

Comments by the UNHCR Regional Representation for Northern Europe on the Draft Strategic Document on the Integration Policy for Foreigners Granted Asylum (4 April 2016 to 30 September 2016) under the National Programme of the Asylum, Migration and Integration Fund for 2014-2020

I. Introduction

1. The UNHCR Regional Representation for Northern Europe (RRNE) appreciates the opportunity to present its comments on the Draft Strategic Document on the Integration Policy for Foreigners Granted Asylum (hereinafter – the ‘Strategic Document’). UNHCR understands that the Strategic Document has been prepared with a view to adopting the National Integration Policy for Foreigners Granted Asylum in the Republic of Lithuania.
2. UNHCR has a direct interest in strategic policy proposals in the field of asylum as the agency entrusted by the United Nations General Assembly with the mandate to provide international protection to refugees and, together with governments, seek permanent solutions to the problems of refugees.¹ This responsibility, which is also reiterated in Article 35 of the 1951 Convention and in Article II of the 1967 Protocol relating to the Status of Refugees (hereinafter – the ‘1951 Refugee Convention’),² is exercised in part through supporting governments’ efforts to promote and facilitate the integration of refugees. UNHCR’s interest and engagement in integration also stems from Article 34 of the 1951 Refugee Convention, which sets out that States shall, as far as possible, facilitate the integration and naturalization of refugees. In this respect, UNHCR’s Executive Committee has urged “States and UNHCR to continue working proactively on local integration where appropriate and feasible and in a manner that takes into account the needs and views of both refugees and their hosting communities”.³
3. UNHCR’s mandate in the area of international protection, including local integration, is also reflected in European Union law, including by way of a general reference to the 1951 Refugee Convention in Article 78 (1) of the Treaty on the Functioning of the European Union, as well as in Declaration 17 to the Treaty of Amsterdam, which provides that “consultations shall be established with the United Nations High Commissioner for Refugees ... on matters relating to asylum policy”.
4. UNHCR greatly appreciates its long-lasting cooperation with the Ministry of Social Security and Labour of the Republic of Lithuania in the field of refugee integration. We strongly support the efforts of the Lithuanian authorities and Civil Society partners to

¹ UN General Assembly, Statute of the Office of the United Nations High Commissioner for Refugees, 14 December 1950, A/RES/428(V), available at:

<http://www.unhcr.org/cgi-bin/texis/vtx/refworld/rwmain?docid=3ae6b3628> (“UNHCR Statute”).

² According to Article 35 (1) of the 1951 Convention, UNHCR has the “duty of supervising the application of the provisions of the 1951 Convention”.

³ UN High Commissioner for Refugees (UNHCR), *Conclusion on Local Integration*, 7 October 2005, No. 104 (LVI) – 2005, available at: <http://www.unhcr.org/excom/exconc/4357a91b2/conclusion-local-integration.html>.

develop and to adopt a refugee integration strategy covering both Convention refugees and persons granted subsidiary protection,⁴ and the commitment to develop an initial Action Plan encompassing specific integration-related measures and future action plans.⁵

II. General Observations

5. UNHCR welcomes the effort made by the Ministry of Social Security and Labour of the Republic of Lithuania and the authors of the Strategic Document to outline a comprehensive cross-sectorial, multi-actor approach to integration for persons granted asylum in Lithuania. The policy proposed has the potential to become, if formally adopted and properly implemented, an example of best practice for refugee integration in other countries. UNHCR also notes that the overall structure and format of the Strategic Document renders it easily accessible and usable for potential partners to the policy.
6. UNHCR appreciates that the integration policy proposed in the Strategic Document contains a number of commendable elements, such as:
 - The good linkage between the asylum procedure and the process of integration in a municipality, including, *inter alia*, the legal and economic needs of asylum-seekers, and the importance of equal opportunities.
 - A recognition that the process of integration starts already at the stage of the reception of asylum-seekers, in line with UNHCR's recommendations, and of the importance of making the time spent in reception meaningful, which includes starting integration-related activities as early as possible.
 - The inclusion of proposals to draw up individual integration plans, as well as the involvement of persons granted asylum in integration planning itself.
 - The effort to bridge the support provided at State and municipal levels, as well as the involvement of non-governmental organisations, the private sector, religious and cultural organisations, schools, secondary and tertiary education institutions, and trade unions in the delivery of integration services.
 - The thorough analysis of the obstacles refugees may face when trying to access the labour market.
 - The evidence-based character of the strategy, which includes learning from other countries' practice (for example, Denmark, Norway, Sweden), as well as from the Organisation for Economic Co-operation and Development (OECD) in the area of refugee integration.
 - The evidence-based analysis of the causes for poor language training outcomes, as well as the link made with social issues and with the consequences of such negative outcomes on the integration of refugees into the labour market.

⁴ For the Refugee Integration Strategy see: Lietuvos Respublikos socialinės apsaugos ir darbo ministro įsakymas Nr. A1-284 „Dėl Prieglobsčio, migracijos ir integracijos fondo 2014–2020 metų nacionalinės programos veiksmų įgyvendinimo plano patvirtinimo“, consolidated version of 23 October 2015, available at <https://www.e-tar.lt/portal/lt/legalAct/c96218b0fec111e488da8908dfa91cac/CjmqniGUiB>.

⁵ For the Action Plan see: Lietuvos Respublikos socialinės apsaugos ir darbo ministro 2014 m. gruodžio 31 d. įsakymas Nr. A1-683 „Dėl Užsieniečių integracijos politikos įgyvendinimo 2015–2017 metų veiksmų plano patvirtinimo“, available at <https://www.e-tar.lt/portal/lt/legalAct/ee908ca090d211e4bb408baba2bdddf3>.

- The recommendation for integration measures to be based on an assessment of the individual needs of refugees including, notably, the calculation of available social benefits based on surveys of their actual expenses.
 - The identification of areas where there is discrimination between persons granted refugee status and beneficiaries of subsidiary protection – or between these two groups and nationals – and the solutions proposed to address these issues.
 - The multi-faceted method used to address incitement to hatred and discrimination, as well as gender discrimination, ranging from amendments of legal frameworks, to elements of an inter-sectorial approach, as well as data collection and monitoring.
7. In addition to welcoming such positive aspects, UNHCR would like to offer a number of recommendations aimed at consolidating and further developing certain aspects of the Strategic Document.

III. Specific Observations

- **Express references to the 1951 Refugee Convention**

8. UNHCR welcomes the fact that the Strategic Document refers explicitly to Articles 25 and 34 of the 1951 Refugee Convention, which require States Parties to provide administrative assistance to refugees and facilitate their integration and naturalization. However, the 1951 Refugee Convention contains a wider range of provisions that are instrumental in supporting refugees in their efforts to integrate into their host communities. These include:
- Article 17, on the State's obligation to accord refugees the most favourable treatment accorded to nationals of a foreign country in the same circumstances, as regards the right to engage in wage-earning employment.
 - Article 18, on the State's obligation to accord refugees treatment as favourable as possible and, in any event, not less favourable than that accorded to aliens generally in the same circumstances, as regards the right to engage on his own account in the various sectors of the welcoming country's economic life.
 - Article 19, on the State's obligation to accord refugees who hold diplomas recognized by the competent authorities of that State, and who are desirous of practising a liberal profession, treatment as favourable as possible and, in any event, not less favourable than that accorded to aliens generally in the same circumstances.
 - Article 21, on the State's obligation to accord refugees, as regards housing, treatment as favourable as possible and, in any event, not less favourable than that accorded to aliens generally in the same circumstances.
 - Article 22, on the State's obligation to accord refugees the same treatment as is accorded to nationals, with respect to elementary education, and treatment as favourable as possible and, in any event, not less favourable than that accorded to aliens generally in the same circumstances, with respect to education other than elementary education.
 - Article 23, on the State's obligation to accord to refugees the same treatment as is accorded to nationals with respect to public relief and assistance.

- Article 24, on the State's obligation to accord refugees the same treatment as is accorded to nationals in respect of labour legislation and social security.
 - Article 26, on the State's obligation to accord refugees the right to choose their place of residence and to move freely within its territory subject to any regulations applicable to aliens generally in the same circumstances.
9. The above standards provide a solid basis on which refugees can progressively restore the social and economic independence needed to get on with their lives. This has also been acknowledged by UNHCR's Executive Committee, which has noted that the 1951 Refugee Convention sets out rights and minimum standards for the treatment of refugees that are geared towards the process of integration, and recognized the need for States Parties to implement their obligations under the 1951 Refugee Convention fully and effectively.⁶ The rights enumerated above are, therefore, of direct relevance for the integration measures outlined in the Strategic Document. Hence, it is recommended that the analysis be also based on all relevant provisions of the 1951 Refugee Convention.

UNHCR recommends:

- Including express references to the aforementioned articles of the 1951 Refugee Convention in relevant sections of the Strategic Document.

• Role of municipal authorities and local communities

10. While the Strategic Document recognises the need to engage local communities with a view to facilitating refugees' integration efforts, there is room for streamlining and enhancing the role and status of municipal authorities and local communities in the envisaged strategy. The environment that refugees encounter in their neighbourhoods, workplaces, social settings and classrooms has a significant impact on their well-being and capacity to rebuild their lives.
11. Welcoming communities ease the way for refugees to adjust to their new surroundings and to move towards independence and self-sufficiency. Based on the experience of the Nordic countries in facilitating refugee integration through specific programmes, it is critical to ensure that: (i) receiving communities are assigned the responsibility to receive refugees in advance; (ii) local authorities and service providers are prepared and capacitated to receive and support refugees; and (iii) the host population is informed and prepared to welcome refugees. It is also important to consider financial mechanisms to support municipalities in their new tasks by providing State funds, which may be complemented with EU and other funding.
12. In Denmark, Finland, Norway and Sweden, the State compensates those municipalities who bear the costs for the reception of refugees, and for the provision of the targeted integration support. During an initial transition period, in the first years of integration, refugees receive financial allowances to cover their costs of living, including rent.

⁶ UN High Commissioner for Refugees (UNHCR), *Conclusion on Local Integration*, 7 October 2005, No. 104 (LVI) – 2005, para. (d), available at: <http://www.unhcr.org/excom/exconc/4357a91b2/conclusion-local-integration.html>.

UNHCR recommends:

- Elaborating on the importance of engaging municipal authorities and local communities in providing persons granted asylum equal access to services in receiving communities and creating a welcoming environment for Convention refugees and beneficiaries of subsidiary protection, including through targeted information and local media campaigns and awareness-raising events, including at the pre-arrival stage.
- Strengthening the role and status of municipal authorities in the envisaged strategy, including through considering a possibility of delegating to municipalities, at the legislative level, the function of providing integration-related support and services to persons granted asylum. A model might be first piloted in a select municipality (e.g. with respect to resettled refugees), and later serve as a model for a more active engagement by other municipalities. The scheme should include a financial support package to cover costs of integration-related support measures and services.

• **Impact of reception conditions on refugee integration**

13. In the Strategic Document, it is rightly recognised that the capacity of the reception system to meet special needs of asylum applicants, notably as regards their physical and psychological health, may have a long lasting impact on the entire integration process (see, *inter alia*, paragraphs 123 and 124 of the Strategic Document). UNHCR believes that the availability of humane and dignified reception arrangements and services at the initial stage of the asylum process are vital towards ensuring the successful integration of refugees. In this respect, the reception conditions available to asylum-seekers in Lithuania have been a source of concern, notably as regards the environment, services and the treatment asylum-seekers have experienced at the Foreigners Registration Centre (FRC). Based on the participatory assessment conducted by UNHCR with refugees in Lithuania,⁷ the following observations can be highlighted:

“Instead of ‘frontloading’ integration by equipping refugees as early as possible through humane, dignified and meaningful reception arrangements, the asylum procedure and reception conditions had left the refugees with an impaired capacity to adjust to the receiving society and reduced ability to prepare for the process of starting a new life in Lithuania. Sadly, the reception received upon arrival to the new country – which was supposed to become their new home – had left many with a negative image of Lithuania and reduced their motivation to make the necessary efforts to successfully integrate.”

14. While important efforts have been undertaken by the Government of Lithuania with a view to improving the material conditions and treatment of asylum-seekers at the FRC, the Lithuanian reception system requires further improvements, in particular as regards the availability of open community-based reception arrangements. In this respect, the Strategic Document might include references to the Draft Government

⁷ UNHCR, *Integration of Refugees in Lithuania: Participation and Empowerment. Understanding Integration in Lithuania through an age, gender and diversity-based participatory approach*, October – November 2013, page 38, available at: http://www.unhcr-northerneurope.org/uploads/tx_news/UNHCR_Integration_of_refugees_in_Lithuania.pdf.

Decree on Alternative Accommodation of Asylum-Seekers⁸ which, for the first time in the history of the Lithuanian asylum system, essentially provides for the direct settlement of asylum-seekers in local communities immediately upon arrival, with related reception measures and services. If adopted, the decree would allow for early contacts between asylum-seekers and their receiving communities, facilitate learning of the Lithuanian language, the development of social skills, and support the empowerment of the individuals concerned. UNHCR therefore recommends further developing and streamlining the analysis of the impact of reception conditions on refugee integration. In UNHCR's view, the inclusion of the reception phase into the integration process should be emphasised as an underlying principle of the envisaged strategy. To that end, UNHCR recommends the insertion of a relevant provision in the section "Principles of integration policy with regard to persons granted asylum" (paragraphs 24 – 30).

UNHCR recommends:

- Underlining the importance of reception conditions available to asylum-seekers for their future integration through, *inter alia*, explicitly including the reception phase in the concept of integration promoted by the Strategic Document, and reflecting it in the section "Principles of integration policy with regard to persons granted asylum" (paragraphs 24 – 30)."
- Inserting a recommendation on further developing reception arrangements and services for asylum-seekers, including through adopting and implementing a policy on community-based reception.
- Providing for the further development of a system of social and psychological support measures for asylum-seekers with special needs, to ensure that the concerned asylum-seekers, including survivors of torture and other forms of physical and sexual violence, receive the necessary care and support from the earliest stages and throughout the asylum process.

• **Education**

15. UNHCR notes that the Strategic Document has successfully captured highly relevant key issues related to education. The evidence-based character of the policy proposed and the use of good practice elements from the Nordic countries, and Europe more broadly, are also welcomed. In particular, the reflections on the need for intensive, dedicated language courses adapted to the levels of education previously attained by the refugees concerned are sound approaches.
16. At the same time, in UNHCR's view, additional elements might be considered with a view to enhancing the effectiveness of education-related measures.
17. Firstly, it would be important to underline the importance of building an inclusive and participatory educational system, which treats minors granted asylum with dignity, and provides assistance in maximizing language and multicultural learning opportunities.
18. In this respect, paragraph 86 of the Strategic Document refers to some existing gaps in the Lithuanian school system concerning the reception and education of foreign

⁸ With reference to Lietuvos Respublikos Vyriausybė, Dėl prieglobsčio prašytojų apgyvendinimo alternatyvioje apgyvendinimo vietoje tvarkos aprašo patvirtinimo, Nutarimo projektas, Reg. Nr. 16-3881(3), available at <https://e-seimas.lrs.lt/portal/legalAct/lt/TAP/77f0b790894211e6a0f68fd135e6f40c?jfwid=-wd7z8bls6>.

children; most notably as regards challenges related to language barriers hampering the integration of foreign children into the educational process. With a view to addressing these gaps, the Strategic Document could provide for the adaptation of in-service and in-training teacher training curricula to embed a protection-education module as well as a basic module that helps teachers understand how to support second language learners in regular classrooms, and recognize the difference between a learning difficulty and a behavioural difficulty. This recommendation is based on the observation made by both UNICEF and UNESCO, namely that “creating an inclusive and child-friendly environment necessitates different skills and styles from teaching in a traditional school”, and that “teachers need to develop competences and capacities on learning through participation; positive forms of participation and class management”.⁹

19. Furthermore, UNHCR suggests proactively involving NGO education partners, including youth organisations, in filling the existing gaps until the national system can respond at scale. In other countries, NGOs play an important role in all interim service delivery until the education system has adapted to meet the needs of new populations. It is highly recommended that the Lithuanian authorities utilise, guide and lead this important nationally-based resource by formalising a working relationship with NGO partners to harmonise the approach, content and results of education service delivery for specific population groups, including: adults, adolescents with educational gaps, people of all ages requiring dedicated language classes, and teachers who require training related to the learning and social adaptation needs of refugee students.

UNHCR recommends:

- Underlining in the Strategic Document the importance of building an inclusive, participatory and accountable education system that treats children granted asylum with dignity, and provides assistance in maximizing language and multicultural learning opportunities.
- Adapting in-service and in-training teacher training curricula to embed a module on protection-education, as well as a basic module that helps teachers understand how to support second language learners in regular classrooms, and recognize the difference between a learning difficulty and a behavioural difficulty.
- Actively involving NGO education partners, including youth organisations, in the delivery of education services and activities to children granted asylum.
- Additional measures engaging refugee children and youth in different forms of education in its widest sense, such as pre-school and pre-primary education, primary education, secondary education, non-formal education, as well as through arts and sports.

- **Public attitudes**

20. Public attitudes are crucial for creating a welcoming environment at both the local community level and the national level. A welcoming environment is a vital element towards making the integration support available effective, and ensuring that

⁹ UNICEF and UNESCO (2007), *A Human Rights-Based Approach to Education for All – A Framework for the Realization of Children’s Right to Education and Rights within Education*, UNICEF/UNESCO, 2007, p. 72, available at <http://unesdoc.unesco.org/images/0015/001548/154861e.pdf>.

integration is indeed a durable solution for refugees in Lithuania. For example, if refugees face discrimination, xenophobia or related intolerance when seeking employment, and/or when trying to find housing and conclude lease agreements, they will have difficulties attaining self-reliance. It is therefore of paramount importance to address comprehensively public attitudes in the envisaged strategy. In this respect, it is recommended to first provide an outline of the current situation as regards public attitudes towards refugees in Lithuania, and of the roles and responsibilities of the various actors in this area and initiatives taken to promote a welcoming environment and combat racism, xenophobia and related intolerance. Secondly, it is recommended to elaborate on a clear way forward beyond the current practices and initiatives.

21. Based on the participatory assessment with refugees undertaken in 2014, UNHCR recommended to undertake activities aimed at raising host communities' awareness about the background, needs and capacities of refugees both at the national level, as well as in municipalities and smaller towns. It was suggested that this could be achieved through, for example, information campaigns conveying the personal stories of refugees; projects targeting the youth and children in schools; projects and events aimed at enhancing the contacts and interaction between refugees and their host community, such as through a host-family system; and by supporting refugees in their daily life with information about Lithuanian society and culture.¹⁰ It was also recommended to explore ways of enhancing the knowledge and understanding of the media about global refugee issues and the situation of refugees in Lithuania to ensure accurate and objective reporting, and the avoidance of stereotyping.¹¹ UNHCR considers that these recommendations could constitute a starting point for the proposal of further concrete measures in this area, within the Strategic Document.

UNHCR recommends:

- Including a list of possible measures aimed at raising the Lithuanian community's awareness about the background, needs and capacities of refugees both at the national level and in municipalities and smaller towns, including of projects and events aimed at enhancing the contacts and interaction between refugees and their host communities.
- Exploring ways for enhancing the knowledge of and understanding by the media about global refugee issues and the situation of refugees in Lithuania, with a view to ensuring accurate and objective reporting and the avoidance of stereotyping.

- **Family reunification**

22. UNHCR welcomes the inclusion of family reunification-related provisions in the Strategic Document (paragraphs 190-207). The analysis could, however, be strengthened by explaining the importance of family reunification for the successful integration of refugees, and elaborating further on practical obstacles persons granted asylum face when trying to bring their families to Lithuania, as well as possible ways to address those challenges. In this respect, UNHCR advocates for family reunification mechanisms that are swift and efficient in order to bring refugee families together as early as possible. It has been shown that delayed family reunification has a negative

¹⁰ UNHCR, *Integration of Refugees in Lithuania: Participation and Empowerment. Understanding Integration in Lithuania through an age, gender and diversity-based participatory approach*, October – November 2013, page 52, available at:

http://www.unhcr-northerneurope.org/uploads/tx_news/UNHCR_Integration_of_refugees_in_Lithuania.pdf.

¹¹ *Ibid.*

impact on the integration process.¹² Indeed, the family plays an essential role in helping persons rebuild their lives and can provide critical support to adapt to new and challenging circumstances. Restoring family unity can also ease the sense of loss that accompanies many refugees who, in addition to family, have lost their homes, networks and other aspects of their former lives. Moreover, family support in this sense can go beyond the traditional and cultural understanding of a family, and can include those who depend on each other for economic and/or emotional support.

23. While the 1951 Refugee Convention is silent on the question on family reunification and family unity, the Final Act of the United Nations Conference of Plenipotentiaries on the Status of Refugees and Stateless Persons recommends that Member States “take the necessary measures for the protection of the refugee's family, especially with a view to (...) [e]nsuring that the unity of the refugee's family is maintained particularly in cases where the head of the family has fulfilled the necessary conditions for admission to a particular country.”¹³ In addition, UNHCR's Executive Committee has adopted a series of conclusions that reiterate the fundamental importance of family unity and reunification, and call for facilitated entry on the basis of liberal criteria for family members of persons recognized as being in need of international protection.¹⁴ Specifically, the Executive Committee has underlined the need for the unity of the refugee's family to be protected by measures which ensure respect for the principle of family unity, including, those to reunify family members separated as a result of refugee flight,¹⁵ and noted that it is desirable that countries of asylum ensure that the reunification of separated refugee families takes place with the least possible delay.¹⁶

24. Furthermore, family unity is a fundamental and important human right contained in a number of international and regional instruments. These include: the Universal Declaration of Human Rights,¹⁷ (Article 16(3)); the International Covenant on Civil and Political Rights,¹⁸ (Article 17); the International Covenant on Economic, Social and Cultural Rights,¹⁹ (Article 10); the Convention on the Rights of the Child,²⁰ (Article 16) (hereafter “CRC”); as well as the European Convention for the Protection of Human Rights and Fundamental Freedoms²¹ (Article 8).

¹² UN High Commissioner for Refugees (UNHCR), *A New Beginning: Refugee Integration in Europe*, September 2013, available at: <http://www.refworld.org/docid/522980604.html>.

¹³ UN Conference of Plenipotentiaries on the Status of Refugees and Stateless Persons, Final Act of the United Nations Conference of Plenipotentiaries on the Status of Refugees and Stateless Persons, 25 July 1951, A/CONF.2/108/Rev.1, available at: <http://www.unhcr.org/refworld/docid/40a8a7394.html>.

¹⁴ See in particular, ExCom Conclusions on Family Reunion, No. 9 (XXVIII), 1997 and No. 24 (XXXII), 1981; ExCom Conclusion on Refugee Children and Adolescents, No. 84 (XLVIII), 1997; and ExCom Conclusion on the Protection of the Refugee's Family, No. 88 (L), 1999. ExCom Conclusions relating to family unity and reunification are compiled in the UN High Commissioner for Refugees (UNHCR), *A Thematic Compilation of Executive Committee Conclusions*, 7th edition, June 2014, June 2014, available at: <http://www.refworld.org/docid/5698c1224.html>.

¹⁵ UN High Commissioner for Refugees (UNHCR), *Protection of the Refugee's Family*, 8 October 1999, No. 88 (L) – 1999, available at: <http://www.refworld.org/docid/3ae68c4340.html>.

¹⁶ UN High Commissioner for Refugees (UNHCR), *Family Reunification*, 21 October 1981, No. 24 (XXXII) – 1981, available at: <http://www.unhcr.org/3ae68c43a4.html>.

¹⁷ UN General Assembly, *Universal Declaration of Human Rights*, 10 December 1948, 217 A (III), available at: <http://www.refworld.org/docid/3ae6b3712c.html>.

¹⁸ UN General Assembly, *International Covenant on Civil and Political Rights*, 16 December 1966, United Nations, Treaty Series, vol. 999, p. 171, available at: <http://www.refworld.org/docid/3ae6b3aa0.html>.

¹⁹ UN General Assembly, *International Covenant on Economic, Social and Cultural Rights*, 16 December 1966, United Nations, Treaty Series, vol. 993, p. 3, available at: <http://www.refworld.org/docid/3ae6b36c0.html>.

²⁰ UN General Assembly, *Convention on the Rights of the Child*, 20 November 1989, United Nations, Treaty Series, vol. 1577, p. 3, available at: <http://www.refworld.org/docid/3ae6b38f0.html>.

²¹ Council of Europe, *European Convention for the Protection of Human Rights and Fundamental Freedoms, as amended by Protocols Nos. 11 and 14*, 4 November 1950, ETS 5, available at: <http://www.refworld.org/docid/3ae6b3b04.html>.

25. UNHCR also wishes to draw attention to the case law of the European Court of Human Rights (ECtHR). The ECtHR has held that family unity is an essential right and a fundamental element in allowing persons who have fled persecution to resume a normal life, and that refugees should benefit from a family reunification procedure which is more favourable than for other foreigners, due to their vulnerabilities. In this context, the Court finds it essential that the national authorities process the request for family reunification without undue delay.²²
26. UNHCR considers that references to the above-mentioned international standards and the pronouncements by the ECtHR could support the family reunification-related findings and measures aimed at facilitating family reunification, as proposed in the Strategic Document.
27. Furthermore, UNHCR supports the findings that family reunification procedures need to be flexible to take into account the specific situation of Convention refugees and persons granted subsidiary protection, and that it may be very difficult, if not impossible, for the concerned individuals to meet formal requirements such as the requirement to demonstrate required income or the requirement to submit birth or marriage certificates (see paragraphs 199-201 of the Strategic Document). However, other practical difficulties, such as the impossibility to obtain travel documents and a lack of financial means to cover travel costs could also usefully be addressed in the Strategic Document.
28. In State practice, two approaches are used to enable family members lacking national travel documents to travel for the purpose of family reunification, i.e. asylum countries either issue their own special one-way travel document, or recognize the Travel Document issued by the International Committee of the Red Cross (ICRC).²³ As none of these approaches are recognised by the current Lithuanian legislative framework, there may be situations whereby persons who would otherwise fulfil the formal requirements for family reunification would not be able to travel to Lithuania to reunify with persons granted asylum.
29. Similar considerations also apply to travel costs that may be an obstacle to effective family reunification. In this respect, Finland, Iceland and Sweden cover, entirely or partially, related travel expenses, thus enabling the concerned beneficiaries of international protection to reunify with their family members.

UNHCR recommends:

- Underlining family reunification as a critical, enabling element of refugees' possibility to enjoy their right to family unity, and the crucial importance of family reunification towards successful integration, and highlighting early family reunification as an objective of the National Integration Policy for Foreigners Granted Asylum in the Republic of Lithuania.
- Elaborating further on the legal and practical obstacles hampering the reunification of persons granted asylum with their family members, notably as regards the impossibility of obtaining travel documents and high travel costs, and proposing concrete measures

²² *Tanda-Muzinga c. France*, Requête no 2260/10, Council of Europe: European Court of Human Rights, 10 July 2014, para. 75, available at: <http://www.refworld.org/docid/53be80094.html>.

²³ See *Reuniting refugee families separated by conflict and bureaucracy*, ICRC, 29 February 2016, available at <https://www.icrc.org/en/document/reuniting-refugee-families-separated-conflict-and-bureaucracy>.

to address them. This may include a recommendation to either recognise the ICRC Travel Document or to issue a national one-way travel document.

- Providing financial support to cover travel costs for the purpose of family reunification for persons granted asylum in Lithuania.

- **Civil society engagement and contribution, and the responsibilities of the respective actors**

30. While the role of NGOs is recognised and reflected across the Strategic Document, it would be important to streamline the proposal for collaboration amongst various actors with a view to ensuring that civil society support complements that of the State, to better realize sustainable results.

31. In addition, it is recommended to describe the integration process from the very beginning, including activities, services, timing, responsibilities, accountabilities and resources. It is important to ensure that all these measures are matched with adequate administrative and financial resources from the State budget to ensure sustainability. The strategy and action plans developed should provide for a flexible approach allowing for adjusting support measures to individual needs of the concerned persons.

32. Setting short-term, mid-term and long-term goals and priority areas would help the prioritization of measures for a national action plan that should comprise specific measures aimed at implementing the Strategic Document.

UNHCR recommends:

- Engaging civil society and providing for a mechanism that facilitates the coordination of contributions by the various actors when implementing the envisaged strategy.
- Drafting a National Action Plan in consultation with all relevant actors in the field of refugee integration, including UNHCR, with a view to ensuring the effective implementation of the recommendations set out in the Strategic Document, and addressing as a matter of priority the most urgent needs of refugees.

UNHCR Regional Representation for Northern Europe

Stockholm, 1 December 2016