



EUROPEAN POLICYBRIEF

VULNER

**TOWARDS VULNERABILITY ASSESSMENTS THAT SUPPORT
THE CUSTOMIZED IMPLEMENTATION OF ASYLUM LAW
AND POLICIES**

The VULNER Consortium¹

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KEY MESSAGES

- Vulnerability assessments should be systematically included in asylum application processes, for example, when registering asylum applications.
- Vulnerability assessments should account for the socially-embedded nature of experiences of vulnerability, instead of focussing exclusively on immediate and practical needs and on some pre-defined groups.
- Therefore, sufficient leeway should be given to the decision-makers on the ground, who must be able to act on the basis of the special needs they identify in individual cases, whenever needed.
- To prevent uneven and arbitrary practices, decision-makers should benefit from adequate support measures, such as efficient communication channels among the various state actors in charge, participatory training, and internal guidelines of the kind developed in Canada.
- Collaboration with the non-state actors involved in asylum proceedings should be promoted, for example, through referral practices.
- Vulnerability assessments should guide the implementation of existing legal protection standards, as established under international refugee law and international human rights law, and should not limit these standards to the most vulnerable asylum seekers and refugees, nor extend them.

¹ This Policy Brief was prepared by Luc Leboeuf, Cathrine Brun, Marie-Claire Foblets, Susanne Hüb, Winfried Kluth, Hilde Lidén, Sabrina Marchetti, Delphine Nakache, Sophie Nakueira and Sylvie Sarolea, based on inputs from all the [VULNER project members](#).

INTRODUCTION

It has become increasingly common, in EU policy discourse, to emphasise the need to develop asylum policies that also address the special protection needs of those asylum seekers who find themselves in the most vulnerable position (such as unaccompanied minors, victims of sexual violence, etc.). The trend is echoed at the UN level, where the UN Global Compact for Refugees calls upon states to adequately address the specific protection needs of the most vulnerable refugees (UNHCR, para. 59-60), and at the Council of Europe (Action Plan on Protecting Vulnerable Persons in the Context of Migration and Asylum in Europe, 2021-2025).

This policy trend has resulted in multiplying legal requirements to perform vulnerability assessments when implementing EU asylum law provisions – as exemplified by the EU Reception Conditions Directive (Dir. 2013/33/EU) and the EU Asylum Procedures Directive (Dir. 2013/32/EU), which require EU member states to address asylum seekers' special reception and procedural needs. The EU New Pact on Asylum and Migration likewise suggests including a systematic vulnerability assessment as part of a new border screening procedure (COM, 2020, 612final). The objective of these vulnerability assessments, as mandated by EU law, is to guide the implementation of EU asylum law in individual cases.

Yet, many uncertainties remain on how the 'vulnerabilities' of asylum seekers should be assessed, and on which 'special protection needs' should be addressed. This feeds uncertainties among the institutional actors who are in charge of assessing vulnerabilities on a daily basis (such as social workers within reception centres for asylum seekers, public servants deciding on asylum applications, and asylum judges). Studies have shown that these uncertainties feed uneven practices across the EU (ECRE, 2017; EMN Luxembourg, 2021).

In this policy brief, we formulate recommendations aimed at improving the quality of vulnerability assessment processes, while supporting the development of harmonised practices across the EU.

EVIDENCE AND ANALYSIS

The VULNER project members conducted an extensive study of the domestic legislation, administrative regulations and internal guidelines which govern the vulnerability assessments performed as part of asylum proceedings. They did so in three EU member states (Belgium, Italy and Germany) and, for purposes of comparison, in Norway and Canada. Norway is part of the Schengen area and has developed an asylum system that is similar to the EU member states. In Canada, there is a long-standing tradition of emphasising, in the policy discourse, the need to care for vulnerable migrants. Two countries located in the Global South, Uganda and Lebanon, were also included within the scope of the study. The objective is to learn the lessons from the long-standing tradition of relying on vulnerability assessments to design humanitarian and aid programmes for refugees in the Global South (see, for example, the Commission Communication COM(2016) 234 final).

In each of the countries under study, desk research was combined with interviews with social and aid workers, public servants in charge of deciding on asylum applications and asylum judges (hereafter referred to as 'decision-makers')². In total, we conducted 216 interviews.

² Interviews could not take place in Canada because of COVID-related restrictions.

Our objective was to unveil how ‘vulnerabilities’ are defined, identified and assessed in the countries under study, and to identify the implementation issues. We sought to tackle the following main questions: Are vulnerability assessments required by the relevant domestic legislation, case law and/or administrative guidelines? If yes, how and for what purpose? What are the decision-makers’ viewpoints on the implementation challenges?

Our research shows that there are three main legal and bureaucratic approaches to vulnerability assessments (2.1.), and that these assessments remain focussed on the immediate and practical protection needs (2.2.).

2.1. Three main legal and bureaucratic approaches to vulnerability assessments

The interim research results from the VULNER project highlight three main different legal and bureaucratic approaches to vulnerability assessments in the EU (Belgium, Germany, and Italy), Norway and Canada. These approaches are not mutually exclusive, and they can be implemented in combination.

- **A first approach** relies on *systematic vulnerability assessment processes and tools*, based on standardised questionnaires that are filled in at the start of the asylum proceedings, and/or questions that are routinely asked by the public servants in charge.

This approach was found to be the one used in Belgium and Norway. In both countries, the main objectives of the questionnaire (in Belgium) and the routine questions (in Norway) are to identify the accommodation centre (or the specialised units within the accommodation centres) to which the asylum seeker should be assigned, and whether any additional measures should be adopted (such as access to specific and additional forms of health care).

The specific needs, which were documented when registering the asylum application, also provide information on how the asylum hearing should be organised, and on the practical accommodations needed to guarantee the quality of the hearing (for example, by ensuring that the room is accessible to a person who uses a wheelchair, or by using a room that is specially equipped to create a less stressful environment for children). Our interviews with public servants in charge of deciding on asylum applications and with asylum judges reported using the questionnaire as a source of additional background information that allows them to better grasp the asylum seekers’ profiles and, thus, to better evaluate the credibility of their statements and the risk of persecution in the home country.

The challenge of this approach is to avoid focussing exclusively on the most obvious vulnerable profiles, which would overlook more complex positions of vulnerability that result from intersecting factors and circumstances, and that may be revealed only once the required degree of trust has been established and/or observations have been made. As explained by a social worker in Norway, whom we interviewed as part of our research:

We are capturing the more serious things, such as disabilities and whether a person is deaf. (...) Less visible needs are more difficult to discover. Vulnerabilities caused by what happened in their home country or on the journey to Norway are not easy to voice. They need to settle down before opening up to difficult experiences and feelings.

- **A second approach** rests on *pragmatic and flexible assessments of 'vulnerability', which implementation in individual cases is left to the discretion of the decision-makers on the ground.* There is no formalised or systematised vulnerability assessment, and decision-makers have leeway to consider some asylum seekers as more vulnerable than others, and to adapt their practices accordingly.

'Vulnerability' is thus a loose notion, which allows decision-makers to justify their decisions in the specific cases where they deem it necessary to adapt state responses to address actual needs on the ground, and to explain why they make minimal adjustments to the existing rules. The term is often used in an all-encompassing way, referring to the various individual and specific circumstances of the case that contribute to putting the asylum applicant in a position of weakness. As explained by an asylum judge in Belgium, whom we interviewed as part of our research:

A healthy young man, apparently strong and resistant, may still break down during a hearing because of a heavy trauma that wasn't diagnosed and taken care of [...] His file won't highlight specific vulnerabilities that should nonetheless be considered when adjudicating on his case.

This approach was identified in all the countries under study. But the leeway it gives each decision-maker raises the issue of how to prevent uneven, if not arbitrary, practices across the EU.

- **A third approach** consists in establishing non-binding guidelines that guide the vulnerability assessments made by the decision-makers. The guidelines serve to highlight the main needs that may arise, and how they can be met. While the guidelines are not mandatory, public servants are expected to apply them unless there are compelling or exceptional reasons for not doing so.

This approach was identified in Canada, where the Immigration and Refugee Board (IRB) provides its board members with a series of guiding principles for adjudicating and managing cases. In 2006, the IRB created a 'vulnerability' guideline ([Guideline 8](#)) to assist board members in 'providing procedural accommodation(s) for individuals who are identified as vulnerable persons'. In 2017, the IRB also developed a Guideline ([Guideline 9](#)) aimed at 'promoting a greater understanding of cases involving sexual orientation and gender identity and expression (SOGIE) and the harm individuals may face due to their non-conformity with socially accepted SOGIE norms'. In Norway, the Norwegian Directorate of Migration (UDI) also established a few [specific guidelines](#) for vulnerable migrants and asylum seekers.

The guidelines mitigate the difficulties that 'vulnerable' claimants may face in proceedings, and hence, offer certain procedural accommodations to these asylum seekers (such as priority processing of some claims, allowing a support person to be present, varying the order of questioning, or creating a more informal atmosphere at refugee hearings).

This approach has the advantage of guiding decision-makers' practices, while also granting them the necessary leeway to address the specific needs that may arise in individual cases, depending on their specificities. But it also raises issues that are similar to the two other approaches mentioned above. The Canadian guidelines likewise focus on the positions of vulnerability that

can be identified relatively easily, and their implementation is left up to the discretion of the public servant in charge.

2.2. A focus on immediate and practical needs

In all the countries under study, the increasing trend of carrying out vulnerability assessments has been translated mainly into a focus on immediate and practical needs. Vulnerability assessments mainly serve pragmatic and organisational purposes that relate, for example, to the organisation of the asylum hearing and the management of the housing system for asylum seekers. Their purpose is rarely to reach a better understanding of the asylum seekers' lived experiences or to address their main life challenges and difficulties.

The overall result is that one may overlook vulnerabilities that result from complex and intersecting factors and circumstances, and/or appear at later stages of the asylum process when the required atmosphere of trust has been established. Yet, such life challenges may equally affect asylum seekers' fair opportunity to present their case and, if their application is considered well-founded, their prospects of integration in the host country.

This observation highlights the challenge of developing a comprehensive approach to vulnerabilities, one which accounts for their socially embedded (and, thus, context-specific and ever-evolving) nature. How to combine the time, resources and flexibility that such an approach requires with the fair and efficient implementation of asylum policies? Our analysis of how these challenges are addressed in the countries under study allows us to formulate policy recommendations, which can help address that challenge and strike the right balance. These recommendations are outlined below.

POLICY IMPLICATIONS AND RECOMMENDATIONS

The findings of the VULNER project allow us to make the following policy recommendations:

- Implement vulnerability assessments more systematically

Our research shows that vulnerability assessments are uneven, and that their implementation depends largely on the discretion of the public servants in charge. There is a major gap between, on the one hand, multiple policy calls at EU, Council of Europe and UN levels to address the specific needs of the most vulnerable asylum seekers and refugees; and, on the other hand, the concrete support measures available at the domestic level to assist decision-makers on the ground in incorporating adequate and systematic vulnerability assessments into their everyday practices.

The implementation in domestic law of the provisions of the relevant EU directives that mandate vulnerability assessments is a minimum³. But it is not sufficient in and of itself to guarantee their implementation. There is also a need for dedicated bureaucratic processes and tools that require and enable decision-makers to perform systematic and qualitative vulnerability assessments.

The Belgian best practice of filling in a dedicated questionnaire at the very start of the asylum application process, and the Norwegian best practice of routinely enquiring about specific needs, offer useful guidance to that effect – provided it does not prevent subsequent, more flexible

³ The VULNER German team made recommendations to the German legislature to that end. They identified the provisions of German law that should be amended and how. See [Kluth, Heuser and Junghans, 2021](#). The other EU countries under study (Belgium and Italy) transposed the relevant provisions of the EU Directives into their domestic legislation.

vulnerability assessments by the decision-makers in charge, whenever they consider it necessary. The generalisation of this best practice to other EU countries should be considered.

- Avoid focussing exclusively on immediate and practical needs

The initial focus on immediate and practical needs should not be exclusive, but should, instead, serve as a starting point for thorough and comprehensive vulnerability assessments, which are performed on a continuous and flexible basis.

Our research shows that there is an overall trend of focussing on immediate and practical needs which can be swiftly identified, such as access to specific health care for a pregnant woman, or the conduct of the asylum interview in a room that is accessible to a person using a wheelchair. While useful, systematic and standardised vulnerability assessment tools and processes, such as questionnaires, have the side effect of reinforcing that trend. They allow for the evaluation of vulnerabilities at a given point in time in a somewhat 'sanitised' and fragmented way, which does not account for their socially embedded, ever-evolving and intersecting nature.

Addressing immediate and practical needs is crucial to the well-being of asylum seekers. But it should not prevent a more comprehensive approach to their vulnerabilities where these are present. Some deeply-rooted vulnerabilities that deprive asylum seekers of a fair chance at presenting their asylum application, and that affect their integration into the host society after legal status has been granted, may appear and/or be voiced only at later stages after the initial registration of the asylum application, once the required sense of trust has been established and the necessary observations have been made. For example, victims of sexual violence may not feel comfortable voicing such intimate issues during an initial, short encounter with a public servant, and longer observations may be required to identify asylum seekers with mental health issues.

- Avoid focussing exclusively on personal characteristics that are defined in standardised ways, and acknowledge the socially embedded nature of vulnerabilities as experienced by asylum seekers

The focus on immediate and practical needs sustains a policy approach that directs attention to certain groups, for whom procedural adaptations and/or adaptations to the reception conditions might be necessary (such as children, the elderly, disabled persons, persons with serious health issues, single and/or pregnant women, LGBTQI+ persons).

The specific protection needs of these groups have been widely documented and established through numerous scientific studies that demonstrate their particularly vulnerable position.

Yet, actual vulnerabilities can take many forms, and may also affect asylum seekers who do not belong to any of these groups. Decision-makers should therefore be allowed to act on the basis of the vulnerabilities identified in individual and concrete cases, irrespective of whether the asylum seeker belongs to one of these groups that are generally considered more vulnerable than others. Moreover, vulnerabilities can also emerge as a result of the constraints inherent in the asylum procedure itself.

- Adopt support measures that encourage and make it possible for decision-makers on the ground to address the specific life challenges faced by the most vulnerable asylum seekers

The fact that decision-makers on the ground have some leeway should not give rise to arbitrary and uneven practices. Broader support measures are needed, which incentivise and enable decision-makers to make use of their margin of appreciation to address the vulnerabilities they identify in specific cases.

The support measures should include setting up adequate communication channels between the authorities involved. In the European countries under study, our research shows that the public servants and judges in charge of deciding on asylum applications often ignore the vulnerabilities that were identified by the social workers in accommodation centres for asylum seekers, although such background information is highly relevant to assessing the credibility of the asylum seeker's statements and the level of risk in the home country.

Solid routines should be established to guarantee an adequate information flow across the different state actors involved, while also meeting data protection requirements. The insertion in each asylum seeker's file of a 'vulnerability sub-file', which would gather the observations of all the decision-makers involved, should be considered.

The support measures should also include additional participatory training for social workers and public servants, offering them a forum for exchange of views on best practices and on the difficulties they face when identifying and addressing the specific protection needs of the most vulnerable asylum seekers or when processing asylum claims.

The training should also involve former asylum seekers and civil society actors and experts. Doing so would improve decision-makers' knowledge about asylum seekers' needs, thus preventing practices that are based on stereotyped understandings of their experiences.

- Promote collaboration between various institutional and non-institutional actors, at the national and local levels, in identifying, assessing and giving support to asylum seekers in positions of vulnerability.

Our research underlined the limits of the practices of identification and assessment of vulnerability that do not rely on collaboration between different institutions and NGOs involved in the fields of asylum and migration. In contrast to such practices, our findings highlighted the importance of collaboration and dialogue among the various institutional and non-institutional actors in order to strengthen an approach that takes into account the various conflicting experiences of protection seekers, addresses their diverse needs, and avoids the risk of perpetuating stigmatization.

A good practice in this regard is the referral mechanism adopted in Italy between local Territorial Commissions for the recognition of international protection and anti-trafficking NGOs to identify victims of trafficking among applicants for international protection. This referral mechanism has been developed in accordance with the guidelines, drafted by the Italian Ministry of the Interior and UNHCR in 2017, for the identification of victims of trafficking among applicants for international protection and referral procedures. This referral system builds on the collaboration of actors with different competencies, backgrounds and approaches, and it has led to an increase in identification of situations of vulnerability to exploitation, which often remain concealed during the asylum seekers' interviews with the Territorial Commissions. At the same time, this system has led relevant actors to

adopt support and assistance responses that are better tailored to the different protection seekers' needs, taking into consideration the specific situations of vulnerability.

The generalization of this good practice to other EU countries should be considered, given that several European countries do not have clear coordination or referral mechanisms established between anti-trafficking and asylum systems.

Furthermore, similar referral procedures could be replicated and applied in other specific situations of vulnerability, such as gender violence or psychological distress, involving various actors competent in diverse fields.

- Avoid limiting the protection standards, as established in refugee law and international human rights law, to the most vulnerable asylum seekers and refugees

Asylum policies have an inherent control and selection dimension: the main objective of the asylum procedure is to identify the non-EU citizens who fulfil the criteria to be granted legal protection status, because of the persecutions faced in their home country. As our research shows, this overall policy and regulatory environment impacts the implementation of vulnerability assessments. It requires that decision-makers attend to the most vulnerable asylum seekers while facing the broader constraints that result from their precarious legal status.

The relationship between the vulnerabilities faced by asylum seekers, and the precarity of their legal status, needs acknowledging. It implies that downsizing legal protection standards for asylum seekers deepens vulnerabilities. For that reason, there is a fundamental contradiction between the overall policy objective to address the specific needs of the most vulnerable asylum seekers, and the establishment of containment policies, which pursue the sole objective of rejecting as many asylum applications as possible irrespective of their actual merits.

To avoid such a contradiction, it is essential to preserve current legal categories, such as the 'refugee' category, and prevent their replacement by a policy focus on vulnerabilities – which may, in the end, limit the asylum regime to the most vulnerable refugees and asylum seekers. Vulnerability assessments should never have definitive consequences for access to the right to asylum, but should, instead, guide the implementation of current legal criteria for obtaining asylum in a way that is sensitive to the main life challenges faced by the refugees and asylum seekers who find themselves in a position of (more) acute weakness.

Vulnerability assessments could also serve as useful tools to design and implement asylum procedures, including by determining the scope of accelerated border procedures, in so far as the overall design of these procedures complies with procedural rights as established under human rights law and does not impede effective access to asylum.

- Avoid stereotyped understandings of asylum seekers' experiences of vulnerability

In Lebanon and Uganda, we studied the vulnerability assessments that are used to help design and implement humanitarian assistance programmes for the benefit of refugees and asylum seekers. These studies show that the understanding international organisations and donor countries have of the needs that should be prioritised is met with scepticism by local actors. They often find the focus of these programmes Eurocentric and out of touch with the actual needs on the ground, which are mainly of a socio-economic nature. This scepticism in turn feeds the suspicion that the attention

devoted to the specific needs of the most vulnerable refugees allows donors to justify the limitations in the aid provided, and does not improve the humanitarian response.

These critical findings inform us more broadly of how vulnerabilities, as understood by policy-makers in the EU countries, may sometimes seem out of touch with refugees' and asylum seekers' own understandings of their life challenges. They may often not identify themselves as 'vulnerable', nor consider that the focus on vulnerabilities reflects their actual needs.

To prevent such a mismatch, it is essential to develop and implement vulnerability assessments that are attentive to how asylum seekers relate to the label of vulnerability, and to how they make use of it as part of their strategies. This requires that asylum seekers and refugees not be reduced to victim status and that their agency be recognised despite constraints. The second phase of the VULNER project, which includes ethnographic fieldwork among asylum seekers and refugees, is expected to provide additional knowledge to serve as a basis of vulnerability assessments to ensure that they do not rest on a stereotyped understanding of their vulnerabilities.

THE VULNER RESEARCH PROJECT

The VULNER research project is an international research initiative, whose objective is to reach a more profound understanding of the vulnerabilities of migrants seeking protection, and how they could best be addressed. It therefore makes use of a twofold analysis, which confronts the study of existing protection mechanisms towards vulnerable migrants with that of their own experiences on the ground.

This policy brief focuses on the findings that are relevant in view of improving the vulnerability assessments performed as part of asylum procedures in Europe. These findings are based on the first phase of the project, which included an extensive study of the relevant domestic legislation, administrative regulations, internal guidelines and the implementing practices in the countries under study (Belgium, Canada, Germany, Italy, Lebanon, Norway, and Uganda).

The findings are in the process of being refined and further developed through the second phase of the VULNER project, which includes interviews with and ethnographic fieldwork among asylum seekers, refugees and other migrants seeking protection. The objective of the second phase is to develop an empirical study of how migrants seeking protection experience their main life challenges, the extent to which these are reflected in current vulnerability assessment tools and practices, and how and to what extent asylum seekers relate to the existing categories of vulnerability and mobilise them to support their claims. These empirical data and analyses will allow us to supplement the policy recommendations formulated in this policy brief by shedding light on how vulnerability assessments could be performed in ways that are not disconnected from the actual experiences of migrants seeking protection.

The VULNER research project is coordinated by Luc Leboeuf, from the Department of Law & Anthropology of the Max Planck Institute for Social Anthropology in Halle a.d. Saale (Germany). It is funded under the Horizon 2020 research programme, from February 2020 to June 2023.

This policy brief reflects only the authors' views. The European Union is not liable for any use that may be made of the information contained therein.

For more information on the VULNER research project and its outputs and events, please visit our website (www.vulner.eu) and follow us on Twitter (@VULNERproject).

PROJECT IDENTITY

PROJECT NAME	VULNERABILITIES UNDER THE GLOBAL PROTECTION REGIME - How Does the Law Assess, Address, Shape and Produce the Vulnerabilities of the Protection Seekers? (VULNER)
COORDINATOR	Department of Law & Anthropology, Max Planck Institute for Social Anthropology, MPG, Halle a.d. Saale, Germany
CONSORTIUM	Max Planck Institute for Social Anthropology – MPG Halle a.d. Saale, Germany Ca’Foscari University of Venice – UNIVE Venice, Italy Catholic University of Louvain - UCL Louvain, Belgium Center for Lebanese Studies - CLS Beirut, Lebanon Institute for Social Research - ISF Oslo, Norway Martin Luther University Halle-Wittenberg - MLU Halle a. d. Saale, Germany Population Europe – PE Berlin, Germany University of Ottawa - UOTTAWA Ottawa, Canada
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BUDGET	EU contribution: 3 030 932,50 €.
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FURTHER READING	El Daif, C., Shuayb, M., Maalouf, M. <i>The Vulnerability of Refugees amid Lebanese Law and the Humanitarian Policies</i> . 2021. VULNER Research Report 1 . https://www.vulner.eu/78656/VULNER_WP7_Report1.pdf

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Marchetti, S., Palumbo, L., (Eds.) *Vulnerability in the Asylum and Protection System in Italy: Legal and Policy Framework and Implementing Practices*. 2021. **VULNER Research Report 1**. https://www.vulner.eu/78645/VULNER_WP4_Report1.pdf

Nakueira, Sophie. *Protecting Vulnerable Refugees: An empirical examination of the implementation practices of aid workers and state actors in Uganda*. 2021. **VULNER Research Report 1**. https://www.vulner.eu/78149/VULNER_WP8_Report_1.pdf

Saroléa, S., Raimondo, F., Crine, Z., *Exploring Vulnerability's Challenges and Pitfalls in Belgian Asylum System – Research Report on the Legal and Policy Framework and Implementing Practices in Belgium*. 2021. **VULNER Research Report 1**. https://www.vulner.eu/80233/VULNER_WP2_Report1.pdf

These policy recommendations are based upon the specific recommendations each team made with respect to the country they studied, in a way that reflects the domestic context - including the institutional structure and the refugee situation they are faced with:

El Daif, C., Shuayb, M., Maalouf, M., *VULNER Policy Brief : Lebanon*. September 2021. https://www.vulner.eu/78607/VULNER_PB_Lebanon_2021_1.pdf

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Saroléa, S., Raimondo, F., Crine, Z., *VULNER Policy Brief : Belgium*.
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https://www.vulner.eu/78577/VULNER_PB_Belgium_20211.pdf



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