

# BEYOND PROCEDURES: HOW MULTI-LEVEL GOVERNANCE SHAPES OUTREACH AND ASSISTED VOLUNTARY RETURN COUNSELLING AT THE LOCAL LEVEL

Policy brief based on the *Support to Frontline Workers* exchange visits to Bilbao, Malta and Milan, implemented by the International Centre for Migration Policy Development (ICMPD), under the Return and Reintegration Facility (RRF).

**Key message:** Outreach, counselling and Assisted Voluntary Return-related support work best when they are embedded in coordinated service ecosystems. Whether governance is bottom-up, co-designed or centralised, migrants need accessible entry points into support systems, while frontline workers need clear roles, feedback channels and practical links between basic support, counselling and case resolution.

## 1. WHY GOVERNANCE DESIGN MATTERS FOR FRONTLINE SUPPORT

Migrants in vulnerable situations often depend on several systems at once: national migration authorities, municipal services, civil society organisations, reception actors, legal advisers, outreach teams and, in some cases, Assisted Voluntary Return (AVR) providers. Whether they receive coherent support depends less on the existence of individual services than on how these services are connected across governance levels.

The Pact on Migration and Asylum places renewed emphasis on coherent, humane and efficient systems.

Yet coherence does not happen automatically. It is built through the way responsibilities, information flows and trust-based working relationships are organised between national, regional, municipal and community-based actors.

Drawing on the *Support to Frontline Workers* exchange visits to Bilbao, Milan and Malta, this policy brief examines how different governance approaches shape coordination of outreach, counselling and AVR-related support in practice. The aim is not to identify one ideal model, but to draw out transferable governance functions that help frontline workers reach people who are outside, or only partially connected to, formal systems.

**Central policy question:** How do different multi-level governance models shape the ability of frontline workers to reach migrants in vulnerable situations, coordinate support services, and provide counselling on available pathways, including AVR?






## At a glance: Governance levels shaping access

<b>National / EU frameworks</b>	Legal framework, AVR standards, quality assurance, funding and implementation requirements
<b>Regional / intermediary coordination</b>	Technical guidance, funding, service networks and coordination platforms
<b>Municipal and frontline services</b>	One-stop access, outreach, stabilisation, legal/social counselling and referral
<b>Community / migrants / diaspora</b>	Trust, first contact, lived experience and informal information flows

## 2. THREE GOVERNANCE APPROACHES IN PRACTICE

The three exchange visits highlight distinct ways of organising the relationship between national frameworks, local practice and frontline support services.

<b>DIMENSION</b>	 <b>BILBAO</b>	 <b>MILAN</b>	 <b>MALTA</b>
<b>Governance approach</b>	Network-of-networks governance, anchored in local access and regional coordination, linking municipal, provincial, regional, national and civil society actors through differentiated roles and a shared rights-based narrative.	Institutionalised co-design in which the municipality, civil society and national actors share planning and implementation responsibilities.	Centralised operational coordination where strategic and frontline functions are largely internalised within national institutions.
<b>How outreach is organised</b>	Through municipal services, one-stop access points, intercultural mediators, NGOs and diaspora/community organisations.	Through the Milano Welcome Center, municipal services, civil society and international partners embedded in a local service ecosystem.	Through institutional visits to centres, early contact, public campaigns and direct communication between national actors, a limited number of non-governmental actors (e.g. religious organisations), community actors and beneficiaries.
<b>How counselling is positioned</b>	Within broader rights-based support, stabilisation and inclusion pathways.	Within holistic case management, while legal, housing, health and employment needs are assessed.	As an early and continuous return counselling practice closely linked to asylum and return procedures.
<b>Role of AVR</b>	One possible option, though not the priority of the local system.	One pathway among several within person-centred case resolution.	A core operational principle of the system, linked to the asylum-return loop.
<b>Main coordination risk</b>	Weak links between local support ecosystems and central national AVR frameworks.	Co-design creates shared ownership, but can blur accountability, and depend on continuous coordination and stable funding.	Limited bottom-up feedback enabled, hampering community intermediation and civil society participation necessary for accountability and adaptability.

### 3. WHAT EACH MODEL SHOWS

#### BILBAO: TRUSTED LOCAL ACCESS AND RIGHTS-BASED ENTRY POINTS

Bilbao illustrates how a local and regional support ecosystem can create access for people who may otherwise avoid formal institutions. The “*padrón*” and firewall logic, one-stop services, intercultural mediation, diaspora organisations and municipal referral pathways help turn the city into a connector between people and services.

The model is especially relevant for outreach and early support. It shows that migrants are more likely to seek help when registration and social support are not experienced as enforcement risks. It also shows how a shared narrative can sustain cooperation across institutions without relying only on hierarchy.

For AVR, the Bilbao case suggests that return-related information is most credible when placed within a broader framework of stability, rights, self-agency and future planning. The challenge is that local inclusion systems may remain weakly connected to national AVR structures.

#### MILAN: CO-DESIGN AS GOVERNANCE INFRASTRUCTURE

Milan shows how co-design can move coordination beyond ad hoc procured cooperation. Through “*co-progettazione*”, public authorities and third-sector actors jointly define needs, design services and share responsibility for outcomes. The Milano Welcome Center operationalises this model by bringing social, legal, employment and AVR counselling into one accessible space.

This matters because AVR is not presented as a stand-alone or enforcement-adjacent intervention. It emerges within holistic case management, after basic needs and vulnerabilities are assessed. Stabilisation and vulnerability assessment become preconditions for informed decisions.

The Milan model also reveals the governance demands of co-design. Shared planning and implementation can strengthen ownership, trust and service integration, but only when roles, accountability mechanisms and decision-making processes remain clear.

Moreover, without sustained funding, continuous coordination and regular review, co-design risks becoming difficult to steer: responsibilities for case outcomes may become blurred, AVR messaging may become uneven across actors, and innovative services may remain dependent on temporary project cycles.

#### MALTA: EARLY COUNSELLING AND TIGHT INSTITUTIONAL ALIGNMENT

Malta demonstrates the operational advantages of a centralised model. Close alignment between asylum procedures, return activation and national institutions can reduce delays and support early, continuous counselling. Frequent informal coordination between institutions enables rapid problem-solving and coherent case management.

For frontline practice, the key lesson is the value of early engagement and clear pathways. Information is generally provided early in the process, counsellors maintain contact across the process, and the asylum-return link creates procedural continuity.

At the same time, the Maltese model raises questions about participation and adaptability. Limited involvement of local authorities, NGOs and community-based actors means fewer structured channels for bottom-up feedback, community trust-building and the identification of complex or emerging needs.

### 4. WHAT WORKS ACROSS MODELS

Although Bilbao, Milan and Malta represent different governance logics, the visits point to several functions that support frontline workers across contexts.

- **Stable basic support as a precondition:** Return counselling, regularisation advice or any other pathway discussion is unlikely to be meaningful if housing, health, legal clarity and family stability are absent. Stabilisation could be understood as part of case resolution, not as a delay.
- **One-stop access points as governance tools:** Harreragune (Bilbao’s one-stop-desk) and the Milano Welcome Center show that one-stop models are not only service delivery mechanisms. They also organise referrals, reduce fragmentation, build trust and create practical interfaces between local needs and wider policy frameworks.
- **Early and continuous counselling:** Information on available options should begin early and continue over time. Early counselling is most effective when it is linked to informed choice, realistic case assessment and access to other support services.
- **Operational proximity reduces delays:** Because key actors communicate directly and frequently, Malta shows how close operational coordination between migration authorities, reception actors, police and counselling providers can reduce implementation gaps.

- **Trusted intermediaries and community reach:** NGOs, intercultural mediators, diaspora organisations and community actors can reach people who do not trust formal institutions. Systems that exclude these actors may gain speed but lose access and feedback.
- **Protected data and safe access:** Where people fear that seeking support may expose them to enforcement, they are less likely to access services. Legal or practical firewalls between social service data and immigration enforcement can improve trust and outreach.
- **Feedback loops from practice to policy:** Frontline workers see gaps before policy systems do. Structured vertical feedback loops help national frameworks learn from local practice and adapt to changing realities.

## 5. POLICY RECOMMENDATIONS

The following recommendations are intended for EU and Member State policymakers designing or revising outreach, counselling and AVR support frameworks, including in the context of National Implementation Plans under the New Pact on Migration and Asylum.

### 1. EMBED AVR COUNSELLING IN BROADER SUPPORT ECOSYSTEMS, NOT AS A STAND-ALONE SERVICE

Return counselling is more credible when connected to legal advice, housing, health, psychosocial support, employment guidance and stabilisation. Outreach and AVR information should be placed where people already seek help, including municipal hubs, community spaces, social services and trusted civil society organisations. Counselling pathways should also be designed around the full migration journey rather than a single decision point, allowing for early and continuous counselling. This framing may help reduce stigma and supports informed decision-making.

### 2. RECOGNISE MUNICIPALITIES AND FRONTLINE SERVICES AS STRUCTURAL PARTNERS IN NATIONAL AVR FRAMEWORKS

Local authorities, NGOs and community-based services are often the first contact point for people outside formal systems. They should be treated as part of the architecture of outreach and case resolution, not only as referral channels.

### 3. FUND ONE-STOP ACCESS POINTS AND REFERRAL MECHANISMS BEYOND PILOT CYCLES

Integrated hubs can reduce fragmentation and improve access, but they require stable funding, clear mandates and sustainable staffing. Temporary projects should not carry permanent system functions indefinitely.

## 4. INSTITUTIONALISE COOPERATION WHERE APPROPRIATE, SUPPORTED BY A NATIONAL LEGAL FRAMEWORK

Public authorities, civil society and operational partners should be enabled to jointly define needs, roles, referral pathways and accountability mechanisms from the outset. This cooperation should include structured vertical feedback loops between frontline practice and national policy. Regular technical forums, municipal-national coordination mechanisms and structured learning channels can help national systems respond to gaps identified in daily practice.

## 6. CONCLUSION

Outreach, counselling and AVR support cannot be effective when designed as isolated interventions. They depend on how legal frameworks, funding arrangements, local access points, frontline services and community-level trust are connected in practice. Governance design therefore directly shapes whether people in vulnerable situations receive early and continuous information, stabilisation support and realistic counselling on the options available to them.

For European Union and Member State policymakers, this means that National Implementation Plans and AVR frameworks should look beyond procedures alone. They should create the conditions for coordinated service ecosystems: clear roles across governance levels, stable funding for access points, protected channels for support-seeking, shared referral pathways and feedback loops from frontline practice into national policy design. Where these conditions are absent, even well-designed frameworks will reach only those already connected to formal systems and miss the people they are most intended to serve.

### Sources:

*This brief draws on [Support to Frontline Workers](#) event takeaways from Bilbao, Milan and Malta peer-to-peer exchange visits, facilitated discussions, expert workshops, and related online forums.*

© International Centre for Migration Policy Development (ICMPD), 2026. All rights reserved. Short sections may be quoted without explicit permission, provided that the source is acknowledged. Funded by the European Commission – Directorate-General for Migration and Home Affairs. The content of this publication is the sole responsibility of ICMPD and does not necessarily reflect the views of the European Union.

Author: Joachim Joris. Contributions and content review: Aleksandra Izydorczyk, Gloria Rendón Toro, and Veronica Grazi.