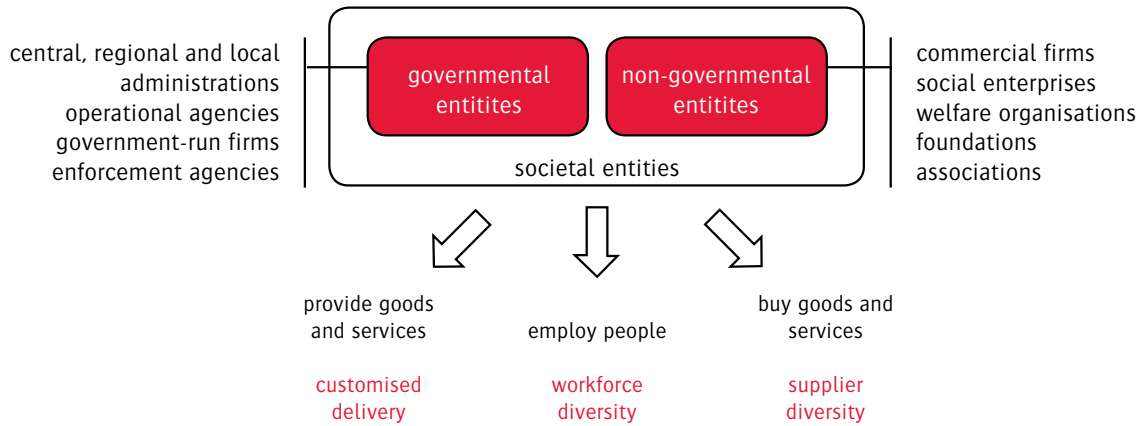
participation. By tailoring their services to a diverse population they serve and better equip the population, thus enhancing well-being.

While it is a democratic duty for the public sector to act upon and reflect the diversity of the population, for civil society and the private sector this is more a matter of good citizenship. By including integration in their employment, procurement and service delivery practices, governments at different levels not only demonstrate their commitment to integration, but also set a powerful example that may attract followers in the private and civil society sectors.

2.4. New concepts and approaches?

The question of whether new concepts should be introduced into integration debates which would lead to more effective approaches can now be answered along the following lines.

Where integration is discussed as the incorporation of particular, well-defined groups into society, a strong link should be made with the debates on wider issues of socio-economic development. In these debates, sufficient attention should be paid to the position of particular groups, including people with a migrant background.

Where integration debates take place in different policy forums, the same concepts should ideally be used by all.

This means that in some forums new concepts will need to be introduced, while forums in which these concepts are already in use will need to ensure their more consistent application, and to new issues. Either way, this approach entails the following:

- Pushing for the acceptance of the fact that integration is a multi-faceted, long-term and open-ended process in which all persons contribute to and benefit from prosperity and well-being on an equal footing. This will help to achieve and strengthen long-term commitment to integration, to limit the extent to which one particular group is the focus at the expense of others, and to stop 'failed integration discussions'.

- **Acknowledging that integration is and can be more driven by competent and empowered individuals and organisations acting toward the goals they value and negotiating on the means to achieve them will emphasise their role in integration processes by calling on their responsibilities and building on their capabilities.**

- Identifying key policy areas and frameworks as well as the main public, private and third sector actors and analysing their mandates, roles and the concepts they use. This will help to assess the merits of an approach that values equality, diversity, openness and inclusion.

3. On the road to open and inclusive organisations

In a globalising world, the European Union has set the ambitious goals of becoming an area of freedom, justice and security and a smart, sustainable and inclusive economy. In order to be successful, the Union with its 27 Member States must create a favourable environment by mobilising resources and valuing the engagement of citizens and residents. Geographical and social mobility are part of the equation.

European policies are guided by the values of equal treatment, equal opportunities and equal access to services - values that are at the heart of any diversity policy. The degree of openness and inclusiveness in society depends on how these values are applied by public, private and third sector organisations operating at various levels of governance. The production and redistribution of prosperity and well-being depends on the opportunities that are offered by societal structures to citizens and residents, and the way the latter commit to and engage themselves with seizing these opportunities. However, it is important to recognise that not all individuals begin from the same starting point. There are factors and obstacles that may influence, constrain or condition the way citizens and residents commit to, engage with and seize these opportunities: language, recognition of qualifications and skills, limitations on the employment of foreigners in certain sectors etc. The opportunities offered by societal structures should therefore be balanced with the capacities of citizens and residents to use them.

This chapter describes and analyses promising approaches and instruments used by organisations when they act as employers, buyers of services and service providers. It describes the steps to be taken to prepare, implement and review their actions. Examples are given which concern individuals with and without a migrant background.

3.1. Planning for openness and inclusion

Planning is a key stage of policymaking and service design. Whether an organisation is seeking to adapt its services to a diverse population, to ensure that its HR procedures are discrimination-free or to use its purchasing power as an instrument of its equality policy, a proper diagnostic and an inclusive needs assessment are central to effective implementation.

Planning begins by understanding: understanding what is required and permitted by law, understanding who service users are, understanding how the workforce is composed and how HR policy influences it, and understanding the composition of the pool of suppliers and the extent to which procurement procedures contain obstacles for under-represented businesses.[7]

3.1.1. Understanding legal provisions

There are laws and regulations which govern an organisation's employment and procurement practices, as well as the way in which it provides goods and services to the population. There are also provisions which frame the diversity measures that organisations may use. Such legislation is derived from both EU and national legislation. Additionally, laws and regulations may differ according to an organisation's status: public body, service provider, private company, non-profit organisation etc. It is important, therefore, that an organisation understands what the law requires, as well as what it allows.

A proper grasp of the following types of legislation (among others) is therefore necessary:
- Labour law, including anti-discrimination legislation relating to employment;
- Anti-discrimination regulations in service delivery (including reasonable accommodation duties);
- Procurement legislation, in particular the use of social clauses;
- Data privacy and protection legislation.

In the United Kingdom, for instance, all public authorities have a statutory duty under the Equality Act 2010 to develop and carry out equality impact assessments of all existing policies and services.[8]

3.1.2. Understanding the local area's population

Before mapping service access and workforce/supplier pool composition, an organisation should be familiar with the local environment. How many immigrants live in the area? How many under-represented businesses are based there? What is the composition of the working population?

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7 Under-represented businesses are defined as businesses of which at least 51 per cent of the stock is owned by a person (or persons) belonging to a minority group, including, but not limited to ethnic minorities, immigrants, women, disabled people and lesbian, gay, bisexual and transgender people. See L. Holford, O. Tregaskis, M. Ram and T. Jones, Handbook on Supplier Diversity in Europe (London: Supplier Diversity Europe, CRèME and MPG, 2009), p. 16.
8 Equality Analysis and the Equality Duty: a Guide for Public Authorities (London: Equality and Human Rights Commission, 2011).

The central challenge for organisations in understanding their service users, staff and suppliers is to obtain diversity data without restricting individuals or groups to forever invariable categories. For instance, counting the number of staff with a migrant background without causing them to feel they are being singled out because of their 'foreignness' or membership of a minority group as opposed to their skills, competencies or personal attributes (see page 11).

Overcoming this challenge implies relying on objective data (i.e. data which is not linked to the subjective appreciation of a person or a group). However, the additional difficulty here is that there are diversity characteristics that can be objectified, whereas others cannot (or should not). For instance, the following can be considered as based on objective data:

• Nationality
• Country of birth
• Parents' country of birth

Other diversity characteristics exist, including visible characteristics such as skin colour and certain signs of religious belonging such as the uncut hair, beard and moustache of Sikh men. People may suffer discrimination on such grounds even before their nationality or country of birth are queried. Therefore, these characteristics should in principle be considered and included in any diversity policy, which would entail both objectifying and monitoring such traits. Aside from the fact that such a measure is prohibited by the majority of EU countries and is of questionable desirability, it could also (i) create more problems than it solves (misuse of data, for instance) and (ii) meet with resistance, including from immigrants and minorities.

In this perspective, nationality, country of birth and parents' country of birth should be privileged as mapping criteria.

Data on nationality and country of birth is often available through public population registers held by local authorities, or similar official sources of information. To the extent that it is permitted by data protection and privacy regulations, an organisation can cross-reference declarative data obtained through surveys - staff surveys, for instance, or the EU Statistics on Income and Living Conditions survey) - with the objective data contained in population registers.

An example of this is provided by the Dutch national office for statistics (CBS), which currently groups its statistics into one dataset entitled 'Sociaal Statistisch Bestand' (Social Statistics Database - SSB) and offers the possibility to cross-check data (for instance, a staff survey) against it. However, this is only possible for a restricted range of organisations, including universities, research institutions and government administrations. A confidentiality agreement between CBS and the requesting organisation has to be concluded beforehand.[9]

3.1.3 Understanding service users
Mapping service users in order to understand their needs and the difficulties they may encounter in accessing public services can be done, broadly speaking, in two ways. Combining the two approaches will yield more robust needs assessments.

a) Looking at the supply side and analysing the services themselves

The first way to understand whether services meet the needs of users is by looking at the use of the services themselves. The inappropriate or disproportionate use of services may indicate communication gaps and unmet needs - although interpreting differences in the uptake of services should be approached with caution as other factors may also play a role.

In analysing the intake of the Accident and Emergency (A & E) department of a Paris hospital, a researcher noted a significantly higher proportion of users with a migrant background than other users.[10] This may suggest that the French system of doctor referrals ('use your local doctor first') is not adequately explained to immigrants. Similarly, a study published in the Irish Medical Journal and referenced in the Irish Health Service Executive's National Intercultural Health Strategy demonstrated that the children of asylum seekers in Galway were four times more likely to be admitted to an A & E department, but less likely to require admission. The study claims that many of the incidents could have been dealt with in a General Practitioner setting, and pointed to language and information difficulties as reasons for the inappropriate use of services.[11] A similar observation was made in 2003 by the Health Service Executive's predecessor and led to the development of an interpretation service in hospitals.[12]

Disproportionate numbers of users with a migrant background in certain services may also be a source of inspiration for other departments in creating new services or adapting existing ones. For example, if in a deprived neighbourhood, there are more fire brigade call-outs for families with a migrant background than for others, this may suggest that fire prevention activities are not communicated well to migrant households.

9   J. Doomernik, PROMINSTAT Country Report Netherlands, Promoting Comparative Quantitative Research in the Field of Migration and Integration in Europe, 2010, p.14.

10   A. Veyre, Les Motifs de Recours aux Urgences Pédiatriques: Etude Prospective menée pendant l'hiver 2006 au CHU du Kremlin-Bicêtre, doctoral thesis for the University of Paris (Paris : 2009), retrieved at http://www.bichat-larib.com/publications.documents/3329_VEYRE_Aurelia_These.pdf.

11   National Intercultural Health Strategy 2007-2012 (Dublin: Health Service Executive, 2007), p.79.

12   Handbook on Integration for Policy-makers and Practitioners - 2nd edition (Brussels: European Commission, 2007), p. 20.

b) Looking at the demand side and analysing the feedback of service users

Another way to understand if the services provided meet the needs of users is to consult the users themselves.

At a basic level, this involves analysing not only complaints and grievances, but also existing customer satisfaction surveys and scorecard systems. A prerequisite, however, is that such feedback mechanisms - including anonymous ones - are designed in such a way that data can be disaggregated by cultural or ethnic origin, so as to understand if users with a migrant background experience similar satisfaction rates to other users.

The information generated by analysing feedback mechanisms may not provide an organisation with enough data to adapt services. Surveys of a more qualitative nature are needed to fully capture the direct experience of users. Different methods at various costs exist for organising user surveys, including questionnaires sent by post and telephone interviews. A more sophisticated approach is to work with focus groups of service users, composed in such a way that they reflect the composition of users accessing the service - although it should be recognised that this approach is lengthier and more expensive than the others.

Difficulties in reaching service users can be overcome by working with community intermediaries such as recognised community leaders and NGOs that provide direct services to communities. It is important to use these intermediaries to reach the users who really access services, as consulting only community leaders and NGOs ('proxy consultation') - who often do not access social services themselves - is unlikely to provide a sufficient understanding of service users' experiences and needs. The City of Rotterdam uses this approach and trains volunteers to act as 'ambassadors' of their communities. In so doing, the ambassadors have a double function: to relay information and needs from the municipality to service users and vice versa, including where bottlenecks occur, and to act as a mediator.[13]

3.1.4. Understanding workforce composition
In order to understand how an organisation's workforce reflects society's diversity, three elements are required:

- Quantitative statistics on workforce composition;
- Qualitative personnel surveys to understand staff members' own experiences within the organisation;
- The equality proofing of all HR procedures against anti-discrimination laws and regulations.

In addition, the organisation should have a good knowledge

of staff members' individual capabilities, and of those individuals who have the potential to rise to managerial positions.

At a basic level, quantitative statistics cover the number of staff with a migrant background, disaggregated by age and by management or salary level, and include a comparison with the area's working population. For instance, the HR unit of the City of Amsterdam collects the following data and uses it to set targets:

Salary scale	Share of non-Western immigrants in the municipality's workforce (2006, %)	Share of non-Western immigrants in Amsterdam's working population (2006, %)	Difference (%)
Scale 1 to 3 (lowest)	41	74	-33
Scale 4 to 6	29.9	41	-11.1
Scale 7 to 9	26.6	36	-9.4
Scale 10 & higher (highest)	10.8	19[*]	-8.2
Total workforce	22.5	34	-11.5

[*]From professional higher education level (HBO) upwards
Source: City of Amsterdam[14]

At a more advanced level, statistics are enriched with other indicators such as:
- Number of staff speaking foreign languages;
- Number of staff receiving intercultural training;
- Number of staff with a migrant background who receive promotions;
- Number of staff with a migrant background who leave the organisation;
- Number of complaints and grievances related to discrimination.

For example, all units of the Fire and Rescue Service (FRS) in the United Kingdom are required to provide the percentage of Fire Authority Members and other staff that have undertaken intercultural training in the last two years. While the data is not published as such in annual reports, it allows FRS units to refine their understanding of how their respective workforces serve a diverse population.[15]

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13 Training immigrant ambassadors - Bridge builders between organisations and difficult to reach population groups, retrieved at http://ec.europa.eu/ewsi/en/practice/details.cfm?ID_ITEMS=7560.

14 Programma Diversiteit (Amsterdam: Municipality of Amsterdam, 2007), p. 11, retrieved at http://www.vng.nl/Praktijkvoorbeelden/AP/AWG/2007/Amsterdam_ProgrammaDiversiteit_2007.pdf.

15 Fire and Rescue Service Equality and Diversity Report 2010 Questionnaire (London: Department for Communities and Local Government, 2009), p. 5, retrieved at http://www.communities.gov.uk/documents/fire/doc/1421882.doc .

Qualitative staff surveys can be undertaken in order to complete the picture. Such surveys allow for a more direct account of staff experience within an organisation. The survey should be anonymous and the number and scope of questions on discrimination should be based on careful consideration. Finally, the interpretation of the results should take into account the response rate to the survey.

One example of such a survey, performed on a massive scale, is the Public Service Employee Survey in Canada, a public service-wide survey that provides a snapshot of the views of federal public servants about the organisations and units in which they work. It contains over 20 questions related to the discrimination experienced by staff from managers, co-workers, junior employees or members of the general public. The 2008 survey was sent to 258,000 employees and approximately 170,000 of them responded, generating an impressive 66 per cent response rate. Data from the survey can be disaggregated by administrative unit - becoming in effect a micro-survey - but also by demographic profile (gender, age group, cultural background etc.) and socio-economic status.[16]

The third step in building a comprehensive picture of an organisation's workforce involves an anti-discrimination diagnostic of existing HR procedures. In order to complement an organisation's internal understanding and reinforce impartiality, such diagnostics are carried out by external experts.

While there are different ways of carrying out a diagnostic of HR procedures, situation testing is a technique that has recently gained prominence, not only in academia and civil society, but also in courts. In fact, situation testing for research purposes is increasingly distinguished from the same technique used for judicial proceedings.[17] It is therefore possible for an organisation to use situation testing in a preventive manner, so as to refine its understanding of possible discrimination in HR procedures.

An example of such a use is that made in France by the Groupe Casino company, a chain of supermarkets. In 2007, the company contracted a research centre to organise a situation testing of its hiring procedures. One thousand six hundred tests were carried out in approximately 700 outlets. Each test involved submitting two applications for the same position. The applicants had similar profiles - not only in terms of education, work experience, competencies and interests, but also their nationality and residence address. The curriculum vitae and the application letters also had similar formats and contents. However, the names

of the two applicants differed: one was of French origin and the other 'non-European'. Results showed that as much as 50 per cent of the outlets only contacted the candidate with the name of French origin. This prompted the Groupe Casino to review its recruitment procedures as well as its training policy. It should be noted that the testing was supplemented by both a statistical analysis and a face-to-face staff survey, carried out by the same contractor.

3.1.5. Understanding suppliers

There are three different ways of using procurement as a diversity instrument. The first is to remove obstacles to the participation of under-represented businesses. The second is to reserve a proportion of jobs within the organisation to which the contract was awarded for people with a disadvantaged position on the local labour market. The third is to promote diversity policies and fair employment practices to suppliers.

Therefore, mapping the pool of suppliers should provide an organisation with an understanding of:

- How many under-represented businesses compose the pool of suppliers, and the obstacles under-represented businesses may encounter at each stage of the procurement cycle;
- The benefits and added value that under-represented businesses can provide to an organisation as suppliers;
- The number of companies in the pool of suppliers that have adopted diversity policies;
- The dynamics of the local labour market and of difficulties in accessing it.

Mapping the pool of suppliers by analysing the procurement process itself can lead to interesting findings. For instance, if there are significant differences between the number of successful and unsuccessful bids put forward by under-represented businesses, the chances are that these businesses encounter obstacles during the procurement cycle.

In Europe, the need to monitor the equality data of bidders is not sufficiently recognised. Consequently, it is likely that the tools used to monitor the procurement cycle do not provide an adequate understanding of the pool of suppliers in terms of ownership or employment practices.

Surveying suppliers directly can therefore be a first step, with results acting as an incentive to develop relevant tools for monitoring an organisation's procurement cycle.

In March 2009, Leeds City Council completed its Equal Opportunities Survey, which examined the Council's supply chain and its workforce and assessed how suppliers included diversity and equality principles in their work practices. Questions were also asked about the profile of

16 2008 Public Service Employee Survey (Toronto: Treasury Board of Canada Secretariat/ Office of the Chief Human Resource Officer, 2009), retrieved at http://www.tbs-sct. gc.ca/pses-saff/2008/index-eng.asp.

17   I. Rorive, Proving Discrimination Cases: the Role of Situation Testing (Brussels and Stockholm, Centre for Equal Rights and Migration Policy Group, 2009).

owners, directors and the workforce, and recruitment and employment practices. The results showed, for instance, that 5.58 per cent of business owners or members of boards of directors and 10.6 per cent of employees were 'black/minority ethnic citizens' and that 78.3 per cent of suppliers provided diversity and equality training to supervisors, managers and staff members responsible for recruitment. In turn, the survey has helped the Council to assess the openness and transparency of its procurement practices, and to ascertain if this current practice results in positive benefits for people of all backgrounds.[18]

The use of intermediaries, including banks and micro-credit institutions, local chambers of commerce, trade organisations and NGOs, can here also facilitate the outreach of organisations to under-represented businesses by assisting with the organisation of focus groups.

Understanding the legal requirements related to employment, procurement and service provision, as well as the equality measures permitted by law, helps to identify areas of potential progress and how to move forward.

Mapping the diversity of staff, suppliers and service users, without restricting individuals to forever invariable categories, will improve an organisation's ability to understand the needs and potentials of the evolving population.

3.2. Defining and designing for openness and inclusion

As we have seen, the planning stage equips organisations with an understanding of the current situation and identifies areas for potential progress. It serves to make the case for action. Defining a policy or designing a new service is as important as effective planning, since it is at this stage that the ambitions born out of the work to be done are matched with commitment and resources. This requires careful consideration, for half-hearted commitment or the inappropriate allocation of resources can erode even the strongest will or the greatest aspirations.

3.2.1. Securing commitment and leadership

Securing the support of an organisation's leaders and high-level managers can be done in multiple ways. Adopting a policy commitment or a service charter is one of them. In the last decade, nationwide charters have been adopted in seven EU Member States - in addition to those adopted internally by private companies or by professional organisations. Building on these charters, the European Commission is currently supporting a Diversity Charter Exchange Platform and is developing a benchmarking tool on diversity management.[19]

The commitment expressed by a charter is often one-sided, decided by leaders and managers with little or no involvement of other societal entities. For organisations that involve civil society and migrant organisations in the development of diversity charters or codes of conduct, the indirect message is that diversity is a goal to be attained and, as a matter implying organisational change, is discussed only with its strongest advocates. This, in a way, confines diversity to particular interests to be defended by pressure groups, as opposed to being an issue of general interest and importance.

One way to secure the commitment of an organisation's leaders and managers that does not confine diversity to a side issue defended by interest groups is to mainstream it into collective agreements established through social dialogue. This is the route chosen by Comisiones Obreras (CCOO), Spain's largest trade union, and Grupo Majestic, a group that owns the Hotel Majestic, a five-star hotel in Barcelona's city centre. Half of the Majestic's workforce, like many of the hotel's competitors, has a migrant background. The trade union's objective was to press for an agreement that goes beyond praising the company's multicultural recruitment policies to include a concrete commitment to action by the company. With the active participation of the whole workforce, CCOO and Grupo Majestic established a collective agreement which includes intercultural training, clear recruitment and promotion policies and work-life balance measures to cater for religious needs.[20] In this way, not only is the diversity policy defended as a matter of general interest by a mainstream social actor, but immigrants are also encouraged to join mainstream trade unions and to participate in their activities.

When change takes place in an organisation as the result of a new diversity policy, it is also important to look beyond leaders and managers to ensure the buy-in of staff in general. This includes not only explaining the rationale behind the new policy so that it is understood and accepted, but also raising staff awareness of discrimination, stereotypes and prejudice.

An example of this is given by the Belgian Ministry of Defence. In 2008, the Ministry adopted a diversity policy

18   See A. Kirchberger & T. Moloney, Cities Accommodating Diversity: Findings and Recommendations from the Peer-review Project Diversity and Equality in European Cities (Brussels: Eurocities and MPG, 2010), p. 24.

19   See the outputs of the seminar on Charters, Labels, Partnerships: Diversity Management in the EU - which way forward? held on 9 December 2010 in Brussels, available at http://ec.europa.eu/employment_social/fdad/cms/stopdiscrimination/diversity_in_the_eu/diversity_business/Diversity_Management.html?langid=en#availablebelow.

20   Trade Union Practices on Anti-discrimination and Diversity (Brussels: European Commission, 2010), p.23.

and committed to recruiting more women and persons with a migrant background.[21] In order to explain to its staff how important a diversity policy is for a public institution such as the armed forces, the Ministry developed several communications tools, including a specific section on its intranet, a newsletter, a monthly comic against stereotypes and a diversity award designed to reward innovative diversity projects by military units.[22]

3.2.2. Allocating resources

It goes without saying that the allocation of sufficient resources is instrumental in making diversity policies effective. Yet, at a time when organisations from all sectors are encountering financial difficulties, it is important to recognise that developing sophisticated mapping tools, tailored policies and adapted services are all expensive actions. Public service organisations in particular need to balance these costs while maintaining overall service quality.

However obvious it may be to put aside adequate funds, identifying policies that work because they are well-funded or practices which would have worked better if sufficiently resourced is not necessarily easy.

Nevertheless, there are examples of policies or services for which adequate funding has contributed to the achievement of success, for instance cultural services for migrants and ethnic minorities. Many cities throughout Europe fund cultural arts centres for youngsters with a migrant background, including the City of Düsseldorf, which helped to create the Zentrum für Aktion, Kommunikation und Kultur (ZAKK) in 2005. ZAKK now has an annual turnover of more than 2 million euros, of which 25 per cent is directly funded by the municipality. It is unquestionable that the high level of funding from the municipality has been influential in giving ZAKK a strong position in the city's cultural landscape. Since it has enough funds to organise cultural events with impressive line-ups, ZAKK has become a 'not-to-be-missed' cultural venue in Düsseldorf. As such, it has become a venue of choice not only for migrant youth, but also for young people who do not have a migrant background. ZAKK therefore acts as a mainstreaming agent, taking diversity out of the integration-migration nexus to which it is still confined.[23]

Adequate resourcing, however, is not only a matter of 'how much money is put into the pot'. It is also a question of how resources are used. Public institutions and administrations are renowned for their rigid approach to the way funds are used in the course of the financial year. It is to ease this

rigidity that the City of Malmö earmarks funds annually for city districts to implement joint projects and develop new forms of co-operation without having to wait for the new financial year to start.[24]

3.2.3. Consulting stakeholders

Once the commitment of an organisation's leaders and managers is secured, the process of involving stakeholders in defining policies or designing services can begin. This is an important step, for in increasingly diverse societies, organisations are able to rely less and less on a 'one size fits all' model in policymaking or service design. Since the growing number of foreign residents means a growing share of the population is excluded from classical political decision-making processes, this is also a participation opportunity that should not be missed.

While most EU Member States have yet to establish structural consultative bodies that give a forum for people with a migrant background to make their views heard, recent research suggests that national governments are much more likely to have a national structural body if such bodies also exist across the country, at regional and/or local levels.[25] An example of such a body is Norway's Contact Committee for Immigrants and Authorities (the KIM Platform). KIM members are nominated and proposed in a bottom-up approach by regional-level associations. Therefore, in addition to horizontal consultation at national level, KIM also vertically relays concerns and ideas from regional and local environments. Another interesting feature is that the KIM Platform's work is not limited to integration issues, and that Norwegian law requires all public authorities to respond to the Platform's recommendations and initiatives. In addition to widening the participation of immigrants on issues beyond integration policy, it also helps to mainstream diversity into the work of all public authorities.

However, not all migrant associations - particularly at local level - have the experience, skills and competencies to participate in consultation processes in a meaningful way. This leads organisations to develop training programmes and other types of capacity-building activity. In the German Land of Rhineland-Westphalia, both the City of Düsseldorf and civil society networks like der Paritätische offer services of this kind. For instance, der Paritätische provides advice and teaching materials to migrant associations on local policy structures, on using evidence for advocacy purposes and on working with the media.[26] The City of Düsseldorf, on the other hand, has chosen to help migrant associations to raise the quality of the services they provide to their

21 Note d'orientation politique 2008-2011 (Brussels: Ministry of Defence, 2008).

22 Diversité et RH: Bonnes Pratiques en Belgique et à l'Etranger (Brussels: Service Public Fédéral Personnel et Organisation, 2007), pp. 67-68.

23 ZAKK - Zentrum für Aktion, Kommunikation und Kultur, retrieved at http://ec.europa.eu/ewsi/en/practice/details.cfm?ID_ITEMS=3970. See also http://www.zakk.de/.

24 Z. Catsaras & A. Kirchberger, Benchmarking Integration Governance in Europe's Cities: Lessons from the INTI-Cities Project (Brussels: Eurocities and MPG, 2009), p. 23.

25 T. Huddleston, Consulting Immigrants to Improve National Policies (Brussels: European Economic and Social Committee, 2010).

26 Fachberatung MigrantInnenselbsthilfe, retrieved at http://www.paritaet-nrw.org/content/e5849/e17233/.

members. Workshops are organised for association staff on a variety of subjects, including project management and development, public relations, fundraising and working in partnership with other bodies.[27]

3.2.4. Setting targets and making them public

Target-setting may seem axiomatic for organisations, considering that it is the basis for measuring progress towards an objective. But, as previous research has highlighted, it is not that simple.[28] Firstly, this is because not all goals or aims are necessarily targets. In addition, target-setting is not always an appropriate tool for improving performance and can too easily reveal unrealistic ambitions or become an overly rigid framework. Finally, setting targets only makes sense if indicators are available which allow the level of progress towards a target to be measured. The first two examples below illustrate the complexity of the exercise.

In the original document outlining the diversity policy for its own personnel for the period 2007-2011, the City of Amsterdam set itself the target of increasing the proportion of non-Western immigrants in top management positions from 6.9 per cent in 2006 to 18 per cent in 2011. However, the municipality recently realised that, for a number of reasons including a hiring freeze in force since February 2010, the targets were overly ambitious. As the table below shows, the municipality had to revert to more realistic targets for the next period, i.e. 15 per cent.

Targets for non-Western immigrant staff in the City of Amsterdam						
2006 (%)	2008 (%)	2009 (%)	2010 (%)	Target for 2010-11	Target for 2011-2014	Share of non-Western immigrants in Amsterdam's working population (%)
6.9	9.4	9.4	12.8	18	15	14*

*From professional higher education level (HBO) upwards
Source: City of Amsterdam[29]

Seizing the opportunity provided by discussions on a new integration policy, the City of Copenhagen decided in 2007 to change its management approach by defining performance criteria and by setting targets for each measure of its new policy, including for itself as an organisation. To publicise the targets as well as to co-ordinate the reporting of efforts by other departments, the municipality developed a web-based

'Integration Barometer', accessible by everyone. In the period 2006-2010, this tool included 33 targets and corresponding indicators. Targets are set centrally, but it is for individual departments to translate targets into indicators and report on their progress. The tool was widely publicised in national and international conferences, and has since been adopted in other Danish municipalities such as Fredericia.[30] However, despite the pride of international recognition, the municipality considers the targets to be unnecessarily rigid (particularly the employment targets in times of economic crisis) and has therefore decided to use non-numerical targets for the period 2011-2014. Nevertheless, this does not undermine the tool's value as a mainstreaming instrument through which all municipal departments adopt a target-setting approach.

Public broadcasters have also begun to take into account the diversity of European societies. Although most operators formalise their engagement through charters or codes of conduct, some are starting to set targets for on-screen and/or off-screen activities. The British Broadcasting Corporation (BBC), for instance, is using the following targets to increase the diversity of its workforce by December 2012:

Targets for black and minority ethnic staff at the BBC			
Management level	Status as of 31 January 2008 (%)	Status as of 31 January 2009 (%)	Target for December 2012 (%)
overall	11	12	12.5
senior management	4.8	5.7	7

Source: British Broadcasting Corporation[31]

The Vlaamse Radio-en Televisieomroep (VRT), the Flemish public broadcaster in Belgium, has also set itself targets, but only for persons appearing on screen. This follows a 2009 survey which revealed that only 8.8 per cent of the people appearing on the first VRT TV channel, Eén, were members of ethnic minorities. This marked a sharp decrease from 2007, when the proportion stood at 14.3 per cent. Consequently, the VRT management decided to go beyond its existing charter-based diversity policy and set new target figures. The proportion of ethnic minority persons shown on screen is now expected to rise to 12 per cent for Eén and 20 per cent for Canvas, the second VRT TV channel. Both targets should, in principle, be achieved by the end of 2011.[32]

27 Training programme for migrant associations, retrieved at http://ec.europa.eu/ewsi/en/practice/details.cfm?ID_ITEMS=543.

28 See in particular M-A. Kate, Target-setting for Improving the Socio-economic Situation of Migrants and Ethnic Minorities in Europe (Brussels: European Network Against Racism, 2010).

29 Figures were obtained directly from the municipality.

30 Fredericia Kommune som arbejdsplads, retrieved at http://www.fredericiakommune.dk/Integrationsbarometer/menu/integrationsbarometer/fksomarbejdsplads/.

31 Equal opportunities and diversity at the BBC, retrieved at http://www.bbc.co.uk/aboutthebbc/policies/diversity.shtml#targets.

32 J-F. Munster, Notre Télé est trop peu Multiculturelle, in Le Soir of 8 December

The legal complexity surrounding the use of social clauses in procurement contracts in Europe means that diversity targets in this area are rare. For instance, Transport for London states in its Supplier Diversity Implementation Strategy that "suppliers cannot be told that a certain percentage of a workforce must reflect the diversity of London, as this would be discriminatory to other member states".[33] However, it is possible to circumvent this obstacle by focusing on diversity targets (numerical or non-numerical) in contract performance instead of contract award. For instance, in its contract for hospital catering services, the Northern Ireland Health Authority incorporated an obligation to undertake an annual patient satisfaction survey and to analyse the resulting data by age, gender and ethnic origin.[34] Another example comes from the Southeast (Zuidoost) district of the City of Amsterdam, where the company KWS was contracted for several large construction and maintenance projects. KWS's contract includes several social clauses to be respected when performing the work. Targets were set for each of these clauses, including customer satisfaction rates, the number of traineeships for Southeast youngsters and the number of jobs created for those with a disadvantaged position on the labour market.[35] Finally, a recently released document indicates that the French government is considering surveying suppliers on their diversity management and non-discrimination policies for public contracts over 1 million euros.[36] This follows a commitment made by the French State to use social clauses in at least 10 per cent of the public contracts for which 50 per cent or more of the budget is spent on staff-related costs.[37]

3.2.5. Communicating on diversity

The commitment of the leaders, managers and staff of organisations is a key factor in developing effective diversity policies. But securing commitment also has an external dimension. The 2008-9 economic crises exacerbated social tensions, resulting in populist parties gaining ground throughout Europe. In this context, tailored diversity policies and adapted services are sometimes considered as undue favouritism. An organisation that wishes to change the public services it delivers, or seeks to increase the diversity of its workforce, needs to accompany such moves with a robust communication strategy.

Adia is one of the leading temporary work agencies in France. As such, it has a pivotal role in convincing clients to adapt their recruitment policies to the diversity of French society, as well as in identifying candidates with the right skills, including those with a migrant background. In France, Adia was the first temporary work agency to adopt anti-discrimination

Adia communications campaign. The poster says: "Here is an employee without ethnic origin, without sexual orientation, without political opinion, and who will not get pregnant".

and diversity policies. In order to gain acceptance of these policies - particularly among persons who do not have a migrant background and who may perceive the policies as giving more favourable treatment to this group - Adia launched a series of nationwide communication campaigns based on radio and print adverts.

Another interesting example from France illustrates how a local authority can go beyond its own diversity duties and lobby for improvements to policies at national level. After setting up a consultation platform for foreign residents in 2009, the City of Strasbourg hosted the first congress of platforms of this kind in France. At this event, the municipality joined forces with nine other French cities and released a declaration calling for voting rights for foreign residents in local elections. The declaration was widely publicised and attracted a great deal of attention, both within France and internationally as the result of the Council of Europe's dissemination efforts.[38]

Securing leadership and commitment, matching ambitions with available resources and developing assertive communications strategies - with and towards internal and external stakeholders - creates the conditions needed to link an organisation's purpose and functioning with its diversity goals and targets.

2010, retrieved at http://archives.lesoir.be/televisions-un-panorama-des-bonnes-pratiques-pour_t-20101208-015NFC.html?query=vrt+diversit%E9&queryand=vrt+ET+diversit%E9&queryor=vrt+diversit%E9&firstHit=0&by=10&when=-1&sort=datedesc&pos=3&all=58&nav=1.

33 Supplier Diversity Implementation Strategy (London: Transport for London, 2006), p. 5.

34 Buying Social - A Guide to Taking Account of Social Considerations in Public Procurement (Brussels: European Commission, 2011), p. 48.

35 Monitoring of City District Supplier on Agreed Social Issues and Targets, retrieved at: http://ec.europa.eu/ewsi/en/practice/details.cfm?ID_ITEMS=11096.

36 Commande Publique et Accès à l'Emploi des Personnes qui en sont Eloignées: Guide Elaboré par l'Atelier de Réflexion sur les Aspects Sociaux dans la Commande Publique (Paris : Ministère de l'économie, de l'industrie et des finances, 2010), p. 49.

37 Notice d'information relative aux achats publics socio-responsables (Paris : Ministère de l'économie, de l'industrie et des finances, 2009), p. 5.

38 Declaration of the Conference on Integrating Foreign Residents into Local Public Life, Council of Europe's Congress of Local and Regional Authorities, 15 October 2010, retrieved at: https://wcd.coe.int/wcd/ViewDoc.jsp?Ref=20101015-FOREIGN-RESIDENTS-declaration&Language=lanEnglish&Ver=original&Site=Congress&BackColorInternet=e0cee1&BackColorIntranet=e0cee1&BackColorLogged=FFC679.

3.3. Implementing openness and inclusion

3.3.1. Service delivery

The implementation of diversity policies in service delivery is such a large topic that it merits a stand-alone publication. For the purpose of this paper, it was therefore decided to concentrate on one type of service to illustrate the two key points to bear in mind when implementing adapted services: business support and entrepreneurship.

When one looks at the landscape of entrepreneurs' networks and associations, it is noticeable that there are as many networks as there are diversity characteristics. There are networks and associations for women entrepreneurs, disabled entrepreneurs, LGBT entrepreneurs etc. There are also networks for ethnic or immigrant entrepreneurs.

Business support and entrepreneurship services are provided to migrant entrepreneurs by a wide array of organisations: local authorities, civil society organisations and support groups, but also local chambers of commerce, micro-credit institutions etc.

Although self-employment rates are higher among foreign-born than native-born individuals in many EU Member States, migrant entrepreneurs face additional obstacles such as:

- Lack of business development skills;
- Heavy administrative and bureaucratic burdens;
- Difficulty in obtaining finance from formal institutions such as banks;
- Lack of involvement in mainstream intermediary business associations and networks, resulting in a:
  - Deficit of information and self-confidence to respond to private and public calls for tender;
  - Lack of recognition by procurement managers in public and private organisations.

A basic study of a sample of good practices selected on the European Website on Integration highlights four key points which are instrumental in making these practices successful.

- Migrant entrepreneurs are entrepreneurs. It reads as a tautology, yet it is a determining element of success for business support services. Migrant entrepreneurs are, after all, entrepreneurs, and deserve to be treated as such. Indeed, readers should bear in mind that the co-founders of leading companies such as Google, Yahoo, Intel and Sun Microsystems were immigrants from, respectively, Russia, Hungary, India and Taiwan.[39] This

is the approach chosen by the Suikeroom Foundation, which benefits from structural accompaniment from the City of Amsterdam. The Foundation functions as an investment fund, with investors earning a profit while the entrepreneur remains the majority shareholder. Migrant entrepreneurs are thus considered from the outset as equal partners and potentially profit-making, and not as a charity target group.[40]

- Holistic approach to support services. The majority of practices are not confined to a single type of support measure, but rather provide a number of different services. For instance, Mingo Migrant Enterprises (Vienna, Austria) provides personal coaching for developing business plans, but also assists entrepreneurs with administrative requirements and organises networking events designed to enlarge entrepreneurs' supplier or customer bases.[41]

- Long-term support. Most practices provide support beyond the business plan. Some help immigrant entrepreneurs in finding alternative sources of financing such as micro-credit loans. Aléos in France, for instance, accompanies immigrant entrepreneurs three years after the business has been created - that is, in the period during which most start-ups fail.[42]

- Partnership-based. All practices identified are based on partnerships, usually between the state and the organisation in charge of support service implementation: municipalities and chambers of commerce, non-profit organisations and private service providers. In Belgium, the Limburg Chamber of Commerce partnered with the VOKA, Flanders' employers' association, and with regional media to mainstream immigrant entrepreneurs into the region's business landscape, using a role model approach.[43]

3.3.2. Employment

Objectifying recruitment
Whether a private company seeks to go beyond the legal requirements on non-discrimination, or a public organisation wishes to ensure that its workforce reflects the composition of the working population, a diverse employment policy should be applied throughout the recruitment process.

When recruitment needs have been assessed, the process begins with the advertisement of the vacancy. Both the wording of the job advertisement and the way it is advertised must comply with legislation on equal treatment; otherwise,

39   In Pictures: Famous Immigrant Entrepreneurs, retrieved at http://www.forbes.com/2007/05/21/outsourcing-entrepreneurs-immigrants-oped-cx_mc_0522entrepreneurs_slide.html .

40   A. Kirchberger & T. Moloney, op. cit., p. 18.

41   Mingo migrant enterprises (work package of project Mingo services for SMEs), retrieved at http://ec.europa.eu/ewsi/en/practice/details.cfm?ID_ITEMS=13495.

42   Cellule conseil aux créateurs d'entreprises, en particulier étrangers, retrieved at http://ec.europa.eu/ewsi/en/practice/details.cfm?ID_ITEMS=14130.

43   Mosaic in Word and Image, retrieved at http://ec.europa.eu/ewsi/en/practice/details.cfm?ID_ITEMS=15613.

this may lead to direct or indirect discrimination. The advert should also provide the job specifications and clearly define the skills and competencies that are sought. In particular, the latter should be realistic: it does not make much sense, for instance, to require a high level of proficiency in the national language for low-skill positions that do not involve contact with the public.

Organisations seeking to diversify their workforce should, however, look a step further to reach promising candidates with diverse backgrounds. At first, this can be done by disseminating the vacancy through non-traditional means of communication: community media, online social networks etc. At a more advanced level, this requires working in partnership with recruitment agencies, but also with community intermediaries and civil society organisations. An example of such a partnership can be found in the "Berlin braucht dich!" trainee recruitment campaign (which can be translated as 'Berlin needs you!'). The campaign was set up in 2006 with the aim of diversifying the Berlin Senate's workforce by promoting traineeship opportunities to migrant communities. The promotion and information activities also involve migrant associations and parents in order to increase the reach of the campaign.[44]

Current diversity management practices in Europe tend to make the selection step of the recruitment process more objective, either by seeking to anonymise candidates or by using simulation tests that focus on skills and competencies.

The use of anonymous CVs has been hotly debated in different Member States since the mid-2000s, with large-scale pilot schemes undertaken in countries including Sweden, France and the UK. In the 2006 law on equal opportunities, enacted as a response to the 2005 riots in the 'banlieues', the French government included an obligation to use anonymous CVs for recruitment in companies with more than 50 employees. However, the decree implementing this article of the law was never published.[45] In 2009, the government re-launched the anonymous CV scheme with a pilot involving 100 companies. A study by the public employment service on this pilot scheme has recently revealed that although anonymous CVs can be helpful in combating gender discrimination, it was actually creating more obstacles for people with a migrant background[46]. Similarly, the Swedish and British authorities concluded that the use of anonymous CVs was not effective enough to prevent discrimination.

To date, only Belgium legally requires the use of anonymous CVs and only for employment in public administrations.[47] The public office responsible for recruitment, Selor, acts as an intermediary between candidates and hiring administrations. Selor anonymises applicants' CVs (removing name, address, gender, age and origin) and candidates' written examinations, and attributes a unique identifier to each candidate. Although the system has not undergone evaluation, Selor itself states that, to be effective, such a procedure requires a time investment on the part of the hiring administration and necessitates the use of a third-party organisation which is entrusted with the task of anonymising applications.[48]

Instead of selecting candidates on the basis of traditional criteria such as qualifications and past experience, simulation tests involve giving candidates practical tests as close as possible to the real situations encountered in the job. Candidates are selected on the basis of their results, which measure their skills and competencies against those required for the job. The competencies tested, include, for instance, the ability to work under pressure, to deadlines or without guidance. France's public employment system, Pôle Emploi, uses this method for companies with more than a certain number of employees. In its concluding review of the European Year for Equal Opportunities, the Haute Autorité de Lutte contre les Discriminations et pour l'Egalité recognised this method as a good practice.[49]

Appraisal and promotion
The promotion of staff members with diverse backgrounds should be central in an organisation's employment policy. An organisation may be successful in hiring candidates with diverse backgrounds, but if it fails to remove the glass ceiling, its practice cannot be considered as conducive to the well-being of all.

As part of their diversity policies, then, organisations should develop programmes and instruments designed to increase the skills and competencies of employees with diverse backgrounds that have the potential to rise to more managerial positions. An example of such a programme is the Black and Minority Ethnic Development Centre set up by Leeds City Council in 2006-2008. Working with existing senior managers under a role model approach, 10 key management competencies were identified, which formed the basis of the Development Centres and of individual personal development plans. The initial evaluation of the impact of Development Centre participation on long-term career progression indicates that 27 per cent of the 29

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44   A. Kirchberger & T. Moloney, op. cit., p. 23.

45   Y. Sabeg, Programme d'Action et Recommandations pour la Diversité et l'Egalité des Chances. Report for the Presidency of the Republic (Paris: La Documentation Française, 2009), p. 62.

46   France: Anonymous CVs handicap people with a migration background, retrieved at http://ec.europa.eu/ewsi/en/news/newsdetail.cfm?ID_ITEMS=19767.

47   Le Curriculum Vitae Anonyme, working document n°LC203 of the French Senate (Paris: Sénat, 2009).

48   Diversité et RH: Bonnes Pratiques en Belgique et à l'Etranger, op. cit., p. 103.

49   Les Discriminations dans l'Emploi, le Logement et l'Education: Bilan de l'Année Européenne (Paris: Haute Autorité de Lutte contre les Discriminations et pour l'Egalité, 2007), p. 11.

employees who attended in 2006-7 were promoted within the authority or took up new opportunities elsewhere.[50]

Another interesting example comes from Randstad, the second largest human resources service provider in the world, with over 27,000 employees in 40 countries. Randstad France, which was awarded the Label Diversité in 2009, has developed an annual talent review. Instead of entrusting the evaluation of a staff person solely to his or her direct manager, the assessment is carried out jointly with human resources officers and managers from other departments. By widening the review and cross-analysing appraisals, the evaluation is considered to be more neutral and objective and helps counter the glass ceiling effect.[51]

Training in diversity management

Intercultural awareness training is a core component of current diversity management practices. However, as previous research has demonstrated, launching training schemes without notice or consultation may not be effective and can even be detrimental to an organisation's diversity policy. The elements that should be carefully considered include the following:

- Language and scope of 'intercultural skills' and 'intercultural competencies': What exactly do we mean by intercultural skills and competencies, and what exactly should be covered by the training? Definitions may differ according to organisations' working cultures, although core components can be identified which are common to a range of environments.

- Scale of training: Type and number of participants. Training should be rolled out to all staff, but also be balanced in terms of cost. This may lead to prioritising staff in human resources management, service design and service delivery, for instance.

- Assessment of training: How can an organisation know if the training is effective and efficient? For staff delivering public services, one way could be to cross-reference data from training participants' feedback with customer feedback on frontline services.

- Associating stakeholders: Are trainings designed and/or delivered with the help of not only experts but also migrant associations and civil society organisations? Typically, trainings that are designed or delivered without consulting those with specific knowledge and/or experience of the issue in question do not meet with great success. Also, contracting migrant associations or migrant-owned businesses would help to diversify an organisation's pool of suppliers.

The City of Helsinki provides a noteworthy example of an equality and non-discrimination training scheme. In the framework of the EU-funded Join-In project, the municipality has partnered with civil society organisations and migrant associations to develop training models that can be mainstreamed into the working practices of three key departments: social services, education and health centres. Participants are recruited from all three departments and are taught by trainers provided directly by the municipality's partners, making both the design and delivery of training inclusive.[52]

3.3.3. Procurement

Adapting procurement procedures
As procurement can be used in many different ways to further diversity and equality goals, the procedures that need to be adapted and the ways in which this can be done differ.[53]

- Using eligibility requirements. EU Procurement Directives allow for the exclusion of tenderers who, for instance, have not introduced equal opportunities policies as required by the national legislation of the Member State where the contracting authority is established. Using this approach minimises the risk of contracting companies with unfair employment practices, and also encourages all potential contractors to adopt anti-discrimination measures. It is the route chosen by six local authorities in the West Midlands (United Kingdom), which have developed a common benchmark to assess whether a company meets national requirements on racial equality.[54]

- Using tender specifications. Under this approach, diversity and equality requirements are directly integrated into tender specifications, making it a requirement for all tenderers to address these issues in their bids. Since tender specifications must be linked to the subject matter of the contract, this approach can be used, for instance, for services that involve a high level of contact with users. The Procurement Unit of Leeds City Council has worked with the Council's Equality Team to develop a Socially Responsible Procurement Toolkit and an Equality Assurance process. The Toolkit is used by the Council within the pre-procurement procedure to ensure that equality impacts are identified and mitigated at the tendering stage. It includes a matrix allowing procurement officers to identify the services with a high equality impact. These services are then subject to an internal Equality Assurance process, which is designed to insert diversity and equality requirements into the tender

50   A. Kirchberger & T. Moloney, op. cit., p. 20.
51   La Promotion de la Diversité dans les Entreprises: les Meilleures Expériences en France et à l'Etranger (Paris : Centre d Analyse Stratégique, 2010), p. 61.
52   Join In Project in Finland, retrieved at http://www.join-in.info/finland.php.
53   Equality at work: Tackling the challenge (Geneva: International Labour Organization, 2007), p. 66.
54   C. McCrudden, Buying Social Justice: Equality, Government Procurement and Legal Change (Oxford: Oxford University Press, 2007), p. 607.

specifications and require the use of monitoring tools (e.g. satisfaction surveys) to ensure that the services cater for the needs of all persons, irrespective of their cultural backgrounds.[55]

- Contract performance. Under this approach, diversity and equality clauses are obligations which must be accepted by the successful tenderer as they relate to the contract's implementation. In Spain, the City Council of Avilés issued a call for tender in 2009 for the maintenance of public parks in the city and recreation facilities in local public schools. The contract was awarded to a sheltered workshop supported by the Fundación Secretariado Gitano, a non-profit foundation which has developed a series of activities to promote the social inclusion of the Roma community throughout Spanish territory, including labour market insertion projects. Contract performance clauses included the obligation to hire socially excluded or at risk persons, in addition to providing adequate and continuous training to them, including on equal opportunities.[56] However, using this approach requires a robust monitoring tool to check that performance requirements are met.

- Contract award criteria. Diversity and equality may be used as contract award criteria, provided that they are linked to the subject matter of the contract and are expressly mentioned in all tender documents. For instance, in a French contract for the procurement of recruitment tests and services, the contract award criteria stated that tests and services should be designed and implemented in a way that ensures equal opportunities for all participants, irrespective of their cultural backgrounds. Tenderers who have obtained the Label Diversité could then be at an advantage when competing for a contract, as the Label certifies their experience in providing services to diverse customers. In effect, using diversity and equality as contract award criteria promotes competition between tenderers on equality issues.

Making opportunities accessible
Ensuring that under-represented businesses have an equal chance to bid for contracts is another way for an organisation to use procurement as an instrument of its diversity policy. This entails removing the obstacles that such businesses may face; however, purchasers are not permitted to give preference to specific categories of tenderers. Positive action is allowed - and should be encouraged - but positive discrimination is forbidden.

In order to level the playing field, then, various measures can be taken within the limits of the law, such as:

- Organising 27 'meet-the-buyer' events where tenderers are informed of the contracting authority's needs and priorities, but also of its procedures during the procurement cycle and its working culture.

- Developing support programmes to improve the capacity of under-represented businesses to participate in tenders. For local authorities, such programmes should be designed in close co-operation with business support and entrepreneurship units.

- Working jointly with intermediaries in order to increase outreach to under-represented businesses. An example of this is given by a corporate member of the Supplier Diversity Europe network. The company works with the Paris-based Agence pour la diversité entrepreneuriale (ADIVE), which develops relationships between purchasing organisations and under-represented businesses who have the potential to respond to call for tenders. The company has put a system in place by which, for all low-value procurements, at least one business from ADIVE's database is given the opportunity to respond to the call for tender.[57]

Improving recruitment outreach, objectifying selection procedures and unlocking the potential of employees who have what it takes to rise to managerial positions helps organisations to contribute to the socio-economic integration of all citizens and residents.

Ensuring that under-represented businesses have an equal chance to bid for contracts and mainstreaming the use of equality clauses in such contracts will further boost an organisation's good governance record.

Believing in the capabilities and potential of individuals, providing services holistically, offering support on the long-term and working with mainstream partners should guide the provision of adapted services.

3.4. Monitoring and evaluating openness and inclusion

3.4.1. Service delivery and employment
Monitoring is the other side of the target-setting coin - one cannot go without the other. Monitoring the implementation of diversity policies and adapted services enables organisations to understand if and where they are making progress towards agreed targets and identify areas in need of improvement. It should therefore help organisations to determine how far they have progressed in the process of diversifying their workforces, using procurement as a diversity instrument and adapting services to diverse service users.

55   A. Kirchberger & T. Moloney, op. cit., p. 25.
56   Information obtained directly from the Fundación Secretariado Gitano.
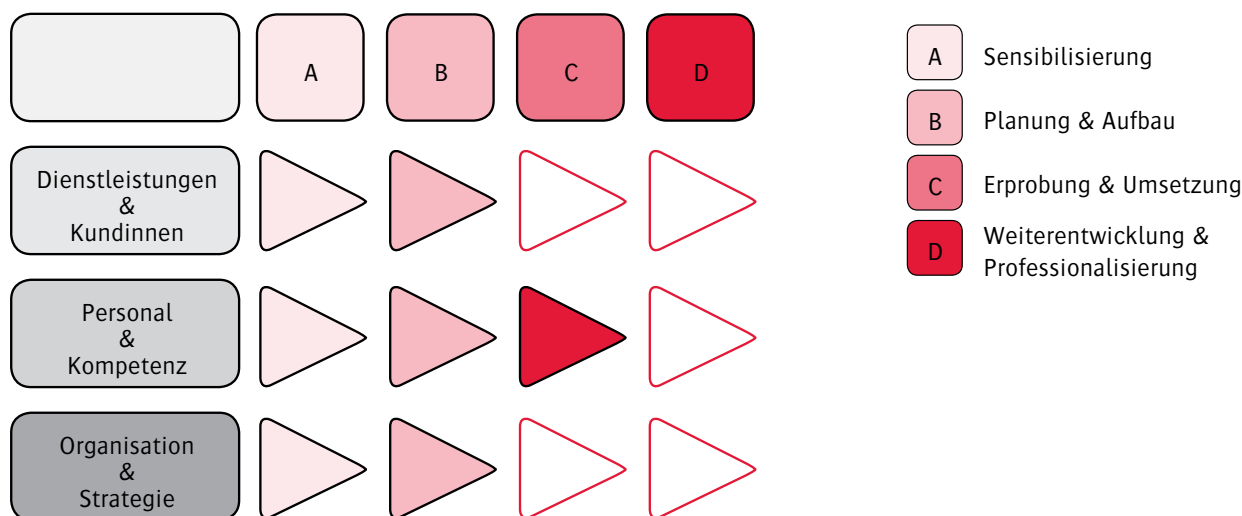57   L. Holford, O. Tregaskis, M. Ram and T. Jones, op. cit., p. 146.

A remarkable example of a monitoring system is provided by the City of Vienna. A Diversity Monitor has been developed which measures the municipality's progress across the whole range of services it provides: education, employment, housing, healthcare, cultural services etc. The Diversity Monitor provides a qualitative assessment, generated through interviews and surveys, and complements an integration monitor which quantitatively depicts the city's integration status quo.

The assessment is presented in the form of a diversity scorecard which measures the performance of each municipal department (a total of 30, including organisations run by the municipality) on three aspects of organisational development: services provided to customers, human resources and staff competencies, and departmental organisation and strategy.

For each aspect, departments receive a score, ranked from A to D, which indicates their level of progress. The 2009 Diversity Monitor indicates that about one fifth of municipal departments received the highest grade (D), which shows that they had made a high level of progress in implementing their diversity strategy. Most of Vienna's departments were in an intermediate phase (grades B-C), meaning that preliminary diversity measures and pilot projects were being implemented. Some departments were still in an initial phase (grade A), indicating that they had only just begun to develop diversity strategies that still had to be implemented.[58]

A scorecard example is given below, that of the Kindergarten Department.

Although the Diversity Monitor is only in its first year of implementation and is not comprehensive (it lacks an assessment of the municipality's procurement practices), its added value in monitoring the mainstreaming of diversity across municipal policies and its potential as a learning tool are significant.

3.4.2. Procurement

A monitoring instrument for procurement needs to be in line with the approach(es) used by an organisation in implementing its diverse procurement policy.

As we have seen, a contract performance approach to diversity in procurement supposes the existence of a robust monitoring tool to make sure that the necessary requirements are met by the contractor when implementing the contract. An example of this is provided by the L'Oréal cosmetics company, which uses a form of social auditing to ensure that its suppliers fulfil their contractual obligations related to diversity, in terms of non-discrimination, harassment, pay and work time. Since 2002, more than 350 such audits have been carried out.[59]

The process of becoming an open and inclusive organisation is complex and multi-faceted. It therefore requires a robust, comprehensive and transparent monitoring tool which enables organisations to learn from their experiences.

Diversitätsanzeiger MA 10

58 Gesamtfassung des ersten Wiener Diversitätsmonitors 2009 unter Heranziehung von Ergebnissen des Integrationsmonitors der Stadt Wien (Wien: Stadt Wien, 2010).

59 La Promotion de la Diversité dans les Entreprises: les Meilleures Expériences en France et à l'Etranger, op. cit., p. 73.

Annex: Note on sources and their use

A great number of sources have been used in the preparation of this paper. Readers may appreciate the selection reproduced in this annex for use in their own work.

Chapter 1

- Migration News Sheet: http://www.migrationnewssheet.eu/
- Locating Migration Policies in the European Commission: http://www.migpolgroup.com/projects_detail.php?id=21
- European Journal on Migration and Law: http://www.migpolgroup.com/projects_detail.php?id=12
- Website of the European Network of Legal Experts in the Non-discrimination Field: http://www.non-discrimination.net/
- Migrant Integration Policy Index: http://www.mipex.eu

Chapter 2

Statistics on demographic and economic developments
- Eurostat: http://epp.eurostat.ec.europa.eu/portal/page/portal/statistics/themes
- European Commission's SME Performance Review: http://ec.europa.eu/enterprise/policies/sme/facts-figures-analysis/performance-review/index_en.htm
- Organisation for Economic Cooperation and Development (OECD): http://stats.oecd.org/Index.aspx
- World Bank: http://data.worldbank.org/topic/social-development?display=graph

Wealth, redistribution and well-being
- F. Comim, M. Qizilbash and S. Alkire (eds), The Capability Approach: Concepts, Measures and Application (Cambridge: Cambridge University Press, 2008)
- A. Sen, The Idea of Justice (London: Allen Lane, 2009)
- M.C. Nussbaum, Creating Capabilities: The Human Development Approach (Cambridge, MA: Belknap Press of Harvard University Press, 2011)
- Report of the Commission on the Measurement of Economic Performance and Social Progress: http://www.stiglitz-sen-fitoussi.fr/documents/rapport_anglais.pdf
- Follow-up on the outcome of the Commission on the Measurement of Economic Performance and Social Progress: http://www.sachverstaendigenrat-wirtschaft.de/fileadmin/dateiablage/Expertisen/2010/ex10_en.pdf
- D. Méda, Qu'est-ce que la Richesse? (Paris : Flammarion, 2000)
- Well-being for All : Concepts and Tools for Social Cohesion (Strasbourg: Council of Europe, 2008): http://www.coe.int/t/dg3/socialpolicies/socialcohesiondev/source/Trends/Trends-20_en.pdf

- R. Wilkinson and K. Pickett, The Spirit Level: why more equal societies almost always do better (London: Penguin, 2009)
- Statistics, Knowledge and Policy 2007: Measuring and Fostering the Progress of Societies (Paris: Organisation for Economic Co-operation and Development, 2008): http://213.253.134.43/oecd/pdfs/browseit/3008081E.PDF
- Organisation for Economic Co-operation and Development, Better Life Index, 2011: http://www.oecdbetterlifeindex.org/

Anti-discrimination and equality
The Network of Independent Legal Experts in the non-discrimination field produces annual reports as well as thematic reports. The European Anti-discrimination Law Review provides updates on the further development and use of anti-discrimination law.

Chapter 3

The authors gratefully acknowledge the assistance of the municipalities of Copenhagen and Amsterdam, as well as that of the Fundación Secretariado Gitano, who provided information directly at the request of the authors.

The policy approaches and instruments identified in this work are directly referenced in Chapter 3.

The following sources provide collections of project outputs and selected good practices and will offer readers additional food for thought:

- European Website on Integration: http://www.integration.eu
- Project repositories of EU actions programmes:
  - European Social Fund: http://ec.europa.eu/employment_social/emplweb/esf_projects/search.cfm
  - EQUAL: https://webgate.ec.europa.eu/equal/jsp/index.jsp?lang=en
  - Education, training, culture and youth: http://ec.europa.eu/dgs/education_culture/eve/index_en.htm
    - ◾ Leonardo da Vinci: http://www.adam-europe.eu/adam/homepageView.htm?pageSeq=5
    - ◾ European Shared Treasure - Grundtvig and Comenius: http://www.europeansharedtreasure.eu
  - 7th Framework Programme: http://cordis.europa.eu/fp7/projects_en.html
- Websites of national equality bodies: http://www.equineteurope.org/361.html

INTEGRATION BEYOND MIGRATION
Kicking off the debate

At a time when EU institutions are developing a new strategy for integration in the EU, and especially as integration is explicitly mentioned as part of the EU's broader strategy for jobs and growth for the next 10 years, it is important to avoid discrimination between vulnerable communities. ENAR therefore advocates for a departure from the current EU and national approaches to integration and to embrace an approach to integration as a cross-cutting field that can be applied in specific policy areas: migration, social inclusion, citizenship, intercultural dialogue, education, and employment creation. Consequently, ENAR seeks to devise better paradigms, tools and measures to foster the development of integration paths most relevant to the specific needs of particular communities and their members.

As a first step, ENAR has commissioned the Migration Policy Group (MPG) to kick off this debate by providing some 'food for thought' on the problems with the EU's current approach to integration. MPG outlines potential new concepts that could remedy some of the current policy inconsistencies and bridge gaps between integration and social inclusion. This publication therefore provides a first reflection on a progressive approach to integration with the view to start a deeper conceptual rethinking of the issues. It proposes defining of integration policies in terms of the engagement of citizens and residents in the promotion of the well-being of all in a diverse society, and accordingly describes and analyses examples of promising approaches and effective instruments.

The European Network Against Racism (ENAR) consists of over 700 organisations working to combat racism in all EU member states and acts as the voice of the anti-racist movement in Europe. ENAR is determined to fight racism, racial discrimination, xenophobia and related intolerance, to promote equality of treatment between European Union citizens and third country nationals, and to link local/regional/national and EU initiatives.