



From Data to Dignity: Monitoring Accommodation Centres to Foster Autonomy and Participation

Meike Fernbach
Central European University

Apolline Foedit
Geneva Graduate Institute

Klaudia Grat
University of St Andrews

Adam Kluge
University of Oxford

Sinéad Mulcahy
Leiden University

Frieda Ottmann
Ludwig Maximilian University

Elisa Sisto
University of Oxford

Teaching Fellow:

Aikaterini Pantazatou
University of Luxembourg

Table of Contents

List of Abbreviations	3
Executive Summary	4
Introduction	5
Monitoring Mandates	8
Challenges of Monitoring	10
Bridging the Implementation Gap	12
The Opportunities of Monitoring	14
Recommendations	16
1. General Recommendations	16
2. Recommendations in Practice	17
Awareness Raising: Dignity.Dishes	19
Conclusion	21
References	22



List of Abbreviations

AMO	Asylum and Migration Overview
Applicants	Applicants for International Protection
CJEU	Court of Justice of the European Union
Commission	European Commission
CSO	Civil Society Organisation
ECHR	European Convention on Human Rights
ECJ	European Court of Justice
EMN	European Migration Network
EU	European Union
EUAA	European Union Agency for Asylum
ECtHR	European Court of Human Rights
FRA	European Union Fundamental Rights Agency
MS(s)	Member State(s)
NGO	Non-governmental Organisation
NHRIs	National Human Rights Institutions
Pact	The Pact on Migration and Asylum
RCD	Reception Conditions Directive
TEU	Treaty on European Union
TFEU	Treaty on the Functioning of the European Union



Executive Summary

Context

The EU adopted the **Pact on Migration and Asylum** in 2024 after protracted negotiations. The reforms, entering into force in June 2026, aim to strengthen EU migration, asylum, border management and integration policies. The **forthcoming implementation** of this framework, combined with ongoing geopolitical crises, places the EU at a critical turning point. Against this backdrop, our report focuses on the **monitoring of reception conditions** for applicants for international protection, as mandated by the **Reception Conditions Directive**.

Problem

The Reception Conditions Directive establishes **standards for reception conditions** and a **monitoring mandate** to assess conditions and improve compliance. Despite this framework, reception standards are **routinely unmet** within and across Member States (MSs). Monitoring often falls short due to **lack of independence** or access, weakening reliability; **insufficient participation** of those directly affected, resulting in missing experiential insights; and **fragmented cooperation**, leading to inconsistent interpretation and application of standards. **Limited training and capacity** hinder the identification of both individual and systemic issues, while **weak accountability** and follow-up mechanisms prevent recommendations from being consistently translated into concrete change. This precludes dynamic adaptation of reception by MSs to consistently put the legal standards into effect.

Approach

Our approach to monitoring is informed by stakeholder consultations, literature review and existing legal frameworks. It **supports MSs in implementing** the Reception Conditions Directive's monitoring mandate, with a commitment to **dignity and autonomy of applicants**. In addition, our social media account (**Dignity.Dishes**) aims to provide collaborative opportunities across civil society, whereby food fosters cultural exchange and enhances the dignity of those living in accommodation centres and beyond.



Independence

Guarantee monitors' full autonomy, including unannounced visits, unrestricted access, confidentiality and protection from retaliation.



Participation

Involve applicants and staff at all stages through voluntary, safe-guarded and meaningful engagement.



Cooperation

Promote coordination and best-practice sharing among authorities, NGOs, civil society and communities at all governance levels.



Awareness

Train monitors to identify individual and systemic issues, apply consistent yet flexible methods and adapt to diverse needs.



Accountability

Embed follow-up and transparent communication to ensure findings lead to recommendation, remedies and corrective action.



Introduction

Background and Rationale

Over the last decade, migration has been a policy dilemma at the EU level. In the first quarter of 2025, 183,810 first-time applicants for international protection were registered in the EU, contributing to the total of 1.25 million applicants awaiting decisions.

183,810
first-time
applicants

The EMN Asylum and Migration Overview (AMO) identifies **2024 as a significant turning point** for migration across EU Member States (MSs). That year was marked by ongoing geopolitical instability across Europe and the globe, leading to regional volatility and new migration patterns.

Across the EU, commitment to migrants has waned, with many politicians framing these groups as threats to cultural and national identities and responsible for a multitude of economic and social challenges (Drosopoulos 2024). Socio-economic crises and geopolitical upheavals have deepened divisions between MSs and further **undermined the dignity of applicants for international protection**. Some MSs are pushing for stronger protections, whilst others are prioritising restrictive policies that intensify migrant marginalisation.

Solidarity is a foundational principle of the EU (Art 2 TEU) which migration policy in particular must embody (Arts 67(2) and 80 TFEU). Yet, the EU has struggled to respond to migration challenges with solidarity-based mechanisms. On 14 May 2024, the Council finally agreed on the **Pact on Migration and Asylum** (hereafter the Pact). **The Pact is a compromise** resulting from eight years of difficult negotiations. It is comprehensive in its content, with seven pieces of legislation setting out key EU policies on migration, asylum, border management and integration.

14.05.24
Pact on
Migration
and Asylum

The Pact aims to “deliver results while remaining grounded in our European values”. In other words, it aims to address heightened security and efficiency concerns whilst also embodying the foundational principles – like solidarity – of the EU. It is based on four pillars:

- secure external borders
- fast and efficient procedures
- effective system of solidarity and responsibility
- embedding migration in international partnerships

Directive 2024/1346, Definitions (Art. 2)

‘application for international protection’ or ‘application’ means a request for protection from a Member State made by a third-country national or a stateless person who can be understood to be seeking refugee status or subsidiary protection status;

‘applicant’ means a third-country national or stateless person who has made an application for international protection in respect of which a final decision has not yet been taken;



‘**accommodation centre**’ means any place used for the collective housing of applicants.

Scale of the Problem

While the Pact is a landmark comprehensive policy package, attention to reception conditions has a long history in EU policy. For two decades, the EU has set **minimum harmonised reception conditions** (Directive 2003/9/EC, Art. 23) and obliged MSs to monitor those conditions.

However, the monitoring of centres across MS has been notably **divergent**, resulting in **inadequate standards of care** and ‘uneven geographies of asylum reception’ (Baalbergen et al. 2025).

The **EU Reception Conditions Directive 2024/1346 (hereafter RCD)** restates standards for reception conditions and a monitoring mandate to assess conditions with a view of **improving compliance**. Despite this framework, reception condition standards are routinely unmet within and across MSs. In particular, **monitoring fails to achieve the intended results** when:

- **Independence** is compromised at any stage of the monitoring cycle
- **Participation** of those directly affected is missing
- **Cooperation** between stakeholders is weak, resulting in fragmented applications of standards
- **Awareness** and capacity to identify individual and systemic failures is undermined
- **Accountability** mechanisms are ineffective, interrupting the link between monitoring and practical change

Any of these causes can effect a **break in the accuracy and legitimacy of the feedback loop**. This precludes dynamic adaptation of reception conditions by MSs to meet standards that ensure dignity of applicants.

While accommodation centres are designed to provide shelter and assistance for applicants arriving into the EU, they are frequently characterised by inadequate management, limited oversight and substandard conditions.

As such, the current state of accommodation centres limits interpersonal and labour engagement opportunities of applicants on the local level and prompts uneven distribution of material resources amongst applicants.

Applicants in accommodation centres are also routinely **stripped of their autonomy**, home ties and ability to engage in culturally specific forms of community (Lumley-Sapanski 2022). Therefore, a **human-rights centred approach** to monitoring of reception conditions should ensure that **inclusion** is an integral component of the reception process. This monitoring model can be standardised according to the RCD.

14.05.24
EU RCD
2024/1346



- Analysis of legislation and case law (domestic courts, Court of Justice of the EU, European Court of Human Rights)
- Analysis of policy documents
- Academic literature review
- Consultations with NGO representatives, academics, local authorities and EU-affiliated institutions in several countries (France, Germany, Greece, Ireland, Poland, Switzerland).



Insights gathered:

1. policy shortcomings
2. discrepancies in monitoring across jurisdictions
3. complexities and obstacles arising in practice



Scope of Study

Practices of monitoring reception conditions have diverged across MSs – often strained by national politics, fiscal constraints or other pressures. The new Pact, to be implemented in 2026, is an opportunity to remedy this with **resilient, standardised monitoring systems**. The benefits are extensive:

1. **Fundamental Rights Protection:** Monitoring upholds applicants' fundamental rights, ensuring the dignity of applicants and promoting their autonomy.
2. **Legal and Policy Compliance:** Consistent monitoring mechanisms ensure MSs meet legal obligations under EU law and the ECHR and thus avoid fines for non-compliance. This also contributes to MSs meeting EU funding conditionalities.
3. **Operational Efficiency:** Robust monitoring supports lasting efficiency and operation of accommodation centres, resulting in long-term economic and social benefits for individual MSs. Effective monitoring enables MSs to identify and remedy shortcomings early on, thereby avoiding the need for emergency, private-sector and/or cash-driven solutions.
4. **Communication and Implementation:** Standardised monitoring mechanisms can inform evidence-based policymaking and promote continuous improvement across accommodation centres.



We recommend that monitoring of reception conditions is grounded in five core values: **independence**, **participation**, **cooperation**, **awareness** and **accountability**.

By applying this approach, MSs ensure national implementation is consistent with EU law and principles, including fundamental rights.



Monitoring Mandates

Under the Pact, an individual who has applied for international protection is entitled to reception conditions set out in the RCD.¹ Those conditions are monitored through **three mechanisms**:

Box A: Independent monitoring of Screening Process

The new Screening Regulation subjects individuals who enter the EU irregularly to a screening process not exceeding seven days, after which the return or asylum procedure is initiated. During the screening, **MSs must monitor compliance with fundamental rights, EU and international law.**

- **Independent** monitoring bodies (National Human Rights Institutions (NHRIs), National Ombudsmen)
- Authority to carry out **on-the-spot checks** and **random and unannounced visits**
- Optional **co-operation with NGOs**
- Optional **annual reporting** by monitors
- **Effective, efficient follow-up** of substantiated allegations of fundamental rights violations needed
- Possibility for Commission to **withhold EU funds** based on findings

Box B: Member State monitoring of reception conditions

- Since 2005: **MSs must monitor reception conditions.** This is explicitly "with due respect to their constitutional structure", meaning MS have **very wide discretion** on the bodies involved, procedures used and follow-up.
- From June 2026: MSs must consider relevant guidance from the EUAA.²

Box C: Cyclical EUAA monitoring

- EUAA, in close cooperation with the Commission, **monitors MSs reception system** as a whole, including material reception conditions.
- Occurs **only once every 5 years** per MS.
- Follow-up dialogue between the EUAA and MSs.

Reception Conditions

MSs must provide reception conditions that:

- Comply with **fundamental rights protection** under the EU Charter of Fundamental Rights and the ECHR.
- Adhere to **healthcare** and material reception conditions under the RCD, The latter includes **housing, food, clothing and personal hygiene products** – either in kind, as financial allowances, in vouchers, or as a combination.
- From June 2026, all MSs must – for the first time – provide a **daily expenses allowance in monetary form**, i.e. cash.



¹The Article 19(2) adequate standard obligation applies to all applicants, including those with special reception needs, persons held in detention and applicants who are subject to screening at the border.

²Directive 2024/1346, Art. 31(1).



Article 19(2) of the RCD stipulates that reception conditions must:

*‘provide an **adequate standard of living** for applicants, which guarantees their subsistence, protects their physical and mental health, and respects their rights under the Charter’.*

Human dignity as the constant core

- Dignity is an **absolute and non-derogable right**, including the right to be free from torture and inhumane or degrading treatment.
- In limited circumstances, MSs can derogate from the RCD Art 19(2) standard – but **must always provide a dignified standard of living**, consistent with EU law.
- An applicant **must always be able to meet basic needs** including a place to live, food, clothing and personal hygiene. Even a temporary deprivation is a violation of EU law.
- If MSs cannot provide this within the reception system or otherwise in kind, **MSs must give applicants the financial support needed** to secure these conditions on their own.

Case C-97/24 S.A, R.J [ECJ, August 2025]

Between February 2022 and May 2023, 100,000 applicants arrived into Ireland – a staggering increase on the yearly average of 3,500, largely due to Russo-Ukrainian war. For twenty weeks, single men could not be accommodated within the reception system.

The Court confirmed that a **temporary deprivation of housing is a manifest breach of EU law**, so S.A and R.J could sue Ireland for damages under EU law. The **exceptional circumstances** – though unforeseen and unavoidable – **could not be used to excuse** Ireland from paying damages. Ireland was **obliged**, for each applicant, to **either find alternative housing or provide the money** to access the private rental market.

Suitability, autonomy and participation:

- MSs must assess whether an applicant has special reception needs and provide conditions which are **suitable for the individual**, including through ‘suitable’ accommodation for families and a ‘safe space’ for female applicants and minors.
- The RCD expressly recognises, for the first time, that **applicants’ autonomy** should be supported. MSs must provide a daily expenses allowance.
- MSs *may* involve applicants in managing resources and life in the accommodation centre through an advisory or representative body, enabling individual **participation** and a sense of **ownership**.



Challenges of Monitoring

The [EU Fundamental Rights Agency](#) (FRA), academics (Goldner Lang 2024) and monitoring bodies have welcomed the **independence** and **objectivity** of the **new monitoring mandate** under the Screening Regulation.³ The mandate requires independence safeguards and grants the authority to conduct unannounced checks. However, **it is extremely narrow** covering only the initial screening procedure, which should not exceed seven days. Generally, reception conditions should be monitored over the longer term under the RCD mandate.

1. Challenges affecting monitoring by mandated authorities:

In contrast to monitoring under the Screening Regulation, **MSs are almost given a *carte blanche* as to how to monitor** reception conditions under the RCD. **Stakeholders** – NGOs, public authorities, private conditions providers – with practical insights **may be excluded** and/or hindered in their ability to share best practice. **Access to locations may be restricted and pre-planned.** All constraints combined pose a risk to monitoring's accuracy and objectivity.

There is also **no legal obligation to follow up**, e.g. annual reporting, enforcement of corrective measures.

While the [EUAA recommends](#) a 'complaints-and-response' mechanism within accommodation centres, it does not link this to monitoring in general. **Thus, monitoring risks becoming a box-ticking exercise**, which overlooks lived experiences.

Resource and operational constraints

Monitoring bodies and relevant authorities **lack the financial means and workload balance to recruit and retain personnel** capable of conducting comprehensive monitoring exercises. Monitoring systems across MSs operate in **silos**, with limited platforms for exchange between actors including public bodies and NGOs. The **lack of digitisation and standardised data collection processes** further hampers the efficiency and consistency of monitoring. Situatedness of accommodation centres, in remote or isolated areas, presents another operational challenge, namely the logistical and financial burden associated with routine oversight.

Independence across the monitoring cycle

Independence of monitors is **often undermined** by structural and political constraints imposed by a MS or reception facilities. This requires critical attention to the independence of monitors during the **three stages of the monitoring cycle** (before, during and post-visit).



³ see Box A, p. 9.



2. Challenges affecting monitoring by reception centre applicants:

Lack of Participatory Requirements in Monitoring Frameworks

The RCD's monitoring mandate **does not require the participation of key stakeholders**, namely applicants in accommodation centres, in monitoring processes. Their participation would enhance both the **empirical quality** of the monitoring process and the **legitimacy** of the monitoring outcome.

Limited Evidence-Based Policy Implementation

While practice varies across and within MSs, monitoring of reception conditions often relies on **infrequent external visits** by national or international bodies. While such visits are a critical component to monitoring, their limited scope, frequency and external nature means that **emergent issues may remain unidentified or unresolved**.

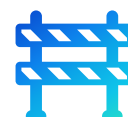
Embedding Participation in Monitoring and Implementation

The **European Commission's Better Regulation Guidelines** stipulate that robust data collection must inform both legislation and implementation. Among its key principles, the guidelines underscore the need for a **'participatory approach'**: 'all interested parties, be they experts or individuals or **groups affected by EU laws and regulation**, should be able to **contribute to policy-making** by expressing their views and providing relevant data.' As monitoring is a core element of policy implementation, participation should be facilitated to ensure the legitimacy of policymaking.



Practical Barriers to Participation

- The **fear of repercussions** for participation in monitoring can silence applicants, leaving **blind spots** and **undermining the integrity** of the monitoring process.
- Participation in monitoring processes can also be **limited** for applicants with a range of **literacy and linguistic** backgrounds. Applicants may face challenges completing surveys, reading complaint guidelines, or engaging with independent monitors.
- Applicants may face **technical barriers** (lack of access to devices or networks), **physical barriers** (physical, cognitive and sensory barriers in reaching or using particular monitoring modalities), as well as **gender and cultural barriers** (disclosing gender issues, time constraints due to caregiving responsibilities).
- These barriers may have further **consequences when applicants want to challenge their treatment before a court** or another authority. According to ECtHR case law, **applicants have the burden of proof to present a credible, sufficiently detailed account** of degrading conditions, supported by photographic evidence.



Bridging the Implementation Gap

The **challenges posed by existing EU monitoring frameworks** have led to a **discrepancy** between the **existing legal directives and the reality of monitoring**. While the recast RCD requires MSs to ‘take account’ of EUAA guidance, the monitoring mandate is otherwise unchanged from the [original 2003 RCD](#). Evidently, the **problem** is not the absence of regulations, but a **lack of accountability, oversight and consistency in implementation**. To understand this implementation deficit, it is useful to address four reception conditions in need of a more robust monitoring mechanism.

Lack of accountability, oversight & consistency in implementation

Implementation Gaps: The Situation on the Ground

Space

Adequate accommodation is the gateway through which other fundamental rights can be accessed. Conversely, **inadequate accommodation may violate** the core, absolute **right of human dignity**. The ECtHR has repeatedly found violations of human dignity and other fundamental rights as a result of inadequate accommodation.⁴ Such **violations are not excusable**, even in extraordinary migratory situations. In practice, fluctuating arrivals have outpaced contingency planning, leading to overcrowding in emergency shelters. Overcrowding has caused problems such as **unsanitary conditions, lack of privacy and sleep and insufficient healthcare** across MSs.

Alongside immediate fundamental rights violations, inadequate accommodation conditions are a significant **post-migratory stressor**. Housing affects applicants in four significant ways:⁵

1. Material circumstances, such as crowding, hygiene conditions and inability to lock doors, **create and aggravate physical and mental health concerns**;
2. Unpredictability and volatility of housing **impedes integration and fragments support networks**;
3. Forced residential assignment and limited autonomy **constrain ‘homemaking’ capacity**, spilling over onto mental health;
4. Accommodation centres **do not provide adequate accommodation** for individuals with **specific medical needs**.

“ [i]n the room, there were as many cockroaches as there was water dropping from the ceiling, water dropping from the walls, from the sides from all over. – [Kos, June 2024](#) ”

⁴ O.R. v. Greece, application no. 24650/19 [23.01.2024]; R.R. v. Hungary, application no. 36037/17 [02.03.2021]; E.A. v. Greece, application no. 74308/10 [30.07.2015]).

⁵ M.A and others v. Greece, T.A. and Others v. Greece, highlight a systematic practice of inadequate living conditions in Greek and European RCs.



Mental healthcare

The **RCD obliges** MSs to **ensure the protection of applicants' physical and mental health** and to provide necessary care. However, lack of capacity by specialized institutions and providers often **limits access to specialized mental and physical healthcare** for applicants. Furthermore, most healthcare services are outsourced to NGOs, who themselves struggle with funding to provide critical support.

Applicants whose psychological care demand is met⁶



Training

The RCD **mandates training for accommodation centre personnel** with respect for the needs of applicants, including the **particular needs of vulnerable groups**. However, training of personnel in accommodation centres is **often limited to procedural knowledge** and training **standards are not proportionately administered across MSs**.

The **outsourcing of functions in accommodation centres to the private sector aggravates these challenges**. Outsourced bodies operate under different hierarchies and training requirements. This again highlights the need for greater political will to develop and apply harmonised guidance, and stronger accountability mechanisms for all.

The training of the European Sectoral Qualifications Framework aims to create consistent application of reception standards across the EU and enhance the quality of care for applicants. Additionally, the European Commission's Technical Support Instrument offers assistance to develop tailored training programs as part of MSs' National Implementation Plans. However, **only nine MSs have seized the opportunity for this technical support**.

Food

The **lack of adequate food** is a major issue in many accommodation centres. Food insecurities in accommodation centres lead to a variety of **preventable health conditions**.

“ The food was not ok, but we had to eat, we were hungry, we couldn't complain. – [Kos, June 2024](#) ”

⁶ Alexandra Liedl et al. „Aufnahmeprozesse und Klient*innen der beiden größten Behandlungszentren für Geflüchtete in Deutschland: Refugio München und Zentrum ÜBERLEBEN Berlin“, Verhaltenstherapie & psychosoziale Praxis, 55/1, (2023), 7-21.



The Opportunities of Monitoring

The **opportunities** of a more robust monitoring system, which ensures dignity and promotes autonomy of the applicant, are **manifold**. In particular, a **fundamental-rights and participation-oriented** approach to monitoring can:

1. Strengthen the effectiveness of monitoring through the incorporation of regular experiential and user-generated data. This data can be shared via continuous feedback loops, thereby identifying risks and facilitating timely responses. By recognising and correcting shortcomings early-on, MSs **avoid higher costs of private-sector, cash-driven and/or emergency measures**, as mandated by the [CJEU](#). Monitoring enables **operational stability** and **predictable budgeting** and **reduces the likelihood of sanctions or litigation**.
2. Ensure that monitoring systems include **appropriate safeguards against repercussions and retaliation, which are clearly, consistently communicated** to applicants. Anonymity, privacy and confidentiality must be guaranteed.
3. **Tailor communication tools** to facilitate applicants' effective participation in monitoring, through a variety of **accessible formats** (pictograms, interpretation, audio-guidance and oral exchanges).
4. Ensure that monitoring is conducted in an inclusive manner. Monitoring mechanisms should be **flexible diverse, as well as gender and culturally-sensitive**.

Some MSs already apply innovative approaches to monitoring through existing institutions. Two recent initiatives include:

Gewaltschutzmonitor – Germany , ongoing

The “German Centre for Integration and Migration Research” piloted an innovative online tool in cooperation with seven German States and 73 selected accommodation centres. Designed to monitor and enhance violence prevention, the tool uses quarterly questionnaires based on continuous, evidence-based self-evaluation by personnel and residents.

Training Pilot – France, being expanded

In 2022, the European Network on Statelessness launched a multilingual awareness pilot that trained accommodation centre personnel to recognise and respond to vulnerable individuals, including victims of trafficking, stateless persons and LGBTIQ+ asylum seekers. The dissemination of a training toolkit, including lived experiences, local NGO referral lists and legal guidance, significantly improved the conditions in participating accommodation centres.

**Fundamental
-rights and
participation-
oriented**

**Avoid higher
costs**



In summary – monitoring, if enacted properly, is a key mechanism to:

- ✓ Reinforce the **EU's commitment to human dignity** and the **rule of law**
- ✓ **Prevent fundamental rights violations** and systemic failures
- ✓ **Alleviate systemic violence** by improving living conditions and reducing stressors
- ✓ **Minimise long-term operational costs** and optimise resource allocation
- ✓ Strengthen the **long-term sustainability** and **legitimacy** of reception systems across the EU
- ✓ Advance **evidence-based policymaking** and **implementation**
- ✓ Ensure **compliance with CJEU and ECtHR caselaw** and **avoid costs** of litigation, sanctions, and required emergency interventions.
- ✓ Pre-empt recurring challenges allowing for more targeted, strategic and **cost-effective interventions**.
- ✓ Promote **feedback loops** for continuous improvement and accountability
- ✓ Improve the **autonomy and health** of the individual, leading to better employment and **social inclusion** outcomes



Recommendations

1. General Recommendations

To achieve a monitoring mechanism that is **resilient, participatory and fundamental rights-centered**, recommendations that **prioritise applicants' autonomy** must be implemented. The policy recommendations **do not entail creating new bodies, but aim to support, inform and connect those actors with a role in monitoring** of reception conditions, particularly as mandated by the RCD.⁷

Monitors should adapt and improve their practices to ensure **dignity and autonomy of applicants** across contexts, **drawing on the following five core values**:

Independence

It is essential to ensure the independence of monitors at every stage of the monitoring cycle. This includes equipping monitors with the authority to conduct **unannounced visits**, to have **full access** and to **report autonomously and without restriction**. Monitors should operate on the basis of **confidentiality** and be **protected from retaliatory measures**. Monitors should, also, observe whether the applicants' autonomy is respected and space for its exertion is provided.

Participation

Those directly affected should have the opportunity to be actively engaged in the monitoring. Participatory mechanisms should be **collaborative, voluntary and embedded in all stages of the monitoring cycle, incorporating the views of applicants** and personnel with robust **safeguards** in place.

Cooperation

Monitoring bodies and other stakeholders should cooperate and **share best practices** across various levels of governance, including at the **regional, national and European** levels. Collaboration between all relevant public authorities, NGOs, civil society and local communities is necessary for resilient and reliable monitoring.

Awareness

Monitors should be sufficiently **trained** to identify both individual and systemic issues, based on a set of relevant indicators, and to respond with a flexible, informed approach. Mechanisms should be designed to incorporate **individual circumstances** and be **methodologically harmonised across MSs**. Monitors should be afforded an opportunity to routinely **adapt and improve their practices**, accounting for the diversity and vulnerability of applicants.

Accountability

Monitoring mechanisms should include robust accountability frameworks, with **follow-up procedures** and **transparent communication channels**. Monitoring results should also form a basis for relevant recommendations, **effective remedies** and **corrective action**.

Supporting, informing, connecting the existing monitoring bodies



⁷ See Box B, page 9.



2. Recommendations in Practice

Following on the five core values constituting the general recommendations, the below presented **sub-recommendations** explain how these values can be applied to practicalities of monitoring. Examples are drawn from the thematic areas identified in the ‘bridging the implementation gap’ section.

A | Space

Independence

Monitors should ensure that applicants are equipped with **means enhancing mobility** (e.g. bus passes) and **individual privacy** (e.g. applied safeguards protecting material objects and personal data).

Participation

Ensure applicants’ **involvement in decision-making processes** related to **communal and private area designs within accommodation centres**, accounting for noise levels, temperature adjustment, affirmation of divergent cultural backgrounds and accessibility needs.

B | Mental Health

Cooperation

Monitor the **existence and effectiveness of peer-to-peer support structures** (e.g. mutual aid, self-help groups) and mental health mentors, as well as the participation rate in awareness-raising and education programmes.



SoulCaRe by Refugio works with peer-to-peer consultants providing low-threshold contact opportunities to enable early detection of mental health issues.

Awareness

Monitor the presence of **designated quiet areas for mental health consultations**, that will uphold the principles of confidentiality and anonymity (e.g. child-friendly spaces, spaces for neurodivergent individuals, consultation sites with adequate soundproofing).

C | Training

Independence

Independent monitoring bodies should evaluate whether **training improves staff capacity** and translates into acceptable treatment of applicants. Monitors should routinely and systematically **assess training content, delivery methods and outcomes** (e.g. site visits, pre- and post-training assessments).



Cooperation

MSs should **involve relevant NGOs and CSOs** in the development and delivery of training programmes to ensure that content reflects the realities on the ground, incorporates lived experience and aligns with fundamental rights standards.

Accountability

Adopt a set **of bi-annually reviewed training monitoring indicators** (e.g. the number and nature of field complaints, number of recorded instances of abuse and/or neglect, staff turnover).

D | Food

Participation

Ensure that applicants are able to **provide regular feedback on food** (e.g. food surveys, reviews of food safety) and that, whenever possible, **financial allowances are prioritised** to allow applicants the autonomy to select their own food.

Awareness

Ensure that **personnel** involved in food preparation and provision are **trained to address gender, cultural, religious and health requirements** (e.g. adequate diets for pregnant and breastfeeding individuals, adjustments for dietary restrictions, flexible schedules to access food during periods of fasting).



Awareness Raising: Dignity.Dishes

Objective

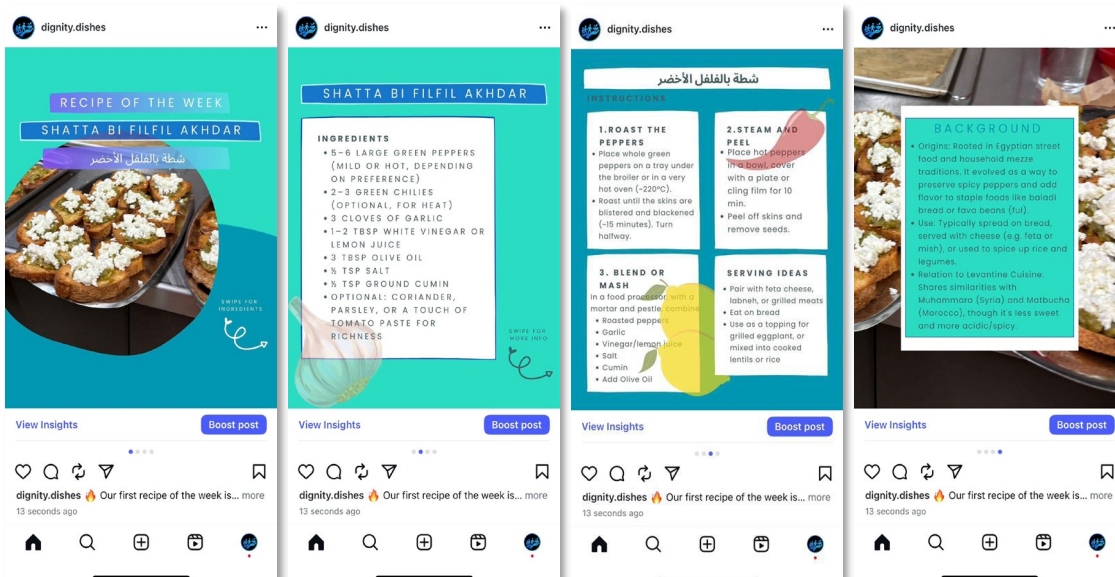
Dignity.Dishes is an Instagram-based awareness campaign highlighting the lived realities of applicants in accommodation centres and host countries, through the universal language of food. Content will be **voluntarily co-created with applicants and partner organisations**. The aim is twofold:

1. **Raise awareness** about the contrast between restrictive reception conditions and the autonomous, dignified lives applicants could lead if granted greater self-determination.
2. **Humanise migration** by amplifying the voices, skills and cultural heritage of applicants and fostering empathy and informed dialogue.

Connection to Policy Proposal

The social-media campaign embodies our proposal's emphasis on **dignity and autonomy as key guiding principles of monitoring**. By documenting conditions and showcasing applicants' cultural contributions, the campaign:

- Acts as an informal, participatory monitoring tool
- Offers a platform for applicants to actively shape narratives about their lives
- Demonstrates how community spaces (physical or digital) can empower autonomy and self-expression



Recipes	Factual Insights – Reception Conditions	Spotlight – Events & Resources
• Traditions and cultural significance of dishes • Personal narratives and family memories behind the recipes • Step-by-step cooking guides with images	• First-hand experiences of cooking (or being unable to cook) in reception centres • Context information on reception conditions • Regulation overview and analysis of legal gaps	• Featuring cookbooks, cultural events and community gatherings • Promotion of NGO-led initiatives and advocacy efforts • Guest takeovers and curated highlights

Cooperation Partners

Initial contacts and collaborations include:

- Galas Collective, Warsaw, Poland
- Kuchnia Konfliktu, Warsaw, Poland
- MigratefulUK, London, UK
- Über den Tellerrand, Munich, Germany

Vision for the Project

Launching in **September 2025**, the campaign builds on groundwork laid since **May 2025**, when we began partnering with NGOs, gathering recipes and stories. Our goal is to sustain the project at least until **December 2026**, expanding outreach and organising events with partner organisations. We envision providing the **ingredients and venues** for events and contributors.

The **Dignity.Dishes** social media campaign provides an opportunity for **collaboration across civil society**. Our goal is to use some of the provided funding to also **expand the online recipe-sharing to in-person events** (e.g. community cooking classes).



Conclusion

The adoption of the new Pact marks a pivotal moment for EU migration policy and practice. The Pact, with its implementation deadline of June 2026, is an opportunity to recalibrate monitoring practices. While EU law has long mandated the monitoring of reception conditions, current practices often fail to secure intended outcomes. The Pact is an opportunity to recalibrate monitoring practices. **In all circumstances, monitoring should aim to effectuate five core values: independence, participation cooperation, awareness and accountability.**

A targeted approach to implement the new legal framework

We recommend a systemic shift in how the monitoring mandate is approached, towards practices that guarantee **impartiality and access**, meaningfully **integrate the perspectives of those directly affected**, and provide monitors with **targeted, adaptable training that raises awareness**. Monitoring should be **reinforced by accountability and follow-up mechanisms** that translate its results into tangible improvements. This shift would **enhance the reliability of results while also promoting the dignity and autonomy of applicants**.

By identifying and correcting shortcomings early-on, our policy recommendations could **improve reception standards in accommodation centres while avoiding higher costs** of private-sector, cash-driven and/or emergency interventions. The recommendations **maximise effectiveness of monitoring for MSs, enabling compliance with EU law including fundamental rights** and thereby avoiding litigation, sanctions or potential loss of EU funding.

As a complementary initiative, the **Dignity.Dishes Instagram campaign** supports these policy recommendations. Through the universal language of food, it aims to foster **awareness** and **engagement**. The campaign highlights the human dimension alongside the practical solutions pertaining to reception and monitoring.



References

- **Amnesty International (2025)** *Samos: Unlawful detention and sub-standard conditions must not become a blueprint for the EU Migration Pact, European Institutions Office*. Available at: <https://www.amnesty.eu/news/samos-unlawful-detention-and-sub-standard-conditions-must-not-become-a-blueprint-for-the-eu-migration-pact/> (Accessed: 13 August 2025).
- **Baalbergen, I. et al. (2025)** 'Waiting in uneven geographies of asylum reception and the Social Mobility of Refugees', *Urban Geography*, pp. 1–16. doi:10.1080/02723638.2025.2517874.
- **Campesi, G. (2025)** *The coercive control of human mobility in Europe: A criminological reading of the EU Pact on Migration and Asylum, Border Criminologies*. Available at: <https://blogs.law.ox.ac.uk/border-criminologies-blog/blog-post/2025/03/coercive-control-human-mobility-europe-criminological> (Accessed: 11 August 2025).
- **Drosopoulos, M. (2024)** *Perspectives on young refugees' autonomy in Europe amid ongoing conflict*. Available at: <https://pjp-eu.coe.int/documents/42128013/47261953/Perspectives%20on%20young%20refugees%E2%80%99%20autonomy%20in%20Europe%20-%20a%20study.pdf/c952f131-88dc-3ab3-439d-2da047d33317?t=1717487224870> (Accessed: 11 August 2025).
- **Dumke, L. et al. (2024)** 'Barriers to accessing mental health care for refugees and asylum seekers in high-income countries: A scoping review of reviews mapping demand and supply-side factors onto a conceptual framework', *Clinical Psychology Review*, 113. doi:10.1016/j.cpr.2024.102491.
- **European Commission (2024)** *Commission presents the Common Implementation Plan for the Pact on Migration and Asylum, European Commission*. Available at: https://ec.europa.eu/commission/presscorner/detail/en/ip_24_3161 (Accessed: 10 August 2025).
- **European Commission (2024)** *Managing migration responsibly, European Commission*. Available at: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/story-von-der-leyen-commission/managing-migration-responsibly_en. (Accessed: 11 August 2025).
- **European Council (2025)** *Migration and asylum pact, Migration and Home Affairs*. Available at: https://home-affairs.ec.europa.eu/policies/migration-and-asylum/pact-migration-and-asylum_en (Accessed: 11 August 2025).
- **European Database of Asylum Law (2003)** *Reception Conditions Directive, Directive 2003/9/EC, EN - Reception Conditions Directive, Directive 2003/9/EC of 27 January 2003*. Available at: <https://www.asylumlawdatabase.eu/en/content/en-reception-conditions-directive-directive-20039ec-27-january-2003> (Accessed: 11 August 2025).
- **European Migration Network (2025)** *European Migration Network Asylum and Migration Overview (AMO) 2024, Migration and Home Affairs*. Available at: https://home-affairs.ec.europa.eu/networks/european-migration-network-emn/emn-publications/emn-annual-reports/european-migration-network-asylum-and-migration-overview-amo-2024_en (Accessed: 13 August 2025).
- **European Union (2024)** *Directive (EU) 2024/1346 of the European Parliament and of the Council of 14 May 2024 laying down standards for the reception of applicants for international protection, EUR-Lex*. Available at: <https://eur-lex.europa.eu/eli/dir/2024/1346/oj/eng> (Accessed: 13 August 2025).
- **European Union Agency for Asylum (2023)** *Asylum Report 2023*. Available at: https://euaa.europa.eu/sites/default/files/publications/2023-07/2023_Asylum_Report_EN_0.pdf (Accessed: 08 August 2025).
- **Eurostat (2025)** *Asylum applications - monthly statistics, Asylum applications – Monthly Statistics*. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Asylum_applications_-_monthly_statistics (Accessed: 13 August 2025).
- **Gammeltoft-Hansen, T. and Tan, N.F. (2017)** 'The end of the deterrence paradigm? Future Directions for Global Refugee Policy', *Journal on Migration and Human Security*, 5(1), pp. 28–56. doi:10.1177/233150241700500103.



References

- **Goldner Lang, I. (2024)** *National Independent Monitoring Mechanisms for Fundamental Rights Compliance at the EU's External Borders*, *European Papers* (Vol. 9, 2024), pp. 1216–1227.
- **Kreichauf, R. (2018)** 'From forced migration to forced arrival: The campization of refugee accommodation in European cities', *Comparative Migration Studies*, 6(1). doi:10.1186/s40878-017-0069-8.
- **Lumley-Sapanski, A. (2022)** "‘It will kill your dreams, your goals, your everything’—humanitarian migrants, governance through containment and the Italian accommodation system', *Political Geography*, 94, p. 102573. doi:10.1016/j.polgeo.2021.102573.
- **Molnar, T. (2024, September 19).** Monitoring Fundamental Rights compliance in the context of screening and the asylum border procedure: Putting bricks back into the EU house of rule of law? *EU Migration and Law Blog*. Retrieved August 13, 2025, from <https://eumigrationlawblog.eu/monitoring-fundamental-rights-compliance-in-the-context-of-screening-and-the-asylum-border-procedure-putting-bricks-back-into-the-eu-house-of-rule-of-law/>
- **Pact on Migration and Asylum (2024)** *Migration and Home Affairs*. Available at: https://home-affairs.ec.europa.eu/policies/migration-and-asylum/pact-migration-and-asylum_en.
- **Pichou, M. (2016)** *Reception or Detention Centres? The detention of migrants and the EU “Hotspot” Approach in the light of the European Convention on Human Rights*. *KritV, CritQ, RCrit. Kritische Vierteljahresschrift Für Gesetzgebung Und Rechtswissenschaft / Critical Quarterly for Legislation and Law / Revue Critique Trimestrielle de Jurisprudence et de Législation*, 99(2), pp. 114–131.

