Malta Report

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1. Introduction

The Republic of Malta is an archipelago located in the Central Mediterranean Sea, 290 km north of the Libyan coast and about 90 km south of Sicily. It consists of five islands: Malta, Gozo, Comino, Cominotto and Filfla, of which only the first three are inhabited.

Malta gained its independence from the United Kingdom on 21 September 1964,[1] and became a democratic republic on 13 December 1974. It joined the European Union in May 2004. The government consists of a legislative House of Representatives (*Il-Kamra Tad-Deputati*) that elects the head of the government, which is the Prime Minister (currently Joseph Muscat).[2] The Parliament of Malta is located in the capital, Valletta, and consists of the House of Representatives and the president, Marie Louise Coleiro Preca.

Throughout its history Malta has been influenced by many different cultures owing to its former domination by Arab, Norman, European and English administrators, and these effects continue to be reflected in Maltese culture today. The official languages of the country are English and Maltese.

With a size of 316 km^2 (Statista 2016a) and a population of 0,4 million (Statista 2016b), Malta is the smallest country in the EU but has the highest population density (1,361 people per km^2) and a relatively low unemployment rate (3,9 % - as of July 2016) (Auswärtiges Amt 2016; Statista 2016c). The Gross Domestic Product per capita in Malta was last recorded at 24,103 US dollars in 2013 (Statista 2016d).

The migration situation in Malta has changed drastically over the years. Within the European migration field, Malta used to be considered a *"dead*

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1 All general information about Malta has been obtained from the Maltese government's website, www.gov.mt.
2 The last election was on 11 March 2013 (www.gov.mt).

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end" for people fleeing to Northern Europe to seek protection. At the beginning of this century, more than 10,000 people[3] reached Malta by boat, mistaking it for a transit country,[4] but the number of boat arrivals has now decreased dramatically (UNHCR 2016a). This is related to an informal agreement[5] between Malta and Italy with regard to rescue-at-sea operations, whereby all migrants saved within the Central Mediterranean disembark in Italy (ECRE 2015; Times of Malta 2015a; Malta Independent 2015). In 2015, only 104 people arrived in Malta by boat (UNHCR 2016a), with air travel having become the most common approach. This shift has led to a change in the countries of origin and thus the profile of asylum seekers and refugees, creating new challenges for the organisations working in this field in Malta (e.g. the need for different language interpreters) (Refugee Commissioner 2016).

In 2013 and 2014, Somalia was the country of origin for most of the nationals who were granted protection status in the first instance, followed by Eritrea in 2013 and by Sudan in 2014. However, the composition of asylum applicants changed entirely in 2015, when most of the 1,584 people who arrived via regular means came from Libya, followed by Syria (ECRE 2015: 37; UNHCR 2016a; Eurostat 2016a).

Table 1 shows the number of arrivals over the past five years, and one can see that they have been relatively constant, varying on average between 1,300 and 2,200 arrivals per year (Eurostat 2016b). Compared with other EU countries such as Italy, Germany and Greece, this is a low number (see Table 1).

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3 Between 2003 and 2009, a total of 11,402 people arrived in Malta by boat (UNHCR 2016a).
4 Information about Malta as a *"dead end"* and *"arrivals by mistake"* is drawn from the interview with the Office of the Refugee Commissioner (ORC) (2016).
5 AIDA Report: Malta 2015; *Times of Malta*, 22 April 2015; *Malta Independent*, 15 September 2015.

Table 1: Asylum applications by country, 2008–15

Asylum applications by country, 2008 - 2015
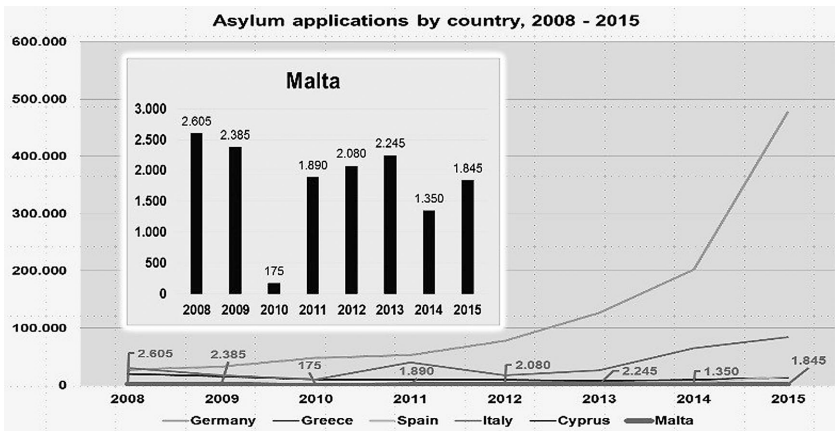
Source: Adapted from Eurostat (2016b).

In 2015, a total of 1,845 people[6] applied for asylum in Malta (UNHCR 2016a). With about four asylum applications per 1,000 inhabitants, the Maltese application rate is one of the highest within the EU.[7] Malta also had the second highest rate of positive first-instance asylum decisions in 2015 (85.3%) (Eurostat 2016c). In the first half of 2016 there has been already 770 first-time asylum applications in Malta (Eurostat 2016d). This corresponds to about 1,786 asylum applicants per million inhabitants (Eurostat 2016e).

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6 Note that the reported numbers vary between Eurostat and UNHCR.
7 The average number of asylum applications in the EU is about 2.6 per 1,000 inhabitants (Eurostat 2016).

Figure 1: Flow chart of the asylum procedure in Malta
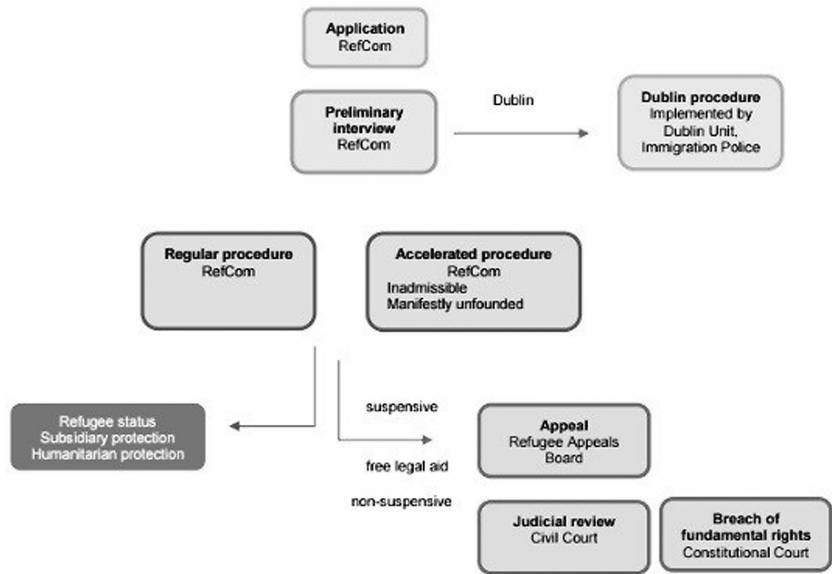
In the first half of 2016 following numbers are characteristic for asylum decision making process in Malta: total recognition rate was about 85 %, subsidiary protection rate constituted 69 % and refugee rate amounted to 11 % (Eurostat 2016f; Eurostat 2016g). In the same period of time 830 asylum decisions were made in Malta in total, 125 of which were negative (Eurostat 2016f; Eurostat 2016g).

Applications for international protection are lodged with the Refugee Commissioner (ORC), which is the authority responsible for examining and ruling on applications for international protection in Malta in the first instance (see Figure 1). The ORC is the only entity authorised by law to receive applications for international protection (ECRE 2015a: 12).[8] Asylum applications are not valid unless they are lodged within 60 days of the applicant's arrival in Malta. Following the initial collection of information by means of a preliminary questionnaire, an appointment is scheduled for an interview (ECRE 2015b). Once the applicant is called in for the inter-

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8 The description of the asylum procedure is based on the AIDA Report: Malta 2015.

view, he or she will be asked to fill in the official form to apply for international protection (ECRE 2015a: 12).

In Malta, there is also an administrative tribunal, the Refugee Appeals Board. Currently made up of six chambers, this board is entrusted to hear and rule on appeals that challenge the recommendations issued by the ORC (ECRE 2015a: 13). An appeal can have a suspensory effect, because an asylum seeker may not be removed from Malta until a final decision is made. This is the case when the regular procedure is employed in adjudicating the majority of applications for international protection. Accelerated procedures are also provided for in national law for applications that appear to be prima facie inadmissible or manifestly unfounded (ECRE 2015a: 27).

The procedure used to assess applications for international protection for detained applicants is identical to that used for applicants who are not detained. The ORC is authorised to grant one of three types of protection: refugee status, subsidiary protection status or temporary humanitarian protection. During the asylum process and after the applicant's status has been determined, the Agency for the Welfare of Asylum Seekers (AWAS) can accommodate asylum seekers in initial reception facilities, which were introduced in Malta in 2015 (ECRE 2015a: 41; MHAS 2015).

2. Current State of Research

The number of people seeking protection who arrive via regular means has increased enormously, and the number of asylum applicants is now more than twice the number of those arriving by boat[9] (People for Change Foundation 2015: 23). The fact that most migrants currently arrive regularly by plane is problematic for the Maltese migration strategy, which was designed for irregular arrivals by boat. Consequently, people seeking asylum in Malta who arrive in regular ways will not be recorded by the initial reception centres (AIDA 2016). In their second annual report (the Human Rights Report 2015), the People for Change Foundation noted that

> *[M]aritime migration has for a number of years [been] a key issue of socio-political concern for the Maltese population. This is partly due to the media and political visibility of migrant arrivals by boat, which has provided a par-*

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9 This statistic is for the year 2014.

tial and ill-informed perception of migration realities in Malta (People for Change Foundation 2015: 19).

Because its migration situation has changed over the years, Malta is not facing the refugee crisis that now confronts other EU member states. The low number of irregular migrants reaching Maltese shores in 2015 was at least in part the result of the Italian government's Mare Nostrum operation.[10] This mission, which includes both air and sea rescue operations, has saved about 150,000 people, most of whom disembarked in Italy (People for Change Foundation 2015: 20).

The MAREM research project was designed to determine the extent to which the implementation of the Common European Asylum System (CEAS) has led to changes in the work of asylum- and refugee-related organisations with respect to cooperation partners, approaches to the integration of migrants and practical adjustments. Because of the lack of scientific studies that address the recent changes caused by the implementation of CEAS, most of the information presented in this report was drawn from publications by the different stakeholders within the field of asylum and refugees in Malta. This project is an attempt to fill this gap by analysing the circumstances of the implementation and the resulting cooperation among the main actors in this field.

The last decade saw continuous change in the Maltese asylum system, especially in 2013, when the Labour Party under Joseph Muscat won the election. By the end of 2015, a new migration strategy was introduced by the MHAS that abolished the detention policy (AIDA 2016). Until then, people entering Maltese territory without the permission of the Principal Immigration Officer could be detained by the state authorities in an effort to protect national security and the public order (MHAS and Ministry for Family and Social Solidarity 2005; AIDA 2015: 54).

On a local level, NGOs such as the Aditus Foundation and the Jesuit Refugee Service (JRS) had criticised

the mandatory and arbitrary nature of the policy of detention, the length and conditions of detention, the poor conditions in open centres, the lack of adequate support for particular categories of vulnerable migrants and asylum seekers, and the huge obstacles to integration (JRS 2015: 5).

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10 The Italian government initiated this mission in response to the Lampedusa tragedy in October 2013, when more than 300 migrants drowned in the Mediterranean Sea (People for Change Foundation 2015).

On the European level, the Council of Europe's committee of ministers demanded that the Maltese government adapt further to the rulings of the European Court of Human Rights after three successful complaints by migrants in Malta (Malta Today 2015).

The new government also set up a new ministry in 2013 – the MSDC – with the intention of establishing an institutional framework for dialogue with social actors and civil society in general.[11] In addition to the new migration strategy, the MSDC published "Mind D Gap" in June 2015, which proposed a national integration strategy that provided guidelines for a systematic approach to integration, showing that the issues of migration and integration were related to national policy[12]. Thereby, their norms and values would contribute to the government's pledge

> *to celebrate diversity, to recognise the social realities around us, to cherish Maltese identity without discrimination, to ensure equality and respect towards minority groups and above all, to safeguard the fundamental human rights and freedoms of all. It is the government's belief that the current realities faced by migrants coming from third countries (i.e. countries that are not EU Member States), require immediate attention* (MSDC 2015: 6).

Considering that Malta is often regarded as a transition locality on the way to the European mainland, especially to Northern Europe, the newly devised integration strategy met with resistance from the outset. One such difficulty was the short timeframe involved, because the MSDC was established in 2013 and the integration strategy was not published until 2015.

Because most of the literature available concerning the Maltese asylum system and the organisations working in this field has been prepared by state authorities and does not have a scientific basis, our focus of interest and the associated research questions are as follows:

1. *To what extent does the implementation of CEAS cause practical changes in the work of the asylum-related actors?* This question focuses on the practical changes in the work done by asylum- and refugee-related organisations as a result of the implementation of CEAS.

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11 For further information, see https://socialdialogue.gov.mt/en/Pages/The_Ministry/Brief.aspx.
12 For more information on "Mind D Gap", see https://socialdialogue.gov.mt/en/Public_Consultations/MSDC/Pages/Consultations/MDGIntegration.aspx.

2. *To what extent does EASO, as the executive actor of CEAS, influence asylum- and refugee-related actors in Malta?* Because the EASO is the agency entrusted with supporting the EU member states in implementing CEAS, our research also focuses on EASO's special role within the organisational field of asylum- and refugee-related actors in order to analyse the extent to which the Maltese organisations communicate with or are influenced by the work of EASO.
3. *How do NGOs and the Maltese government approach integration? Have there been any recent changes in their policies and therefore in their approach?* This research is also focused on Malta's recent approach to the integration of migrants. Therefore, the changes in the asylum system were analysed in terms of the recent development of the integration policy.
4. *Does the theory of neo-institutionalism (which is explained in the first chapter of this book) apply to the cooperation of Maltese asylum-related organisations?* Elements of the theory of neo-institutionalism will be assessed based on the data collected in Malta in 2016. The main aim of this research is to analyse the extent to which organisations must adjust and therefore become more similar in their structure and practices and create homogeneous cooperation networks regarding the relevant characteristics of these organisations in order to survive within their working field. To address this fourth research question, we developed three hypotheses, which are described next.

3. Hypotheses

Based on the theory of neo-institutionalism, three hypotheses were developed:

> *Hypothesis 1* (Normative isomorphism): Because they apply certain standards of professionalisation when choosing staff members, the organisations are likely to be similar to one another in their working practices.
> *Hypothesis 2* (Coercive isomorphism): Owing to their dependence on centralised sources of funding, organisations must meet certain expectations of their donors.
> *Hypothesis 3* (Mimetic isomorphism): Owing to the exchange of best practices among the organisations, the (egocentric) networks of asylum-related actors in Malta tend to be homogeneous.

4. Data

To gain a profound understanding of the organisational field and the cooperation of asylum- and refugee-related organisations in Malta, semi-structured expert interviews were conducted with seven organisations during the field research in Malta, which took place between 7 and 14 March 2016.

The seven interviewed organisations have been categorised according to the following criteria: (1) their ***actor type*** (official executive actor, civil society nongovernmental organisation (NGO), intergovernmental organisation (IGO), research institute), (2) their field of action and legitimation and ***spatial reach*** (local/regional, national, European, international, transnational), (3) **driving *norms and values*** (religious, political, enforcement of law, objectivity or human rights–oriented), (4) the ***main issues*** they work on (asylum- and refugee-related or multiple) and (5) their ***resources*** (private, public or mixed). The categorisation is based on website analyses and on the self-description of the organisations in documents and interviews. Table 2 gives an overview of the interviewed organisations and their main characteristics.

Table 2: Overview of the organisations interviewed in Malta and their characteristics

Interviewed organisation	Actor type	Driving norms and values	Spatial reach	Main issues	Resources
Aditus Foundation	NGO	Human rights	National	Asylum Seekers and Refugees	Private
IOM (International Organisation for Migration)	IGO	Human rights	Global	Multiple	Mixed
EASO (European Asylum Support Office)	GO	Political	European	Multiple	EU funds
NCPE (National Commission for the Promotion of Equality)	GO	Human rights	National	Multiple	Mixed
MSDC (Ministry for Social Dialogue, Consumer Affairs and Civil Liberties)	GO	Political	National	Multiple	Gov. funds/ EU funds

Interviewed orga-nisation	Actor type	Driving norms and values	Spatial reach	Main issues	Resources
MHAS (Ministry for Home Affairs and National Security)	GO	Political	National	Multiple	Gov. funds/ EU funds
ORC (Office of the Refugee Commis-sioner)	GO	Enforcement of law	National	Asylum Seekers and Refugees	Gov. funds/ EU funds

Source: Adapted from expert interviews and website analyses as part of the MAREM project 2016.

Five of the seven interviews were conducted with governmental stake-holders in different positions within the field of asylum-related actors. These GOs are as follows:

The newly established MSDC focuses on the integration of migrants in Malta. Among other things, it is responsible for establishing framework documents from which the strategy for integration can be drafted (MSDC 2016).

MHAS and its departments work on multiple issues related to national security (e.g. border control, detention service and human trafficking) (MHAS 2016).

The main role of the ORC is to rule on asylum applications. The Refugee Commissioner has a special role in this field owing to his pos-ition as a neutral decision-maker (ORC 2016).

The NCPE is not specifically asylum-related in that it deals with, for example, xenophobia or any other form of discrimination within Maltese society (NCPE 2016). Unlike the previous three GOs, the NCPE is not driven by political norms/enforcement of the law but rather by human rights norms, as are the International Organisation of Migration (IOM) and the Aditus Foundation.

EASO is the European institution entrusted with supporting the EU member states in implementing CEAS (EASO 2016).

The only intergovernmental actor we interviewed was IOM. All the other interviewed organisations operate for the most part on the national level, although EASO also works on the international level. IOM Malta is project-based and works on issues such as resettlement to the United

States,[13] integration and human trafficking and also offers advice regarding policy (IOM 2016).

The Aditus Foundation is the only NGO we interviewed in our study of the asylum- and refugee-related field in Malta. Aditus is a general human rights organisation that focuses on monitoring and reviewing laws and policies. It has a small pro bono unit that offers legal advice to asylum seekers and refugees concerning their applications or appeals and also does legal work in relation to the human rights situation in Malta (Aditus Foundation 2016).

5. Results

In the following sections, we present the results of the MAREM research project undertaken in Malta in 2016.

5.1 Cooperation of Asylum-Related Organisations in Malta

With an area of approximately 316 km^2 (www.gov.mt)[14] the Maltese territory is relatively small when compared with other Mediterranean countries such as Italy (301,340 km^2) or even Cyprus (9,251 km^2) (Statista 2016a). For this reason, all the asylum- and refugee-related organisations are situated in physical proximity to one another, so the people who work for these organisations tend to be acquainted:

> *Since Malta is quite small, we know each other quite well. All the organisations know each other. […] So this is a kind of give-and-take [arrangement]* (Aditus Foundation 2016).

Most of the interviewed organisations point out the importance of cooperation in Malta. NCPE named some of the advantages of such cooperation:

> *There are a couple of benefits related to coordination work and discussions with other organisations. It brings […] knowledge sharing, information, dis-*

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13 Malta is the only EU member state to offer resettlement to the United States. Between 2014 and 2015, a total of 1,145 persons were resettled there, and a number of people offered the benefit of protection have been relocated to other EU member states (UNHCR 2016b).

14 For further information, see https://www.gov.mt/en/About%20Malta/Maltese%20I slands/Pages/The-Maltese-Islands.aspx.

> *cussions, identification of good practices [...]. It is very important to see what other bodies are working on to strengthen the knowledge base that you are working on* (NCPE 2016).

IOM also commented on the importance of cooperation in Malta. Because the country is relatively small, the work done by the asylum- and refugee-related organisations is interlaced:

> *I think when you work on such a small island, in such a small environment, it is crucial to have good relations with everybody working in this field and actually to know whom to go to. And even NGOs – I consult with them [to see] whether they can provide assistance. It works very well* (IOM 2016).

This statement emphasizes the importance of NGOs for the asylum system in Malta. MHAS confirms this, pointing out the exceptional position of the NGOs in that they complement the work carried out in the field of asylum and refugees with a different view of the asylum system:

> *[Cooperation] is very important. Cooperation with NGOs is definitely important because they offer you a different perspective* (MHAS 2016).

The importance of NGOs in the system is emphasised even more by EASO. Because each actor works in a different subfield and focuses on different issues in the field of asylum and refugees, cooperation contributes to the exchange of ideas and a broad knowledge base that is strengthened further:

> *Yes, we believe that [the] civil society [represented by NGOs] is very important, because it is important to have different perspectives and they definitely bring you different perspectives and that is why we are interested in working with them specifically. Also when it comes to the expert input, so it is not just kind of bouncing ideas [around], asking people who are coming with a different kind of agenda, with a different kind of background. It is also about their specific expertise based on their practical work with refugees or asylum seekers* (EASO 2016).

The different NGOs work together for lobbying purposes and to gain more influence on national policy, confirming the bilateral relation with governmental institutions. Aditus states:

> *Of course we [the NGOs located in Malta] all lobby together. We are kind of an unofficial group that works together. And we have always lobbied the government on specific issues like detention, conditions in open centres. So we have kind of joint position* (Aditus Foundation 2016).

Although the Refugee Commissioner refers to the impartiality of his position, he confirms that he has a form of working relationship with other actors:

> *We are doing something together. We cooperate, we work, we contact each other, we have meetings and we help each other and so on. But that does not mean that we are partners* (ORC 2016).

However, cooperation was not always regarded as important as is stated above. The turning point occurred on 30 June 2012, when Mamadou Kamara, a 32-year-old migrant from Mali, died while trying to escape from a detention centre (Amnesty International 2013). According to Aditus, this tragic incident should be considered a milestone for cooperation among the asylum- and refugee-related organisations in Malta. It brought the different actors together and paved the way for dialogue among them:

> We had cooperated with the other organisations since the beginning, but it sort of all came together when there was a death in detention. […] That was the first time when all the NGOs actually sat down and said, okay, we actually have to do something about it. It was the first time that the government – it was a different government then – said, okay, let's talk. Let's talk about a solution, about procedures, about an integration policy. It took a long time from then until now to actually have a policy (Aditus Foundation 2016).

This incident has had a lasting impact on the profound structure of cooperation among the organisations working in Malta. The NCPE even points out that the working relations are becoming steadier and the persistent exchange is ensured through regular inter-organisational contact. Cooperation is being strengthened because more meetings facilitate dialogue among different organisations (NCPE 2016). This is confirmed by IOM, which states that cooperation among the organisations in Malta can be regarded as "stable to growing" (IOM 2016). In addition to the current forms of cooperation, which occur mostly on the national level, a tendency towards internationalisation can be observed: cooperation now also takes place on the European level. MHAS points out the importance of international cooperation for the EU member states when it comes to addressing international issues:

> *It is also important to cooperate internationally because issues [e.g. the migration crisis] can only be addressed internationally. Ultimately I think that no member state on its own can really address the migration issue. And I think that this improved over the last year, not before. So yes, I think this is an important issue* (MHAS 2016).

MSDC confirms regular contact with other organisations from other EU member states:

> *We are absolutely looking into collaborating internationally on integration. In human rights we have been collaborating for years now, but on integration we are just starting. [...] We are part of a network for national contact points of integration. So we have this kind of almost monthly, every two months, meeting in Brussels* (MSDC 2016).

The ORC explains that the national government also focuses on EU+ countries and the countries of origin of the asylum seekers and refugees:

> *So I think the fact that the Maltese government has made that summit shows that they are really interested and involved and would like to bring the European countries together to see what strategy they have. [...] I believe that ultimately it is a long-term thing, we have to say that. The solution to the immigration problem [...] will be [possible] by improving the situation of the African countries, Syria and Afghanistan and so on* (ORC 2016).

Cooperation in Malta is constantly evolving. Since the death of Mamadou Kamara in 2012, cooperation among the different actors continues to develop and is now about to be extended to the international – more precisely, European – level.

5.2 Network Analysis: Isomorphism

In order to verify Hypotheses 1 and 2, which are based on the mechanisms of isomorphic change (DiMaggio and Powell 1983), we explored two avenues: (1) to what extent organisations apply certain standards of professionalisation when it comes to employing new staff members (for example, organisations might require employees to have a certain kind of university degree or might have no special requirements at all); and (2) what kind of funding sources organisations receive to determine whether they are centralised or decentralised. (Hypothesis 3 will be analysed later.)

Concerning the professionalisation of employees, all interviewees state that a third-level education is required to work in their organisations. A specific field of study cannot be identified because it depends on the role of the organisation and the person's position within it:

> *I think that it is a pretty broad mix. I mean everyone who is a staff member here has at least a minimum of a third-level education* (EASO 2016).

Even within the same backgrounds there are further differentiations in cases where certain skills are required. For example, the employees of the NGO Aditus all studied law but specialised in different key areas:

> *But even within the legal field we are all a bit different; we all have our different expertise. Our French lawyer is an expert on refugee law issues, Neil is more human rights and refugee law of course and I am more EU law–oriented. So even among the lawyers we have different backgrounds* (Aditus Foundation 2016).

This statement in particular can be regarded as a clear sign of professionalisation, which could explain the occurrence of isomorphic processes within this organisation. Not only is a high educational level required but also specialisation in a specific subject – in this case, law with a focus on asylum issues. Because most interviewees[15] indicate this level of professionalisation in NGOs and GOs, one can see that the organisations exhibit a certain level of homogeneity by choosing staff based on the minimum requirement of a first-level academic degree. However, because not all these employees have studied the same discipline or at the same university, their working practices might still be different. Thus, normative isomorphism may occur to some degree, but we cannot fully confirm this possibility at this time.

With regard to centralisation of funding being the mechanism underlying coercive isomorphism, one can see that the sources of funding for NGOs and IGOs vary. Aditus states that they finance their work

> *through EU projects, local and national funds and EU funds, [as well as] through research work that [we] are contracted to do from overseas. So [we] apply for a number of projects* (Aditus Foundation 2016).

It is important to note that the Maltese government does not provide direct funding to NGOs, which can lead to financial shortages and challenges for these organisations. IOM, as an IGO, uses these same external sources but also receives funding from embassies and national governments:

> *We […] get money from the EU, [but] we [also] call for proposals regarding projects we want to do – all directly through the government, through private donors, through embassies. In this case we have one through an embassy. We*

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15 Although only two examples of such organisations are mentioned here, NCPE, the ORC and MSDC gave similar answers in 2016; in the cases of NCPE and MSDC, there was no need for specialisation in a specific subject.

> *[cover] quite a wide spectrum. That doesn't mean it's easy, but it is quite all right* (IOM 2016).

The organisations we interviewed did not mention the need to adapt to certain donors, so it is still possible that both the organisations quoted here may tailor their work accordingly. In such cases, should they need to adapt to one donor more than others – the premise for isomorphic change – more information would be needed concerning the exact amounts of money and resources being supplied; however, there was no indication of adaptation, and the evident decentralisation of funding would seem to obviate such a need. Concerning expectations with regard to isomorphism in that field, it seems unlikely that through a process of isomorphism one of those organisations would adapt to the expectations of another.

GOs, which are financed through taxes[16] and EU funding mechanisms (as indicated by MHAS), and EASO, which is funded through EU taxation,[17] clearly show centralised funding. One can assume homogenisation in their organisational structures and behaviour, because they might be required to meet certain donor expectations. This situation might be strengthened by additional political influence and dependency – another factor in coercive isomorphism (DiMaggio and Powell 1983: 150) – and can probably be assumed, owing to their putative proximity to the government. However, this assumption was not confirmed by any of the interviewed organisations and thus cannot be verified.

Based on the previous analysis, we can propose the presence of an isomorphic process within governmental institutions but not within IGOs and NGOs, so Hypothesis 2 can be confirmed only in part.

In order to verify Hypothesis 3, we looked at the extent to which the organisations' egocentric networks reflect a certain degree of homogeneity or heterogeneity. In order to follow a certain discourse of efficiency, these organisations would act similarly and presumably exchange best practices only with organisations that follow the same discourse, leading to homogeneous cooperation networks (e.g. NGOs cooperate mainly with NGOs, human rights–oriented actors with human rights–oriented actors, and so

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16 For a review of the total tax revenue received by the ministries and departments of the Maltese government, see https://nso.gov.mt/en/News_Releases/View_by_Unit/Unit_A2/Public_Finance/Documents/2015/News2015_201.pdf.

17 For a review of the budget and finance of EASO, see https://www.easo.europa.eu/budget-finance-and-accounting.

on). To test this assumption, it was necessary to determine whether an exchange of best practices was confirmed by the organisations.

In the case of Maltese asylum- and refugee-related actors, an exchange of best practices occurs among half the interviewed organisations, as confirmed during the interviews, and different reasons were given for this practice. Aditus, for example, looks at the structures of other NGOs in particular in order to improve the efficiency of their new Pro Bono Unit:[18]

> *Yes, we look for best practices. But we also look abroad quite a bit. We would look at the way other NGOs are structured particularly because at the moment our Pro Bono Unit is quite new so we are always looking at ways to see how other organisations do it* (Aditus Foundation 2016).

The NCPE indicates that coordination with others *"brings about knowledge sharing, information, discussion, identification of good practices"* (NCPE 2016). NCPE further specifies that *"it is very important to see what [other bodies] are working on to strengthen the knowledge base you are working on"* (NCPE 2016).

In addition, MSDC professes to

> *definitely encourage best practices [...]. There was in fact a study visit to Portugal. Portugal is quite well known to have a very good system with regard to refugees, asylum seekers – integration in general. [...]. [The] study visit [was] conducted to possibly emulate these practices in Malta in the future* (MSDC 2016).

The statements by MSDC and Aditus in particular reveal their willingness to adopt the best practices of other organisations in order to become more efficient in their work. This is particularly evident in areas where organisations perceive a lack of knowledge, hope to resolve certain problems, minimise risks and work more effectively:

> *If we had a particular issue, either a legal issue or in approaching an authority, we would call another NGO who we know has gone through the same thing and has had success. If they did not have success, we would not go down the same road* (Aditus Foundation 2016).

In the 2016 interviews, the ORC, IOM and EASO all stated that they do not exchange best practices. EASO legitimises its position by saying that

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18 In order to "strengthen access to justice for those persons encountering difficulties in securing their human rights", Aditus has provided free legal aid to asylum seekers and refugees since 2014. For more information, see http://aditus.org.mt/our-work/projects/pro-bono-unit.

it has a very clear mandate, as well as clear rules and structures, that are predetermined by the European Commission (EASO 2016). IOM, in contrast, prefers to *"come up with [its] own"* practices (IOM 2016) based on the organisation's size and experience. In the case of the ORC, practices such as processing asylum cases are regulated by law and are harmonised by implementing the Asylum Procedures Directive (Directive 2013/32/EU) into Maltese national law, which leaves the ORC with little opportunity for action.

Thus, the larger, better established organisations do not seek out the best practices of others but instead maintain the identity they have already created. With regard to the interviewees that copy one another's best practices, we can assume that their internal structures and behaviour reflect an isomorphic process. However, to fully verify this assumption, it would be necessary to monitor organisations for exchanges of best practices and to compare their internal structures and development over time.

We will now assess whether isomorphism is also reflected in more homogeneous cooperation networks in relation to the relevant characteristics of these organisations. The likelihood of isomorphic tendency increases if we consider the size of the country: the organisations in Malta report knowing each other well, sometimes even personally (Aditus Foundation 2016), which, according to DiMaggio and Powell (1983: 155), contributes to the isomorphic process.

Before we evaluate the cooperation networks of the interviewed organisations, it is important to revisit the organisations' own assessments of the degree to which their networks are homogeneous or heterogeneous and what they consider to be desirable. When it comes to cooperation partners, governmental and nongovernmental actors differ on whether their aim is to increase homogeneity or heterogeneity. For MSDC, for example, the goal is to establish a more homogeneous cooperation network (MSDC 2016), whereas Aditus is committed to a heterogeneous one:

> *Let's hope it is not homogeneous. In the beginning it was just Maltese-led organisations. It has been Maltese people leading the discussions on migration. Over the years we have had groups from other backgrounds join us [...]. So it is pretty mixed* (Aditus Foundation 2016).

Thus, an exchange of best practices might not necessarily lead to the homogenisation of an organisation's cooperation partners, because not all the interviewees regard homogeneity as beneficial. In our analysis of networks, we focused only on those organisations that we interviewed during

the 2016 round of MAREM and that exchanged best practices: Aditus, MSDC, NCPE and MHAS. In total, 63 organisations are included in the following visualisations of the cooperation networks.

Figure 2, which displays the spatial reach of the asylum-related organisations in Malta (e.g. on the national, international and European levels), shows that the network reflects a high degree of homogeneity – most actors that operate on the national level tend to cooperate with other national organisations. However, on closer inspection, one can see that the networks of MSDC and NCPE are more homogeneous, while MHAS and Aditus have rather heterogeneous networks. If we look at the level at which best practices are being exchanged (as based on the statements made during the MAREM 2016 interviews), one can see that most of the organisations are part of international superordinate networks of other organisations working in the same field as the interviewed organisation – even if the latter have a cooperation network that includes mainly actors who work on the national level.[19] These cooperation partners (not shown in Figure 2) are important because the interviewed organisations explicitly state that they exchange best practices via these networks. For example, NCPE is part of Equinet:

> *Cooperation in the EU setting puts us in constant liaison with the European Network of Equality Bodies [Equinet], and we participate in its working groups. There is a sharing of knowledge and an exchange of good practices, resulting in capacity building* (NCPE 2016).

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19 Not all the cooperation partners are included in the visualisation, because the organisations mentioned them during the interview but did not name them among the most important of their partners.

Figure 2: Spatial reach and cooperation partners of asylum-related organisations
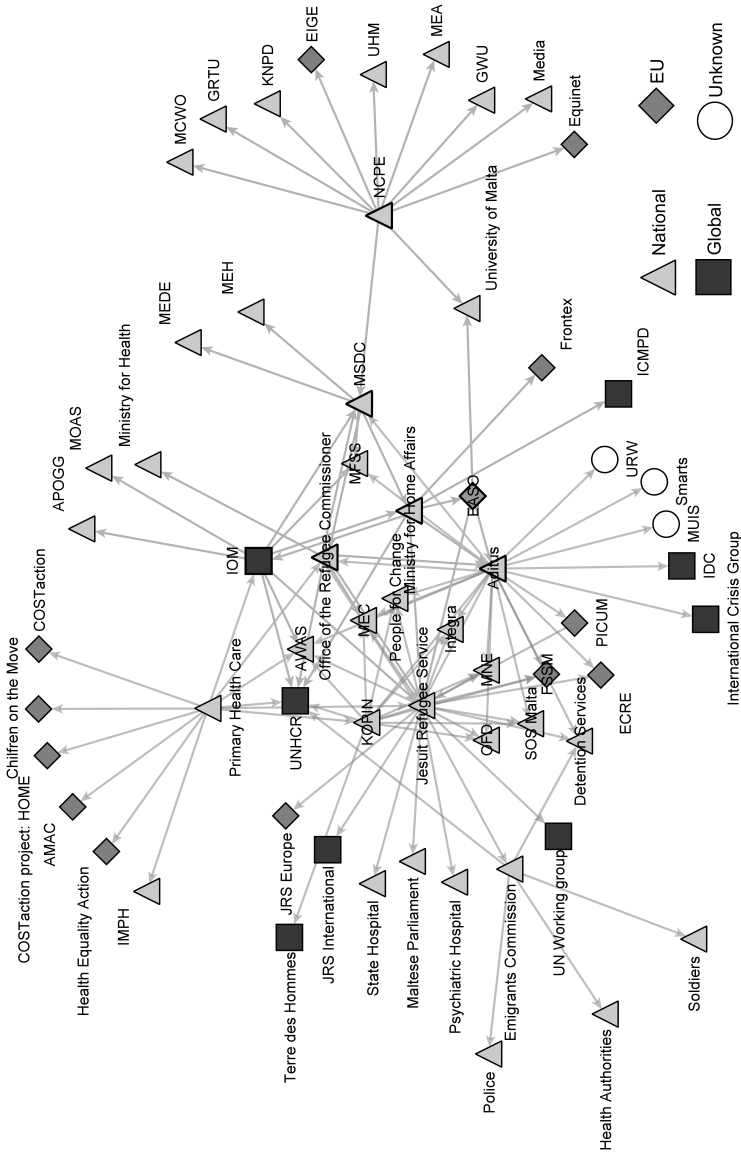
Aditus is cooperating with the Platform for International Cooperation on Undocumented Migrants (PICUM), an international NGO that promotes capacity building among NGOs whose work involves supporting undocumented migrants and helping them gain access to legal aid.

MSDC has an entirely homogeneous network on the national level but also states that it is part of an international network:

> *[MSDC] does collaborate on an international level. [...] We are part of the network for national contact points of integration, so we have... meetings almost monthly or every two months in Brussels, where there is a really good environment because [the participants] understand immigration, [have been] working on integration for years, and it is a good exercise in sharing good practices* (MSDC 2016).

MHAS cooperates with the International Centre for Migration Policy Development, which functions as a *"service exchange mechanism for governments and organisations".*[20]

Based on these findings, homogeneity cannot be confirmed for all the organisations' networks. However, international cooperation through superordinate networks for the purpose of exchanging best practices and capacity building among organisations that work in the same field could be confirmed for all the interviewed organisations. With respect to the degree of homogeneity or heterogeneity in their networks, we also looked at the partners with whom these organisations cooperate, and it was concluded that, owing to these superordinate networks, internal homogenisation of practices and structures does occur, because organisations exchange best practices not only on the national level but also internationally with organisations working in the same field.

Figure 3: Asylum-related organisations in Malta, their actor type and cooperation partners

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20 For more information, see https://www.icmpd.org/about-us.
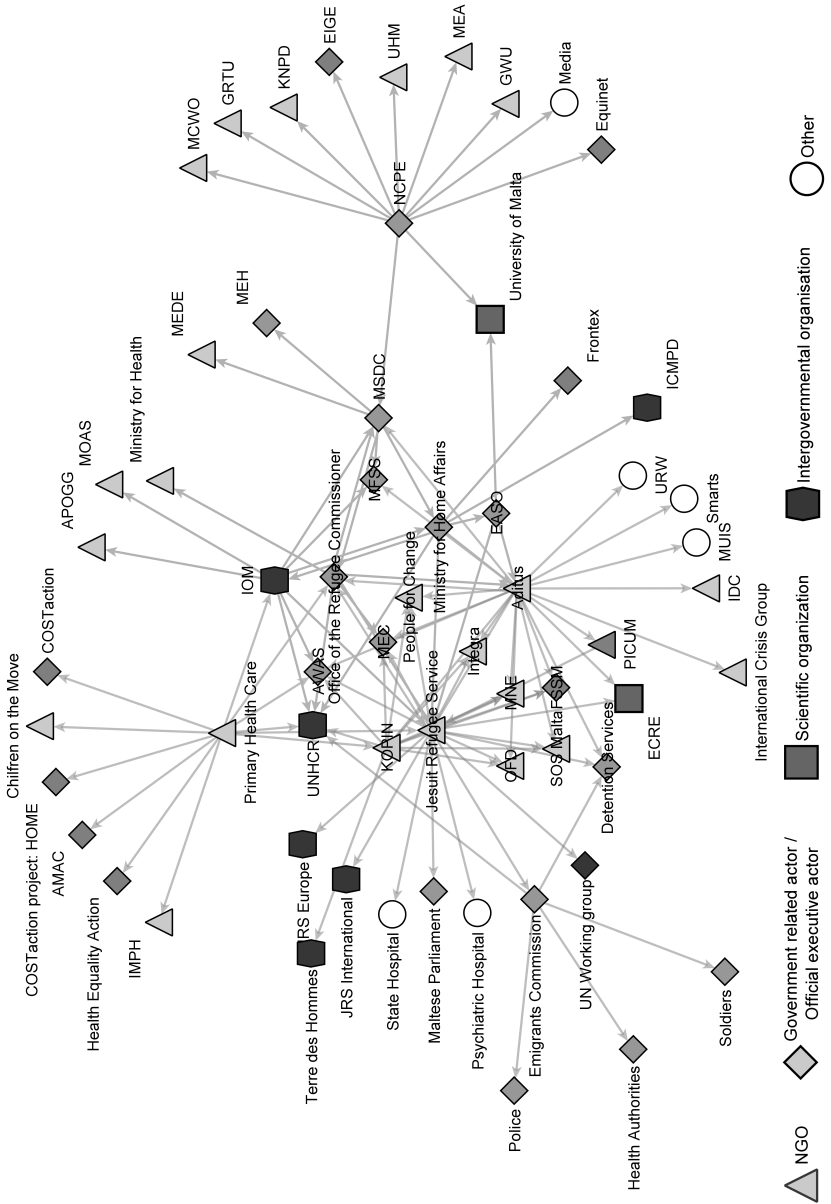
Source: Adapted from expert interviews and website analyses as part of the MAREM project 2014–16 using Visone.

When we analysed the types of organisations within these networks (e.g. NGO, government-related actor/official executive actor, international organisation, scientific organisation), we found that only MSDC's network is homogeneous, whereas NCPE, MHAS and Aditus have heterogeneous networks and cooperate with different types of actors. In terms of actor types, we can now confirm the earlier assumption that including those who exchange best practices may not necessarily result in a homogeneous organisational network. Thus, in case of the type of actor appears to be more of a connection to homogeneity than in the case of other attributes; according to the interviewed organisations, different types of organisations are needed in order to have an efficient immigration system – that is, one that must deal with multiple issues, from human rights (traditionally stressed by NGOs) to legal aspects of the asylum procedure (especially relevant for governmental organisations). Jadwiga Maczynska from EASO stated that different tasks within the field are covered by different types of actors. Regarding the role of NGOs, she says that

> *they come with a certain agenda, and I say that in a positive way. They come with a strong mandate, with a strong belief, norm or value system and they criticise us, and if they do it from that perspective, it is healthy and is partly how the [immigration] system should work: that we have different roles* (EASO 2016).

This view is supported by Aditus' statement that clients are transferred from one organisation to another to take advantage of certain competences that the organisation itself cannot provide:

> *Other NGOs refer a client [to us] if they have a legal issue. We would also refer clients to them if they have a social issue or a psychological issue. So it is kind of a give-and-take* (Aditus Foundation 2016).

Based on these results, we conclude that an exchange of best practices is not necessarily connected to more homogeneous networks. Heterogeneity is evident among different types of cooperation partners, is valued by most of the organisations and can be seen in the network visualisation. Because no information is available on whether or not these networks have been more heterogeneous in the past, it is still not possible to fully eliminate the possibility of an isomorphic process occurring. To be certain, one would need to survey the development of the networks over a longer period of time, but for now we believe that an isomorphic process is not likely to occur in the near future. This conclusion is based on the fact that from 2014 until 2016 our results regarding the networks in MAREM have been

similar every year. Isomorphic change may occur if these organisations change their opinions and later regard homogeneous cooperation partners as more beneficial to their work. Because organisations do not necessarily make rational choices, this cannot be ruled out.

Figure 4 shows the norms and values of the organisations (human rights/humanitarianism, political/enforcement of law, objectivity, religious and so on). We analysed these networks to determine whether the conclusion from the previous section can be further supported. One can see that the networks of the interviewed organisations in Figure 4 are heterogeneous. Although all the other actors cooperate with actors that have a variety of norms and values, only MSDC has a homogeneous network. Thus, Hypothesis 3, which proposes that the exchange of best practices can be connected to more homogeneous cooperation networks in terms of norms and values, is not verified. This finding can be explained by the previously examined fact that, in order to increase efficiency, the organisations consider cooperation with different kinds of partners to be more beneficial.

According to our results, a vital exchange of best practices among organisations on the national and international levels can be proven. Contrary to the prediction made in Hypothesis 3, the networks of actors are heterogeneous rather than homogeneous regarding the actor type and the norms and values of the organisation. If we include the superordinate networks in the assessment (not displayed in the figures but mentioned by the organisations), this is also the case for spatial reach.[21] This contradicts the hypothesis that an exchange of best practices among the organisations can be connected to cooperation partners with similar characteristics. However, we can assume that the organisations' internal practices might converge when they copy best practices from each other, and this process would seem to extend across national borders.

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21 The egocentric networks shown in Figure 4 tend to be homogeneous. National organisations seem to cooperate mainly with organisations that also work on the national level. Nevertheless, as analysed previously, they also cooperate with other, international networks, actively exchanging best practices with other organisations not named as direct cooperation partners. Therefore, this network appears to be more homogeneous than it actually is.

Figure 4: Asylum-related organisations in Malta showing their norms and values and cooperation partners
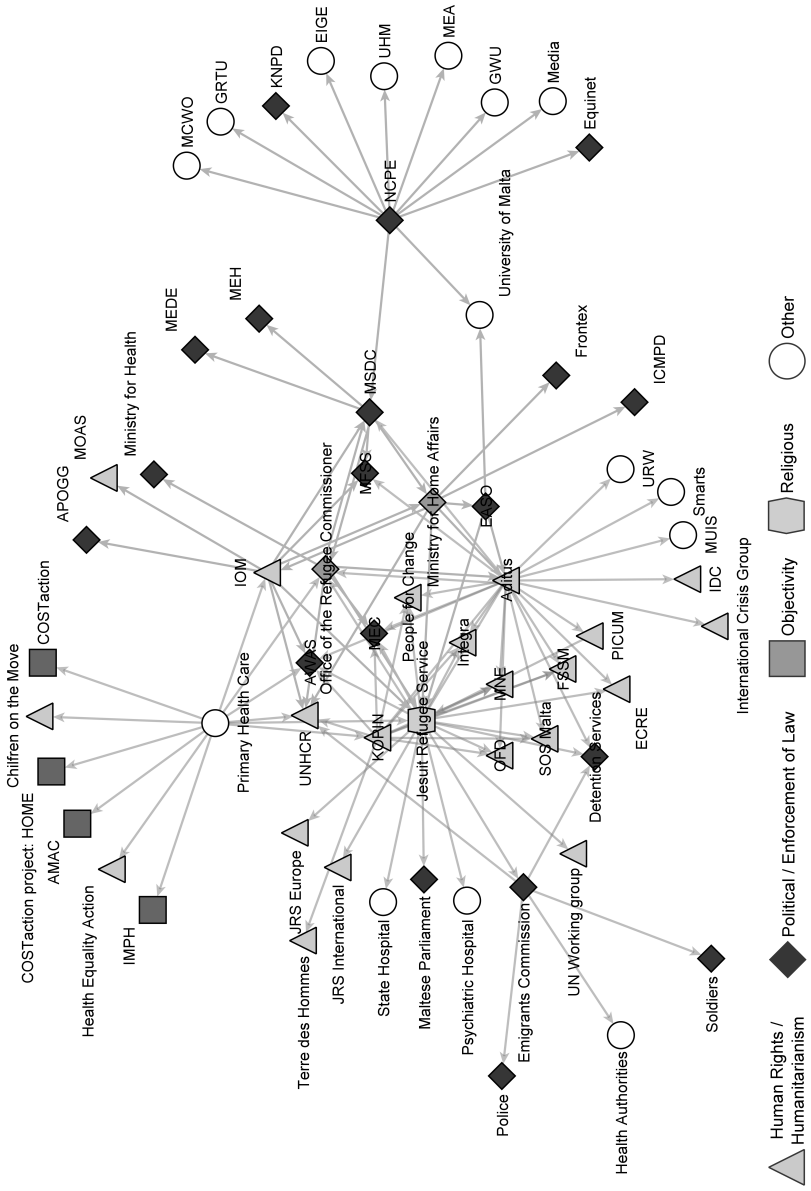
Source: Adapted from expert interviews and website analyses as part of the MAREM project 2014–16 using Visone.

5.3 State of the Integration Policy

After the elections in March 2013 and the inauguration of the Labour Party under Joseph Muscat, MSDC was established with the intention of setting up an institutional framework for dialogue with social actors and civil society. This Ministry has a wide array of tasks in various different areas, including consumer affairs, industrial and employment relations, civil liberties, equality and anti-discrimination policies, information and data protection, the volunteer and non-governmental sector and the integration of migrants (MSDC 2016). Under the leadership of the new government, MSDC set up an Inter-Ministerial Committee consisting of representatives from MSDC itself and from the Ministry for Family and Social Solidarity, the Ministry for Education and Employment, the Ministry for Energy and Health and MHAS. The aim of this committee is to develop a national integration strategy (MSDC 2015).

In June 2015, two years after its establishment, the Inter-Ministerial Committee published this strategy ("Mind D Gap"), providing guidelines for a systematic approach to integration for developing national policies and bringing about institutional change. The integration strategy was based on surveys conducted via telephone or online with different parties such as the public, civil society organisations, trade and business organisations and governmental institutions and their representatives (MSDC 2015). This new strategy is criticised by various actors involved in the field of asylum and refugees. For example, Aditus argues that the integration strategy could not be seen as an extensive integration policy*:*

> *Last year [MSDC consulted] with groups on a future integration policy. In June they published [a] framework for an integration policy. It is [a] pretty framework, [but] more of a to-do list: there should be this and that and so on. But it is very sketchy and not really a policy in the full sense of the word. It is not what we would call a proper integration policy. [...] There are a number of EU-funded projects about integration, but as such I think that at the level of national government policy there is not really a programme* (Aditus Foundation 2016).

The circumstances in Malta complicate the situation and hinder the implementation of the integration strategy. The ORC points out Malta's role as a transit country:

> *They come to Malta by mistake, at least the boat persons do. If you speak of non-boat persons, it is a different issue, but if you speak of boat people, they ended up in Malta by mistake. Their dream is to leave Malta, to move on or to go to the United States. There is no real integration* (ORC 2016).

In addition, there is a certain level of discord within the government: some delegates publicly express their antipathy to migrants and asylum seekers without being held accountable for these statements:

> *The issue is this: although you may have a president who is pro-migration, you tend to have governments or MPs, backbenchers, etc., who speak quite negatively about immigration and are openly racist on social media such as Facebook, but you don't get the government or the opposition telling them not to say that. They say it is the right of freedom of expression. It is a bit dangerous* (Aditus Foundation 2016).

Those seeking protection often regard Malta as simply a stepping stone on the way to the European mainland and especially to the European north. Considering this fact, as well as the racist tendencies even within the Maltese government, one must recognise that the integration strategy has had to contend with difficult conditions from the outset. These problems also include its brief time in operation, with MSDC having been established only in 2013 and the integration strategy having been published in 2015. Therefore, one can reasonably assume that the strategy will further stabilise and develop as time goes by, and the mere establishment of this Ministry by the new government shows that integration has become an important issue of national policy.

5.4 The Common European Asylum System (CEAS)

Because CEAS applies to all EU member states, one can assume that it will eventually lead to changes in the practices of asylum- and refugee-related actors. To address our research question whether this political programme will in fact result in such practical changes, we must examine CEAS and its (amended) directives (for more information on this topic, see the first chapter of this book).

In September 2015, Malta, along with Greece, was urged by the European Commission to communicate measures taken nationally to fully implement the Asylum Procedures Directive (2013/32/EU), which sets out common procedures for granting and withdrawing international protection, and the Reception Conditions Directive (2013/33/EU), which deals with access to reception conditions for asylum seekers while they wait for their applications to be examined (EU Parliament 2015). So far, they have not communicated the necessary implementation measures. In the case of Malta, this was due to further regulations regarding the use of detention

for asylum seekers, which was not in line with the stated requirements (UNHCR 2013).

There continue to be further practical challenges to implementing CEAS in Malta for the asylum system in general,

> *ranging from the cooperation difficulties between Member States in the responsibility allocation procedures to practical questions on the implementation of transfers on the actual access of asylum seekers to procedures for international protection* (EU Parliament 2016).

Those responsible for these apparent difficulties include the EU member states, the national administration, the courts, the asylum seekers and the system itself (EU Parliament 2016). Concerning Malta, the interviewed organisations IOM and MHAS regard legal implementation of the CEAS directives to have been completed, resulting in practical changes to ensure compliance with the new EU obligations:

> *But I would say at the moment – if I am giving an example of Malta – what I see now is that there is an initiative from the government, from entities working in this field, to standardise according to the directives and regulations [of] the CEAS in order to have a standard* (IOM 2016).
> *What I can say is that we have implemented [the directives] in full. Whether implementation has been equally effected in member states is something for the Commission to assess* (MHAS 2016).

The Reception Conditions and Asylum Procedures Directives, which were heavily amended during the review process, had an especially severe impact on Malta's asylum regime (Aditus Foundation and JRS 2014). Moving forward with implementing CEAS in terms of granting international protection and improving access to rights and integration measures (Qualification Directive of CEAS), several initiatives were carried out over the past few years in order to improve the living conditions of irregular migrants and asylum seekers in the reception centres. In addition, access to the labour market will now be granted after nine months (ECRE 2015: 46), which has been confirmed by MHAS:

> *As regards access to the labour market, as I said we try to help through employer ability training, and we also provide legal access to the labour market. [...] We [also] offer accommodations in Open Centres, and [the asylum seekers] have access to the employment market after a period of nine months, should they still be asylum seekers at that point* (MHAS 2016).

As noted earlier, there have also been significant changes in the Maltese Detention Policy, most importantly concerning the maximum duration of detention of asylum seekers, which was decreased to nine months (ECRE

2015: 49). However, although the relevant EU Directives should have been implemented by now, there was common agreement that the practical implementation, in the sense of enforcing the legal standards, has not yet been fully implemented, because it is *"a process [of] getting there [...]"* (IOM 2016). IOM also states that especially now, in light of the refugee crisis, it is not easy to implement a general system: "*It is very difficult to think of implementing a general system in the current climate"* (IOM 2016). The government has been criticised for their cursory approach to implementing the Directives: *"The way [the government] implements directives and policies is very framework-like, very sketchy"* (Aditus Foundation 2016). Also, the ORC has insisted that as a first step in properly integrating the Directives into national law,

> *we must move towards a reasonable Common European Asylum System [and] have the legal tools completely in place, [because] before the rethinking [about the Dublin Regulation and the Qualification Directive] has been done on what is common in the European Union, you cannot then predict on the local level what is going to happen if you know that these things are unstable, are not strong* (ORC 2016).

One can assume that CEAS has had an impact on the practical implementation of the new Directives in Malta and thus has already caused several practical changes; however, at this point it has not been implemented fully and still shows persistent gaps. Based on our results, we can answer our research question and confirm that CEAS does cause practical changes for the work of asylum- and refugee-related actors even though, owing to the relative newness of the Directives and the fact that CEAS and the Maltese asylum system are constantly developing, the work of asylum- and refugee-related actors has not as yet been influenced significantly.

However, one can expect that further changes will be forthcoming. On 4 May 2016, in response to the "migratory crisis" (EU Parliament 2014), the Commission took a first step towards a further (complete) revision of CEAS: an amended Dublin Regulation ("Dublin IV"), an amended EU-RODAC Regulation and a proposal for the establishment of a European Union Agency for Asylum (European Commission 2016). This reform sets out priorities for improving CEAS with the primary aim of strengthening the role of EASO and developing it into an agency that will facilitate the implementation of CEAS and improve its functioning (European Commission 2016).

5.5 Cooperation of Asylum-Related Organisations in Malta with EASO

With regard to the Maltese organisations cooperating with EASO as the actor assisting EU member states in the practical implementation of CEAS, we found that four of the six interviewed organisations – namely MHAS, the ORC, IOM and Aditus – are in contact with EASO, although their forms of contact differ. For some of them, such as MHAS and the ORC, EASO provides training sessions of the staff members:

> *Yeah, we do actually work with EASO. […] As a matter of fact, [MHAS] has benefited from EASO training on several occasions. [...] We still cooperate with them on good terms, especially as regards participation in training initiatives, which are of course positive* (MHAS 2016).

ORC also refers favourably to the EASO training programme:

> *I must say that the EASO training programme is helping a lot. […] This week, four members of the staff attended trainings by EASO, on interviewing techniques and on exclusion as well. This week they are having face-to-face training. First, you get about 14 days of training over the internet and then in the last week you spend four days face to face with the experts. So this is also a great help* (ORC 2016).

Other organisations report an exchange of data, for example in the form of "*practical handbooks"* (IOM 2016). Some international organisations such as IOM even cooperate with EASO by working together in hotspots for relocation:

> *We collaborate with EASO in relocation as one of the entities in the hotspots, with EASO, Frontex and the UNHCR* (IOM 2016).

Aditus is monitoring EASO in a blog to address allegations that EASO lacks transparency (EASO Monitor Blog 2016) and also participates in its Consultative Forum, *"the yearly conference which is open to NGO participation"* (Aditus Foundation 2016).

> *The idea behind [the blog] was that when EASO was set up, it was very closed. There was not much information concerning what EASO was, what it was doing, what they were discussing. So the idea was more to monitor the actual organisation, trying to make it more transparent, trying to know what their discussions were about* (Aditus Foundation 2016).

Aditus also stresses the fact that EASO is quite a young agency and is still evolving, implying that its role and its remits will eventually become clearer:

I would say maybe their role is getting clearer as time goes by. I think in the beginning they were also not really sure of their remit. The situation changes so rapidly, they are rushing off to the hotspots, doing this, doing that. [...] I think it is an evolving agency (Aditus Foundation 2016).

Even though the EASO headquarters is located in Malta, its influence is greater on the European level than on the Maltese asylum system: *"Despite the fact that EASO is based in Malta, it has more of an impact on a European level"* (IOM 2016).

As the above analysis shows, some organisations are in contact with EASO, but in various different ways. Therefore, the impact of EASO on the Maltese organisations should be evaluated further once its mandate and its remits are better clarified.

5.6 Criticism and Suggestions

The interviewed organisations were asked to suggest improvements in the asylum situation in Malta and Europe. With respect to the proposals on the European level, it is important to note that there is no common understanding of what the achievements of CEAS are supposed to mean. For example, ORC refers to such confusion:

When you are speaking about a CEAS, it does not boil down to just how they integrate or how they reside. [...] When [...] you say that in a certain country 80 per cent are given protection and speaking of the same country another member state says they are given only two per cent protection, there is something wrong (ORC 2016).

But MHAS has a different view:

Many people seem to have the impression that we will have effectively standardised the asylum system only when all member states start getting similar recognition rates. I too get this impression, but I think this is rubbish, mainly because each application is or should be ultimately assessed on its own merits (MHAS 2016).

The discrepancy between these two statements shows the lack of consensus concerning the achievements of CEAS. However, most interviewees, especially Aditus and the ORC (2016), criticise the Directives, above all the Dublin Regulation, and considered the lack of mutual trust between member states to be the result of the continued fragmentation of the system. This is regarded as one of the main weaknesses of CEAS. Especially regarding the asylum procedure and asylum applications, they agree that

CEAS, as well as the regulations, should be based more on solidarity instead of on individual responsibility alone:

> *Basically, everyone looking out for himself – I don't think that would be a solution. I think it can be improved in the sense of introducing a solidarity component* (MHAS 2016).

ORC further demands a Dublin Regulation based on solidarity:

> *There will always be need for the qualifications directives to be recast, for the procedure directives to be recast. After the Dublin Regulation, Dublin II became Dublin III, and soon the need for recasting was felt. It is obvious because, more than Dublin II, Dublin III is based on responsibility and not on solidarity. At the moment all the European states are pushing towards solidarity, so the Dublin Regulation has to be scrapped completely. And that is why, with respect to the local states, I believe that before we have that, we must have something more common and so on. The Dublin Regulation must be changed* (ORC 2016).

The organisations also request that the EU work more like a union, with all member states working together rather than separately in order to resolve the problems arising from the refugee crisis.

All interviewed actors desire further action on a European level in this field and feel that the future challenges and difficulties should be faced by all the member states together. For example, IOM states that

> *in general, [the EU member states should] come together and do what they said they would do, which is cooperate, support each other and act as one. [...] I would say that everybody understands that the situation is very hard, but dealing with it alone, as individual states, is only going to make it harder. We need to start working more as a union, as one whole, not as each state dealing with its own issues and putting its national interest ahead of the interests of the EU* (IOM 2016).

MHAS stresses that it would be wrong for individual states to try to resolve the refugee crisis on their own: "*Basically, everyone for himself – I don't think that this would be a solution*" (MHAS 2016).

On a national level, almost all actors would like to see a "Two-Way Approach to Integration". This means that the national government should facilitate access to the labour market and lower barriers to citizenship:

> *The government [should] recognise the benefits of integration for the young up to citizenship for adults who have been here for a while, and according to the law their cases should be judged, they could be judged favourably, but we find that very few people are given citizenship* (IOM 2016).
> *That's one of the main things [that should be changed]: access to the labour market* (IOM 2016).

> *[The government] needs to make plans to facilitate access to the labour market* (MSCD 2016).

On the other hand, the Two-Way Approach to Integration means that the asylum seekers and refugees must gain

> *a certain understanding of the Maltese language and culture in order to make sure that they can integrate into a community more easily, for example, because they would also be able to provide services* (IOM 2016).

In addition, asylum seekers and refugees in Malta should be better monitored, especially regarding insufficient access to the labour market. Many people are unable to work legally, which leads to a

> *massive black labour market in which people are not paid enough, they are maltreated [and] are made to work hours that are not in any way acceptable according to EU standards* (IOM 2016).

Aditus states that one reason for this is that

> *a lot of the employers would not be willing to go through the process [and] to pay the national insurance* (Aditus Foundation 2016).

This situation often forces asylum seekers and refugees to work

> *in the hotel industry or restaurants with bad working conditions or in even worse sectors, such as construction work, which is one of the most dangerous jobs* (Aditus Foundation 2016).

6. Conclusion

Based on the results we have presented, we can conclude that the theory of neo-institutionalism can hardly be confirmed. Concerning Hypothesis 1, organisations tend to hire staff members only if the applicants have a certain academic background and expertise. Still, because no specific field of study is required for employment, it is not likely that the result will be a more harmonised way of working. One can conclude, however, that the level of professionalisation required could result in the increased professionalisation of the asylum system to which the organisations must adjust. Still, it is not possible to say this for certain based on our research results so far. Concerning Hypothesis 2, which refers to funding sources and the need for receiving organisations to adapt their behaviour to their donors' demands, none of the organisations indicated that they felt the need to adapt. In the years since the implementation of CEAS, we can conclude

that the asylum system in Malta, as affected by several adjustments to the CEAS, seems to be in a healthy state when it comes to its actors: the organisations fulfil different roles in the system and seem to value this heterogeneity. Furthermore, concerning Hypothesis 3, based on the concept of neo-institutionalism, one can see that there is a frequent exchange of best practices among the organisations. Recent reception strategies are a particularly good example of the attempt to institutionalise cooperation among the organisations. Moreover, organisational participation is now common in superordinate networks. Evidently cooperation and the exchange of best practices and expertise are increasing on the European level as well as on the national level. Nevertheless, contrary to our presumption, this does not mean that the networks are more homogeneous: within the interviewed organisations, diversity and different kinds of expertise are valued. Because we were able only to show some egocentric networks of asylum related organisations in Malta and the interviewed organisations represent only an extract of the entire Maltese cooperation network, further research would be needed to fully verify or falsify our hypotheses concerning neo-institutionalism. Possibly one could monitor the development of these networks over a longer period of time or could increase the number of interview partners to cover all of them.

Concerning Hypothesis 3, it is clear that CEAS has enhanced cooperation and is likely to formalise it further. Because standardisation of the asylum system in Europe, which is the main scope of CEAS, cannot be regarded as finalised yet, further adjustments will be needed in the future. The legal framework needs to be constantly adjusted to address the changing migration situation. Still, its implementation has already had a huge impact on national policy, for example, in the establishment of MSDC and in the change in the reception strategy. On this basis, one can assume that it has also had an impact on Maltese asylum-related actors. With increasing standardisation and professionalisation in the field across the EU, it is possible that, as mentioned before, CEAS will also force the organisations to become more professional. The extent of this impact will need to be assessed in the future.

With regard to EASO, which is the European institution entrusted with supporting the member states in implementing CEAS, contact with EASO could be confirmed for four of our six interview partners: this contact occurs in the form of training sessions, exchange of data material and work cooperation. Therefore, EASO's influence on the asylum-related actors in Malta is evident, but so far this influence has been minimal for most orga-

nisations and, if it has occurred at all, is hardly visible. Further cooperation and greater influence might result if the mandate and the EASO's position become clearer with time — or if Malta should require increasing support in the future in response to rising numbers of arrivals. Although based in Malta, EASO currently influences actors mainly on the European level, which then filters down to the national level.

On the national level, although recently an integration policy was developed soon after the new government had set up a Ministry responsible for integration, it still needs to be improved. There are difficulties with access to the labour market, legal aid and information policy. Further improvements are about to be achieved through an increasing dialogue between different actors.

All in all, the asylum system even in the small country of Malta is under a lot of pressure, and the organisations need to keep adapting to new challenges and different needs owing to changing migrant groups and changing policies. Cooperation among the different actors operating in this field is facilitating the work required by the quickly changing situation (and vice versa) in order to cope with the day-to-day requirements. As cooperation improves – not only among the organisations but also among state actors as part of CEAS – the asylum system might improve as well.

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Conducted Interviews (2016), alphabetically:

Aditus Foundation
EASO
IOM
MHAS
MSCD
NCPE
ORC