Multi-level Governance of Integration Policy. Role of the Cities. Comparison of Warsaw and Prague

Abstract: This paper analyses the role of the cities in the multi-level governance of integration policy. The goal was to analyse the relations of diverse actors in a multi-level governance context and the direct impact of the transnational EU policy to local level actors (that also bypassed the national level). We show how the interconnection of policy levels and the presence of actors in many roles in the process of developing immigrant integration policies resulted in the top-down transfer of policy goals. We also highlight the converse perspective and demonstrate how bottom-up policy initiatives strengthen the position of cities as important players in the multilevel governance, both individually and collectively.

Key words: multi-level governance, integration policy, migration, cities, migrants, local level

Introduction

After the transformation, Czechia and Poland have had different migration histories. However, currently, they have been facing many similar processes in the area of migration and integration. Poland, for instance, has been generally depicted as a state of large emigration to the USA and Western Europe (Okólski, 2012), and the outflow of labour migrants has only increased when Poland joined the European Union (EU). Czechia had been already the destination for labour migrants in the early 1990s. And this process has resulted in the highest number of immigrants living in Czechia, amongst the Visegrad countries (Eurostat, 2019). The inflow of labour migrants to Poland over the last five years has increased significantly. According to Eurostat (Eurostat, 2018), Poland issued the largest number of the first residence permits to third-country nationals amongst all of the EU member states. In both countries, the main group of labour migrants came from Ukraine with people from Vietnam being the second largest group (Okólski, Wach, 2020).

In both countries, the development of migration and integration policies differed in terms of how the process had started. In Czechia, the process of setting up both policies started in the early 1999 and resulted in many governmental documents in this area (Zogata-Kusz, 2020). Contrary to Czechia, Poland has never finalized any complex,

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long-term immigration and integration policy. The regulations in the area of migration continues to be fragmented and related to selected elements of immigration and integration policy, such as access to the labour market (Łoziński, Szonter, 2016).

In terms of political discourse around migration during the so-called ‘refugee crisis’ of 2015, the subject of migration has been brought into the public debate in both countries (Kubicki et al., 2017). The migration has been used politically, related to and treated as a matter of, national security (Trbola, Rákoczyová, 2011). The political and media discourse has impacted the attitudes towards migrants in both counties.

The decision to study policy frames on the local (municipal) level stems from the fact that in Europe, immigration is predominantly a city phenomenon. Current migration literature focuses on the role and relevance of the cities in migration and integration governance (Caponio, Borkert, 2010; Penninx et al., 2004). Research findings show that cities set up their own political agendas as a means to answer the local concerns (Zapata-Barrero, Cantle, 2020). However, cities are embedded in the multi-level governance (MLG) of immigration and integration policies. According to Caponio (2020, pp. 182–183) ‘general understanding of MLG as a process of state authority dispersion across different levels of government and/or non-state actors’. In this context, the interactions between state and non-state actors in the horizontal and vertical locale are crucial for cooperation and negotiation of the frame of policy.

We would argue that focusing on the local level enables researchers to study organizational design of policy formulation and implementation. This process of policy design is made up of different types of actors: 1) city hall agencies, 2) state and regional agencies, non-governmental organizations, migrants associations – which, together, constitute the local organizational fields (Matusz-Protasiewicz, 2013). An organizational field is a meso-level social order (Fligstein, McAdam, 2012) where social actors, who relate to each other because of a common issue, are brought together (Hoffman, 1999) – in the case of this study, the issue bringing together social actors is the integration of immigrants. Organizations that participate in an organizational field create a common meaning system (Scott, 2014). Yet, fields are spaces of both cooperation and conflict (Fligstein, McAdam, 2012; Pawlak, 2018).

This paper is organized along the conceptual framework proposed by Penninx and Garcés-Mascareñas (2016). First, we shall discuss the concept of integration policy. Second, we shall explain the concept of MLG. Third, we shall analyze the content of policies, specifically looking at policy frames, policy aims, and policy target groups. Fourth, we shall discuss policy governance, focusing on strategy, organization of policymaking and implementation, actors, and multilevel context and influence. Lastly, we shall compare and contrast the cities’ approach to immigration, including immigrant integration governance – their policies as well as policymaking in this area.

Integration policy

In the majority of the EU member states, integration is a mostly accepted way of conceptualizing the process of developing the relations between a receiving society and migrants (Favell, 2010). It is also widely used to frame policy that aims to assist migrants
in their full inclusion in a receiving society. According to Penninx (2013), integration includes three main dimensions: legal-political, socio-economic and cultural-religious. The complexity of all these three dimensions means that the integration policy of migrants covers diverse sectoral policies such as education, housing, health care, etc. Thus, integration policy is a set of regulations and the system of their implementation, embedded in the political system, the historical context of immigration and the structure of migrants living in the receiving country. Integration policies are the key to counteracting the discrimination, marginalization and social exclusion of newcomers, as well as weak social cohesion, ethnic and cultural tensions and the irregular employment of immigrants (Lesińska, 2012).

In the case of Poland, the national authorities have a very limited policy response to the presence of immigrants because up to recently, it had been viewed as a future problem, along the lines of ‘let’s cross the bridge when we get there’. Even the rapid inflow of labour migrants in the last five years did not change the national authorities’ approach to integration – which has been seen, almost dismissively, as a rather temporary phenomenon. The proximity of the culture of the most numerous group, mainly Ukrainians, to that of Poland strengthened the belief that integration policy is irrelevant. There have been attempts to develop a strategic document framing the integration policy, but eventually, it had never been implemented. In this regard, Czechia has been much more successful. The developments of integration policy started in 1999, and in 2000 the *Foreigners Integration Concept* (FIC) was accepted. After the accession to the EU Czechia adopted the new version of this concept of integration.

The accession to the EU has shaped the legal changes in the immigration policies in both countries, and in case of Czechia caused the adaptation of a new version of the integration policy. However, more important for the development in the area of integration for both countries, especially on the local level, was the presence of the European funds (specifically, the launch of the *European Fund for Integration of Third Country Nationals* (EFI) in 2009, later the *Asylum, Migration and Integration Fund* (AMIF)). In Czechia and Poland, the European funds (ERU, EIF, recently AMIF) have been used to finance various *ad hoc* initiatives in the area of migrant integration, as well as policy-oriented research, which was the source of knowledge for the development of the local integration strategy (Prague). The main actors involved in the practical implementation of the integration programmes were NGOs whose role in the development and implementation of integration strategies/policies in both states has been significant (Pawlak, Matusz-Protasiwicz, 2015).

The EU institutions provided the member states not only with the EU funds in the area of integration but also with concept papers and recommendations, how to frame integration and work on integration policies (*The Common Basic Principles for Immigrant Integration Policy*, *Common Agenda for Integration of Third-Country Nationals*). Moreover, the European Commission has financed the city networks working on a diverse set of issues related to integration, in order to improve cooperation and exchange of good practices amongst European cities (Caponio, 2020). All these tools and resources impacted the diffusion and adaptation of some practices of the EU to the local entities and levels. It is not a mechanical process of policy transfer but rather a result of organizational actors working together in order to use the available financial resources as well as to apply new *symbolic resources* to legitimize their actions (Czarniawska, Joerges, 1996; Djelic, 2008).
Multi-level governance in integration policy

The MGL model originates in the field of political science and has started to be used by scholars representing other disciplines such as Sociology, Anthropology or even Geography. This theoretical concept is used to understand not only the policy-making process but also a variety of relations between the state and not-state actors across different levels. The focus of this model is on both formal and informal interactions and inter-relationships, which occur in different fora (Poles, Stern, 2000). We understand MLG as a dialogue and cooperation between transnational, national and local levels, with the top-down and bottom-up initiatives in policy formulation. According to Piattoni, there are three important criteria for MLG: 1) different levels of government are simultaneously involved; 2) non-governmental actors at different levels are also involved; 3) relationships defy existing hierarchies and take the form of non-hierarchical networks (Caponio, 2020, p. 184). It is important to stress that actors might act at different levels individually or collectively as, for example, networks of cities working on different issues related to migration and integration governance (Intercultural Cities, Arriving Cities etc.). In this paper we follow the Hooghe and Marks (2001) understanding of local level as an active actor of MLG in integration policy, acting both in horizontal and vertical networks, not only in policy implementation but also integration policy development.

Our decision to analyse the local level of integration governance is underpinned by research on the local turn in the Integration Studies (Penninx, 2004; Alexander, 2007; Caponio, 2010). In the migration research, there is an increasing interest in the role and relevance of cities to policy responses in integration. The analysis of the local integration strategies/policies in the new member states of the EU is still in the early stages. It is interesting to look at the developments in both of these cases because it is similar as they have significant inflow of economic migrants but they do differ from each other in terms of the degree of the national development policies. In other words, despite these differences it important to consider whether are any similarities at the level of the cities.

In the analysis of the empirical data, we have used local policy documents (city strategies, action plans etc.), minutes from the meeting of consultative bodies, recommendations and reports provided by different stakeholders (NGOs and migrants associations). Due to the very fragmented approach to integration, mainly in Polish case, besides the official documents directly addressing this area, we looked at the local strategies/policies aiming at social cohesion, education, housing etc. These written sources are supplemented by in-depth one-on-one interviews (semi-structured) with the key actors in both cities (municipal civil servants, NGO activists, leaders of migrant associations).

Analysis of the cases

In order to analyse the cases of Prague and Warsaw, we have used a mixed-method approach, namely, Penninx’s (2014) comparative policy approach as well as the theories of institutional diffusion and translation of practices (Djelic, 2008; Sahlin, Wedlin, 2008). As we aim to understand how the EU and national levels shape the development of integration policy on a local level in Warsaw and Prague, how this diffusion
happens, and whether, and/or how, it is transferred into local context practices. We use the former approach to clarify whether there is a common pattern emerging in the context. But in order to understand how organizational actors search for policy responses to their new problems we use the latter approach. The managing of policy responses to new problems has been noted to be effective in Western Europe (Pawlak, 2013). Firstly, we analyse the content of the policies (policy frames, policy aims, and policy target groups) that is what are the targeted groups and how many integration actions have been implemented on a local level. Secondly, we focus on policy governance, in particular on strategies, organization of policymaking and implementation, and policy actors. We argue that the local responses to the integration of migrants – within the structure of multilevel governance, in which the transnational level (the EU) addresses general frame for integration, the national level (in this case) – are characterized by weak, or absent, integration policy, and the city level tries to deal with the everyday needs and realities of integration.

Content of policies

Policy frames

In comparison to the approach taken by the Western European cities, in Prague and Warsaw positions immigration as an issue of relatively low importance for the cities (Tbola, Rákoczyová, 2011; Matusz-Protasiewicz, 2013). However, the existence of the immigrant communities in these cities and their ‘proper treatment – by this we mean adequate access to social services – is then conceptualized as the cities being modern in their approach to immigration.

In both cases, the development of strategic documents for integration and/or plans seems to be only a partial adjustment to the European standards. The evolution of the EU level integration policies is rather limited and is limited to these three main areas: a modest set of the European common basis principle, a research fund in the area of integration, the AIMF, and financing of city networks (Scholten, 2020). Both cities have been using the EU funds for implementation of integration activities, the institutionalization of integration centres (Integration Centre Prague, Multicultural Centre in Warsaw) or policy-oriented research. Prague had used the funds from the AMIF for the evaluation of local strategy in 2018.

When it comes to the development of the local integration strategy, Prague seems to be far more advanced. The first Prague integration policy was adopted for 2014–2017, and updated in 2017 – this was the result of cooperation between various actors (Drbohlav et. al., 2010; Tbola, Rákoczyová, 2011; Horáková, 2012). This integration policy had been designed to solve the problems of migrants living in the city.

The same cannot be said about Warsaw but it does not mean that the city of Warsaw is not implementing integration activities, it is rather that these processes are fragmented and not institutionalized (Duszczyk, Pszczółkowska, Wach, 2020). The integration activities are mainly organized by the NGO sector.
Similarly, to Poland, in Czechia, the NGOs involved in the integration field have started acting as service providers before the state has developed the policy and tools aimed at supporting the integration of migrants. The NGOs in both cities work together on a formal and more informal basis, e.g. acting as service providers, experts and partly actors of policy-making. For example, in Warsaw, the Social Dialogue Commission for Foreigners (SDCF) (in Polish: Komisja Dialogu Społecznego ds. Cudzoziemców) brings together a number of NGOs working with foreigners. The SDCF advises the City Hall, although it is not an advisory body but a networking platform that links together its member organizations. In Prague, there is the Administration Committee of the Council of Prague for the Area of National Minorities and Integration of Foreigners (ACCPANMIF) (in Czech: Komise Rady hl.m. Prahy pro oblast národnostních menšin a integrace cizinců na území hl.m. Prahy) which is quite similar in its organization to the Polish equivalent.

These kinds of platforms help both state and not-state actors in exchanging knowledge and good practices. Local NGOs from both cites were involved in the cooperation on the transnational level, through the European Integration Forum, and common actions projects were financed from the European Integration Fund. Because of these experiences, the cities have the chance to transfer knowledge from the EU to the local level.

Policy aims

The policy aims in the two cities are rather vague and lack of focus. As such, these aims are often said to promote cultural diversity rather than concentrate on the legal-political dimensions or socio-economic aspects of integration. In the field of diversity management and intercultural dialogue, the local level seems to be flexible in adopting its own strategies. The legal-political and socio-economic dimensions are developed as a part of legal regulations on a national level. However, on a local level, there is a relatively smaller opportunity for local policymakers to act independently from a national level.

The formulation of a national integration policy has been in a permanent state of development with no end in sight as such both states’ policies lack legally binding regulations and institutional arrangements. For example, the national government in Czechia has developed two strategic documents Principles of Policy for the Integration of Foreigners (in Czech: Zásady Koncepce Integrace Cizinců 1999) and the Policy for the Integration of Foreigners (in Czech: Koncepce Integrace Cizinců 2000, revised 2006 and 2011). Both documents are not legally binding and have been viewed as a set of recommendations and good practices from the more advanced and experienced European states. Similarly, in Poland, the strategic integration document Migration Policy of Poland (in Polish: Polityka Migracyjna Polski 2012) had been also used more as a guide rather than a legally binding document. These guidelines had not been transferred into policy, and therefore had not been implemented. The documents’ focus, as in Czechia, is based around the language learning, socio-economic orientation, self-sufficiency, relationships between migrants and the receiving society – which is quite similar to the goals set up by the EC. At the beginning of these strategic documents, there is an acknowl-

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2 This document was abandoned in 2016 and as such, in Poland there is no strategic document on migration policy.
edgement of the cooperation between national and local level actors. Even though there clearly was a declaration, its scope, however, had been limited and had not really been transformed into practice.

One of the most important achievements of the Czech strategic documents on a national level has been the setting up of an institutional platform in Prague. The idea required the Ministry of Interior to establish the so-called integration centres in each of the Czechias’ fourteen regions. Because the centres have been set up with the EIF funding, their aims are the same as that of the fund: legal counselling, language courses, social and cultural courses. It is important to add that the EIF was formed specifically for the third-country nationals (TCN) and not EU citizens which means that centres target only a part of documented migrants in Prague (Blahoutová, 2012). Similar Multicultural Centre (in Polish: Centrum Wielokulturowe) has been established in Warsaw. The centre is an example of cooperation between actors from various levels. It is an official institution of the City Hall, although the city’s budget supports only its basic functioning.

**Policy target groups**

In Prague and Warsaw, the integration policies target beneficiaries of international protection (mostly from the Caucasus) and the TCN the two major groups are: 1) Ukrainians – perceived as culturally close to Czech and Poles, as they speak a Slavic language, and 2) Vietnamese – (perceived to be culturally distant). The policymakers from both states have started to focus more on the engagement of school children in migration issues of their states. Additionally, the promotion of intercultural dialogue and raising awareness of the host societies have also gained more policy attention. The cities have the same policy target groups as the target groups of the European funds (EIF, ERF, and AMIF). In both cities, the integration policy and/or programmes adopted at the national level, apply only to migrants who are TCN who legally reside in these states.

According to Drbohlav and colleagues (2010, p. 83), in the Czechia, there has been a shift in the notion of integration from a group-oriented one-way approach, to more individual two-way civil integration, including migrants and receiving society, approach. This approach has also been woven into the Prague local integration strategy, where inclusive policy aimed at the integration of all inhabitants of the city has been emphasized (Praha – metropole všech, Prague – the city for all). The key focus of this approach is to address all inhabitants as the target group for integration activities in the city – as seen, and modelled on, in the strategies in Western European in cities such as Stuttgart or Amsterdam.

NGOs based in Prague have been targeting their activities to a diverse group of TCN. Apart from offering general counselling for all migrants, some of the NGOs target specific social groups in the migrant community and professional groups within the public sector (i.e. La Strada, META, Organizace Pro Pomoc Uprchlíkům, and Inbáze).

In 2018 Warsaw’s strategic document was announced (Warszawa 2030). Immigration is mentioned only once in the chapter on economic development. It is noted that Warsaw would like to attract leaders and talented people as their desired migration group. However, groups of migrants, such as beneficiaries of international protection, can be found in the more specific city documents – Warsaw strategy for solving social problems.
2009–2020 (in Polish: Warszawska strategia rozwiązywania problemów społecznych na lata 2009–2020), Programme of the development of education in Warsaw (in Polish: Program Rozwoju Edukacji w Warszawie). The city’s primary focus is to support the beneficiaries of international protection. Moreover, the category of school-pupils is highlighted – it merges the immigrant children with Polish re-emigrant pupils, and with the members of established ethnic minorities, such as Germans, Ukrainians and so on.

**Governance**

**Strategy**

In June 2014, Prague announced its official strategy: *Praha – Metropole Všech (Prague – city for all)* while Warsaw has launched a specialist team whose job is to co-ordinate foreigners, national and ethnic minorities and the *Social Dialogue Commission for Foreigners* (an advisory body made of NGOs). Warsaw has also initiated a strategic document, titled: *Warszawa Różnorodna (Diverse Warsaw)*. However, the development of this document had been eventually abandoned.

The document *Praha – Metropole Všech* highlights the role of cooperation between various stakeholders on a horizontal (NGOs, city administration and migrant organizations) as well as vertical level (regional support platform, national committees on integration). The document has an entire chapter dedicated to institutional responsibilities. However, the responsibilities are based on regional and local platforms of cooperation, rather than positions of people in charge of this issue or departments within the structure of local administration. The responsibility for minorities and foreigners has been added to the duties of the deputy director of the Municipal Office. The Integration Centre Prague (ICP) has been tasked to lead practical activities in the field of integration of diverse actors. The City of Prague was the founder of the Centre (a public service organization), however as it was financed by the European Fund for the Integration of the TCNs and the City of Prague’s budget, its operations were project-based and not a structure within the city’s institutional structure. For the governance of integration on the local level in Prague, it is important that in 2018 the City Hall and the Integration Centre Prague (as a platform of cooperating organizations and institutions) audited the integration activities because this suggests that another step towards the institutionalization of these actions – at least to some degree. The *City Integration Audit Report for Prague* was based on the participatory and multi-method research of the implementation of the integration activities in the city.

**Organization of policymaking and implementation**

Similarly, to the dispersion in strategy, there is a distinctly large dispersion of responsibilities in both cases because there are no institutional arrangements in the cities’ structure that are responsible for the whole process of integration. Although in Prague
a number of local politicians have started paying more attention to the integration issue, it still remains at the bottom of the local politicians’ agenda. Although this issue has been addressed in political campaigns (e.g. local elections), it has been largely left unattended, with no legal implications. The government of the Czechia prefers short-term migration to the settlement of migrants (Kušniráková, Čižinský, 2011: 506), as such the integration is considered less important. In Poland the same approach can be seen, in the government regulations, immigration is linked to the labour market. As immigration is viewed as, preferably, temporary and the seasonal migration from the neighbouring countries. Therefore, the policymakers do not see the point in developing any integration policies.

In Prague since 2006, integration governance has been coordinated through the Committee of the Council of Prague for the Area of National Minorities and Integration of Foreigners (in Czech: Komise Rady hl.m. Prahy Pro Oblast Národnostních Menšin a Integrace Cizinců na území hl.m. Prahy) and the Committee of the Council of Prague for the Awarding of Grants in the Area of National Minorities and Integration of Foreigners (in Czech: Komise Rady hl.m. Prahy pro udělování grantů v oblasti národnostních menšin a integrace cizinců na území hl.m. Prahy). Both committees do not meet on a regular basis and are reconstituted every municipal election. The first committee has been made up of 14 members that represent the following actors: political representation, municipal bureaucracy, governmental representatives, and non-governmental sector. It does not have a clearly defined programme and meets as and when necessary.

As of 2018, the content and extent of integration governance are still dependent on the results of municipal elections and change in Prague’s political leadership. This shows that the integration governance has not been established as a permanent institutional domain of Prague’s public policy agenda – if it were, it would be resistant to the changes brought on by the election cycles. The City Hall has one established bureaucratic position, Specialist for National Minorities (in Czech: Specialista pro Národnostní Menšiny) that has been written into the agenda of integration policies. The Specialist is in charge of the administration of grants awarded by the City Hall in the domain of cultural integration that focus on the activities of national minorities and migrant communities. Its key functions are to monitor as well as liaison with other stakeholders of integration governance, especially regarding the meetings of the two aforementioned committees.

In Warsaw, there is a significant gap between politics and policy in the matter of integration. In the City Hall of Warsaw, the issues of integration are not centrally located but scattered between different branches. The main beneficiary of state-level funds is Warsaw Family Assistance Centre (in Polish: Warszawskie Centrum Pomocy Rodzinie) – the city’s social welfare agency that is also responsible for integration programs for the recipients of international protection. The integration programmes for the beneficiaries of international protection are the most institutionalized national integration policies (Frelak, Klaus, Wiśniewski, 2007). The programmes are run by the local agencies but financed and coordinated by the state. As noted previously, in Poland the integration offer for the recipients of international protection is far more institutionalized on the national and local level than the integration of other groups of migrants.

In Warsaw, the financing from the city budget goes into the two policy areas: education and culture. A number of school initiatives are supported by the city but they are not the city’s initiatives per se. It is the responsibility of the local authorities to provide extra
Polish classes for foreign pupils. The city hall supports events and projects highlighting its cultural diversity. This is mostly done in the form of open bids for funding projects run by NGOs, not by the city’s institutions that deal with the arts and culture.

All other areas of integration policy implementation, such as educational and cultural projects have been, up until 2016 financed by the EIF, ERF, and AMIF. In order to estimate the proportions of funding from these three sources (national, local, and European) Pawlak and Matusz-Protasiewicz (2015) have analyzed the available data on the budgets of the non-governmental organizations active in the Warsaw.

Between 2011 and 2013 the European Funds had been the main source of financing NGOs. This means that NGOs were familiar with the framing of integration issues set up by the EC and they had to apply organizational and administrative practices as required by the EC to receive the grants. The European Funds were a key resource supplier, so organizations started to conform to the ‘European’ practices (DiMaggio, Powell, 1983). Yet, the political changes in Poland after national elections in 2015 meant that NGOs financial support from the EU sources has been blocked. As of 2017 Poland, before Estonia, is the second EU member-state with the smallest share of the AMIF funds going to NGOs (ECRE, 2018). This has resulted in NGOs shifting their focus from the EU towards cities for funding. At the same time, cities (ruled by mayors opposing the national government) have started to openly highlight their willingness to run integration policies. The Union of Polish Metropolises has declared its openness towards immigration (in opposition to the national government) and has established a team that is tasked with developing a place where the exchange of experiences and sharing good practices can take place.

Similarly, in Prague the European funds were used for the development of the local integration strategy, the institutionalization of the cooperation platform between NGOs and the City Hall, monitoring and audit of the implemented activities, as well as of diverse projects run by the NGOs. Our research clearly shows that the EU funds were crucial for the institutionalization of the local integration responses, and through the use of these, the cities authorities and the cooperating actors had been able to familiarize themselves with the EU-level integration policy concepts (integration frame, European common basic principles etc). In other words, this was a transfer of norms and standards through these sources.

**Actors**

It is important to stress that the local integration strategies are often formulated and implemented by a network of multiple stakeholders, such local public institutions, NGOs, migrant organizations, labour unions, employer organizations, state agencies, educational institutions, churches, sports clubs, neighbourhood associations etc. These multiple actors might take part in policymaking or only shape the integration process indirectly throughout their regular activities. This role of the involvement of multiple actors in the development and implementation of integration is crucial for the MLG model. In both cases, the non-state actors acted in many roles in the process of setting up their policy responses to integration. In both capital cities, the fields of NGOs interested
in assisting, and advocating for, immigrants, as well as immigrant associations, have become more prominent. These organizations try to influence local policies by means of engaging with various consultative bodies but also by approaching national authorities that shape a general policy framework.

In Prague and Warsaw’s City Halls, the units assigned to deal with the integration policies are positioned quite far from the core of their organizational structure. These units are supposed to coordinate the actions of various divisions but their actual influence is quite limited. In Prague, immigrant integration centre has been already working. In Warsaw a new actor has emerged, namely The Warsaw Multicultural Centre and is financially supported by the City Hall, and it is also run by a consortium of NGOs.

The Prague-based NGOs’ scope of operation includes also other Czech Republic’s regions. They act on both local and national (and also partly on international) levels to facilitate policymaking. The average turnout of clients for the seven largest NGOs is more than 13,000 per year. At the same time, the NGO sector functions as an expertise hub for public administration in providing advice on the legal rights of migrants in access to public goods. The NGOs, as members of many international projects and networks, have served as points for the direct transmission of good practices.

In the structure of the City Hall of Warsaw, there are three branches that could be called integration policy actors: 1) Warsaw Family Assistance Centre (responsible for running state-financed integration programmes for immigrants under the international protection); 2) the Bureau of Education (responsible for the running of all types of schools, setting up the Polish language tuition for immigrants, and providing multicultural assistants, and their native language classes); and 3) the Bureau of Culture (responsible for supporting city theatres, museums, libraries and cultural events and those that relate to ethnic diversity). Other branches of the City Hall are also responsible for a number of issues that impact immigrants, but these branches are considered less important. The Team for the Coordination of Actions for Foreigners, National and Ethnic Minorities (in Polish: Zespół ds. koordynacji działań na rzecz cudzoziemców, mniejszości narodowych i etnicznych) located at The Centre for Social Communication has been operating since 2013. The team has been established in order to bring together actions in the following areas: education, intercultural dialogue, support of the multicultural heritage of Warsaw, antidiscrimination and support for integration. The team is a body of civil servants from different branches of government set up to exchange information and coordinate their actions.

Several NGOs in Warsaw focus their actions on the specific needs of immigrants. The state and the city are largely absent in the field, the NGOs are rather proactive in obtaining the EU funding. There are 49 organizations that are either based in Warsaw and run the EIF-funded projects or are member-organizations of the Social Dialogue Committee for Foreigners (in Polish: Komitet Dialogu Społecznego ds. Cudzoziemców). We consider these NGOs as members of the integration field and the Social Dialogue Committee for Foreigners we considered as an internal governance unit of the field (Fligstein, McAdam, 2012).

The NGOs that deal with migration issues in Poland are strongly oriented towards the frame of integration policy as promoted by the European Commission (Pawlak, Matusz-Protasiewicz, 2015). We showed that funding from the EU is a consistent part of their
budgets. Furthermore, the dates when these organizations have been established suggest that the availability of European funds was a significant factor in their formation.

The availability of European funds has contributed to the emergence of NGOs has supported their existence. From 2015, the unavailability of these funds has resulted in the shrinking of the NGOs. However, NGOs can also apply for funding from the city’s budget and have started to work with different bodies from the City Hall in order to plug the funding hole.

*The Social Dialogue Committee for Foreigners* is one of the 33 such committees working with the City Hall of Warsaw. These committees are mostly consultative bodies but they also influence the city policies more directly by assigning its members to boards that evaluate applications for city financing. These committees are made of organizations, not people. The Social Dialogue Committee for Foreigners is one of the youngest in Warsaw. It was established in 2012 and consists of 31 member-organizations. The branch in the City Hall responsible for the contacts with the Committee is the Centre for Social Communication – the largest unit in the city administration responsible for its public relations, consultation of city policies and several other issues which “do not fit” into the profiles of other units in the City Hall.

*The Warsaw Multicultural Centre* is an initiative started by one of the NGOs active in Warsaw: *Fundacja Inna Przestrzeń* (The Other Space Foundation). It was initially active in a cultural domain: organizing ethnic festivals and promotion of cultural diversity in Warsaw. Since 2009 it has been lobbying for the establishment of the Warsaw Multicultural Centre. A coalition of nearly 20 organizations supporting the idea of the Centre was built, which acquired the support of the European Fund for Third Country Nationals Integration to run the pilot project at the Centre.

In 2014 a new organizational actor emerged as the organizations in the coalition of NGOs decided to establish together the *Foundation for the Multicultural Centre in Warsaw*. Also, in 2014, the City Hall granted a building for the Centre and money to support its maintenance for three years. The City only supports the physical space (the building) of the Centre but any other activities are to be financed from other sources. In 2017 the new consortium of NGOs won an open bid for the running of the Centre, because of this the Centre is more dependent on the City Hall than on the EU funds.

**Multilevel context and influence**

The two cases that we have analysed show why the multilevel organizational context of policy transfer and application are important. The local fields of immigrants’ integration are influenced by the EU agencies as well as by the international networks that are developed by NGOs. These multilevel links foster the flow of ideas and practices, and are used to legitimize the applied policies. The organizations tackling a relatively new issue deal with a lot of uncertainty, this is why these organizations turn to Western European models of integration in order to mimic their structures of operations.

The integration of immigrants as a new public policy is still in the early stage of development. The most advanced project, in terms of the institutionalization of this area, is the ICP. The ICP was established in 2012 as part of the implementation of the *Con-
ception for the Integration of Foreigners – local integration strategy. The costs of the ICP’s establishment and subsequent operation have been covered by annual subsidies provided by the EIF, as is the case for other integration centres across Czechia. The ICP is assigned a double function. First, it provides a coordination platform for all stakeholders in the Prague’s integration governance. It facilitates an exchange of information between stakeholders and synchronizes their activities. Second, having opened already six branches around Prague, it complements the provision of social/legal counselling, socio-cultural education and teaching of the Czech language that, thus far, have been organized exclusively by NGOs. The integration centre forms a basis for the potential establishment of a sound institutional framework. Indeed, the need for institutionally coherent and integration governance strategy has been expressed by the municipal politicians in the context of the ICP’s establishment.

Although the ICP initially had been perceived as a new and redundant competitor by the non-governmental sector, it has become a crucial policy platform in the coordination of Prague’s integration governance. Moreover, the ICP has been also assigned to coordinate the preparation of a strategic document that would define the long-term targets and direction of Prague’s integration governance, and would also respond to the Conceptions for the Integration of Foreigners. The strategic document Praha – Metropole Všech (Prague – Metropolis for All) was completed in June 2014, then it was updated in 2017 and then it was audited in order to verify whether and how it works.

The Regional Advisory Platform was established as a major policy forum for the coordination of integration governance. The platform involves 54 experts who represent Prague’s main NGOs that deal with migrants’ integration, Prague’s public administration, state public administration, and academia. The majority of its working history has been spent on the creation of Prague’s integration strategy. The platform is the first large-scale and long-term project which represents an institutionalized body where contacts, experiences, information, and policy practices can be shared and subsequently transformed into strategic documents. The platform has made the stakeholders aware of their counterparts and established a formal relationship between them. And as a result, the platform has created a knowledge hub that gathers issues and problems that are later addressed in Prague’s integration governance.

The Forum for Migrants has not met, unfortunately, its expectations because migrants limited organizational capabilities. Moreover, there have been repeated appeals to the platform’s members to provide contacts for those migrants who would be able to talk on behalf of their particular group. As such, the operation of the Forum for Migrants was problematic. Migrants have, on the whole, welcomed this suggestion as a step forward in their own involvement in public life. However, the invited representatives of particular migrant groups were visiting the forum randomly. In this sense, the migrant communities have not been able to actively participate in the policy-making process due to the low institutionalization of migrant organizations.

In Warsaw, the multilevel context for framing integration policy is clearly visible. Before 2015 the presence of the European funds made NGOs much stronger actors. Using European funding NGOs have started not only to provide services for immigrants but

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3 The problem of the migrant organizations weakness is a significant one and its causes are structural. It requires addressing but due to the space limit we do not discuss it in this paper.
also lobbying for changes in local and national policy. The part of the National Migration Policy, announced in 2012 (then revoked in 2016), regarding the integration policy was constructed by the Ministry of Interior along the framing of activities financed by the EIF and non-governmental organizations strongly supported this frame (Pawlak, 2013). NGOs joined the Social Dialogue Commission for Foreigners designed as a consultative body on the local level, in 2013. In 2014 the Social Dialogue Commission for Foreigners stated opinions on a draft of National Integration Policy and on a draft of an Act on Foreigners. Thus, the emergence of a two-way level interaction between national and local levels (Dekker et al., 2015) can be seen. Warsaw’s NGOs have been able to sustain lobbying for establishing a local institution of Multicultural Centre because they had the funding to do so, thanks to the EU funds. The centre is supported by the city with an intention that non-governmental operator will seek funding from different sources (including European). During the pilot project of the Centre NGOs’ activists and civil servants from the City Hall visited and established relations with similar centres in other European cities. For example, the one-stop-shop is a Portuguese best practice promoted by the European Commission among European cities. One of the aspirations of the Centre is to build the institutional good practice that in the future is going to be shared with, and implemented in, other Polish cities.

Discussion and conclusion

Over the past decade, many studies have started to analyze the integration policy on the local level because the effects of immigration are felt more directly on this level (Borkert, Caponio, 2010; Ambrosini, Boccagni, 2015). The majority of immigrants in the EU have settled in cities, which has put local governments under a pressure to become involved in the integration process (Bosswick, Will, 2002; Çağar, Schiller, 2009; Dekker et. al., 2015). Local authorities have been implementing national policies in a top-down way, and they operate in the MLG model. On the one hand, local authorities are embedded in a national policy system, on the other hand, they, very often, operate in transnational networks. By this we mean, that the local integration policies have been implemented in a complex multilevel system, including top-down and bottom-up relations, as well as networks of multidimensional actors working both, horizontally and vertically. This complex system has shaped the negotiations between local officials, NGOs, migrant associations, trade unions, churches, academics and so on.

The studies of local policies in Western Europe have contributed to the understanding of relations between national policies and local ones. The researchers focused on the factors shaping the relations between national and local levels, in states with developed national models of integrations, and established migrant communities. In our research, we looked at the institutionalization of local integration policies in states with underdeveloped national integration policies. Looking at actors in policy network and the policy diffusion, we focused, particularly on the relations between transnational (EU) and local levels. The lack of comprehensive national policy and the need for the management of the local integration process has been present not only in the horizontal relations of many public and private actors but also in the vertical relations. In these relations, the local
actors who have been searching for norms and organizational models have bypassed the national level, and have used the resources from the transnational level (EU). Our aim here was to fill the gap in the research about the local level integration policy, looking at two cities form CEE region operating in the MLG models, in which the transnational and local levels are stronger than national levels.

Prague represents a more advanced level of institutionalization of their local integration policies. But we can find similarities in the diffusion of the best practices from the EU level, in both cities. Furthermore, there is the convergence of the strong role of NGOs in the development of local integration activities and the use of the EU funds. But how far, and in what ways, both cities might adopt the integration policy through a policy learning process in the cooperation with the transnational level, as well as how this might contribute to the policy convergence and the emergence of the CEE local integration model, still remain to be seen.

In the case of Czechia, on the national level, the integration policies have been formulated. However, it is still not coherent, systematic and evidenced-based policy (Zogata-Kusz, 2020). There is a lack of a long-term vision of the migration process into both countries and the process is seen as a temporary and not requiring any integration measures. This is why both cities have unclear, fragmented, and rather ad hoc approach to legislation. In terms of integration, the documents adopted on the national level are very often not legally binding and function more as declarations or action plans.

Our research shows that the European funds designated for migrant integration (the EIF, EFU, AMIF) have become the key source of financing for NGOs. City Halls also have applied for the European funds. European NGOs’ networks, the EU platforms for the exchange of experiences, working together with partner cities (city networks as Intercultural Cities, CLIP) have jointly created conditions where the European Frame of Integration has been applied. In this case, the frame had not diffused mechanically but rather, it had been translated into the local context. Many actions of city halls and NGOs have been aimed at creating institutions that resemble the models from Western Europe – i.e. the centres for integration. Yet, these actions are not the sole responsibility of the City Halls as many of these actions had been outsourced to NGOs with an understanding that these organizations would seek, and find, financial resources elsewhere.

The centres that have been established in both cities also play a very important symbolic role. Their very existence has been used as evidence that the cities run integration policy. Yet, the actual enactment of integration policies is not particularly impressive. The centres are project-based which means that they are not included in the institutional system of the municipalities. On the one hand, the strong role of NGOs is used by the municipalities (as service providers, experts), on the other hand, there is no long-term system of financing them, which in practice means that NGOs’ projects are temporary. The limited funding from the national and local budgets is stemming from the lack of integration policy and the absence of political commitment to tackle this public domain systematically.

Ironically, in Warsaw the newly elected national government and its openly anti-immigration rhetoric have triggered the City Hall to become more active in the integration policy. The City Hall – controlled by the opposition party – in order to emphasize
the political differences between the opposition and the government, has engaged in pro-immigrant policymaking. As the national government anti-immigrant rhetoric is also anti-European the adaptation of European frame by the City Hall suits the political motives of the former.

The actions of both cities are limited by the national regulations as these give a relatively small number of policy tools for the local governments to utilize. Czechia and Poland are centralized states, thus on the national level, only the integration of the beneficiaries of international protection is recognized as a state’s obligation.

As both cities have started to experience an increase in their migrant population, this has created more of new bottom-up pressure to address immigrants. The issues of integration have started slowly to be part of public discourse on the city level. This rising presence can be seen mostly in the field of education because schools have to deal with the specific needs of immigrant students.

In both cities, the fields of integration are well interconnected. The City Halls facilitate interaction between NGOs by setting up bodies, such as the Social Dialogue Commission for Foreigners in Warsaw and the Platform of Cooperation in Prague. The transfer of social practices, in a well-connected field, is faster and the system of common meaning is more institutionalized. We argue that in both cities the NGOs are the most influential actors in the process of integration governance. They identify the needs of migrants in the cities and provide the local authorities with the expert knowledge on integration based on the experiences, as well from the exchange of good practices from working on a transnational level. The NGOs work is project-based and lacks long-term planning, which exacerbates the temporal status of many NGOs.

Both cities have aimed their activities specifically for TCN because this is the target group of the EU funds. However, financing integration activities only from the EU funds exclude the EU citizens from the majority of the existing projects, even if their everyday needs are similar to those of TCNs who live in either of the cities.

Looking at the future of local integration policies in Prague and Warsaw one question remains open, namely when, and how, will the local authorities develop a vision for integration and decide on a long-term system of financing it? The horizontal and vertical cooperation of local actors will be crucial for forming a sustainable integration policy because the inflow of migrants in both cities has been increasing systematically.

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Streszczenie

Artykuł dotyczy wielopoziomowego zarządzania polityką integracji migrantów w miastach. Celem artykułu jest analiza relacji różnych aktorów w kontekście wielopoziomowego zarządzania polityką integracyjną, w szczególności oddziaływania transnarodowej polityki UE na aktorów szczebla lokalnego (proces by-passing national level). Tekst zwraca uwagę na wzajemne powiązanie poziomów polityki i obecność aktorów w wielu rolach w procesie tworzenia polityk integracji imigrantów. Procesy te skutkowały odgórnym transferem celów polityki. Artykuł zwraca również uwagę perspektywę odwrotną i pokazuje, jak oddolne inicjatywy polityczne wzmacniają pozycję miast jako ważnych graczy w wielopoziomowym zarządzaniu, zarówno indywidualnie, jak i zbiorowo.

Słowa kluczowe: wielopoziomowe zarządzanie, polityka integracyjna, migracja, miasta, migranci, poziomo lokalny