

## Exchange visit to Malta

Dates: 14-15 April 2026

### Project: Support to Frontline Workers (SFW)

## EVENT TAKEAWAYS - REPORT

### 1. Context

Under the Support to Frontline Workers (SFW) project, implemented within the Return and Reintegration Facility (RRF) and funded by the European Commission (DG HOME), a study visit was organised in Malta from 13 to 15 April 2026. The visit brought together frontline practitioners from Belgium, Denmark, Luxembourg, Ireland, Switzerland, Italy, Germany, and Portugal, alongside Maltese authorities and IOM Malta.

The visit responded to the continued need for peer-to-peer exchange among practitioners working directly with migrants in irregular situations, with a focus on return counselling, outreach, and operational coordination between relevant – multi-level and multi-disciplinary - stakeholders.

The relevance of the visit is closely linked to the implementation of the New Pact on Migration and Asylum, which calls for more coherent, efficient, and humane return systems across EU Member States. In this context, the Malta visit provided an opportunity to analyse, through the eyes of multiple member states, how a highly centralised migration system operates in practice, particularly in relation to:

- return counselling and AVRR implementation,
- institutional coordination,
- and the link between asylum procedures and return.

The exchange was designed to enable reflection on how different governance models influence frontline work and case outcomes, and what elements may be transferable across national contexts.

Malta offers a very interesting (and contrasting) case for SFW when it comes to *multi-level collaboration*, precisely because it is *not* a classic multi-level system.

### 2. Objectives and focus of the exchange visit

The exchange visit aimed to:

- Provide participants with a practical understanding of Malta's centralised migration governance model, including the role of key institutions;
- Explore how return counselling is operationalised, from early intervention and outreach strategies to intense case management;

- Examine the interaction between asylum and return procedures;
- Analyse how detention, enforcement, and incentives interact with voluntary return uptake;
- Reflect on operational challenges, including identification, documentation, vulnerability assessments and time constraints;
- Identify lessons with cross-border relevance for frontline practitioners.

### 3. Malta's approach in action: centralised and operational perspective

#### *A highly centralised system*

Unlike relatively more decentralised contexts showcased during other visits under the SFW project, Malta operates a highly centralised governance model, where what would normally be “multi-level” (national–regional–local) is largely internalised within national structures, authorities such as the Ministry for Home affairs, Security and Employment (MHSE), Immigration Police, and AWAS. This structure enables:

- rapid communication and decision-making,
- strong operational alignment between actors,
- and daily informal coordination.

The key actors (Migration Directorate, Immigration Police, AWAS, etc.) operate at national level but perform both strategic and operational roles

This results in a *compressed* multi-level system, where coordination happens within institutions, rather than across multiple ‘vertical’ levels, often informally and on a daily basis. Multi-level collaboration is not absent — it is *internalised and operationalised horizontally within the state*, rather than vertically across governance levels, excluding civil society in the process.

#### *A “closed loop” between asylum and return*

A defining feature of the Maltese model is the tight linkage between asylum procedures and return. Following a significant backlog in 2019 (approximately 4,000 pending applications), Malta worked with EUAA to enhance the asylum process: establishing SOPs, creating a quality control unit, and fast-tracking decisions. The result is that by the time a negative asylum decision is issued, the return process can be triggered immediately. This creates:

- continuity between decision-making and implementation,
- reduced delays,
- and increased return rates.

#### *Return counselling from the start*

Although not formally embedded in legislation, return counselling plays a central role in practice. It is introduced early in the migration journey and delivered in detention and

reception settings. Return counsellors are mobile, visit open centres (AWAS) at least twice a month, and maintain continuous contact with migrants throughout the process. The early and continuous engagement was identified as a key driver of voluntary return uptake.

Under the New Pact, Malta is planning to introduce return counselling at the earliest point of the migration journey, ensuring migrants are informed before medical clearance is even completed. The main implementation challenge is not the counselling itself but obtaining travel documents within the 12-week timeframe, particularly for undocumented migrants who may require in-person interviews at their country's embassy.

### *AVRR incentives and IOM partnership*

The Maltese model combines cash incentive schemes, and in-kind reintegration support via IOM AVRR programmes – who, in their turn, place this within a structure of vulnerability assessments, in close collaboration with the Ministry. AVRR provides pre-departure counselling and logistics, travel assistance, and post-return reintegration support. Between 2023 and 2026, IOM Malta assisted 48 returnees, with Colombia, Nigeria, Somalia, and Venezuela as the main nationalities.

Participants noted that the combination of early counselling, financial incentives, and efficient procedures can significantly influence return decisions.

### *Outreach and communication strategies*

Outreach is proactive and multi-channel, combining institutional and community-based approaches:

- regular visits to reception centres,
- multilingual information materials,
- engagement with community actors (e.g. shop owners, religious leaders),
- public campaigns (e.g. bus stop advertising, QR-coded posters).

These strategies aim to build trust, increase awareness, and normalise voluntary return as a realistic option. Participants observed that public visibility of return as a service (while not without controversy) reduces stigma and increases take-up.

### *Practical operational coordination and decision making replaces formal governance layers*

Instead of structured multi-level governance mechanisms (e.g. coordination councils, co-creative project design, formal networks, etc.), Malta relies on daily *informal* communication between institutions, *small administration size* enabling *rapid problem-solving*, and *direct interaction between policymakers and frontline staff*.

In practices this is exemplified within coordination between Migration Directorate, Immigration Police, and AWAS as something continuous, spontaneous and case-driven. Issues are often resolved in a practical matter directly, rather than through formal processes.

In Malta, operational proximity substitutes formal multi-level governance structures, increasing efficiency but reducing institutional depth.

#### 4. Selection of key insights from the final exercise

The group of expert participants highlighted the following operational qualities observed throughout the visit. Discussions lead to specific limitations to be taken into account and a listing of good (potentially transferable) practices.

The following insights reflect broader tensions between efficiency and inclusiveness, and between centralisation and multi-actor engagement. It lays out a seeming paradox: while it seems that there is *flexibility* because of a history of migrant arrivals in waves and intense, individual case work, and while centralisation enables *efficiency*, systemic *adaptability* can still be considered potentially limited when *responding to complex migration dynamics* of the future, because of reduced diversity of perspectives, checks and balances, and missing bottom-up input.

#### Structural challenges observed

<b>Participants identified several key challenges</b>	<ul style="list-style-type: none"> <li>• Sustainability concerns (e.g. reliance on specific tools such as incentive schemes).</li> <li>• Limited legal embedding of return counselling.</li> <li>• Fragmentation or isolation of certain processes within a centralised system.</li> <li>• Limited NGO involvement and constrained multi-actor perspectives.</li> <li>• Tensions between institutions affecting information flow.</li> <li>• Geographic and structural constraints influencing implementation.</li> <li>• Difficulties aligning voluntary return with strict timeframes under the Pact.</li> <li>• Operational challenges related to identification and travel document acquisition.</li> </ul>
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#### *Operational constraints:*

- Obtaining travel documents remains the main bottleneck, especially for undocumented migrants.
- Time constraints under the Pact (e.g. 12-week procedures) create implementation pressure.
- Limited feasibility of alternatives to detention due to identification issues and risk of absconding.

### *Governance limitations:*

- Centralisation reduces fragmentation but limits NGO involvement and bottom-up perspectives.
- Strong existing tensions between governmental and non-governmental actors affect cooperation.
- Lack of legal formalisation of certain practices (e.g. counselling) may impact sustainability.

### Good practices observed

<p><b>Participants identified several key practices</b></p>	<ul style="list-style-type: none"> <li>• Dedicated case management with individualised solutions.</li> <li>• Well-equipped staff capable of adapting to fluctuating migration dynamics.</li> <li>• Strong informal coordination between institutions.</li> <li>• Multiple communication channels supporting outreach and counselling.</li> <li>• Early and continuous counselling enabling informed decisions.</li> <li>• Structured return processes discouraging system abuse (through clarity and predictability).</li> </ul>
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The following elements were further discussed, remaining within the Maltese context.

#### *Good Practice 1: Early and continuous return counselling*

Embedding counselling early in the migration process, including in detention settings, supports informed decision-making and increases voluntary return uptake.

Counsellors' mobility across centres and continuous case contact are essential enablers. Under the Pact, Malta is moving to introduce counselling at the very first point of contact, before medical clearance.

#### *Good Practice 2: Closed-loop asylum–return system*

Strong alignment between national strategy and local implementation

One of the clearest takeaways is the high level of alignment between policy and practice. National priorities (e.g. linking asylum and return, increasing return rates) are directly translated into operational workflows, and implemented without major institutional fragmentation. The “closed loop” between asylum and return is a concrete example:

- policy objective → streamlined asylum decisions
- operational outcome → immediate triggering of return procedures

Malta demonstrates how *tight vertical alignment can reduce implementation gaps*. (The latter is a recurring challenge in more decentralised systems.)

### *Good Practice 3: Operational coordination in a centralised system*

Daily informal coordination between the MHSE migration directorate, Immigration Police, and AWAS enables rapid problem-solving and coherent case management. Issues are resolved in real time rather than through formal processes. Small administration size is a structural enabler, but the principle - proximity between policy and practice - offers lessons for larger systems.

### *Good Practice 4: Multi-channel outreach*

Combining institutional outreach with community-based approaches, including local actors such as religious leaders or shop owners, enhances trust and access. The integration of social media and public visibility of the service (including bus stop advertising) can help normalise return as an option and expands reach beyond formal settings.

### *Good Practice 5: Combined incentive and AVRR framework*

The integration of financial incentives with structured reintegration support creates a comprehensive return package.

## 5. Opportunities for transferability

### **A comparative exercise:**

Participants reflected on how Malta's model contrasts with other SFW contexts. In the comparison table that emerged from the final session:

<b>Bilbao</b>	Bottom-up: strong municipal and civil society layer with complex local multilevel collaboration; limited national strategy presence.
<b>Milan</b>	Balanced middle way: national strategy connected to a regional and municipalised approach with broad civil society engagement. Continuous efforts to link all the levels on the vertical axis.
<b>Malta</b>	Top-down: very strong national presence; limited civil society and municipal role on the vertical axis; coordination internalised horizontally within the state.

While Malta's model is context-specific, several elements offer transferable insights:

- Early counselling integration: embedding return counselling at the earliest point of the migration pathway, regardless of governance structure.
- Strengthening the asylum–return link: improving operational coordination between asylum and return units to reduce delays between negative decisions and return initiation.

- Combined incentive frameworks: designing return packages that integrate cash support and in-kind reintegration assistance, calibrated to vulnerability profiles.
- Practical operational coordination mechanisms: even in decentralised systems, creating regular (also informal) coordination channels between key institutions/actors can reduce fragmentation.

However, participants emphasised that centralisation advantages may not translate to larger or decentralised systems, and adaptation would require contextualisation to national governance structures.

## 6. Conclusion

The Malta visit highlighted a distinct model of “internalised multi-level governance”, where strong centralisation enables close alignment between national strategy and local implementation. This is reflected in the direct translation of policy priorities into operational practice, supported by continuous coordination between key institutions. As a result, the system benefits from efficiency, clarity of roles, and the ability to respond quickly to straightforward operational challenges – if they fit within the system’s own range of motion. Its strengths lie in strong institutional coordination, early and continuous counselling, and the integration of asylum and return processes. For frontline workers, the key takeaways are the importance of timely engagement, clarity of legal pathways, and the integration of counselling across the full migration journey. Malta demonstrates that a well-coordinated, early-intervention approach, even without formal legal embedding, can significantly influence return outcomes.

At the same time, the limited involvement of local authorities, NGOs, and community-based actors means that fewer structured channels exist for bottom-up, community feedback and engagement. While coordination is strong within the institutional framework, the reduced diversity of perspectives may influence how complex or evolving needs are identified and addressed in practice. Moreover, the absence of a broader ecosystem of actors can limit opportunities for trust-building, complementary expertise, and alternative approaches to case management that are often present in more decentralised contexts. It lacks accountability and, in some respects, creative resilient systems which are agile in unforeseen situations. Therefore, Malta makes sure that the situation is under tight, centralised, social and juridical control.

## Institutions and organisations met

*Malta Migration Directorate - Ministry for Home Affairs, Security and Employment; Immigration Police; Agency for the Welfare of Asylum Seekers; International Organisation for Migration Malta; ICMPD Mediterranean*