

NON-GOVERNMENTAL ORGANIZATIONS ADVOCACY ROLE WITHIN INCLUSIVE MIGRATION POLICIES IN THE EUROPEAN UNION'S WESTERN COUNTRIES

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Abstract. *The increasing role of non-governmental organizations in advocating for inclusive migration policies in the European Union Western region countries such as Germany, Spain and Italy highlight the need for a deeper understanding of their influence, strategies, and challenges. This research examines the complexities of NGO advocacy, aiming to explore the strategies used by these organizations to amplify the voices of migrants in EU policymaking processes. Through a combination of literature review, semi-structured interviews, and policy analysis. The study identifies the challenges that non-governmental organizations face, such as legal restrictions or financial limitations, and explores how addressing these challenges can inform the development of more effective strategies to enhance NGO influence on migration policies.*

Keywords: *migration, non-governmental organizations, policy-making, advocacy, European Union*

Reikšminiai žodžiai: *migracija, nevyriausybinės organizacijos, politikos formavimas, advokacija, Europos Sąjunga*

Introduction

Migration is a vital issue in the European Union, and the involvement of non-governmental organizations (NGOs) has become increasingly significant. NGOs serve as mediator and negotiators between policymakers and migrant communities, working to ensure that inclusive migration policies reflect the needs and rights of all individuals. (European Commission, 2020). There have been a few migrations crisis in the European Union, particularly in western region countries, where it was witnessed that non-governmental organizations have emerged as key players in shaping migration discussions, advocating for policies that promote and emphasize integration. However, their advocacy and not only, efforts often meet with challenges, including limited financial resources, and restrictive legal environments (Bagavos, Kourachanis, 2022). These challenges were also mentioned by Spencer (2017) who also included lack accountability and expertise while receiving and managing funds. This article seeks to clarify the nature of the constraints and the role of non-governmental organizations via advocacy within the scope of complex migration policy landscape in the European Union. By identifying the challenges and strategies that are used, this paper aims to explore deeper understanding of how non-governmental organizations navigate this migration policy environment in the European Union. Furthermore, one of the aims is to explore the advocacy role of NGOs within European Union migration policies, focusing on the tools and mechanisms they employ to influence decision-making, which were mentioned by Dany (2019). In order to determine the underlying factors contributing to these challenges, it is essential to examine existing theoretical frameworks such as Advocacy Coalition Framework (Ansell, Torfing, 2022), Multi-Level Governance (Panizzon, van Riemsdijk, 2018) that elucidate the origins and dynamics of these obstacles.

The structure of the article proceeds as follows: firstly, the significance of non-governmental organizations in advocating for inclusive migration policies in the European Union is discussed, outlining the research problem and objectives. Furthermore, the theoretical approach and framework that is related to inclusive migration policies is presented. This section examines key theories such as the Advocacy Coalition Framework, Multi-Level Governance, and Institutionalism. Last parts of the paper, explain the methods of the article and inform research results, highlighting the findings from interviews, focusing on challenges faced by NGOs. Lastly, the conclusion summarizes the key insights from the research results and insights for future NGO advocacy efforts.

Theoretical Perspectives on NGO Advocacy in Migration Policies

Non-governmental organizations are often involved in migration processes, especially when it comes to inclusivity. One of these examples in the past decade was Germany, where organizations that directly or indirectly working with migrants assisted or were directly involved in inclusion processes, such as assisting with administration, translation, cultural integration (Hoehne, Scharrer, 2023). Hence there are different tools that NGOs use to enhancing efficiency in this process and its advocacy tools. Namely for this reason, Zhou (2022) stated that one of the first signs of an inclusive migration policy among the member countries, is whenever the hosting country is open to welcome migrants, and they are not deported back to their home countries or not allowed to enter the hosting country by turning them back at the border. The organizations that directly work with migrants, at the same time work with local governments and institutions, which also includes advocacy and promotion of development. These actions align with various programs and initiatives organized at both the national level and within the EU (Cuttitta et al., 2022). Generally, the common activities that are recognized in all the member countries are that non-governmental organizations are raising awareness, providing information trying to influence any policies while using advocacy or lobbying (Uifalean, 2015). The European Union entrusts and relies on the non-governmental organizations that do directly work with them or at state levels to handle migration management. However, this reliance allows the EU to use NGOs as instruments for influencing policy changes. On the other hand, participation and direct interactions with migrants set a certain level of expectations from the governments, which could create possible tensions about how other instruments are used in the whole integration process (Irrera, 2016). However, it is important to note that the levels of engagement vary among different countries and some of them expect to be involved as an instrument in the policy implementation, and other countries use NGOs for more advisory purposes (ECRE, 2019).

Moreover, NGOs influence inclusive migration policies through different actions and channels. Dellmuth and Tallberg (2017) analysed various strategies NGOs employ for advocacy. They elaborate that non-governmental organizations try to use different communication channels and often involve partnerships with other organizations or for instance businesses in private sector. In addition to actions and tools that are being used by non-governmental organizations, Hudson (2002), described and indicated examples of activities such as raising awareness or initiating discussions that non-governmental organizations use during the advocacy process. This helps to have a better understanding of the strategies and aims that NGOs have during policy-making processes. Junk (2015) further examined NGO behaviours, explaining why NGOs use advocacy to initiate or increase the possibility of policy change.

These actions can be interpreted together with advocacy coalition framework theory, that elaborates in the field of coalition politics and public policy. This theoretical framework is particularly relevant because it explains how groups of actors with shared policy beliefs such as non-governmental organizations and policymakers engage in long-term policy advocacy. The framework recognizes that policy subsystems operate over extended periods, aligning well with the slow and incremental nature of EU migration policymaking (Sabatier, 1998). Its empirical applications are extensive, demonstrating the Framework's utility in understanding the dynamics of advocacy coalitions and the influence of policy beliefs (Satoh, et.al.,

2021). Furthermore, it is crucial to emphasize that, the policy process is characterized by competition among coalitions of actors advocating for specific beliefs about policy problems and solutions (Chicowore, 2018). This competition occurs within various policy subsystems, where actors, deeply concerned about particular issues, strive to actively and consistently influence relevant public policies.

These coalitions are characterized by coordinated political activities, defining them as groups unified by common policy beliefs and collaborative efforts. The application of the advocacy coalition framework enables the research to better capture the most important aspects of coalition-building, resource mobilization and advocacy strategies, while also accounting for the external pressures that influence the policy-making process. Furthermore, multi-level governance theory that was introduced and explained by Gary Marks in the early 90s provides a framework on how non-governmental organizations could possibly operate within European Union's governance structure in relation to migration policies (Panizon, van Riemsdijk, 2018). The theory highlights by emphasizing the shared distribution of competencies among various actors, including different types of NGOs, civil society organizations, and professional bodies, in policymaking and implementation. Additionally, it is said that the multi-level governance theory notably represents the links between the EU institutions and non-governmental organizations. As (Zuern, 2020) stated and emphasized the great importance on the simultaneous concept of vertical and horizontal relationships within multi-level governance systems. The systems are characterized by the links between political institutions at the same level and by the links between different levels institutions such as non-governmental organizations. The main argument is that as the territorial scale increases, the community weakens, which limits the authority. However, as the territorial scale decreases, the community may become stronger, and the scope of authority expands. The Advocacy Coalition Framework and Multi-Level Governance theories were chosen in order to explain how non-governmental organizations influence migration policies in the European Union. Advocacy Coalition Framework highlights the role of NGOs in building long-term coalitions and shaping policies through sustained advocacy, while Multi-Level Governance theoretical framework demonstrates how NGOs operate across different levels of governance, from local to EU institutions. These approaches offer a clearer understanding of non-governmental organizations engagements they emphasize collaboration, policy influence, and strategic advocacy within complex governance structures

Conceptualization and operationalization of the role of NGOs in inclusive migration policies in the European Union

In the continuous process of migration policies and its governance, the conceptualization of migrants and migration has been changing within different aspects and involving different stakeholders and institutions in the European Union. Therefore, migration in different regions and countries have been more widely seen as a security problem; however, political refugees have been looked more into as individuals that require more protection and have to be more efficiently integrated and managed in the European Union (Irrera, 2016)

At the moment the core migration policy and its instruments in the EU member states include visa and entry document regulations, extradition documentation and agreements in the country and within other countries and relocation of migrants and refugees. These policies are formalized through various legal frameworks and programs implemented by the European Union, such as the Common European Asylum System (CEAS) and the Asylum, Migration and Integration Fund (AMIF) (European Commission, 2024). Within local laws and formalized by different programmes ran by the European Union. It is important to emphasize that target groups, place of discharge and levels of bureaucracy, complexities are shaping migration processes and highlight the needs of improvements (Czaika, 2023). In addition to these, for decades developed mechanisms and policies another essential policy named The Cohesion Policy is one of the core policies that are used in the EU since the start of the union. As of early year 2000, a substantial

part of the European Union 's budget has been processed and directed for Cohesion Policy. Usually, these policies support and promote for different types of training initiatives including practice, financial support for employment of migrants in public and private sector (Guia, et. al., 2022).

From an economical point of view, efficient integration in the European Union is a sign of a decreased gap between population that is native or has already fully integrated, in relation to equal job opportunities, job qualities, and similar salary wages.

According to Thiel et al. (2023), to monitor and evaluate these integration policies in every member state, there is the Migration Integration Policy Index (MIPEX) that evaluates the performance and results across different governments within various dimensions. Few of those include human and fundamental rights, equal opportunities, and strategies. In the Figure 1. the presented criteria include education availabilities, residency documentation and permits, and health. According to the data tool and analysis that was last done in 2023 the results showed that the integration policies tend to improve with a very slow pace (MIPEX,2020).

In the complex landscape of inclusive migration policies within the European Union, it can be said that these policies have undergone recognizable and important transformations. From the initial emphasis, there has been a shift toward focus on essential integration policies such as visa regulations, relocation initiatives and solving bureaucratic complexities. This changing and adapting environment shows the need for continuous adaptation and flexibility to challenging integration and inclusion policies in the European Union.

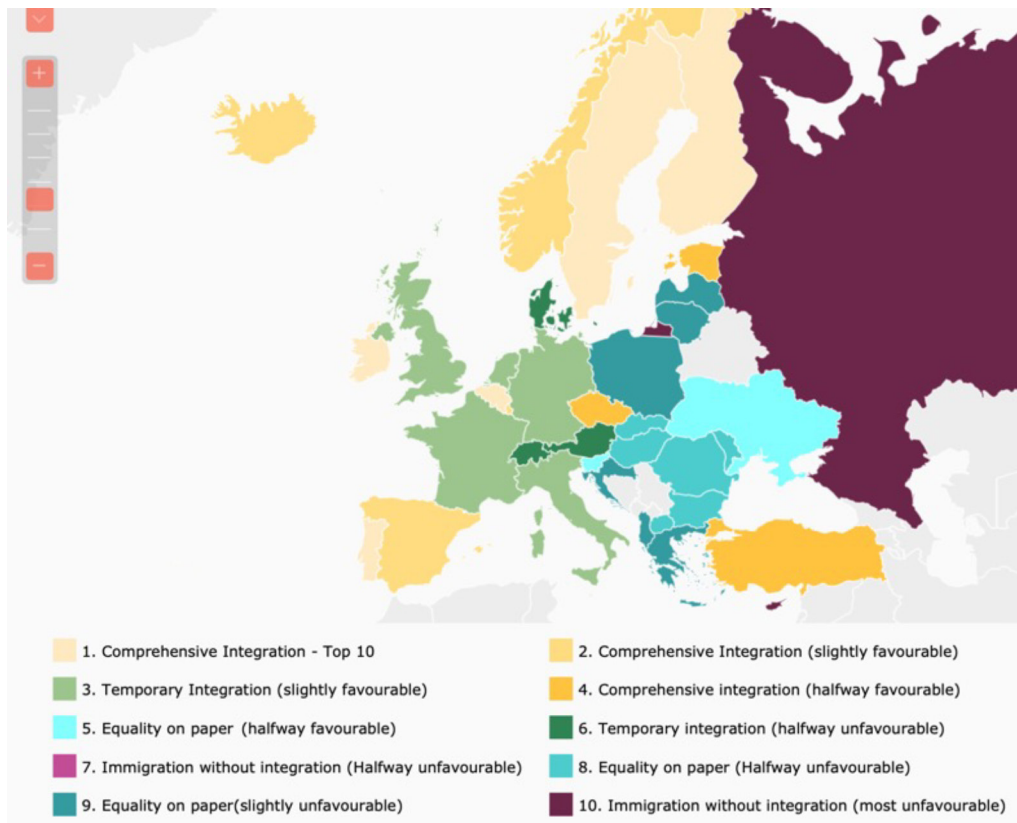


Figure 1. *The Migration Integration Policy Index 2020 ranking ranks (MIPEX,2020)*

In the wider context of policy change, the Advocacy Coalition Framework contributes by placing particular emphasis on policy-oriented learning. In this way, it offers a valuable perspective on the processes involved in the development of policy. The policy-oriented learning is that it involves relatively stable changes in thought processes or behavioral intentions, which originate from experiences and/or new information. These changes are focused on achieving or revising policy objectives. Furthermore, this framework suggests that such learning is carried out with the intention of better comprehending the environmental factors that could affect the advancement of policy goals (Sabatier, 1997, p.192). Moreover, it conceptualizes the policy process as occurring within specific policy systems, where diverse advocacy coalitions, united by shared belief systems, compete and collaborate to influence policy outcomes.

As Sotirov and Memmler (2011) stated, advocacy coalition framework approach examines the processes of policy making by its geographical and topical boundaries. This conceptualization views the policy subsystem as an arena of competing interactions among multiple advocacy coalitions. Each coalition comprises diverse actors, including governmental and non-governmental individuals and groups, representing varying institutional affiliations and levels of government. Despite these differences, these actors share a common belief system and engage in coordinated actions.

Based on the complexity and institutions involved in EU, where multiple actors with diverse interests and beliefs interact within multi-level governance structures, this approach can be the most compatible.

Methodology

In order to better understand the influence of non-governmental organizations, during the analysis, qualitative methodology was included. Qualitative research methods were chosen due to their ability to capture insights regarding complexities and interactions between non-governmental organizations and public institutions. According to Zapata – Barerro and Yalaz (2022, p. 420). Qualitative research has an important role in showing that terms related to migration that are not fixed but shaped by social and political factors. Even though these categories are created by society and governments, they have real effects on how countries function. Qualitative research is especially useful in understanding how labels are experienced in daily life by individuals, organizations, and institutions.

Secondary data analysis was selected in order to provide a comprehensive understanding of legal frameworks shaping migration governance in the European Union. This approach was chosen because it allows for a systematic examination of existing policies, institutional mechanisms, and regulatory frameworks that influence NGO advocacy efforts and migrant integration policies. Furthermore, by using secondary data, which helps to identify gaps in policy implementation and highlights the intersection between legal structures and NGO advocacy strategies. The analysis included EU policy documents, migration reports, and academic literature. The documents analyzed include key regulations such as the Schengen Borders Code (Regulation EU 2016/399), the Dublin Regulation (Regulation EU 604/2013), and the Reception Conditions Directive (Directive 2013/32/EU). Table 1 outlines the key EU documents analysed.

Data collection aimed to understand the operational dynamics and challenges faced by non-governmental organizations in the context of EU migration governance.

As there were various regulations that were presented during the years and due to multiple factors in the region and the development is continuous. EU migration and asylum policies includes several significant directives and regulations as presented in the Table 1 which are selected from 2013 and in relation to inclusive migration policies and its changes. Key regulations such as the Schengen Borders Code (Regulation EU 2016/399) and the Dublin Regulation (Regulation EU 604/2013) have shaped the EU's approach to managing migration. Recent updates, including the European Parliament and Council's 2024 regulations and directives, continue to refine these frameworks, addressing various aspects of asylum and migration management (Wagner et. al., 2024).

Table 1. Regulations and directives related to inclusive migration in the European Union

Schengen borders code 2016	Regulation EU 2016/399
Visa list 2018	Regulation EU 2018/1806
Immigration Liaison Officers Network Regulation	Regulation EU 2019/1240
Dublin Regulation 2013 (recast)	Regulation EU 604/2013
Asylum Procedures Directive (recast)	Directive 2013/32
The European Parliament and of the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013	Regulation (EU) 2024/1351
The European Parliament and of the Council of 14 May 2024 laying down standards for the reception of applicants for international protection	Directive (EU) 2024/1346

Semi-structured interviews were selected due to the flexibility and possibility in the discussions during the interviews enabling to deepen the insights on challenges and to identify the impact that might not be visible in the EU policy documents. It complemented the secondary data analysis by providing a broader policy context and insights on implementation of documents. This data collection and overview methodology allowed to have a better understanding of how migration policies translate into practice, particularly on how the formal policy frameworks and practical stakeholder experiences align.

Between April and June is 2024 interviews were done with 3 stakeholders, including NGO representatives, policymakers. Participants were selected for their expertise and regional representation across the EU, ensuring diverse insights. The interviews aimed to examine the practical barriers NGOs face, such as financial constraints, legal restrictions, and the impact of securitization policies. Data from these interviews was transcribed and analysed using thematic coding to identify key patterns and align findings with the theoretical frameworks of Multi-Level Governance and Advocacy Coalition Framework.

Participants were selected to ensure representation of experts in migration governance and non-governmental organizations.

In the transcript interviews, several significant themes and subtopics have been identified, illustrating the intricate challenges and operational dynamics encountered by government entities, non-governmental organizations, and community services in the context of policy shifts and crises. The primary categories that have emerged include *Government Policies and Actions*, *Non-Governmental Organizations*, *Financial Issues*, *Community Services*, and *Crisis and War Impact*. Within these categories, key subtopics such as the financial instability, the essential services provided by non-governmental organizations, and the fiscal pressures resulting from crises and wars are prominently discussed.

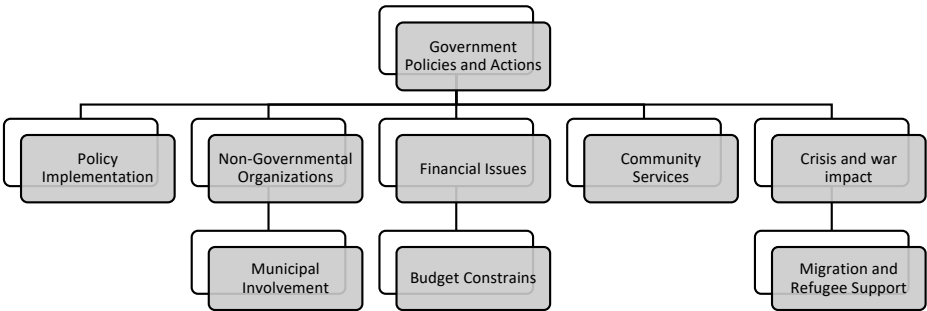


Figure 2. Themes and subtopics of the interviews

This coding framework is structured to systematically categorize the collected data and establish linkages to the theoretical frameworks of Multi-Level Governance and the Advocacy Coalition Framework. The conceptualization of Multi-Level Governance in this paper highlights the characteristics of vertical and horizontal governance interactions (Piattoni, 2009). Furthermore, the focus on how GOs interact across multiple governance levels—ranging from local municipalities to EU institutions—examining the extent to which decentralized decision-making enables or constrains their influence on migration policies. The horizontal governance perspective in Multi-Level Governance is also relevant, as non-governmental organizations collaborate with other civil society actors for example other organizations, private sector companies, associations to form networks that strengthen advocacy efforts and service provision. By viewing these dynamics, this paper explores whether Multi-Level Governance proposes inclusive governance by allowing non-state actors to participate in policy formulation and implementation or whether it leads to fragmented and inconsistent policy application across member states. Additionally, the Advocacy Coalition Framework allows to have insights on the role of non-governmental organizations as part of advocacy coalitions. In particular, on how their policy beliefs shape the engagement with policymakers. It investigates the formation of coalitions between non-governmental organizations and governmental actors and the extent to which external factors, such as migration crises or political transformations, drive policy change. Additionally, it examines how NGOs refine their strategies in response to institutional feedback, historical precedents, and evolving political dynamics, reinforcing their influence within the policymaking process.

By integrating MLG and ACF, this research provides a nuanced perspective on the mechanisms through which NGOs operate within complex governance structures and their ability to advocate for more inclusive migration policies. The combination of these theoretical perspectives allows for a comprehensive understanding of both institutional constraints and strategic opportunities available to non-governmental organizations in EU migration policymaking. The ongoing analysis of the interviews reveals several critical themes reflecting the intricate challenges and operational dynamics encountered by government entities, non-governmental organizations.

Results

There have been multiple migration crises in the European Union that affect more than 4 million refugees, for instance such as Syrian refugee crisis that was happening in 2015, following the Libyan crisis back in 2017 that had affect and consequences for most of European member states (UNHCR, 2015). In order to control the migration flow, one of the most significant milestones developments was the Tampere Programme, initiated in 1999. This programme laid the foundation for the EU's comprehensive approach to migration by focusing on these key elements: controlling migration flows, ensuring integration and cooperation with the countries of origin (European Council, 1999). Afterwards, suggestions and recommendations to improve the inclusivity in relation to migration policy making, the European Agenda on Migration (2015) proposed four pillars for structural reforms, including reducing incentives for irregular migration. This was succeeded by the New Pact on Migration and Asylum, which further delineated the EU's migration policy objectives. After this agenda, an updated one was presented, called New Strategic Agenda 2019-2024.¹ While reaffirming these commitments, remained notably short and vague, focusing on continued cooperation with origin and transit countries to combat illegal migration and human trafficking.

In addition to these regulatory measures, the EU has made significant financial investments in supporting non-government organizations. The financial reports that were presented by EU institutions about non-governmental organizations activities, showed that the EU is a major funder of NGOs working with migration reflecting its commitment to upholding democratic values and fundamental rights (OECD,

¹ Presented by the European Council in 1999 the document influenced the EU's migration and asylum policies https://www.europarl.europa.eu/summits/tam_en.htm

2020). As the fundings from European Union is one of the ways to get financial support, it is important to mention private fundings such donations or sometimes self-fundings. Therefore, getting different sources of funding is crucial to perform their roles in advocacy, community support, and humanitarian aid. Public support for these organizations translates into tax exemptions, access to deliberative fora, and formal participant status in European policy processes (Ackermann et. al.,2023).

Despite this support, financial instability remains a significant challenge for both governmental bodies and NGOs. Secure and diversified funding mechanisms are essential for ensuring stable operations and effective advocacy (Ackermann et. al.,2023).

The selected EU migration and asylum regulations and directives demonstrate the European Union's evolving approach to managing migration flows, border security, asylum procedures, and the integration of migrants. While some regulations, such as the Schengen Borders Code (2016) (Regulation EU 2016/399) and the Visa List (2018) (Regulation EU 2018/1806), focus on controlling entry and movement within the EU, others, including the Asylum Procedures Directive (2013) (Directive 2013/32) and the recent 2024 Asylum and Migration Management Regulation (Regulation EU 2024/1351), address asylum processing and international protection. Examining these regulations reveals patterns, missing elements, and how they complement each other in shaping EU migration governance.

One major trend across these documents is the balance between border security mechanisms and the rights of asylum seekers. The Schengen Borders Code (2016) provides a framework for border control measures to ensure security within the Schengen Area, enabling reinforcement of internal border checks under exceptional circumstances. Meanwhile, the Visa List Regulation (2018) categorizes third-country nationals who require or are exempt from visas for short stays, contributing to a tiered approach to migration governance based on country of origin. However, these regulations primarily emphasize border management and security, with less emphasis on humanitarian considerations or asylum protections.

Conversely, the Dublin Regulation (2013) (Regulation EU 604/2013) establishes responsibility-sharing rules for asylum applications but has been widely criticized for placing disproportionate burdens on frontline states (e.g., Italy, Spain, and Greece). This issue was partially addressed by the 2024 Regulation on Asylum and Migration Management, which repeals the Dublin Regulation and introduces a solidarity-based mechanism to redistribute asylum seekers across member states. This shift suggests a gradual move from security-driven policies toward a more burden-sharing model, though implementation challenges remain.

Another key pattern is the increased focus on external cooperation with third countries and inter-agency coordination within the EU. The Immigration Liaison Officers Network Regulation (2019) (Regulation EU 2019/1240) enhances cooperation among EU member states and non-EU countries through designated liaison officers, aiming to improve intelligence-sharing on migration flows, border crossings, and asylum trends. This regulation complements both the Schengen Borders Code and the Visa List Regulation, reinforcing border externalization as a critical EU migration strategy.

However, despite efforts to enhance cooperation, the Immigration Liaison Officers Network does not address concerns regarding human rights violations in third-country migration management agreements. The lack of oversight mechanisms raises concerns about how liaison officers engage with countries that have poor asylum systems or restrictive migration policies.

A significant development in EU migration governance is the enhancement of asylum reception standards through the 2024 Directive on Reception Conditions (Directive EU 2024/1346). This directive replaces the previous 2013 Reception Conditions Directive, setting higher standards for material reception conditions, including housing, healthcare, and employment access for asylum seekers. Compared to its predecessor, the 2024 directive provides more uniform standards across member states, addressing discrepancies in reception conditions.

However, while the 2024 Directive improves legal safeguards for asylum seekers, it does not fully resolve the issue of disparities in asylum processing efficiency and integration policies across EU states. The Asylum Procedures Directive (2013) (Directive 2013/32) remains the main legal framework governing asylum application procedures, but it has been criticized for its slow and inconsistent implementation across the EU. The 2024 asylum regulations attempt to streamline processes, but without strict enforcement mechanisms, differences between member states may persist.

While these policies collectively form a comprehensive framework for managing migration, gaps remain in human rights protections and migrant integration efforts. The Schengen Borders Code, Visa List Regulation, and Immigration Liaison Officers Network Regulation focus on controlling migration flows, but they do not adequately address the rights and protections of asylum seekers and vulnerable migrants. On the other hand, the Asylum Procedures Directive (2013) and the 2024 Reception Directive aim to standardize protections, but enforcement mechanisms remain weak.

Moreover, while the 2024 Asylum and Migration Management Regulation improves solidarity mechanisms, it does not fully resolve tensions between frontline states and Northern European countries regarding responsibility-sharing. The regulation removes the rigid structure of the Dublin Regulation, but actual implementation will determine its effectiveness.

The documents reveal inconsistencies between border security priorities and asylum protections. While the European Union has progressively strengthened cooperation mechanisms and reception standards, implementation gaps and legal inconsistencies between member states remain key challenges. The 2024 policy updates indicate a trend toward more centralized migration governance, though it is unclear how effectively these changes will address long-standing issues of burden-sharing and procedural delays.

The results of the interviews showed that non-governmental organizations face multiple structural and operational challenges in advocating for inclusive migration policies within the European Union. During the interviews several topics were recognized that are mentioned and presented in Table 1 with citations that indicate the relation to the categories. One of the focus areas during the interview, was on the redistribution of resources and the involvement of municipalities in providing local services. Government policies play a pivotal role in addressing migration and integration challenges.

Another category defined and its related subcategories that was motioned and recognized during the analysis were non-governmental organizations in migration policies and as a subcategory its roles and functions. As it appeared during the analysis, non-governmental organizations are responsible for a wide range of services, including advocacy, community support, and humanitarian aid. Individuals emphasized the role of NGO and what support services and influence they do have in terms of migration.

Furthermore, one of the representatives emphasized of financial challenges that non-governmental organizations face, affecting the ability of both governmental and NGOs to deliver services effectively. During the data analysis it appeared that there is a need for more secure and diversified funding mechanisms in order to have stable influence and continuous service. It was also mentioned that it does directly affect the opportunities to advocate for improved policies and propose more efficient services.

As it appeared services that are provided by non-governmental organizations are essential in supporting the integration and well-being of immigrants and refugees. Participants acknowledged the importance of these services in aiding integration but pointed out inconsistencies in service provision. Effective community services have a profound impact on the lives of beneficiaries, aiding in their integration and overall efficiency, including any influence of improvement of processes or advocacy.

The impact of crises and wars on migration patterns and the subsequent response required from governments and NGOs is a critical issue discussed in the interviews. Geopolitical instability exacerbates the challenges faced by both migrants and service providers. Migration and refugee support systems are heavily influenced by such events, with the fiscal strain caused by crises and wars affecting the availability of funding and resources.

Table 2. Government Policies and Actions

Category	Subcategory	Citations	Inter- viewee Code	Description of Interviewee	Date and Duration of Interview
Government Policies and Actions	Policy Imple- mentation	“Um, and we don’t necessarily have follow-through in terms of implementation. In different countries within the organization itself, we do it to help governments with implementation as part of our work. And then we look at monitoring and evaluating the impact of our recommendations to see how we can constantly improve the advice that we’re giving. Um, so that’s very important. But, um, you make a good point that sometimes a challenge we face is the fact that, um, it can occasionally be seen as performative.”	I-01	Female, policymaker, political science degree	2024-05-15, 45 minutes
Government Policies and Actions	Municipal Involvement	“Um, and we don’t necessarily have follow-through in terms of implementation. In different countries within the organization itself, we do it to help governments with implementation as part of our work. And then we look at monitoring and evaluating the impact of our recommendations to see how we can constantly improve the advice that we’re giving. Um, so that’s very important. But, um, you make a good point that sometimes a challenge we face is the fact that, um, it can occasionally be seen as performative.”	I-02	Female, policymaker, political science degree	2024-05-15, 45 minutes

The table with categories related to government policies and actions, presents the role of the challenges in policy implementation and the level of municipal involvement. Interviewees highlight issues in achieving follow-through on policy recommendations and the role of monitoring and evaluation in improving policy effectiveness. There is also mention of the perception of some government actions as performative, suggesting gaps between policy goals and actual outcomes.

Table 3. Non-Governmental Organizations in Migration Policies

Category	Subcategory	Citations	Interviewee Code	Description of Interviewee	Date and Duration of Interview
Financial Issues	Budget Constraints	“Of course, we also attend human rights meetings, but when it comes to the kind of advocacy that is more important, and what would be needed, it’s always finance.”	I-04	Female, head of department	2024-05-30, 55 minutes

The table 3 presents the financial issues that impact migration-related advocacy, particularly budget constraints. The interviewee highlights that financial limitations often restrict NGOs’ abilities to engage in advocacy efforts and address human rights issues. This suggests that while NGOs are dedicated to supporting migrant communities, financial challenges remain a significant barrier to achieving their goals.

Table 4. Crisis and War Impact

Category	Subcategory	Citations	Interviewee Code	Description of Interviewee	Date and Duration of Interview
Crisis and War Impact	Migration and Refugee Support	“ Perhaps some of them have engaged in some advocacy objectives anyway... to try to quell as much as possible that resistance against foreigners”	I-05	Female, head of department	2023-08-18, 55 minutes

This table addresses the impact of crises and war on migration and refugee support. The interviewee discusses efforts to reduce societal resistance to migrants and engage in public advocacy, especially in the context of conflict-driven migration. The emphasis is on the role of advocacy in easing tensions between migrants and host communities, highlighting the social challenges that accompany crisis-induced migration. The interviews provide a comprehensive view of the challenges and dynamics faced by government bodies. As it appeared during the interviews that changing policies in the European Union already have and will impact the influence and possibilities for non-governmental organizations to advocate in relation to migration policies.

During the analysis, patterns of certain topics and categories were indicated. Table 5 resents the common categories and how they relate with each other. The analysis shows that what the experts from the interview mentioned, does also represent in the reports or regulations.

Table 5. Common categories identified during the analysis

Category	Categories from Interviews	Categories from secondary data
Government Policies and Actions	<ul style="list-style-type: none">• Need for more municipal involvement• Challenges of centralized policy implementation	<ul style="list-style-type: none">• EU policy frameworks like CEAS and Dublin Regulation shaping migration management• Increasing focus on border management (Schengen Borders Code)
Non-Governmental Organizations	<ul style="list-style-type: none">• NGOs in service provision and advocacy• Collaboration between NGOs and private sector/international bodies	<ul style="list-style-type: none">• NGOs facing with restrictive EU policies• NGOs leveraging EU directives like the Asylum Procedures Directive to promote migrant rights
Financial Issues	<ul style="list-style-type: none">• Budget constraints affecting NGO service provision• Call for diversified and secure funding mechanisms from municipalities	<ul style="list-style-type: none">• Funding challenges exacerbated by EU migration crises and economic pressures• EU funding to? civil society? through budget allocations and programs
Crisis and War Impact	<ul style="list-style-type: none">• Increased migration flows due to geopolitical instability• NGOs under pressure to adapt services in response to crises	<ul style="list-style-type: none">• EU policies focusing on irregular migration and returns in response to crises• EU's external action policies shaping co-operation with non-European Countries that manages migration
Community Services	<ul style="list-style-type: none">• NGO services critical for migrant integration• Inconsistencies in service provision across different regions	<ul style="list-style-type: none">• Reception Conditions Directive (2024) setting standards for fair treatment• EU-level policies offering a basis for NGO advocacy on migrant integration

Discussion and Conclusions

The findings presented in the analysis of EU policy documents and stakeholder interviews with insights into the structural and operational challenges that non-governmental organizations face in advocating for inclusive migration policies within the European Union, particularly in the Western Europe. Given the limited number of interviews, the discussion first examines EU migration and asylum regulations to have a better understanding on how non-governmental organizations operate in advocacy context. These documents reveal a policy landscape that prioritizes border security and migration control over inclusive integration measures, which is then further elaborated upon through qualitative findings from stakeholders.

The EU policy documents analyzed—including the Schengen Borders Code (2016), the Dublin Regulation (2013), and the newly introduced 2024 Asylum and Migration Management Regulation—demonstrate policy changes in the EU migration policy making. While initially regulations primarily focused on border management and state security, more recent legislative efforts, such as the 2024 Reception Conditions Directive, seek to standardize integration efforts across member states.

Interviewees talked about the importance of municipal-level support in ensuring effective migration management and integration efforts. Furthermore, non-governmental organizations remain intermediaries between policymakers and migrant communities, yet their ability to effect policy change is challenged by legal frameworks, limited funding opportunities, and varying levels of governmental engagement. These challenges closely align with the structural constraints identified in EU policy documents, particularly in relation to the financial and administrative limitations imposed on non-governmental organizations advocating for migrants' rights.

Furthermore, the application of theoretical frameworks such as the Advocacy Coalition Framework and Multi-Level Governance theories illustrate the role of coalition-building and shared policy beliefs in influencing migration governance. Findings from interviews and policy analysis confirm that non-governmental organizations actively engage in advocacy efforts and coalition-building to represent migrant communities better, yet their influence varies depending on national political climates, legal environments, and financial constraints.

One of the key insights from the research is that while NGOs have successfully formed partnerships and contributed to migration policymaking, in European countries such as Germany or Spain there are still inconsistencies in governance and funding structures, which continue to challenge the organizations to keep the ability to drive systemic change. Future efforts should focus on enhancing non-governmental organizations capacity through diversified funding streams, and fostering stronger institutional partnerships.

Ultimately, the research highlights the persistent divide between legal frameworks and practical implementation in EU migration governance. Addressing these challenges requires a coordinated effort among the European Union institutions, national governments to ensure that NGO advocacy efforts are not only recognized but effectively integrated into policymaking processes. By strengthening NGO capacities and fostering more robust institutional collaboration, the EU can work toward a more sustainable and inclusive migration policy framework that benefits both migrant communities and host societies

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NEVYRIAUSYBINIŲ ORGANIZACIJŲ ADVOKACIJOS VAIDMUO ĮTRAUKIOS MIGRACIJOS POLITIKOS KONTEKSTE EUROPOS SĄJUNGOS VAKARŲ ŠALYSE

Anotacija. Šio straipsnio tikslas - remiantis literatūros šaltiniais išnagrinėti nevyriausybinių organizacijų vaidmenį, siekiant įgyvendinti įtraukią migracijos politiką Europos Sąjungoje. Tyrimo tikslas – atskleisti nevyriausybinių organizacijų taikomas strategijas, kurios padeda stiprinti migrantų, pabėgėlių ir prieglobsčio prašytojų balsą politikos formavimo procese. Nors yra svarbūs tarpininkai tarp migrantų ir politikos formuotojų, jų veikla dažnai susiduria su iššūkiais, tokiais kaip riboti teisiniai rėmai, nepakankamas finansavimas ir politinė opozicija. Tyrimo metu bus analizuojama mokslinė literatūra ir atliekami pusiau struktūruoti interviu su NVO atstovais bei politikos analitikais, siekiant identifikuoti šias kliūtis ir pasiūlyti veiksmingesnes advokacijos strategijas. Tyrimo rezultatai padės geriau suprasti NVO vaidmenį formuojant įtraukią migracijos politiką ES ir jų įtaką socialinei sanglaudai bei migrantų teisių apsaugai. Tai prisidės prie įtraukesnės visuomenės kūrimo bei politikos formuotojų ir praktikų veiksmingumo didinimo.

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