



European Social Catalyst Fund

Scaling up case management as an alternative to immigration detention in Europe



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Introduction

This two-year implementation plan aims to reduce immigration detention by scaling up community-based solutions and case management-based Alternatives To Detention (ATD) for people in or at risk of detention, with a specific focus on increasing implementing actors at local and national levels. This includes expanding geographically to reach more cities and countries, promoting strategic partnerships with different actors, and increasing the number of beneficiaries of case management. Crucially, implementation will also be combined with network building and strategic advocacy at national and regional level, in order to effectively influence those who have the power to make decisions and create an environment conducive to putting in place case management-based ATD for people in or at risk of detention. This will advance the European Alternatives to Detention Network (EATDN) towards being able to present case management as a convincing alternative to enforcement-based migration management both at national and regional levels, thus contributing to reducing and ultimately ending detention.

Implementation plan can be accessed on the website atdnetwork.org

Lead organisation

Platform for International Cooperation on Undocumented Migrants (PICUM), Belgium

Other organisations in the consortium

International Detention Coalition (IDC), Australia

Primary social challenges that the innovation seeks to address

Migration

Relevance of this Social Innovation

Across Europe, there is pressure to increase the use of immigration detention as part of a push to accelerate return rates and deter irregular migration. While EU law states that detention should only be used as a measure of last resort and in very specific circumstances defined by law, European governments rarely conduct an individual assessment before detention, to evaluate whether detention is necessary and proportionate and if the criteria for detention apply. When such criteria do apply, less coercive measures should be prioritised, however this rarely happens in practice; detention is frequently applied as a first option before ATD are considered, if they are considered at all. Moreover, where the term is used by governments in the region, ATD has generally been focused on 'traditional' or 'enforcement'-based approaches, which apply restrictions/conditions to control and keep track of migrants and asylum seekers. These allow governments to monitor individuals and apply sanctions for non-compliance, but fail to support people in working towards their case resolution (i.e. any temporary or permanent migration outcome) and usually involve some kind of restrictions on freedom of movement. As witnessed first-hand by the EATDN pilots, the conditions of enforcement-based ATD are often unrealistic and put overly harsh burdens

on people regarding reporting and bail conditions. In contrast, ATD based on case management are more humane and effective in supporting people to work towards finding a temporary or permanent migration outcome, which can include regularisation, moving to a third country, or voluntary return.

Immigration detention – including of children and vulnerable people – continues to be the default approach for many European countries. In **Belgium**, for instance, despite the government’s commitment to end child detention and promote alternatives, the immigration detention system continues to expand. In **Bulgaria**, meanwhile, even after a sharp reduction in the number of undocumented migrants apprehended, detention remains a key tool in the country’s response to migration. Its detention centres lack appropriate health care services and fail to provide adequate access to procedural guarantees, spurring criticism from civil society organisations and international watchdogs. During the COVID-19 pandemic, detention orders were automatically renewed without hearings. In early 2020, **Cyprus** announced stringent measures including the creation of new closed centres. During COVID-19, many migrants were moved from detention centres into allegedly open centres with substandard conditions, where migrants are in situations of *de facto* deprivation of liberty with no time limit, weak procedural safeguards, and a lack of access to legal aid. In **Greece**, the country’s immigration detention practices have been repeatedly condemned by regional and international bodies, including the lack of individualised assessment, the use of police stations for immigration detention purposes, and conditions across much of its detention estate that amount to inhuman and degrading treatment. **Italy** has seen several recent migration policy reforms aimed at reducing procedural safeguards and pathways for regularisation in the country while multiplying the number of detention centres. In **Poland**, despite the sharp drop in the numbers of asylum applications since 2017, anti-immigrant rhetoric dominates public discourse, migrants are viewed as security threats, and pushback is common along the border with Belarus. Poland rarely considers ATD, systematically detains families with children, and requires detainees to pay for their detention.

Furthermore, proposed [reforms](#) at the EU level would risk dramatically [increasing the use of detention](#) in the EU with a view to increasing and speeding up returns and deportations. The proposed Pact on Migration and Asylum would set up new forms of *de facto* detention, in particular at borders, in situations in which case management and community-based solutions would be very challenging to implement because of the extremely limited access to services and non-governmental organisations (NGOs)/civil society organisations (CSOs) as well as the severe restrictions on freedom of movement.

While the current ATD pilots are making progress, at this point they remain too small to exert sufficient pressure to make structural changes at the level of governments. They also remain too small to present themselves at an EU level as a convincing example of how case management-based approaches should be applied across the board and how these can represent an effective ATD for people in or at risk of detention. Moreover, while the evidence acquired through implementation of the EATDN pilots has been presented in a number of regional and international fora (including meetings of the European Parliament, the Council of Europe and the UN Network on Migration), policy makers have expressed a continued need for evidence demonstrating the effectiveness and scalability of case management-based ATD.

Yet the relevance of case management-based ATD remains high across Europe, and the achievements that the pilots have made in the context of challenging external conditions also

demonstrate that there is potential to make significant changes and social impact if the efforts of the pilots are expanded and amplified.

Across the different countries in which the pilots operate, authorities are increasingly reaching out to pilots for collaboration, and often releasing detainees into the pilots. Through this, the pilots have managed to demonstrate the effectiveness of case management by the number of case resolutions and people's level of engagement. The [evaluation report](#) of pilots in three countries shows that 97% of individuals remained engaged with immigration procedures through case management in the community. In some countries there has also been increased dialogue between government and civil society. There is political momentum in some countries and also examples of increased engagement with civil society. In **Belgium**, the Cabinet is reaching out to civil society and also to local municipalities and potential partnerships between national immigration authorities and ATD pilot implementers are being negotiated, including with the newly created ATD Department. Pilot implementers in **Cyprus** and **Poland** continue to have good access to key authorities including some collaborative work, while in **Italy** members of the EATDN are engaged in conversations with key local authorities, the Ministry of Interior and some political leaders. Network members have also highlighted the considerable added value brought by the EATDN when advocating for community-based solutions, both nationally and regionally. Their view is that advocacy and engagement with the authorities is strengthened by presenting their pilot as part of a wider European 'movement'.

Pilots, for instance in the case of **Cyprus**, have also managed to engage authorities to a level where they can facilitate the release of detainees into case management-based ATD, thus to some extent addressing the lack of knowledge and capacity at a government level to implement and coordinate ATD. Progress on engagement with authorities has also been made in **Belgium**, **Poland** and **Italy**. Of the major structural gaps, the lack of coordination between government departments as well as the lack of access to services for migrants are prominent and call for a holistic approach towards case management and community-based solutions, including by increasing the implementation of case management-based ATD when the grounds for detention apply.

The extent to which this innovation has already been implemented in countries in Europe

This scaling plan aims to build upon the existing work of the European Alternatives to Detention Network (EATDN). The EATDN is a group of NGOs that aims to end immigration detention in Europe. Established in 2017, it brings together civil society organisations implementing community-based solutions and case management-based ATD in seven European countries – Belgium, Bulgaria, Cyprus, Greece, Italy, Poland and the UK – in partnership with regional-level and international organisations. The network aims to create a shift at a systemic level from enforcement-based migration management systems that rely on detention, to promoting community-based solutions. Ultimately, the goal of the EATDN is to reduce and eventually end the use of immigration detention. The EATDN works towards this by building evidence and momentum on rights-based approaches which are based on the principles of case management in the community, in order to demonstrate how migration management without detention can be effective. Network members implement and test case management-based approaches aimed at supporting individuals in an irregular situation to work towards a durable solution while living in the community. They also provide non-

coercive, non-enforcement based ATD to support people who would or could otherwise be detained and promote the further expansion of this model over enforcement based ATD.

To date, pilots have been established in all seven of the countries where EATDN members are present. This is in addition to a longer term ATD project in the UK, which has been operating since 2014. The pilots are all carried out in line with the principles of IDC's [Community Assessment and Placement \(CAP\) model](#), which sets out a social work approach to migration governance based on case management that aims to ensure detention is only ever used as a last resort. All of the pilots employ case managers to work with individuals at risk of detention in order to ensure that their holistic needs are being met, and their immigration cases dealt with, in the community.

As part of working towards its goals, the EATDN sees a need to expand and amplify its pilots and take them to the next level. This 2-year implementation plan sets out how it will scale case management projects and community-based ATD for people who would otherwise be detained, with the aim being to demonstrate that migration management frameworks that do not include detention are feasible and effective.

Scope

Where the innovation is planned to be implemented

EATDN pilots are currently implemented in Belgium, Bulgaria, Poland, Cyprus, Greece and Italy, with a longer-term ATD project underway in the UK. In some of these countries, pilot implementers are engaging strategically with a number of cities and local authorities; in Italy, for instance, the pilot is being implemented in Rome and has been engaging in an ongoing dialogue with local authorities. Discussions are in progress with Milan around the possibility of establishing a case management- and community-based ATD pilot, subject to funding. There are also possibilities for other NGOs in Italy to implement pilots in Turin. In the context of this implementation plan, our ambition is to strategically partner with at least two additional cities to implement case management-based approaches, and to have established a pilot in at least one other country.

In terms of additional countries to expand to, given current developments in EU migration policy – which largely aim to ensure that migrants stay at the periphery of Europe, including through introducing de facto detention at borders – expansion to an additional European country is likely to target a first country of asylum/reception. Proposed countries for expansion include Spain and the countries on the Balkan migration route, and consultations have been carried out with actors in these locations in order to establish relationships and to begin exploring the possibility of setting up a pilot.

The aim to expand geographically to key strategic countries will be paired with an expansion to locations within countries where case management-based approaches are already established practice but may be confined to a certain city or region. For instance, in Italy the pilot is largely focused on Rome but (as noted above) discussions are ongoing with authorities in Milan and Turin around how case management-based approaches can be extended to these cities. The pilot in Belgium is also involved in discussions with the authorities in Antwerp and Ghent regarding a similar approach. Expanding in this way, in countries where the EATDN is already well established and has a good understanding of socio-political and legal dynamics, will mean that case management-based ATD can be

scaled up nationally to help strengthen the evidence base for this approach and extend intra-national networks. This expansion will specifically focus on establishing strategic partnerships with cities and relevant local authorities, following a scoping exercise to understand the opportunities for such partnerships.

Reasons the geographical areas were chosen for implementation

The geographical areas for implementation have been selected because of the favourable civil society environment and possibilities to work strategically with other stakeholders, including decision makers, and in order to cover diverse contexts to demonstrate the versatility of case management-based approaches.

The first three countries in which the pilots were introduced are Cyprus, Bulgaria and Poland. In all three countries, a key enabling element was the existence of organisations with sufficient capacity and resources to carry out pilots, combined with advocacy experience. Moreover, the choice of these three relatively diverse contexts allowed the EATDN to cover different situations in which case management could be applied, including in transit contexts (Bulgaria), countries of first arrival (Cyprus), and where the focus is on families (Poland). After this initial phase, the network was expanded to pilot implementers in Greece, Italy and Belgium. The decision to include Greece and Italy was motivated by the political weight of these countries in the EU decision-making process on migration policy, and because – as countries with high numbers of arrivals – demonstrating the success of case management in these contexts was thought to be very useful from an advocacy perspective. Belgium was selected because of its favourable political environment and the long-standing experience of local organisations providing case management-based services and carrying out advocacy against immigration detention, with a focus on children. Another key enabling element has been the availability of funding for these pilots.

In the context of our ambitions within the scaling plan, an important decision-making factor in the selection of countries and cities to expand to is the probability for success and impact. This will be determined carefully through building on existing efforts, examining legal frameworks that are favourable to case management, and scoping the relevance of the countries in question when it comes to this particular area of migration policy. The existence of a socio-political and legal environment conducive to reducing detention and establishing case management-based approaches to migration management, as well as the presence of organisational capacities for such an approach, are also key factors. Availability of funding or potential for funding is also an important element. Such considerations are important because of the current situation in Europe, where the institutional tendency is to resort to detention as a first option. As such, in order to ensure that the scaling of community-based solutions results in demonstrable successes when it comes to convincing governments of the benefits of a case management-based approach, it is important for us to strategically expand to geographical areas where our approach is likely to have the most impact.

Level of implementation of the innovation anticipated

Level 3: Inter-connected demonstration projects

Level of Adoption	Description
1	Consistent adoption by mainstream social services at national/federal level
2	Partial adoption by regional/municipal social services
3	Inter-connected demonstration projects
4	Pilots external to mainstream social services

Anticipated measurable outcomes

Within 2 years

The 2-year Implementation Plan aims to reduce detention by scaling up community-based solutions and case management-based ATD for people in or at risk of detention, with a specific focus on increasing implementing actors at local and national levels. This includes expanding geographically to reach more cities and countries, promoting strategic partnerships with different actors, and therefore increasing the number of beneficiaries of case management. This will advance the pilots towards being able to present case management as a convincing alternative to enforcement-based migration management both at national and regional levels, thus contributing to reducing and ultimately ending detention.

Specifically, the 4 objectives of the implementation plan are:

1. Strengthening of networks among organisations working on case management-based ATD at local, national, regional, and international levels;
2. Geographical expansion of case management-based pilots to more cities and countries and increase in strategic partnerships;
3. Expansion beyond vulnerable groups (widening profiles of beneficiaries i.e., beyond families and those of risk for detention to also include those already in detention and migrants who are not identified as having specific vulnerabilities);
4. Increase in the number of people benefiting from case management-based pilots, by 10 to 20 percent.

Table 4.1: Outcomes of the Implementation Plan

Objective 1: Network building Outcome 1: In 2 years, the EATDN will have expanded and strengthened its network of civil society, government actors and other potential actors e.g. local authorities, CSOs, UN organisations and the private sector.	
<p>Background: Network building is a core objective of the implementation plan for several reasons. Firstly, for the pilots to scale up sustainably, it is paramount that they strengthen relationships and collaboration with national authorities and government actors, including local authorities, so that community-based solutions become a solid approach that is embedded in migration governance systems under a whole of government approach. Secondly, the existence of an ATD network that spans a number of European countries has been a key factor in amplifying and strengthening the call for case management- and community-based ATD for people in or at risk of detention. Yet to move forward with this work, the EATDN will need to ensure that it is working with a wide range of allies; hence the need to form partnerships and build networks with other stakeholders, including CSOs, academia, other fields, sectors and professionals under a whole of society approach. This kind of network building also needs to incorporate systems and tools to facilitate it, such as a sustainable coordination/network infrastructure, regular meetings, a shared database among relevant stakeholders and harmonisation of data collection methods to facilitate effective MEL which will support evidence-based arguments when presenting case management as a solid approach. As such, network building in this implementation plan is an objective on its own but is also an enabling element that facilitates the achievement of all the other objectives. Below we flesh out how network building will be done as an objective. After this it becomes a cross-cutting enabling element towards other objectives.</p> <p><i>Responsible for implementation: PICUM, IDC, and the EATDN</i></p>	
Strategy	<ul style="list-style-type: none"> • Further develop the EATDN through bringing in more actors, interacting with others and increasing the EATDN’s capacity to operate sustainably. • Expanding strategic partnerships with cities/ municipalities working on ATD.
Implementation methods	<ul style="list-style-type: none"> • Coordinating collaboration and cross-country working amongst network members • Reaching out to and collaborating with relevant stakeholders and partners • Increase capacity and sustainability of the EATDN as an effective coordinating network • Working closely with leaders with lived experience and grassroots movements focusing on immigration detention. • Establishing joint projects and consortia of actors to work on holistic approaches to case management

Target audience	<ul style="list-style-type: none"> • Civil society including migrant-led organisations and CSOs working in other sectors (e.g. child rights., human rights, women's rights, racial justice, etc.) • Local authorities and municipalities • National authorities/relevant ministries • Local communities • People at risk of or already in detention, people with lived experience of detention • Local, regional, national and international organisations • Other sectors and professionals: legal practitioners, academia, healthcare professionals, media/journalists, influencers/celebrities, donors, faith based groups, commercial/private enterprises with Corporate Social Responsibility (CSR) component.
Enabling elements	<ul style="list-style-type: none"> • Innovation information and communication technologies for faster (online) communication • Harmonisation of data collection methods and MEL frameworks • Organisational capacity and funding • Network building • Working with leaders with lived experience • Detailed stakeholder mapping of all relevant actors at local, national and regional level • Creating a shared database across projects for case management
Main stakeholders	<ul style="list-style-type: none"> • EATDN • Other civil society organisations working on migration, child rights, service provision, etc. • Council of Europe • Allies in the European Parliament • City municipalities (including Athens, Antwerp, Ghent, Nicosia, Milan, Turin). • Ombuds persons and human rights bodies • City Initiative on Migrants with Irregular Status in Europe (C-MISE) • Human rights actors
Resources required	<ul style="list-style-type: none"> • Effective and innovative Information and Communication Technology (ICT) • Practical and facilitation support from partner institutions that already have good relationships with local authorities, e.g. Council of Europe/C-MISE • Human resources and sustainable funding for case management and technical support

Objective 2a: Extending scope of pilots

Outcome 2: In 2 years, the EATDN will have increased the number of countries engaging with the network on case management-based approaches, including community-based ATD, and will have established a pilot in one additional country.

Background: EATDN pilots are currently implemented in Belgium, Bulgaria, Poland, Cyprus, Greece and Italy, with a longer-term ATD project underway in the UK. In the next 2 years, we aim to expand EATDN engagement to several additional countries, and to have established a pilot in at least one other country – preferably of first reception. An important decision-making factor in the selection of countries to expand to is the probability for success and impact. This will be determined carefully through building on existing efforts, legal and policy frameworks that are favourable to case management, and relevance of the countries to migration. The existence of a socio-political and legal environment conducive to reducing detention and establishing case management-based approaches to migration management, as well as the presence of organisational capacities for such an approach, are also key factors. Such considerations are important because of the stage at which community-based ATD are in Europe, where the institutional tendency is to resort to detention as a first option. As such, in order to ensure that the scaling results in demonstrable success to convince governments of case management as a solid approach, it is important for us to strategically expand to geographical areas where case management is likely to succeed.

Responsible for implementation: IDC, EATDN, new pilots

Strategy

- Scope opportunities for implementing pilots in more countries, prioritising countries of first reception
- Exploring opportunities for resource mobilisation

Implementation methods

- Setting up new pilot in one country of first reception
- Exploring enabling environments and scoping possibilities to establish new pilots/partnerships
- Dialogue and outreach with new partners in different European countries
- Securing relevant funding for new pilots

Target audience

- CSOs relevant to work on case management, and those interested in engaging with the network
- Local communities and support groups
- Local, regional and national authorities in EATDN countries (and potential pilot countries)
- Vulnerable groups (see outcomes 4 and 5), including people in detention and at risk of detention
- Leaders with lived experience

Enabling elements	<ul style="list-style-type: none"> • Network building • Politically and socially targeted advocacy • Supporting campaigning • Clear MEL Framework and clear definition/standards on case management and ATD to ensure common objectives • Clear communication strategy to increase visibility of the EATDN and ensure sufficient visibility for evidence • Full country scopings
Main stakeholders	<ul style="list-style-type: none"> • EATDN and existing pilots • Training partners/strategic allies e.g. Council of Europe • Grassroots based organisations and people with lived experience of detention • ODIHR • Learning Networks and Training Partners, including CSOs and authorities implementing the Bed-Bath-Bread approach • Schools and universities • Local communes and municipalities
Resources required	<ul style="list-style-type: none"> • Training resources and practical training for new pilots • Funding for setting up new pilots • Human resources (including people with lived experience of detention)

Objective 2b: Extending scope of pilots

Outcome 3: In 2 years, EATDN pilots will be strategically partnering with two additional cities to implement case management-based approaches.

Background: In the countries where pilots are being implemented, EATDN members are engaging strategically with a number of cities and local authorities; in Italy, for instance, the pilot is being implemented in Rome and has been engaging in an ongoing dialogue with local authorities. Discussions are in progress with Milan around the possibility of establishing an ATD pilot, subject to funding. There are also possibilities in Turin (see above). The aim to expand geographically to key strategic countries will therefore be paired with an expansion to locations within countries where case management-based approaches are already established practice but may be confined to a certain city or region. Expanding in this way, in countries where the EATDN is already well established and has a good understanding of socio-political and legal dynamics, will mean that community-based solutions including case management-based ATD can be scaled up nationally to help strengthen the evidence base for this approach and extend intra-national networks. This expansion will specifically focus on establishing strategic partnerships with cities and relevant local authorities, following a scoping exercise to understand the opportunities for such partnerships.

Responsible for implementation: IDC, selected existing pilots, new pilots

Strategy	<ul style="list-style-type: none"> • Implement pilots in more cities of countries in which pilots are currently being implemented. • Develop and support a network of cities and municipalities working on ATD. ¹
Implementation methods	<ul style="list-style-type: none"> • Expanding existing pilots to or establishing new pilots in the mentioned cities through increasing the number of organisations implementing pilots • Establishing strategic partnerships with municipal authorities around service provision and resource mobilisation
Target audience	<ul style="list-style-type: none"> • CSOs relevant to work on case management, e.g. • Organisations working on case management to provide holistic services (Caritas, Jesuit Refugee Service, etc.) • Local communities and support groups • Local and municipal authorities • Leaders with lived experience
Enabling elements	<ul style="list-style-type: none"> • Network building • Politically targeted advocacy at local and regional level • Socially targeted advocacy • Supporting campaigning • Full context scoping to identify opportunities for expanding to additional cities
Main stakeholders	<ul style="list-style-type: none"> • Existing pilots • CSOs relevant to work on case management in relevant cities and new pilots working with cities • Migrant led CSOs in relevant cities • People with lived experience of detention • Non-traditional actors (private sector, youth organisations, etc.) • UNHCR local offices • C-MISE
Resources required	<ul style="list-style-type: none"> • Resources and training for new pilots • Funding for translators • Human resources (including people with lived experience of detention)

¹ The full scope of cities to be prioritised are still to be determined. Current cities being considered are: Antwerp, Ghent, Milan and Turin.

Objective 3: Expansion beyond vulnerable groups

Outcome 4: In 2 years, the EATDN pilots will have increased the number of beneficiaries beyond vulnerable groups. This will include people already in detention and migrants who are not identified as having specific vulnerabilities.

Responsible for implementation: existing and new pilots (with technical support from IDC)

Strategy	<ul style="list-style-type: none">• Expansion beyond vulnerable groups• Advocate for case management-based approaches as the default approach to all migration management, rather than detention.• For vulnerable groups, continue to insist that these groups should never be detained.
Implementation methods	<ul style="list-style-type: none">• Pilot activities going beyond families and children and include other groups• Incorporating migrants (and those who have been affected by detention) in relevant HR positions to conduct migrant-led case management• When scaling to other cities/countries, incorporate migrant led organisations when setting up new pilots• Partner with migrant-led organisations on advocacy and also with other relevant social movements
Target audience	<ul style="list-style-type: none">• All people in detention or at risk of detention.• CSOs relevant to work on case management, e.g.• Organisations working on case management to provide holistic services (Caritas, Jesuit Refugee Service, etc.)• Local communities and support groups• Local and municipal authorities• Leaders with lived experience
Enabling elements	<ul style="list-style-type: none">• Network building• Key partnerships with other social movements e.g. women's rights, refugee rights, maternity rights, criminal justice reform, racial justice, etc.• Working with leaders with lived experience• Socially targeted advocacy• Full country scoping to identify opportunities for expanding beyond vulnerable groups

Main stakeholders	<ul style="list-style-type: none"> • EATDN • Partner CSOs working on case management • Migrants and people with lived experience of detention or at risk of detention • Migrant-led organisations • Local, regional, national and international organisations working on case management • Migrants and people with lived experience of detention or at risk of detention
Resources required	<ul style="list-style-type: none"> • Additional human resources, including migrants and people with lived experience of detention • Training of main actors – including migrant led organisations and new EATDN members • Resources and funding for expansion
<p>Objective 4: Increase in beneficiaries in terms of engagement and case management</p> <p>Outcome 5: In 2 years, the EATDN pilots will have increased the total number of beneficiaries in terms of engagement and case management by between 10 and 20 percent</p>	
<p>Background: Outcomes 1-4 should lead to an increased total number of beneficiaries of case management This will contribute to evidence-based arguments to demonstrate that case management is an effective ATD. Currently, pilots work with between 40-60 people per year, which is approximately 400 people in total across all the projects. An increase of 10-20% will mean that this total number grows by 40-80 people over the next two years. This growth will contribute to evidence-based arguments to demonstrate that case management is an effective ATD.</p> <p><i>Responsible for implementation: existing and new pilots (with technical support from IDC)</i></p>	
Strategy	<ul style="list-style-type: none"> • Outcomes 1-4
Implementation methods	<ul style="list-style-type: none"> • Outcomes 1-4
Target audience	<ul style="list-style-type: none"> • Detained people released into pilots for case management
Enabling elements	<ul style="list-style-type: none"> • Creating a shared database across projects for case management and harmonisation of data collection methods to facilitate effective MEL • Network building

Main stakeholders	<ul style="list-style-type: none"> • EATDN, including new pilots • Partner CSOs working on case management • Local and municipal authorities • Healthcare workers • Legal professionals • Housing/homelessness professionals
Resources required	<ul style="list-style-type: none"> • Increased funding for HR (specifically case managers) • Transport, Accommodation, and subsistence costs for beneficiaries • Resources for interpreters

Beyond 2 years

The Implementation Plan itself focuses on scaling community-based solutions and case management-based ATD over a two-year period. However, this plan is in line with the European ATD Network’s longer-term [Theory of Change](#).

Within a longer timeframe, the objective of the EATDN is to reduce immigration detention and end it for vulnerable groups, by acting both at regional and national level. The network aims to achieve this goal by building evidence and momentum on case management and community-based solutions, including as an ATD. It links NGOs running pilot projects in Europe with regional and global advocacy organisations, and conducts and facilitates advocacy, peer learning and evidence generation among Network members.

Our work to promote community-based solutions, and in particular case management based-ATD for those at risk of detention, is part of a longer-term strategy to reduce and ultimately end immigration detention. We consider scaling of the work of the EATDN to be essential to achieving this goal.

Evidence

Level V: Evidence for this innovation derives from systematic reviews of descriptive and qualitative studies (see Appendix 2).

A number of studies demonstrate that case management-based ATD programmes based on the IDC’s CAP Model are a humane and effective way of ensuring that migrants and refugees remain engaged while having their status determined (Clark et al, 2018; IDC, 2015; Ohtani, 2018, 2020) Evaluating the impact of case management-based ATD pilots in Bulgaria, Cyprus and Greece run by EATDN members (Ohtani (2020). found that the majority of beneficiaries (86%) remained engaged with immigration procedures, with 25% achieving case resolution. Only 12% disengaged or absconded and 2% were forcibly removed.

Ohtani found that effective case management increased the ability of beneficiaries to contribute positively to the resolution of their cases. She observed that it was critical for beneficiaries to be treated with respect and dignity by their case managers. This was significant for trust-building and enabled beneficiaries to disclose more information about

their vulnerabilities which was crucial for helping case managers identify the support they needed. She also highlighted the importance of agency and providing people with the tools they need to take proactive steps for themselves, keeping them informed about the status of their case, and ensuring that they had access to competent legal assistance. Facilitating access to other services, such as accommodation, healthcare, and education, also contributed positively to beneficiaries' resilience. Ohtani observed that this approach was adaptable to different contexts and could be used in countries with very different migration trends and systems.

In Malaysia, an evaluation of a case management-based community placement ATD programme based on IDC's CAP Model, run by a Malaysian NGO for unaccompanied refugee children, found that it led to beneficiaries being and feeling safer, experiencing greater wellbeing, and having their status determined in a timelier way (Clark et al, 2018). As the evaluation observed, "Overall well-being related to material needs, physical health, mental and emotional wellbeing, education, housing, relationships and support systems and risk and safety improved for unaccompanied children in the program."

Nevertheless, it is neither easy nor straightforward to design and implement ATD programmes. In their review of ATD programmes in Europe (De Brucker et al, 2015) observed that building ATD programmes was complex and required sound knowledge of national reception and detention systems and the rationale behind authorities' use of detention. There is a danger that ATD programmes inadvertently expand the detention estate, particularly when they are based on coercion and enforcement rather than engagement. As De Brucker et al point out, ATD programmes should be non-custodial, respect human rights, and be subject to scrutiny to ensure that they do not become alternative forms of detention. They highlight the importance of ensuring that beneficiaries of ATD programmes are provided with case management support and given access to services by states, even when they live in communities.

Scaling Methods

To be able to scale the efforts of the EATDN, and to build on its achievements to date, advocacy, network building, strengthened partnerships and the expertise of leaders with lived experience are at the forefront of our approach.

The general rationale for using advocacy as a mechanism is that in order to end detention, it is key to create the political space to make it possible. However, there are differences in the political environments in which pilots operate and advocacy strategies must therefore be based on a deep understanding of key stakeholders and their local/national contexts and of the level at which advocacy can be undertaken most strategically. For environments in which migration regulations are particularly stringent, e.g., Greece, it is more strategic for pilots to focus on regional advocacy so that pressure comes from the EU and trickles down to the national government. In order to do this, pilots need to increase the number of beneficiaries significantly so that they can present case management as an effective and evidence-based mechanism of migration management, demonstrating that detention as a first resort is avoidable. The strategy for targeting the EU in order to increase pressure on national governments has worked in certain contexts, for example Cyprus. Hence the importance of coordinating local, national and regional efforts. Conversely, in other countries such as

Belgium or Italy, advocacy at the national level might be a more effective tool for the adoption and implementation of community-based ATD for people in or at risk of detention as a result of the current socio-political context and the existing opportunities. Further, because of the complex nature of the socio-political contexts, advocacy must address the political level, as well as the social level, simultaneously and strategically. It also needs to be dynamic and able to adapt to changing situations and different contexts.

Network building is an enabler because only through strategic and reliable partners can the EATDN successfully implement its plan. For instance, migrants do not have access to basic services such as healthcare, employment, food, housing, to mention a few, in most countries, as a result of punitive government policies. This is a major limitation for the success of pilots. While on the one hand pilots have to advocate for structural change, on the other they have to deal with the immediate basic needs of migrants which is a priority for them. Building a network with relevant professionals and sectors facilitates the latter. Building and maintaining partnerships with relevant local authorities, allied government institutions and key decision makers is an important element for upscaling the pilots when the enabling conditions for such partnerships are in place. Network building is also a cross cutting strategy towards the achievement of all the other objectives.

Last but not least, the EATDN's full understanding of the needs of migrants who are at risk of being detained or those who have previously been detained would be incomplete if people with lived experience of detention are only engaged with the work of EATDN members from the perspective of recipients of support or in a tokenistic manner. The EATDN's approach is therefore to expand migrant-led advocacy and migrant-led case management in order to amplify the voices of migrants, particularly those affected by immigration detention, to ensure that their perspectives are incorporated holistically and to make them visible to society in a way that demonstrates their leadership and agency.

Key partners

Key partners that will support the scaling of the innovation comprise:

- European ATD Network members;
- Other civil society organisations (CSOs) working on migration, child rights, women's rights, racial justice, service provision;
- Grassroots organisations and people with lived experience of detention
- State-run services (social services, schools etc.);
- The Council of Europe;
- Office for Democratic Institutions and Human Rights (ODIHR);
- UN Agencies;
- Migration authorities in EATDN countries;
- Other relevant government departments in EATDN countries, e.g. child protection;
- Cities and municipal authorities;
- Allies in the European Parliament and national parliaments;
- National and regional policymakers (where relevant);
- Legal professionals.

Role(s) each partner will play

Along with PICUM and IDC, the members of the European ATD Network (including new member/s) will be responsible for the implementation of the plan. Whilst IDC and PICUM will lead efforts on networking, partnership building, advocacy and technical capacity building, the members of the EATDN will be responsible for the day-to-day management and implementation of the pilots themselves, as well as undertaking 'advocacy by doing' and strengthening partnerships as an integral part of their work.

IDC, PICUM and the members of the EATDN will work closely with other CSOs and state-run services working on migration and providing services in areas related to the holistic approach to case management outlined within IDC's [CAP model](#). These will include CSOs and services working on child rights, homelessness, healthcare, women's rights, education and social work. Whilst these actors will not themselves be part of the EATDN, formal and informal partnerships will be established with them in order to ensure that people involved in the EATDN pilots can be quickly and effectively referred to relevant services according to their needs. Similarly, legal professionals and networks will play a role both in supporting individual cases and also in exploring opportunities for strategic litigation.

Grassroots organisations and people with lived experience of detention will be involved at all stages of the implementation, in order to co-design services, monitor their progress, and evaluate their impact.

The Council of Europe, ODIHR, and UN Agencies (notably UNHCR, IOM and UNICEF) are key allies in the work to promote community-based solutions, including case management based ATD, and in the context of the implementation plan they will serve as strategic partners. This includes acting as a bridge to policymakers and government targets, as well as providing training and funding opportunities.

National-level migration authorities, as well as cities and municipal authorities, already play a key role in the implementation of the EATDN pilots and will continue to do so as the work of the Network is scaled up. These authorities see the concrete impact of migration policies and will therefore be a key target for our work as well as a partner in ensuring effective information sharing and referrals. The EATDN is looking to increase its strategic partnerships with such actors, notably through on-the-ground advocacy and engagement.

Finally, although national and regional policymakers will primarily be a target of advocacy and campaigning, they can play a key partnership role where relevant. Allies in the European Parliament, for instance, have shown themselves to be champions of ATD and have ensured that case management-based approaches are reflected in regional legislation and frameworks. These relationships will continue to be cultivated at both national and regional levels, in order to ensure that the impact of our scaling plan is echoed in relevant policy.

Who will scale the innovation?

The members of the [European ATD Network](#) employ case managers to implement their pilots on the ground, and it is these case managers – alongside the colleagues who support them – who will continue to implement the innovation when it comes to extending the geographical scope and the number of beneficiaries of the pilots. IDC has dedicated members of staff whose role is to coordinate the EATDN and expand networks and

partnerships, as well as supporting with national- and regional-level advocacy, while PICUM carries out regional advocacy, informs the EATDN members of ongoing initiatives and policy developments, and facilitates provisions of inputs by the EATDN. These staff will continue their work to scale the innovation in these areas.

Involving end beneficiaries/service users

The EATDN case management-based approach is specifically designed to ensure that people are able to engage with their migration cases, with one of the main aims being to provide them with the tools that they need to resolve their case temporarily or, ideally, permanently. It works under the assumption that engagement, rather than enforcement, will build trust in the system and allow people to be self-directed. In particular, it respects asylum seekers, refugees and migrants as rights holders who can be supported to empower themselves to work towards case resolution without the need for restrictions or deprivations of liberty or freedom of movement.

Case management is designed to support the empowerment of individuals to resolve issues independently and link them with additional support when needed. Case management relies on identifying all the needs and strengths of the individual, addressing those needs and building upon the strengths as able with available resources, and building resilience in the individual to deal with the range of outcomes before them. Case managers form relationships based on trust with individuals and families in order to support their empowerment, enhance their wellbeing and problem-solving capacities, resolve outstanding issues, provide information on how to obtain services and resources in their communities, how to assert their rights, and work towards the protection of people who are not in a position to do so themselves.

Whilst the EATDN approach to case management has been geared towards supporting service users to be self-directed from its inception, the involvement of service users in implementation has not been a focus of the Network to date. However, the scaling plan puts migrant and refugee lived experience leadership – particularly of people affected by or at risk of immigration detention – front and centre, in order to ensure that they are involved at all stages of implementation, including design, monitoring, and evaluation. Consultations with experts by experience in the development of this plan (see above) allowed us to better understand how we can meaningfully and responsibly ensure such involvement given how central it is to the plan.

Funding and Financing arrangements

Costs of scaling the innovation envisaged

On the part of the pilots, there is a strong need for increased and sustainable funding and for additional staffing and internal capacity. This was identified as one of the main obstacles in implementing the pilots. The approach of tailored case management requires significant human resources, which translate to financial resources. At the same time, pilots must implement a two-tiered approach to addressing the lack of access to services, where on the one hand they have to advocate for increased social services and on the other, address

through their own service provision – often at significant cost – the day to day needs of migrants, for example housing and healthcare.

Table 4.2: The current indicative costs of the pilots².

Belgium	Bulgaria	Cyprus	Greece	Italy	Poland
€194/family per month	€79/person per month	€63/person per month	€194/person per month	€88/person per month	€219/person per month ³

Costs vary according to country contexts as well as the capacities and activities of implementing partners. For instance, some pilots (e.g. Belgium) spend a considerable amount of money on transport, whereas others may spend less on this. Similarly, those organisations that already have funding for overheads (office space etc.) may not need to include this in their budgets, and pilots that have staff capacity funded through other projects (i.e. legal advisers) can make use of their internal expertise. Staff costs tend to make up the bulk of the project budgets. On average, the cost per person/case per month of the EATDN pilots is €140, and we can therefore estimate that – assuming an annual caseload of 400, with a projected increase of 15% (which is the mid-point of our ambition) – the cost of increasing the scope of pilot implementation will be approximately €100,800 per year, in addition to maintaining current budgets. In addition to the case work budgets, costs to maintain the EATDN (currently at around €95,000 per year) will need to be increased in order to allow for a scaling up of national and regional level advocacy, network building, and research capacities.

These costs, of course, do not take into account the potential savings that could eventually be made as a result of effective network-building and economies of scale which will be the ultimate result of coordinating with a wider set of allies.

Funders

To date, the work of the EATDN pilot implementers has been largely funded by private foundations. Currently, with the exception of the UK pilots, all of the pilots are receiving funding from the European Programme for Integration and Migration (EPIM), which has been funding key ATD pilots across the region for a number of years in addition to supporting the work of the European ATD Network itself. We hope that, going forward, the support of private foundations – including but not limited to EPIM – will continue and increase. Our consultations with private foundations during the development of the implementation plan has suggested that our approach is very much in line with their priorities, and that they see this innovation as being impactful.

Our plans to scale up the work of the EATDN, however, means that the network will also have to scale up considerably in terms of resources. Given our ambitions to promote case

² Approximate figures based on total budgets and caseloads. Per person costs in fact refer to ‘case’ costs, which may include families.

³ Figure adapted from E. Ohtani (2020) *Alternatives to detention: building a culture of cooperation Evaluation of two-year engagement-based alternative to immigration detention pilot projects in Bulgaria, Cyprus and Poland*, European Programme for Integration and Migration (EPIM).

management-based solutions as a key part of migration management systems, this is likely to involve targeting national-level government funding and/or regional funds. An important opportunity for funding this scaling plan has been the adoption of the Asylum and Migration Fund (AMIF), which foresees the possibility for EU Member States to fund case management-based ATD programmes. This work has been the result of coordinated advocacy by CSOs, including EATDN members, and advocacy is ongoing with national governments to ensure that they include reference to ATD in their national programmes. Notably, ATD are also eligible for higher co-financing (up to 90% of activities), which is an incentive for Member States to include such activities in their programmes. We are aware that government departments in some countries, such as Belgium, are trying to prioritise ATD funding through AMIF. The European Social Fund + may also provide an opportunity to fund part of our plan, given its focus on impactful social innovation.

Pilots will also explore potential government or city/local authorities funding when the socio-political conditions are conducive to this.

Financial arrangements and instruments planned to scale the innovation

As noted above, EPIM is currently funding the majority of the EATDN's pilot implementers. We are hoping for some of this funding to continue and should have confirmation of this by the end of 2021.

Several EATDN members already have additional funding sources; in the UK, for instance, EATDN members have received funding from both private foundations and the UK Government for implementation of ATD pilots. In Bulgaria, the pilot implementer is being funded by AMIF to implement their ATD project.

The EATDN has already started looking for additional funding to scale this innovation, including (as outlined above) EU funding at regional and national level. Given the network's ambitions to present case management as a viable approach to migration management, in order to avoid the widespread use of detention, it is essential that we continue to make the case to governments and authorities that they should be investing in case management-based ATD pilots and community-based solutions. We will continue to do this through our advocacy and will also explore the possibility of making use of innovative funding models, such as social bridging finance, allowing us to obtain independent support for the initial demonstration phase of our pilots alongside an agreement from national or local authorities that they will sustain access to the services if they successfully meet agreed outcomes.

Finally, given the focus on network building and working in synergy with other actors and sectors, we will explore the possibility of setting up consortium partnerships with actors on the ground including migrant-led organisations. This is already the case for the Italian pilot, which has paired an organisation providing services to migrants with an organisation which focuses on strategic communications, advocacy and campaigning. This has allowed for the pilot to combine case management with effective advocacy for systemic change.

Cost implications of the model compared to alternative approaches to the social challenge(s)

In terms of the human cost of detention, numerous studies attest to the serious negative impacts of detention on an individual's physical and mental health (e.g. JRS Europe, 2010; Kotsioni, Ponthieu and Egidi, 2013). Ward (2011) estimated the lifetime health costs of long-term detention to be AUD \$25,000 (€15,360) per person.

In addition, studies consistently indicate that detention is costly for states, while ATD programmes provide significant cost savings (Clark et al, 2018; De Brucker et al, 2015; Edwards, 2011; European Migration Network, 2014; IDC, 2015; Ohtani 2020). De Brucker et al (2015) estimate the cost of immigration detention per person per day in Austria to be €120, in Belgium to be €180 (without the costs of infrastructure, removal and lawyers), and in the UK to be €164.

De Brucker et al. suggest that shifting to ATD has resulted in cost savings of up to 86% in Austria. The European Migration Network (EMN) suggests that the cost savings for Belgium could be up to 53% (EMN, 2014). Similarly, Edwards (2011) highlights that shifting from detention to ATD resulted in savings of 93% of cost per person per day in Canada, 76% in the United States, and up to 98% percent in Australia, while Clark et al (2018) estimate a saving of 90% in Malaysia.

Ohtani (2020) supports this analysis, indicating that the cost per person per day in case management ATD pilots was just €3.34 in Bulgaria, €6.90 in Cyprus and €7.30 in Poland.

There are other cost savings associated with the switch from programmes which are focused on deportations to programmes which analyse different options for case resolution. Indeed, the [average cost](#) per deportee is around €3,000 and can reach €14,000 or even €75,000 per person. On the other hand, states can [benefit financially](#) from exploring and implementing regularisation pathways for migrants.

Sustaining and further scaling of the innovation

With this plan, our ambition is to demonstrate the feasibility of case management-based approaches and convince governments to defund and reduce the use of immigration detention, with the goal of ultimately ending it. The current size and scope of the pilots means that they remain too small to exert sufficient pressure to make structural changes at the level of governments, however ultimately the aim of the EATDN – over the course of this 2-year Implementation Plan, and beyond – is to create momentum amongst local and national authorities, as well as regional actors, to adopt case management-based ATD. Eventually, we expect these authorities to invest in such approaches, as they have done in the Netherlands and the UK, and to integrate them into their migration governance systems while at the same time actively reducing the number of people in immigration detention. We also expect new partnerships to be formed leading to investment in community solutions including case management ATD and more sustainable amounts of funding from European funding programmes, e.g., AMIF).

Measuring the Impact of Scaling

The Monitoring, Evaluation and Learning plan below details the outcomes of the implementation plan, indicators, and the evaluation process. In the evaluations the relevance, effectiveness and impact of the objectives, outcomes and activities should be examined through the lens of multiple stakeholders, including those with lived experience of detention

Table 4.3: Outcomes and Indicators of the Implementation Plan

Outcomes	Indicators
Geographical expansion to more cities and countries	<ul style="list-style-type: none"> • Number of new stakeholders working on and talking about community-based solutions and case management-based ATD in target country or mentioning target countries as evidenced through statements, policies, advocacy plans, presentations, articles • Number of new pilots set up in European countries • Number of new pilots set up in European cities
Increasing embeddedness of case management in government systems, i.e. partnerships with government actors including local authorities	<ul style="list-style-type: none"> • Number of CSOs/governments/cities exploring or implementing pilot projects in target countries • Number of concept notes developed and submitted • Number of CSOs approaching government/local authorities/other potential funders (or vice versa) on community based-solutions and case management-based ATD • Number of pilot projects with sustainable funding sources
Increase in number of pilot beneficiaries	<ul style="list-style-type: none"> • Number of beneficiaries
Expansion beyond vulnerable groups (widening profiles of beneficiaries i.e. beyond families and those of risk for detention to also include those already in detention and without specific vulnerabilities)	<ul style="list-style-type: none"> • New groups that were not previously benefiting from pilots • Number of beneficiaries among additional groups of people
Strengthening of networks among organisations working on case management and ATD at local, regional, national and international levels.	<ul style="list-style-type: none"> • Feedback from Network members e.g. through qualitative confidence test, feedback questionnaires • Number of invitations to speak and presentations by Network members, including at high profile events • Number of network members articulately presenting Network's learning/messaging • Development of shared database for joint data collection on key data accompanied by standardised relevant forms
Increase in the active involvement of those with lived experience of detention/at risk of detention	<ul style="list-style-type: none"> • Number of people with lived experience of detention involved in case management • Number of trainings conducted with people with lived experience of detention aimed towards increasing their knowledge of detention as a broader issue • Number of initiatives or projects spearheaded by people with lived experience of detention/at risk of detention

A 6-month internal reflection will focus on the following

- Relevance of implementation plan
- Progress
- Necessary adaptations to implementation plan

Mid and end term progress towards outcomes will be indicated through:

- Update of context analysis
- Midline/endline evaluation of indicators- quantitative and qualitative increase in the baseline values
- Relevance of objectives, outcomes and activities
- Effectiveness
- Impact
- Agility of implementation plan- deviations and changes related to contextual shifts
- Lessons learned
- Recommendations

Challenges and Risks

One of the key challenges that has emerged during the development of the plan has been the question of resources and funding. Most EATDN members are small organisations, and the pilots do not necessarily have sustainable sources of funding. Given how central the pilots are to the scaling model, and to ensuring a solid evidence base for solutions-focused advocacy, it is essential that we address the question of resourcing. This is something that we are including in the plan itself (see above regarding potential funders), but also something that we are hoping to address in ongoing discussions we are having with potential funders about the plan and our ambitions for scaling.

It has also been necessary, throughout the process, to address the challenging political context. Migration – and particularly immigration detention – is a highly politicised area of social policy, both at the national and also at the regional level. There is a strong push on the part of the EU and many national governments to increase detention, and the EATDN is thus operating in a context that is not wholly conducive to our aim of ending detention. To an extent, this is something that the network has been battling with since its creation four years ago, however in the context of the plan development we are addressing this head-on and are having challenging discussions around how to make our work relevant for policymakers while not watering down our final objective to end detention. This has included, for instance, finding common terminologies around case management and alternatives to detention which fit very different contexts (i.e. both progressive and regressive political environments). To overcome this challenge, we developed a background document presenting the different approaches/options and presented them in a meeting to which we invited all pilot implementers. The meeting was facilitated by an external expert and gave the possibility to all members of the Network to present their position and hear from others. At the end of the meeting, a common terminology was agreed and adopted.

Finally, we have given considerable thought to how to ensure the meaningful inclusion of leaders with lived experience in the development, monitoring and evaluation of the implementation plan. The leadership and inclusion of people with lived experience is one of the principles that underpins our implementation plan, however it is an area that is relatively

new to some members of the EATDN (though others have been working on this for some time). It can be a particular challenge in the migration sector, particularly when it comes to immigration detention, given the high levels of vulnerability amongst many of the people with whom that the EATDN works. We have managed to consult leaders with lived experience on the plan itself and are working to ensure that members are equipped with the tools that they need to continue this into implementation.

Mitigation

Table 4.4: risk matrix developed to inform our implementation plan:

Area of risk	Type of risk	Strategies for mitigation
Risk to the goal of the 2-year implementation plan	Lack of resources, over working system. Lack of capacity. Lack of funding and challenges in sustainability as a result. Multiple priorities for pilot implementers affected by lack of resources, capacity and a potential loss of initial momentum/enthusiasm especially if changes are not happening quickly.	Streamline processes, increase funding/resources/personnel and engage strategically and collectively with funders. Look at diverse sources of funding and explore partnerships. Attempt to secure grants from sources with higher funding (e.g. European Commission). Think creatively about resources.
	Lack of interest or differences in opinion. Lack of credibility. Unwillingness to change current system. If pilot/project is unsuccessful, governments could use this as an argument for detention (and/or abandon alternatives).	Showcase how pilots have expanded successfully in other contexts and increase evidence base to support arguments. Gain support from local/national, credible experts. Take a holistic approach.
Network building	The bigger the network grows and the more people get involved, the bigger the risk that definitions may change or get misinterpreted or be ineffective in getting the message across. There is also a risk of potential co-option of terms.	Set clear definitions from the beginning and ensure key concepts are defined collectively. Collect and systematise evidence and data demonstrating the efficiency of ATDs. Adapt to changes of circumstances/context and review collective positions/assumptions regularly.
	Different priorities in each group's respective fields.	Work together to show how one group's cause can directly benefit another's.

Area of risk	Type of risk	Strategies for mitigation
	Confusion over roles and responsibilities.	Strengthen the network with clear leadership, clear roles and responsibilities, and sub-divisions based on tasks.
Campaigning	<p>Campaign isn't received well; leads to backlash and increases anti-migrant rhetoric.</p> <p>Campaigners stay in defensive position (i.e. instead of campaigning to shrink the detention space, campaigners only try to stop it from expanding).</p> <p>Campaigning groups with different messages don't collaborate.</p>	<p>Have various reputable and credible stakeholders as part of the campaign.</p> <p>Ensure a solid communications strategy with communications professionals.</p> <p>Ensure strong networking and collective approach.</p>
Advocacy	<p>Push backs and negative/regressive changes in political context. Hidden/contradictory agendas on the part of political actors.</p> <p>Lack of follow-through due to lack of resources and political will</p>	<p>Develop strategies to effectively show how community-based solutions and case management-based ATD are a cheaper and more effective method of managing migration and ensuring wellbeing of migrants. Link with rates of engagement with projects.</p>
	Scepticism, claims of bureaucracy	<p>Flexibility to adapt and respond to changing political context.</p> <p>Develop user-friendly, harmonised databases and forms; showcase how this aids efficiency.</p>
	Advocacy with governments and authorities – and increased collaboration with them on pilots – may lead to demands being made on EATDN members that are unconscionable (e.g. sharing information when participants disengage, a focus on returns, etc.)	Ensure that any discussions with governments and authorities set out clear 'firewalls' and allow for the provision of independent case management and case resolution where CSOs and NGOs are concerned.
Lack of grounding of the implementation plan	<p>Top down and unrealistic implementation plan.</p> <p>Non collaborative development and implementation.</p> <p>Lack of buy in from pilots.</p> <p>Lack of involvement of leaders with lived experience and people affected by immigration detention.</p>	<p>Co-production of implementation plan and joint implementation.</p> <p>Involvement of leaders with lived experience and migrant led organisations at all stages of the project while noting that people with lived experience are not a homogenous group.</p>

Area of risk	Type of risk	Strategies for mitigation
Working with people with lived experience of detention	<p>Those with lived experience of detention may not necessarily have the expertise or knowledge of for example campaigning and advocacy.</p> <p>People with lived experiences of detention are not a homogeneous group and there can be friction between types of lived experience. This can affect the types of messages in advocacy, for example, those who have never been convicted can advocate not to be treated like criminals, without realising that this diminishes the rights of migrants with past convictions.</p>	Capacity building of those with lived experience so that they can go beyond experience to ensure that they have a broader view of the issue and advocacy/communications messages that can potentially be harmful to others with a different type of lived experience.