

Evaluation of the 'Documentation = Employability' Project

IMPLEMENTED BY THE ADITUS FOUNDATION, MALTA

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2023

**IN THE FRAMEWORK OF THE PROJECT 'LOST
MILLENNIALS – TRANSNATIONAL RESEARCH
NETWORK FOR THE EVALUATION OF INITIATIVES
TARGETING 25+ NEETS'**

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Project summary:

The project 'Lost Millennials' focuses on a regularly neglected group of the generation of Millennials: young people aged 25-29 neither in employment or education and training (25+ NEETs). This generation started their working life shortly after the economic crisis of 2008, perceiving uncertainty and lack of security for work and well-being, they are more likely to be inactive or in precarious jobs. The main objective of the project is to contribute to the successful integration of 25+ NEETs to the labour market through increasing knowledge on the effects of employment initiatives on 25+ NEETs, building capacity of stakeholders to perform impact studies and thus improving the quality of labour market interventions. This objective will be achieved through the creation of the transnational research network which will share know-how and good practices, the evaluations of governmental and community-based initiatives targeting 25+ NEETs, as well as the engagement of stakeholders to increase the policy-relevance of project results.

For more information, please visit our [website](#), contact us on lm.leadpartner@hetfa.hu and follow our social media ([Facebook](#), [LinkedIn](#)).

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Implemented by:



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1. Introduction and context

1.1 Introduction

This report summarises the findings of the evaluation process analysing an initiative implemented in Malta, targeting socially excluded persons or people at high risk of poverty, among them NEETs and 25+ NEETs, namely the 'Documentation = Employability' project of the Aditus Foundation funded by the European Social Fund (ESF).¹

When selecting the project for evaluation, the evaluator needed to consider several aspects. At an earlier phase of the Lost Millennials Project,² BCI identified 18 initiatives which (at least potentially) have addressed 25+ NEETs in Malta since 2007. Notably, only two of the 18 initiatives and programmes designate 25+ NEETs as their target;³ the rest potentially address them as they are part of a larger social group (for example, they are among the long-term unemployed aged 25-64 years). We had to choose a completed initiative (or nearly completed) at the time of the evaluation. The two programmes targeting

¹ Before finalisation of the report, the draft was sent to Aditus for comments and clarifications.

² See: Kósa (2022)

³ The 'INTERCEPT' project implemented by Jobsplus (2021-2024) and the 'SMARTLY - NEETs' employability in the Green and Digital Economy' project implemented by Jobsplus (2021-2024)

explicitly 25+ NEETs run until 2024, so we had a portfolio of programmes and projects available for evaluation, which *potentially* reach out to 25+ NEETs.

BCI also identified a recent project for evaluation, where the focal point, lead experts, and partners are still in their positions, and beneficiaries have ‘fresh’ memories and impressions of the provisions they received.

However, based on previous experience, the evaluator aimed at working with non-governmental organisations as their responsiveness, openness towards external stakeholders, and willingness to participate in an evaluation and share data, documents, and thoughts were more likely.

Finally, the choice to evaluate the Aditus project aimed to complement the ‘big picture’ where training, education, job counselling, internship, and incentives dominate the field of employment-related services. These interventions reflect the most present needs of unemployed and inactive young people. However, in some cases, the obstacle of labour market integration is less typical, and the ‘Documentation=Employability’ project responds to the need of a marginalised and less served group (mainly refugees, asylum seekers, migrants and members of the LGBTQ+ community), 25+ NEETs among them.⁴ By evaluating the Aditus project, the evaluator also aimed to call attention to the importance of providing the needs of less visible, socially excluded groups and innovative solutions.

The goal of the Aditus project was to identify the personal or institutional obstacles preventing people from being appropriately documented and intervene to remove these obstacles through targeted in-person support. Within the project framework, Aditus provided support services to persons — including NEETs and 25+ NEETs — encountering difficulties in obtaining updated and accurate documentation. Support services included tailor-made legal consultations to secure correct documentation for the beneficiaries to enable them to become employable in a dignified manner. The project also included a rental subsidy scheme to assist individuals facing financial hardships to live a dignified life until they can achieve a higher degree of independence and self-reliance. To impact institutional and structural capacity, Aditus also produced consultation-based research on the relationship between (the lack of) personal documentation and social exclusion/employability.⁵

⁴ In Eurostat NEETs related data, young people with migrant backgrounds are present (as data can be filtered based on the country of origin). The NEETs statistics are collected within the framework of the Labour Force Survey (LFS), “which covers all persons usually residing in private households in the territory of the reporting country” [EU Labour Force Survey - new methodology from 2021 onwards - Statistics Explained \(europa.eu\)](#). It means that the statistical population is regardless of the legal situation of the persons included (citizen, legal resident, refugee, asylum seeker, etc.) We, during our research consider all young people residing in Malta NEETs if they fulfil the definition (out of employment, education or training, falling in the relevant age bracket).

⁵ [Documentation = Employability: Support Services for the Documentation of Various Communities - Aditus Foundation](#)

1.2 National context

1.2.1 Vulnerable communities, 25+ NEETs among them in Malta

Compared to the EU average, young people in Malta have a lower level of education (although trends are moving in a positive direction) and a higher employment rate. Both the 2007/8 financial crisis and the COVID-19 pandemic had negative impacts on the economy and labour market; however, Malta is quickly rebounding and getting back on track with economic growth and high employment levels. Despite these promising statistical data, there are ‘hidden’ groups who suffer from multiple disadvantages, social exclusion or discrimination and are hard to reach by policies and initiatives. These hidden groups include migrants, refugees, people working undeclared, irregular workers, precarious workers, undocumented people, members of the trans- and non-binary community, and dependent spouses in abusive relationships, some of whom fall under the NEETs, more specifically under the 25+ NEETs category. The evaluated Aditus project reached out mainly to the migrant and refugee community and, on a smaller scale, to the LGBTQ+ community; the following is a short overview of the situation of these groups in Malta.

1.2.2 Migrants and refugees in Malta

Malta’s economy, which had one of the most robust GDP growth rates in the EU during the last decade, strongly relies on a foreign workforce which is evident by the number of migrants, third-country nationals, and refugees in the country. On the 1st of January 2021, *35 per cent of Malta’s total population was foreign-born (the second highest proportion among the European member states after Luxemburg).*⁶ Immigration to Malta (from other EU member states and non-EU countries) has been increasing since 2010 (with a dip in 2020 because of the COVID-19 pandemic, but now growing again).⁷

Based on Amnesty International’s annual Human Rights Report on Malta,⁸ by the end of 2022, 450 refugees and migrants had reached the country by sea. As the report mentions, the Maltese authorities continued to pursue a deadly deterrence policy, ignoring or responding slowly to distress calls from refugees and migrants at sea. Although the Council of Europe (CoE)’s Commissioner for Human Rights recommended⁹ that Malta stop detaining children and vulnerable adult refugees and migrants and end arbitrary detention, the government continued to arbitrarily detain asylum seekers, including unaccompanied children, beyond permissible legal periods and without adequate access to a remedy.

⁶ Eurostat (2023a)

⁷ Eurostat (2023b)

⁸ Amnesty International (2023)

⁹ Commissioner for Human Rights, Council of Europe (2022)

The United Nations High Commissioner for Refugees (UNHCR) data shows that in 2022 six per cent of all asylum cases were closed with granted protection.¹⁰

As one of our interviewees (researcher and activist on refugees' rights, Dr Maria Pisani) explained, the government ignores the non-governmental organisations (NGOs) supporting or advocating for refugees; the situation is the worst now, having deteriorated in the last two decades. There was always space for discussion between human rights defenders and decision-makers, even if it was heated. Currently, government bodies refuse to engage in dialogue. In addition, the political opposition is dysfunctional, and the public is experiencing 'compassion fatigue.' It is difficult to call people's attention to the unjust and inhumane situation of migrants and refugees. As she explained 'the Maltese transition to a more diverse nation has been challenging, with increasing concerns in relation to institutional racism and xenophobia'.¹¹

1.2.3 Members of the LGBTQ+ and non-binary community in Malta

Malta is one of the [safest countries](#) in the world for the LGBTQ+ community and ranked as the best European country for LGBTQ+ rights in Europe in 2022.¹² This outstanding achievement resulted from ground-breaking legislative reform in the last decade. In 2013 the government launched an LGBTQ+ Consultative Council,¹³ and in 2014, the Maltese parliament passed the Civil Unions [Act](#).¹⁴ The first Civil Union was celebrated on the 13th of June¹⁵. In 2015, parliament adopted the Gender Identity, Gender Expression and Sex Characteristics Act.¹⁶ In 2016, Malta was the first EU member state to ban Conversion therapy.¹⁷ In 2017, Malta introduced marriage equality¹⁸ and, in the same year, allowed for the X marker on identity cards and passports.¹⁹ In 2018, a gender well-being clinic²⁰ opened its doors to offer multi-disciplinary services to transgender individuals.

Despite the progressive legislative and institutional environment, people identifying as non-binary might face difficulties when obtaining proper documentation. Since belonging to the LGBTQ+ community is

¹⁰ United Nations High Commissioner for Refugees, UNHCR (2022a)

¹¹ [Immigrants in Malta protest racism, discrimination, violence – EURACTIV.com](#)

¹² Euronews (2022)

¹³ [Who we are](#)

¹⁴ Civil Unions Act

¹⁵ [First civil union registered on Friday - The Malta Independent](#)

¹⁶ Gender Identity, Gender Expression and Sex Characteristics Act. (2014)

¹⁷ [Malta becomes first European country to ban 'gay cure' therapy](#)

¹⁸ Marriage Act

¹⁹ [ID cards and passports go gender neutral](#)

²⁰ [Around 30 people receiving services at the new gender clinic](#)

criminalised in numerous countries, refugees and asylum seekers in Malta may include people requesting protection because of their sexual orientation and identity.

1.3 The importance of the project

When, at a previous phase of the Lost Millennials Project, BCI analysed the initiatives potentially addressing 25+ NEETs in Malta. BCI found that until recently, Malta did not prioritise 25+ NEETs as a target group. However, young people in this category are part of other social groups targeted by employment-related initiatives and programmes. Based on the analysis, the geographical coverage, thematic focus, financial scope and the circle of involved stakeholders and implementers are adequate to address the challenges rooted in the situation of 25+ NEETs in Malta.

Support to 25+ NEETs in Malta is provided by more extensive employment-related programmes and schemes and smaller initiatives targeting rather special needs — for example, the needs of those who lack proper documentation, which is a significant obstacle to their employment. The evaluator selected the Aditus ‘Documentation=Employability’ project for evaluation because it addresses a niche, an otherwise often overlooked or forgotten small and diverse target group including numerous 25+ NEETs. The solutions offered (legal counselling and housing subsidies) are not typical activities in employment-related programmes. However, the project aims to have a long-term impact on employability and, more broadly, on the social well-being and social inclusion of its clients, benefiting their personal lives and the society in which they live.

The importance of the project and the problem of lacking proper documentation are explained clearly in Aditus’ research document completed within the project framework.

‘It is therefore important to understand that challenges in obtaining documentation have enormous implications on a person’s level of access to the labour market, healthcare services, social welfare support services, schools and other educational entities and private services, such as banking and rent contracts. The end result of lack of documentation is an increased risk of poverty and social exclusion borne of the inability to secure regular and stable employment, healthcare and education. Prone to discrimination, exploitation and abuse, undocumented or incorrectly documented persons’ risk remaining in the legal and social shadows unable to regularise their situations and set on the path of self-sufficiency and self-reliance.’²¹

²¹ Camiller Dr, Carla (2022) pp. 5-6.

2. The design of the initiative

2.1 Time frame

Initially, Aditus planned to implement the project from the 1st of January 2021 until the 30th of June 2022 (18 months). In September 2022, Aditus submitted a six-month extension request with additional funding to the Managing Authority, which was approved, and the project ended at the end of 2022. At the time of drafting this evaluation report, data on the implementation of the original project period (January 2021 – June 2022) was available.

2.2 Target group/eligibility criteria

Based on the work plan, annexed to the proposal, the project targets persons encountering difficulties securing personal documentation, including:

- Members of the trans and non-binary community needing to amend birth certificates, Identity Cards, passports, O' and A' Level Certificates²² and other documents;
- Asylum-seekers as they await their Asylum-Seeker Document from the International Protection Agency (IPA), without which they are legally inexistent and unable to commence the journey of integration and self-reliance.
- Applicants of the Specific Residence Authorisation (SRA), including their dependant family members (spouses and minor children);
- Holders of Specific Residence Authorisation (SRA) seeking to renew the 3-year permit (possible eligibility assessment could require support);
- Newly-arrived dependant family members of refugees seeking to obtain the 'family member' residence card to access employment, education, etc.;
- Non-Maltese same-sex partners of persons living in Malta seeking to obtain partner visas to come to Malta;
- Victims of human trafficking who need to file police reports to be formally identified as victims of trafficking, without which they would be undocumented and therefore unable to access employment;
- Spouses in abusive relationships who are dependent on the abusive spouse for their residence permits. They require assistance to apply for and secure an autonomous residence

²² In the Maltese education system these are the two most important milestones in educational attainment before tertiary education. O-level exams are taken at the age of 16 (when compulsory education ends), A-level exams are taken at the age of 18 and also serve as entrance exams to universities in the European Union (within the so-called Bologna Process).

permit to start living independently, including through accessing employment and other essential services;

- Vulnerable undocumented migrants who could be eligible for a humanitarian permit, allowing them to work based on their vulnerability (medical, age, disability, trauma, etc.);
- Stateless persons, therefore undocumented, wishing to access the statelessness determination procedure that would identify them as such and provide them with documentation;
- Third-country nationals who are eligible for Long Term Residence, as this will secure access to increased employment opportunities and mobility rights;
- Undocumented third-country nationals who are parents of an EU national child, for them to apply for a residence permit - and therefore secure employability - based on parenthood of an EU national;
- Third-country nationals who could be eligible for citizenship (after several years of residence in Malta or following marriage to a Maltese national), as this would secure increased levels of employability, education, and mobility.
- Maltese persons and families facing similar challenges in securing their documents, such as persons with mental health problems, homeless people, and persons with disabilities.

Commonalities amongst these groups are discrimination, administrative delays, incorrect or incomplete application of legal rights, lack of information on entitlements and procedures, and the inability to engage effectively with public institutions.

The evaluator's observation is that regarding the originally set goals of the project (the labour market *and* social integration of those who do not have proper documentation in Malta through the identification and elimination of administrative obstacles) the definition of the target group is thorough. This definition allows a limited number of employed persons whose status in Malta is endangered because their documents expire in the near future, and underaged children (family members) to be project beneficiaries. The 'Documentation=Employability' project's results are measured by the given ESF indicator system, namely the number of persons who 'become employed/studying/actively job searching' after receiving service provision. The evaluator identified a discrepancy as this result indicator is not adequate for all beneficiaries, namely for already employed persons and for underaged children.

2.3 Scope

Aditus implemented the project nationally (in Malta and Gozo).

2.4 Measures/services

Aditus did not conduct a designated needs assessment to determine the challenges and needs to be targeted by this particular project. The identified measures and services are based on Aditus' decade-long experience with vulnerable populations in Malta (detailed analysis of relevance under the sub-chapter 6.1.1.).

Aditus planned and carried out three different types of activities within the project. The work plan outlined the following activities.

2.4.1 Legal Counselling

Support services planned by Aditus within the project framework offered information, advice and interventions to persons facing challenges securing personal documentation. At the planning phase of the project, Aditus identified the following individual and institutional challenges when applying for documentation in Malta:

- Persons without a fixed address face difficulties (homeless people, people often moving between rentals, people in rentals which are not registered at the Housing Authority) as authorities request proof of residence for documentation.
- People in vulnerable situations (dependent spouses, victims of violence and trafficking, people with mental problems and disabilities) face difficulties during official procedures without appropriate legal counselling or representation.
- Migrants, asylum-seekers and refugees face serious challenges when trying to apply for or renew residence documents; there is a constant uncertainty of always being at risk of authorities withdrawing residence documents or permits.
- Transgender and non-binary individuals may have details in their documentation which do not reflect the true identity of that person.

As Aditus describes in the proposal, their approach is 'based on an ethos that ensures the provision of professional support whilst simultaneously empowering the beneficiaries. It is a rights-based approach while supporting the enjoyment of fundamental rights by the clients, also ensuring their own self-awareness of their rights and necessary remedial actions.'²³ As the work plan describes, Aditus' work ethic seeks to support immediate needs by providing skills and information to allow the beneficiaries to evolve into stronger and more empowered community members.

²³ Project proposal pp.7.

2.4.2 Rental Subsidy Scheme

The project proposal notes that the rising cost of living including rent, water and electricity, clothing, and schooling often prevents their clients from getting onto their feet and focusing on mid- to long-term personal planning. As it is explained in the clarification document regarding the proposal sent to the Managing Authority, at the time of the proposal submission Aditus operated two projects whereby, together with NGO partners, they offered hardship support to their beneficiaries. Aditus planned to extend this support to a limited number of the 'Documentation=Employability' beneficiaries, based on already applied protocols, such as:

- Referrals for requests for support will be made internally or externally by stakeholders with the consent of the beneficiary;
- All requests and consequential assessment procedures will be duly documented;
- Decisions will be taken by an assessment panel;
- Where necessary, referrals for other form of support will be made (e.g., food vouchers, clothing supplies, psycho-social support, etc.);
- The amount to be provided will be determined within the specific brackets on a case-by-case basis;
- Aditus Foundation will not enter into contractual arrangements with lessors, but will ensure the provided funds are utilised for the purposes they are given, to be ensured via the provision of necessary documentation (e.g., lease agreement, receipts, etc.);
- The assessment procedure will explore whether alternative forms of support are available and accessible (e.g., rental assistance from the Housing Authority, etc.);
- All support will be provided based on a signed agreement with the beneficiary explaining rights and obligations.²⁴

Selection criteria were defined by the project team during the project implementation:²⁵

- Sources of income;
- Living environment;
- Personal history;
- Educational level and skills;
- Medical history and healthcare needs;
- Family composition and number of dependents;
- Disability;

²⁴ Clarification notes on the proposal

²⁵ Beneficiary Rental Subsidy Guidelines

- Financial difficulty;
- Any other vulnerabilities.

It is important to point out that the costs of the Rental Subsidy Scheme were not funded by the project; however, this financial support was available for the project beneficiaries. Because of this, detailed financial reporting is not available on the Rental Subsidy Scheme within the project documentation, only on the number of the beneficiaries.

2.4.3 Research Report²⁶

Within the framework of the project, Aditus planned and in 2022 prepared a report to analyse the project learnings on a higher level. The report describes the special situations where access to documentation is problematic, experienced by Aditus during the project implementation. The report provides an overview of the various cases (for example non-Maltese transgender and non-binary persons, EU citizens on maternity leave, applicants for citizenship, third-country national parents of EU nationals, etc.) and describes concrete recommendations for the decision-makers and the legislators. The research methodology is based on action research (dialogue and consultation with project beneficiaries) and stakeholder consultations to ensure inclusivity and comprehensiveness.

2.5 Partnerships

Aditus did not create formal partnerships with other organisations for this project. However, collaboration with stakeholders referring beneficiaries to Aditus is an important element of the organisation's operations.

Beneficiaries reach out to Aditus in different ways: (1) direct drop-ins to the office (word of mouth or former clients), (2) due to Aditus outreach visits to accommodation or community centres, hubs or apartments, and (3) referrals from government and non-governmental partners. These referrals are based on a relationship of mutual trust with the primary goal of effective and efficient support provision for persons in need.

Some examples of the organisations referring beneficiaries to Aditus as described in the project proposal:²⁷

- International Protection Agency (IPA, formerly Office of the Refugee Commissioner);²⁸

²⁶ Camilleri Dr, Carla (2022)

²⁷ In the project documentation there is no information on how the project beneficiaries got to Aditus, but there is evidence in publicly available documents on Aditus' cooperation with the listed organisations: common projects, publications, training sessions, etc.

²⁸ [International Protection Agency](#)

- LEAP Services (Helping the most deprived ‘take the leap’ out of poverty, provided by the Social Services Foundation);²⁹
- Aġenzija Appoġġ (APPOGG, the agency offering quality psycho-social welfare services to individuals and families inclusive of all diversities through empowering, advocating and safeguarding the wellbeing of these persons.);³⁰
- Mount Carmel (Mental Health Hospital in Malta);
- Mater Dei (National Hospital in Malta);
- Agency for the Welfare of Asylum-Seekers (AWAS, the implementation of national legislation and policy concerning the welfare of refugees, persons enjoying international protection and asylum seekers);³¹
- Detention Services (DS, Immigrants are detained under the issuance of a detention order by the Principal Immigration Officer per applicable legislation.);³²
- Identity Malta (the Maltese authority to execute the functions and duties of the Public Administration in matters relating to passports, visas, identity documents, work and residence documents and the registration of public deeds and acts of civil status);³³
- Housing Authority (the Maltese authority to provide and sustain decent social and affordable housing opportunities promoting stability and supporting social mobility);³⁴
- Refugee Appeals Board/Immigration Appeals Board;
- Legal Aid Agency Malta (operates under the Ministry of Justice in Malta, it is a provision of assistance to low-income people who are unable to afford legal representation and access to the court system);³⁵
- Malta LGBTIQ+ Rights Movement;³⁶
- Jesuit Refugee Service (JRS Malta);³⁷
- United Nations High Commissioner for Refugees (UNHCR Malta);³⁸

²⁹ <https://ec.europa.eu/social/BlobServlet?docId=17797&langId=sk>

³⁰ [Appogg Home](#)

³¹ [Agency for the Welfare of Asylum Seekers](#)

³² [Detention Services Agency](#)

³³ [About | Identity Malta Agency](#)

³⁴ [About - Housing Authority](#)

³⁵ [Home - Legal Aid Malta](#)

³⁶ [MGRM – Malta](#)

³⁷ [JRS Malta: accompanying people as they navigate their new lives](#)

³⁸ [UNHCR Malta](#)

- International Organisation for Migration (IOM Malta);³⁹
- Richmond Foundation (non-governmental mental health service provider);⁴⁰
- Integration Unit (Government of Malta);⁴¹
- Private lawyers and law firms.

Aditus underlines in its project proposal that such referrals are not only based on the good relationship between the organisations but on the understanding that there are no other entities in Malta that provide free legal information and support to marginalised, vulnerable or otherwise disadvantaged persons and communities. Unable to secure private lawyers, and ineligible for the Government's Legal Aid Service, such persons cannot access the most basic services to ensure their updated and correct documentation, which is a critical element in securing their access to employment and other core provisions.

3. Descriptive statistics

3.1 Number of beneficiaries

In reports submitted to the Managing Authority (January 2021 – June 2022) and shared with the evaluator, Aditus claims 156 beneficiaries participated in the project.

Table 1. Number of new beneficiaries in the different reporting periods

Time period	Number of new beneficiaries	New beneficiaries MALE	New beneficiaries FEMALE	Cum. Number	Cum. MALE	Cum. FEMALE
January-June 2021	38	33	5	38	33	5
July-December 2021	47	28	19	85	61	24
January-June 2022	71	50	21	156	111	45
Total	156	111	45			

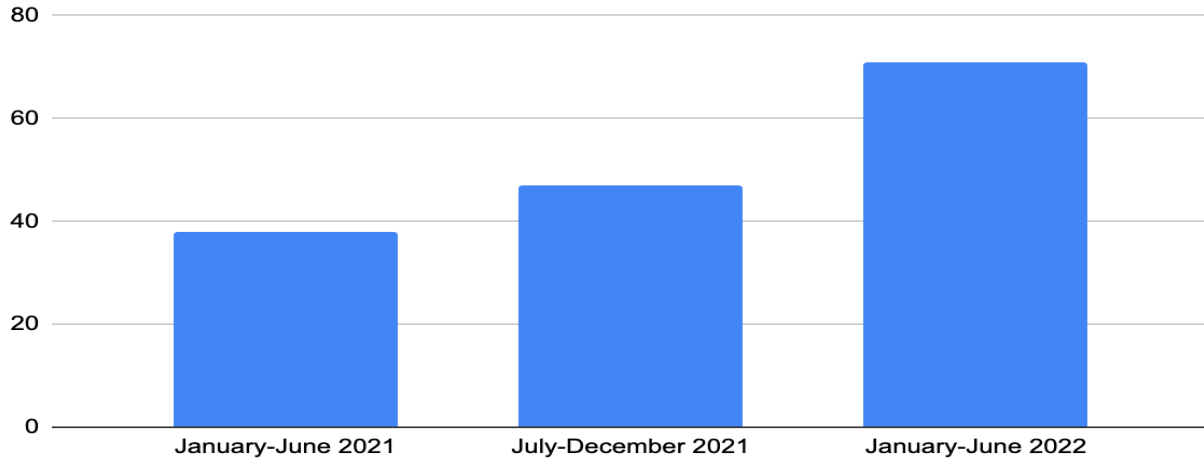
Source: project documentation

³⁹ [IOM Malta](#)

⁴⁰ [Richmond Foundation](#)

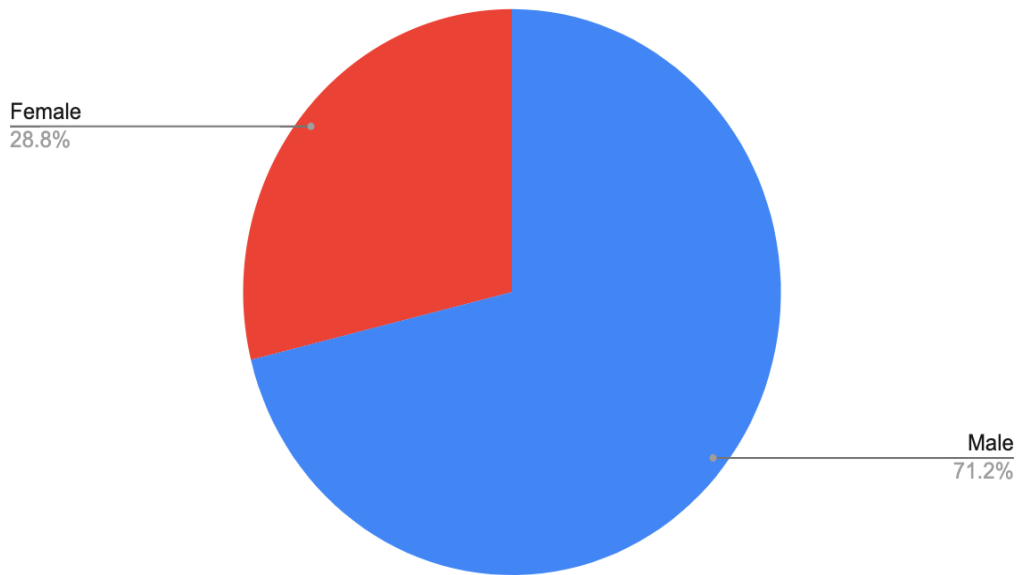
⁴¹ [I Belong Programme](#)

Figure 1. Number of new beneficiaries in the three reporting periods



Source: project documentation

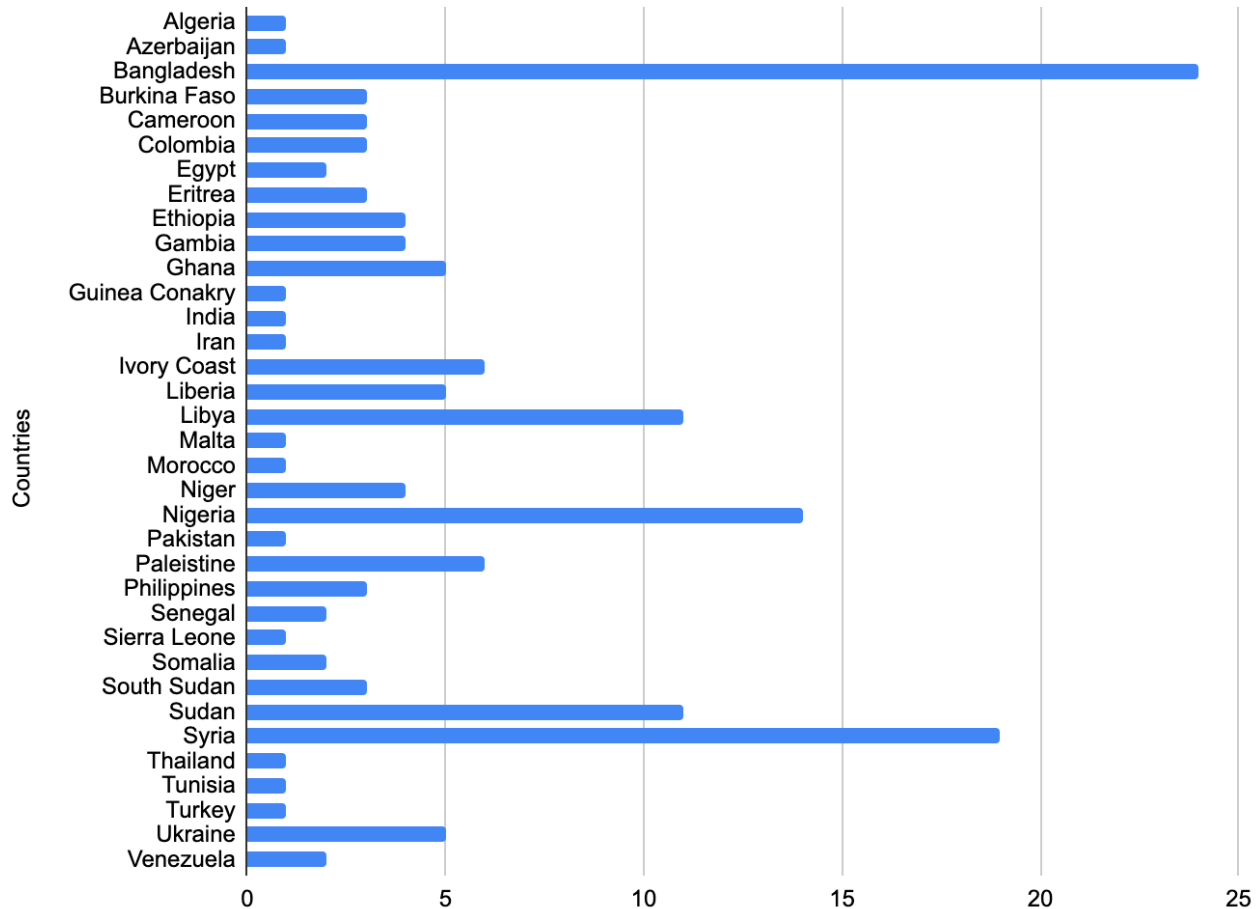
Figure 2. Gender distribution of the beneficiaries (%).



Source: project documentation

The gender distribution of all beneficiaries reflects that men are overrepresented in the refugee and asylum-seeker community (see for example UNHCR data on migration to Malta (UNHCR 2022a)).

Figure 3. Beneficiaries based on the country of origin (numbers).



Source: project documentation

As the above chart shows, only one person out of the 156 beneficiaries is a Maltese citizen; all others are migrants from non-EU countries. There is incomplete data on the legal status but based on the available information in the report documentation, the vast majority of the beneficiaries are asylum seekers, rejected asylum seekers, refugees and third-country nationals.

3.2 How many of them are NEETs (16-29) and 25+ NEETs?

It is not possible to accurately know how many beneficiaries fall into the NEETS category, since reporting on age is inconsistent over the three reporting periods. The ESF reporting system registers beneficiaries based on age brackets; unfortunately, these brackets are not identical in the different reporting periods (see Table 2.). In some cases, rather randomly, we have the date of birth of the beneficiary. Based on employment status data registered in the project documentation, all beneficiaries potentially falling in

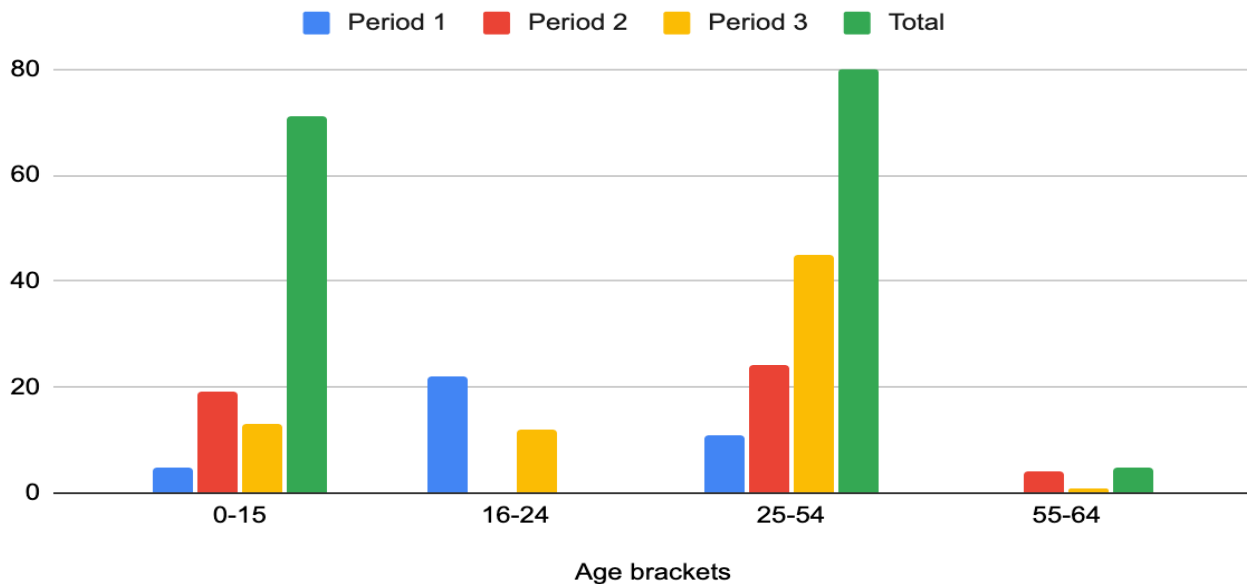
the age group of our interest (16-29 years) were not in employment, education or training when joining the programme.

Table 2. Number of beneficiaries in the different age brackets

Age brackets	Period 1	Period 2	Period 3
0-15	5	19	13
16-24	22		12
25-54	11	24	45
55-64	0	4	1

Source: project documentation

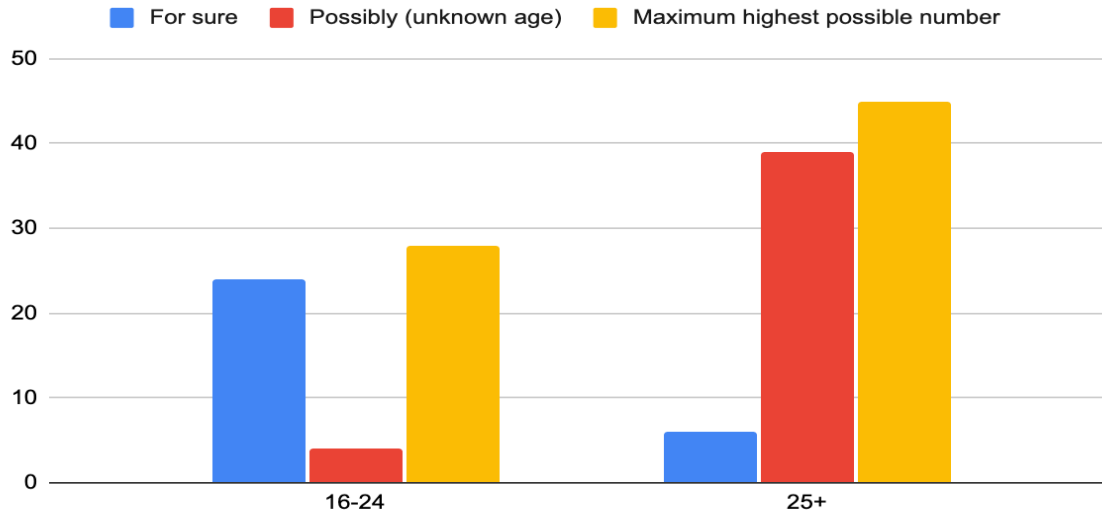
Figure 4. Number of beneficiaries in the different age brackets



Source: project documentation

Based on the available data on the beneficiaries' dates of birth or age bracket, at least 30 beneficiaries fall within the age brackets of NEETs (24 between 16 and 24 years and six between 25 and 54). There are 43 additional beneficiaries who, depending on their exact age, might be of NEETs' ages (four of them under and 39 of them over 25 years). Therefore, the number of beneficiaries falling into the NEETs age category is at least 30 and possibly 73. The number falling into the 25+ NEETs age range is at least six and possibly 45.

Figure 5. Number of NEETs (under and over 25 years of age) among beneficiaries



Source: project documentation

Considering the proportion of all NEETs (aged 16-29) among all beneficiaries, it is between 19 and 47 per cent. 25+ NEETs represent a minimum of four and a maximum of 29 per cent of all beneficiaries.

The wide interval and uncertainties result from missing data on the exact age of the beneficiaries in most cases. However, other data suggest that many young people make up the asylum seekers and refugee community. According to Eurostat, out of 1,200 asylum applicants in Malta in 2021, 920 (77 per cent) were between 18 to 35 years old. In 2022, 565 (62 per cent) of the 915 asylum applicants fell into the 18-35 age bracket.⁴²

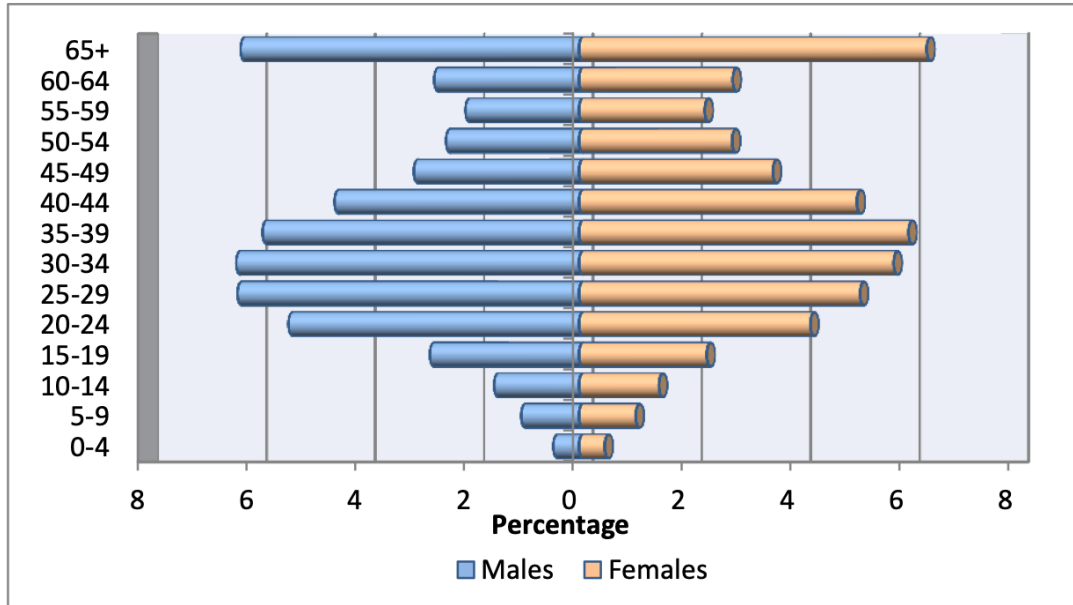
UNHCR data on Malta asylum seekers and refugees⁴³ do not share detailed data on age groups, only on adults and children. However, the last available UNICEF data (2013) also presents most migrants in Malta were in the 25-29 years and 30-34 years age brackets.⁴⁴

⁴² Eurostat (2023c)

⁴³ United Nations High Commissioner for Refugees, UNHCR (2022 b)

⁴⁴ Unicef (2013)

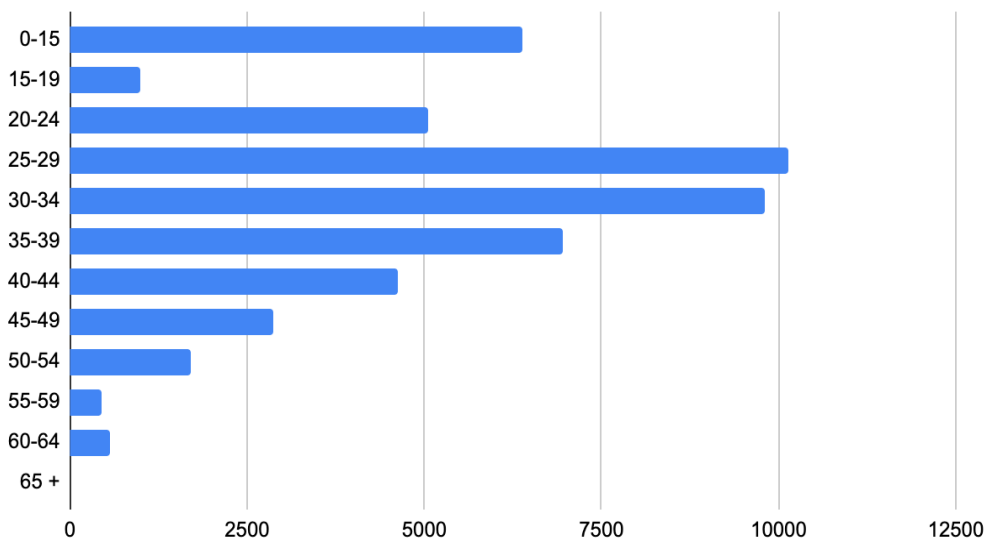
Figure 6. Migrant stock in Malta by age and sex, 2013



Source: UNICEF

The latest (2022) population data from Malta notes the following age distribution of third-country (non-EU) citizens residing in Malta:⁴⁵

Figure 7. Number of non-EU citizens residing in Malta, 2022

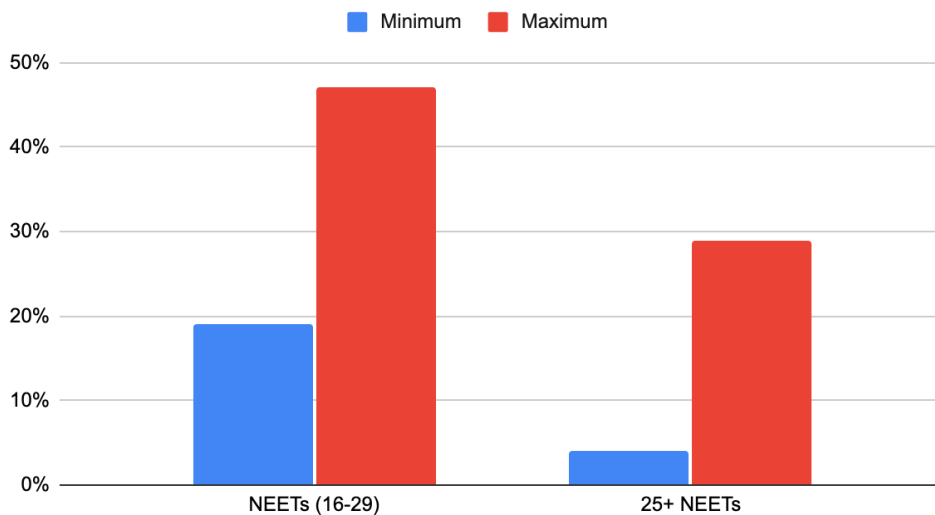


Source: NSO

⁴⁵ Eurostat (2023d)

Considering the above-described age distribution data on the general migrant, non-EU migrant, and asylum seeker or refugee population in Malta and, based on the expert opinion of the project’s focal point and lead expert stating that the majority of the beneficiaries in the 25-54 years age bracket are under 35 years of age, it can be stated that, **on the scale from 19 per cent to 47 per cent (the proportion of all NEETs among all beneficiaries) and on the scale from 4 per cent to 29 per cent (the proportion of 25+ NEETs among all beneficiaries), the representation of these groups is probably closer to the higher values.**

Figure 8. Proportion of all NEETs (16-29) and 25+ NEETs among all beneficiaries



Source: project documentation

3.3 Budget data

The total budget of the project was EUR 79,791 and the amount of grant requested (ESF) was EUR 63,833.

The budget (detailed in the proposal and later modified and finalised based on an exchange with the Managing Authority) covers only staff costs. It provided four staff members’ costs, one of them working full-time, three of them working part-time on the project, all of them calculated based on different hourly rates and including 40% indirect costs. The project focal point is responsible for the project management and the research study. The other three staff members provide the support services (pro-bono legal counselling and case work).

4. Description of methodology

4.1 Data and data sources

Aditus provided the following documents:⁴⁶

1. Project Proposal
2. ANNEX to the Proposal: work plan
3. ANNEX to the Proposal: Budget
4. ANNEX to the Proposal: Note on sustainability
5. Grant Contract (draft)
6. Interim Implementation Progress Report (January 2021 - June 2021)
7. ANNEX to the Report: Data on beneficiaries (January 2021 - June 2021)
8. Interim Implementation Progress Report (July 2021 - December 2021)
9. ANNEX to the Report: Data on beneficiaries (July 2021 - December 2021)
10. Interim Implementation Progress Report (January 2022 - June 2022)
11. ANNEX to the Report: Data on beneficiaries (January 2022 - June 2022)
12. Research paper on Support Services for the Documentation of Various Communities
13. Rental Subsidy Beneficiary Guidelines
14. Extension request from Aditus to the Managing Authority

The evaluator reviewed and analysed:

- Publicly available legislative and policy documents relevant for the project;
- Publicly available information on the project on Aditus' website and social media;
- Publicly available information on success stories and legal cases within the framework of the project.

The evaluator conducted three interviews:

- **Dr Carla Camilleri**, Maltese lawyer specialising in European Law, Assistant Director at Aditus Foundation, Focal Point of the Documentation = Employability project;
- **Marine Giorgis**, Legal Officer at Aditus Foundations, Case Officer of the Pro Bono Unit during the Documentation = Employability project implementation;

⁴⁶ BCI has rigorous internal data protection policy and rules. All data we receive we handle highly confidentially. No sensitive personal data of the beneficiaries (name, ID number, contact information) have been shared.

- **Dr Maria Pisani**, Senior Lecturer and Head of Department University of Malta, Youth and Community Studies Faculty for Social wellbeing, practitioner and activist, the co-founder and director of the Integra Foundation.

4.2 Methods applied

The Aditus project is a small initiative, so the applicability of *quantitative methods* is limited; analysis of the numbers is elementary (planned numbers vs implemented numbers, gender and age distribution, outcome and result indicators).

Desk research, the thorough analysis of the available documents, was the most applied methodology.

The evaluator conducted two *interviews* (in December 2022 and March 2023) with the project implementers and one with the representative of a partner organisation (in May 2023).

One important limitation of the methodology is that the evaluator could not reach out to beneficiaries. The project implementers at Aditus explained to the evaluator from the very beginning of the process that their clients are reluctant to participate in focus group discussions (FGD) or interviews. Citing previous experiences conducting interviews with beneficiaries, Aditus suggested that clients do not see any advantage in participating on such occasions, are exhausted by them and therefore refuse invitations for interviews and FGDs. The evaluator provided several suggestions to the Aditus team to mitigate beneficiaries' reluctance, including offering food vouchers to participants in FGDs and interviews to compensate for their time and efforts. The evaluator also suggested meeting with beneficiaries within the framework of a simple 'pizza and soda' dinner to express appreciation. The phase of the planned interviews and FGDs coincided with Ramadan, so the evaluator articulated flexibility regarding time and place at the convenience of the beneficiaries. The evaluator indicated willingness to engage interpreters for participants who do not speak English.

However, the Aditus team informed the evaluator that it could not identify any beneficiary for an interview or participation in an FGD. Our other source, Dr Maria Pisani, who also works with refugees, confirmed that it is very difficult to convince beneficiaries to provide feedback or share their thoughts. Those who were willing to do so in the past, experienced that their insights did not make any changes, and they felt like being used as illustrations for reports and refused this role. The evaluator understands that there are relevant ethical considerations on how to involve or involve at all members of vulnerable groups to evaluation processes if they feel exploited based on previous experience.

Similarly, the funder (Managing Authority) neglected our request for an interview. Although the evaluator sent the questions in advance in writing (ANNEX I) as agreed via email with the representative of the funder, numerous phone calls and email reminders remained unanswered.

The evaluator acknowledges that the lack of information from two key stakeholder groups — beneficiaries and funder — is a significant weakness in the evaluation methodology. The conclusions noted below are, therefore, based mainly on secondary sources including an external partner’s opinion, project documents and publicly available success stories.

5. Evaluation questions

During the planning phase, the evaluator formulated the following evaluation questions:

5.1 Relevance

- Are the project’s objectives consistent with the context and the needs of social groups in Malta who are excluded from the labour market because of the lack of proper documentation?
- Since the Lost Millennials project focuses on 25+ NEETs, what percentage of all beneficiaries fall under this category?

5.2 Coherence

- Which are the legal instruments, policies, and institutional practices enabling/supporting the actions of the project?
- What are the legal and institutional obstacles to project implementation?
- How did the project development (setting goals, identifying beneficiaries, determining activities) build on previous experience of Aditus?
- How did the project development (setting goals, identifying beneficiaries, determining activities) build on research findings or existing evidence?
- What other interventions address the same target groups?
- What kind of synergies can be identified or developed?

5.3 Effectiveness

- How many beneficiaries were identified?
- How were the beneficiaries identified? How did they know about the project?
- How many of them had successful cases (proper documentation, integration to the labour market)?
- What was the level of satisfaction of the beneficiaries regarding the services of Aditus?
- How do all these data relate to the original project plan?
- What unexpected challenges needed addressing? How were they addressed?
- Were there any changes in the project plan?
- How did the COVID-19 pandemic affect the project’s implementation?

5.4 Efficiency

- What was the average time per client spent?
- How does this ratio relate to the initially planned resources?
- Was there any lack of resources experienced during the implementation? (i.e., special expertise, workforce, time, financial resources, etc.)
- Were there other support services involved if needs were identified and not served by the project? (i.e., mental, social, etc.)

5.5 Sustainability

- To what extent will the project's benefits be continued?
- Does Aditus plan to provide the same target groups with this project's services after the project's lifetime?
- If so, how can it be funded?
- What changes would you introduce in case of continuing the project?
- Can beneficiaries of the project serve as resources for others in the community? (Peer help, information sharing)

5.6 Impact

- What long-term effects are (predicted to be) produced by the project?
- What difference did the project make regarding the labour market status of the target group?
- Have the beneficiaries experienced changes in their lives (attitude of the environment towards them, their ability to represent their interests, etc.) as a consequence of their participation in the project?
- Could beneficiaries advise people in similar situations based on their experience in the project?
- Is there an impact of the project on legislation, policies, authorities' and institutions' practices and applied procedures?
- Did the project generate any unintended (positive or negative) consequences?

6. Conclusion

6.1 Findings

The findings of this evaluation provide limited insights into the relevance, coherence, effectiveness, efficiency, sustainability and impact of the 'Documentation=Employability' project. Using data collection and applied qualitative methods, the evaluation concluded the following.

6.1.1 Relevance

6.1.1.1 Legal counselling for socially excluded groups

There are numerous governmental, non-governmental and international organisations in Malta providing services to asylum seekers, refugees and other vulnerable groups like the members of the LGBTQ+ and non-binary community or people dependent on abusive spouses in Malta. These services include in-kind donations, financial support, social work, mentoring, counselling, training, integration services, and mental health help. However, Aditus is the only non-governmental organisation that provides free legal counselling and legal representation by lawyers for vulnerable, socially excluded and discriminated social groups.

Based on Aditus' decade-long experience and research evidence (detailed in the next section), in many cases, the lack of proper documentation is the first and most significant obstacle to accessing the labour market and essential social services, like healthcare, education, social assistance, and housing subsidies. People in disadvantaged social situations often lack the skills, knowledge, attitude, self-confidence or even the language to cope with the expectations of the bureaucratic system. They need help to fill out forms, participate in official meetings, respond to official inquiries, articulate their interests, and demand their rights. Aditus identified this niche during its work and built the 'Documentation=Employability' project on this unserved need providing pro bono legal counselling services for disadvantaged social groups. The project proposal explains in detail the concrete legal services offered to different target groups, such as trans-gender persons, asylum-seekers, undocumented third-country nationals, dependant family members of recognised refugees, victims of trafficking, third-country nationals dependent on spousal employment status, vulnerable migrants without proper documentation, or stateless persons.

6.1.1.2 Rental Subsidy Scheme for beneficiaries

People earning less than EUR 10,000 per year in Malta are eligible for social accommodation,⁴⁷ but those who lack the proper documentation cannot apply for the scheme. Similarly, the housing benefit scheme,⁴⁸ which provides financial support for rental costs, is only available for the most disadvantaged groups if they possess proper documentation. In the past decade, rental costs have increased,⁴⁹ together with increased prices of water, electricity and food.⁵⁰ The Rental Subsidy Scheme implemented within

⁴⁷ [Social Accommodation](#)

⁴⁸ <https://housingauthority.gov.mt/wp-content/uploads/2023/01/HBS-Conditions-English-2023.pdf>

⁴⁹ <https://www.grantthornton.com.mt/insights/rental-house-prices-in-malta/>

⁵⁰ The inflation rate changed during the project implementation phase from 0,3 percent (January 2021) to 7 percent (December 2022) in Malta. Source: NSO (2022)

the Aditus project recognises the need for temporary financial support for those who cannot afford decent housing until they get on their feet with the help of legal counselling also provided by the project.

As the project proposal notes, 'In our experience with our beneficiaries, the delays it takes for personal documents to be provided often lead to a deterioration of the beneficiary's personal financial situation. Unable to secure a proper job, yet with payments to make related to rent, services, schooling, food/water, internet, transport, clothing, etc. many of our beneficiaries end up in extremely challenging situations during the course of our interventions. The aim of the Rental Subsidy Scheme is to assist the most vulnerable beneficiaries for a short time, possibly sufficiently to allow our support services to take their course and provide the desired result. Essentially it offers a breather to the most vulnerable beneficiaries. Furthermore, by providing a small financial injection we hope that newly-arrived refugees would be able to leave the institutionalised accommodation setting (open and closed centres) and live independently until they secure the necessary documentation to access the labour market or educational opportunities.'⁵¹

6.1.1.3 Research and reporting on project findings

While there have been several reports on poverty in Malta — researched and published by EU, governmental and non-governmental organisations⁵² — there is no research that adopts the horizontal and intersectional approach Aditus adopted in their research within the framework of the 'Documentation=Employability' project. The research report presents data, personal accounts and technical analyses of the relationship between (the lack of) personal documentation and employability, social exclusion, and material deprivation. In this sense, the research element of the project is innovative and targets a non-discussed area of social exclusion in Malta.

6.1.1.4 Outreach to NEETs and 25+ NEETs

In selecting the Aditus project for an evaluation, the evaluator knew it *potentially* addressed 25+ NEETs. Based on the analysis, it appears that the project reached NEETs and 25+ NEETs, as a considerable proportion of beneficiaries fall under these categories. The Aditus project is small compared to other ESF-funded interventions, with a small number of people (a maximum of 73 young people identified as NEETs and a maximum of 45 of them above 25 years of age among the 156 beneficiaries). Because of the particular focus of the initiative, we found it relevant to study how its unique set of service provisions impact marginalised persons' — among them NEETs — lives, employability and social inclusion.

⁵¹ Project proposal pp. 14.

⁵² For example: Central Bank of Malta (2018)

The evaluator determined that the project is relevant. Its objectives, which involve identifying personal or institutional barriers that prevent individuals from obtaining proper documentation and intervening to eliminate these obstacles, align well with the current context and the needs of the target group. The provision of pro-bono legal counselling for marginalised social groups and the implementation of the Rental Subsidy Scheme addresses existing needs in Malta that have previously been unmet. The research report produced as part of the project sheds light on overlooked situations faced by vulnerable groups lacking appropriate documentation in Malta. Moreover, it provides concrete recommendations to legislators and decision-makers. Given its impact on NEETs (Not in Education, Employment, or Training), the "Documentation=Employability" project is also an important subject for our evaluation analysis.

6.1.2 Coherence

Aditus implemented the 'Documentation=Employability' project within the Operational Programme II (2014-2020) called 'Investing in Human Capital to Create More Opportunities and Promote the Wellbeing of Society', under Priority Axes 2: 'Towards a more inclusive society'. The project's set goals align with the Priority Axes' goals as it supports socially excluded groups to strengthen their employability and enhance their social inclusion.

6.1.2.1 Legal, institutional environment

As the project proposal explains, the 'Documentation=Employability' project operates within clear legal and policy frameworks. The interventions seek to align individuals with existing legal norms by using legal procedures, therefore supporting the implementation of relevant national priorities at the most basic level.

Examples of laws and policies that provide a framework for the project activities:⁵³

1. The LGBTIQ Equality Strategy and Action Plan (2018-2022)⁵⁴ provides the national policy framework for ensuring equality for the LGBTIQ+ community. Aditus' services with the trans and non-binary community to ensure documentation that reflects their gender identity supports Malta's recognition and implementation of the right to gender identity.

⁵³ Based on the project proposal

⁵⁴ Government of Malta (2017a)

2. The Specific Residence Authorisation Policy⁵⁵ confirms the national approach to regularising a specific group of undocumented migrants. The policy provides the policy approach, criteria, rights and procedure for granting this regularisation status.
3. Regarding the Migrant Integration Strategy and Action Plan Vision 2020,⁵⁶ Aditus' project in this area operates within the parameters of the policy which focuses on anti-discrimination and equality, in close liaison with the implementing authority (Identity Malta).
4. Malta's National Action Plan Against Human Trafficking⁵⁷ describes the protection and reintegration of victims as also their granting of a residence permit once identified as victims.
5. All of the project's services for beneficiaries of international protection (refugees and grantees of subsidiary protection) operate within the EU's broader Common European Asylum System, of which Malta participates as a Member State. On a more specific national level, the work in this area conforms to the legal rights and obligations attributed to refugees via national legislation, including the Refugees Act,⁵⁸ the Reception Regulation⁵⁹ and the Family Reunification Regulations.⁶⁰
6. Maltese Citizenship Act⁶¹ and Status of Long-Term Residence Regulations⁶² or autonomous residence permits provide the parameters and guidance when applying for residency or citizenship for clients.
7. Overall, the project providing third-country nationals with basic information and support services as to their rights in Malta, falls within Malta's stated objectives for the Asylum, Migration and Integration Fund (AMIF).⁶³

6.1.2.2 Institutional practices as obstacles of the project implementation

Precarious work and modern slavery of third-country nationals are not unknown phenomena in Malta, as reported by the media in the last few years.⁶⁴ Due to Malta's system, whereby residence permits are dependent on work permits, the employer of victims of trafficking or other exploitation can terminate the work contract immediately and, consequently, the residence permit, rendering the person irregular

⁵⁵ Government of Malta (2020)

⁵⁶ Government of Malta (2017b)

⁵⁷ European Commission Migration and Home Affairs (2023)

⁵⁸ International Protection Act (2001)

⁵⁹ Reception of Asylum Seekers Regulation (2005)

⁶⁰ Family Reunification Regulations (2007)

⁶¹ Maltese Citizenship Act (1964)

⁶² Status of Long-term Residents (Third Country Nationals) (2006)

⁶³ [Asylum, Migration and Integration Fund \(2021-2027\)](#)

⁶⁴ [What modern slavery looks like](#)

and prone to arrest, detention and removal from Malta. Recognising this unjust situation, within the project framework Aditus aimed at the personal empowerment of the victims to file reports to the Police while liaising with the relevant authorities to ensure the provision of residence and work permits for the victims. This way, the cycle of abuse could be broken, and decent employment could be ensured.

6.1.2.3 Building on previous experience and research evidence

Aditus has a unique experience providing legal counselling and representation for marginalised communities in Malta, especially migrants, refugees, asylum seekers, third-country nationals and members of the LGBTQ+ and non-binary community. As it is explained in the project proposal, ‘based on this experience in the absence of an Identity Card – or in the case of non-Maltese nationals, the Residence Card – problems are encountered with work permits, rent contracts, social security, schools and other educational entities, etc. The ultimate result of these obstacles is an increased risk of poverty and social exclusion borne of the inability to secure regular and stable employment. Prone to discrimination, exploitation and abuse, undocumented or incorrectly documented person’s risk remaining in the legal and social shadows unable to normalise their situations and set on the path of self-sufficiency and self-reliance. The broader implications are an inability to secure dignified private accommodation, inability to purchase sufficient food and other essentials. Our years of experience working with such communities is marked with cycles of homelessness, discrimination, drug and alcohol abuse, human trafficking, sexual exploitation, undignified living conditions, institutionalisation, deteriorating mental health conditions, increased reliance on service-providers, higher risks of domestic and other forms of violence.’⁶⁵

Aditus, in partnership with other organisations, conducted two important pieces of research identifying the importance of the issues tackled by the ‘Documentation=Employability’ project.

The ‘*Dari? Refugee Voices on Making Malta Home*’⁶⁶ publication points to the problem that refugees are often employed irregularly (not registered) in Malta, and the lack of decent accommodation (because of the high rental prices related to the typically low income of this group) conclude to low-level living conditions and high-level accommodation mobility and uncertainties.

The ‘*Struggling to Survive - an Investigation into the Risk of Poverty among Asylum Seekers in Malta*’⁶⁷ research paper points out that the legal norms establishing asylum-seekers’ access to essential services (healthcare, housing, employment, education and social support) are vague. The study also calls attention to the fact that the ‘at risk of poverty and social exclusion rate’ in Malta (similar to other EU

⁶⁵ Project proposal pp. 9

⁶⁶ JRS Malta, Aditus Foundation, Integra Foundation (2017)

⁶⁷ JRS Malta, Aditus Foundation (2017)

countries) is higher in the migrant community than in the major society and is exceptionally high among non-EU nationals. Among asylum-seekers, unemployment and poverty rates are significantly elevated, which impact their physical and mental health.

6.1.2.4 Other interventions addressing the same target group, synergies

As described earlier, Aditus operates in a broad network including authorities and public and non-governmental organisations so it can serve the diverse needs of their beneficiaries in cooperation with other entities based on mutual trust.

Malta is a small country (with approximately half a million inhabitants) where people and organisations working in the same field, sharing the same goals, values and commitment, know (about) each other and cooperate easily. Aditus is the founder and member of three Maltese umbrella organisations, the Malta Refugee Council (MRC)⁶⁸, the Platform of Human Rights Organisations in Malta (PHROM)⁶⁹ and the Malta Legal Network on Asylum.⁷⁰

The MRC's mission is to advocate for legislation, policies and practices per Malta's international obligations and best practices in the sector. The Council seeks to foster an environment that is welcoming and inclusive for refugees and understands that these goals are best met through its members' concerted and coordinated efforts. The Council develops policy papers on key themes, press statements and other public interventions, and advocacy meetings with stakeholders. Membership in the Council is open to any non-governmental organisation, including informal groups. The PHROM is Malta's first and only national network of human rights NGOs. The Platform comprises 25 member organisations, whose fields of expertise vary from the environment and culture to disability, migration and LGBTIQ+.

PHROM's mission is to provide a national forum for human rights organisations in Malta to develop, promote and advocate for the values of human dignity and equality more effectively. PHROM is grounded in the values cited in the United Nations Declaration of Human Rights. PHROM believes that effective human rights recognition and enjoyment by all persons in Malta strengthens and empowers Maltese society. PHROM holds that the multitude of human rights are interrelated and interdependent, embracing all civil, political, economic, social and cultural rights. PHROM understands that active citizenship and civic participation based on democratic principles of inclusivity and mutual understanding are central to national, regional and international efforts to combat inequalities and human rights violations and improve community empowerment.

⁶⁸ [Malta Refugee Council](#)

⁶⁹ [Platform of Human Rights Organisations in Malta \(PHROM\) | Anna Lindh Foundation](#)

⁷⁰ [Malta Legal Network on Asylum - aditus foundation](#)

The Malta Legal Network on Asylum is the national group of the European Legal Network on Asylum (ELENA).⁷¹ It is a forum of legal practitioners promoting the highest human rights standards for treating refugees, asylum seekers and other persons in need of international protection.

Based on these alliances and everyday cooperation with other organisations providing the same target group, Aditus creates synergies, makes it possible to avoid redundancies and to address unserved needs on the highest professional standards within the framework of the ‘Documentation=Employability’ project.

The evaluator determined that the project is coherent. The project implementers, who are legal professionals, possess a strong understanding of the legal and policy framework that the project operates within, and they execute their tasks in alignment with these regulations. Aditus, as the organisation behind the project, demonstrates awareness of the institutional obstacles and has developed responsive actions to effectively address them. Furthermore, the project draws upon the organisation's prior experience and relies on research evidence to inform its implementation. To prevent redundancies and ensure coverage of unmet needs, the project is implemented within a broad network of other stakeholders serving the same target group.

6.1.3 Effectiveness

Based on the project proposal and the reports shared with the evaluator, the planned and implemented numbers (until the end of June 2022) were the following:

Table 3. Planned and implemented numbers: number of beneficiaries

	Number of beneficiaries of legal services	Number of those who entered employment, education or actively job searching	Number of beneficiaries of Rental Subsidy	Research
Planned	350	292	15	1
Implemented	156	29	15	1

Source: project documentation

The project reached less than half of the planned number of beneficiaries by the end of July 2022, which was the original end of the project. Aditus provided no data on the number of beneficiaries in the last

⁷¹ [ELENA | European Council on Refugees and Exiles \(ECRE\)](#)

six months (extension period), but as explained earlier, the number of beneficiaries increased in each reporting period.

Restrictions imposed by the COVID-19 pandemic account for the decreased reach to beneficiaries compared to the project proposal’s targets. Aditus designed the project in early 2020 when the extent (and timeline) of the pandemic’s impact was unknown. The number of people attending Aditus’ office for legal assistance was significantly lower than anticipated when designing the project — particularly in 2021. The Rental Subsidy Scheme reached its aimed target number, and Aditus conducted and published the research study as planned.

Table 4. Result indicators⁷²

	Number of beneficiaries	Number of those who entered employment, education or actively job searching	Success rate
Planned	365	292	80%
Implemented	156	29	18.5%

Source: project documentation

Examining the results indicators points to a significant diversion from the targets. To some extent, the gap appears to result from ambiguous or imprecise technical terms used in the proposal and later in reporting.

In its proposal, Aditus set a target of 292 beneficiaries in employment, education, or actively seeking employment. Programme documents note that the target ‘represents 80 per cent of the indicated 365 persons participating in our support programme. In our experience securing correct and proper personal documentation has a direct impact on a person's employability either due to the actual legal possibility to enter employment on the basis of documentation, to the possibility to enrol in educational institutions or to an improvement in the person's mental health status thanks to removal of a major stress/anxiety factor.’⁷³ Aditus did not define the length of time it usually takes to receive proper documentation.

The project proposal also mentions that 'Whilst we cannot guarantee a comprehensive success rate, since most decisions remain in the hands of public institutions, we trust that our support measures provide our beneficiaries with the professional support they would otherwise be unable to access in

⁷² 29 as result indicator is based on the Annexes of the interim reports (own calculation), in the last narrative report the cumulative number is even less (21)

⁷³ Project proposal pp. 14.

order for them to engage with the authorities responsible for their documentation.'⁷⁴ Since the evaluator did not have access to beneficiaries, verifying how or if Aditus' support helped beneficiaries is impossible.

The reported result indicators (based on the reporting template, which differs from the proposal template as it also allows 'active job searching' as a result, too) represent the status of the beneficiaries after four weeks of the service (the first occasion of legal counselling). Based on our discussions with the project implementers, the four weeks of follow-up data requested by the reports do not present the real success rate as receiving proper documentation is usually a very long procedure. Most of the cases were still pending when reported, which does not mean that those cannot turn into positive results in the future. It is also important to mention that there has been an internal decision within the organisation focusing on core cases for collective legal decisions (precedent) as those have a much bigger impact concerning many beneficiaries at the same time. These cases take a long time. It means that the indicators given to measure the results are not suitable for the type of support services provided by the 'Documentation=Employability' project.

At least 17 (approximately ten per cent) of the beneficiaries were under 16 years of age, and were eligible for the project provisions as family members of beneficiaries to receive proper documentation. In their case, becoming employed or searching actively for a job due to the project is irrelevant. Still, being properly documented has an impact on their future opportunities and social inclusion; it provides access to health care, compulsory and further education, benefits. The evaluator is convinced that the practice of dealing with families as a whole within the project was the right approach based on the 'best interest of the child's fundamental professional value.

There is an interesting detail regarding the results. In the final reporting period (January-June 2022), the results were low (one person entered education or employment and one was actively seeking employment), while the number of new beneficiaries was the highest in this period. As the focal point explained, those months were especially hostile towards refugees and asylum seekers due to the election campaign (spring 2022), when the migration issue became over-politicised. Also, public bureaucracy slowed down during the elections and until after the swearing-in of a new cabinet.

Since the Managing Authority neglected to respond to the evaluator's questions, it is impossible to understand its insight or opinion on the diversion from the target and actual results. In its extension request letter, Aditus says that 'to date, the project activities have been effective and successful. Our services are proceeding very well, and the research report has been finalised and is being shared with key stakeholders.' Since the project was extended, one can assume the funder agreed. It is possible that

⁷⁴ Project proposal pp. 15.

the funder agreed that, despite the gap between the targeted and actual results, the project was going well as the given indicators were not suitable for measuring the project's success. One can also assume that the Managing Authority was flexible, understood the special circumstances of the project which makes it unmeasurable by the given rigid ESF indicator system formulated for 'classic' employment interventions (training, education, mentoring, job search consultation, etc.).

Although the evaluator was unable to interview any beneficiaries, she did speak with Dr Maria Pisani, who leads the organisation Integra, which cooperates with Aditus and often refers clients for legal support. During the years Dr Pisani referred numerous clients to Aditus for pro-bono legal counselling. Dr Pisani noted that, based on her follow-up, clients referred to Aditus reported they were happy with the services they received.

The evaluator determined that the project lacks effectiveness based on the specified result indicators. The project fell short of reaching its intended number of beneficiaries, achieving only less than half of the target, resulting in a success rate of 18.5 percent instead of the planned 80 percent. This significant deviation from the initial plans can be attributed to various factors. Notably, the Covid-19 pandemic had a substantial impact on the number of beneficiaries involved in the project. Additionally, the low success rate can be attributed to the inadequacy of the result indicator provided by the funder, which does not accurately measure the type of support provided by Aditus. Furthermore, the evaluator discovered that Aditus did not establish realistic or well-defined expected results, particularly in terms of the timeframe for achieving the 80 percent success rate.

6.1.4 Efficiency

As the Aditus focal point and the case manager explained, there are extreme differences in the time and level of effort spent on different cases. Sometimes an email sent to the appropriate authority or public body is sufficient. More often, it is a multiyear-long legal procedure, involving different levels of the judiciary system, sometimes even reaching the European Court of Human Rights. In the extension request, Aditus proposed a EUR 4,500 per month budget for the extension period for legal counselling. Aditus based the calculation on the average monthly costs spent on the project beneficiaries in the previous months. Aditus does not select cases based on their resource allocation needs but on the service needs.

The project implementers also shared that the Rental Subsidy Scheme would have benefited from more financial sources. Additionally, although the beneficiaries were less than planned, the Aditus team needed more time and human resources to deal with numerous complicated and time-consuming legal

cases. The implementers shared with the evaluator that in the future they will plan more resources (time) for the legal counselling services.

Aditus refers clients in need of mentoring, social work, in-kind donations or shelter to other partners in its network.

The evaluator's findings regarding efficiency are not straightforward. While the project did not reach the intended number of beneficiaries with the allocated resources, the evaluator acknowledges that the resources were insufficiently planned. Additionally, the cases handled within the project framework were more complex and demanding than initially anticipated. The organisation prioritised core cases that require a significant amount of time and effort but have the potential to positively impact numerous other cases in the long run, thereby increasing the efficiency ratio.

6.1.5 Sustainability

Aditus' focal point and case manager confirmed that the organisation will, independently, continue with all cases already in progress, since ESF funding of the project finished at the end of 2022. Aditus will continue to provide legal counselling and representation for socially excluded groups; it will consider applying from AMIF, ESF or UNHCR.

In a future project, Aditus noted it would plan significantly more sources for the Rental Subsidy Scheme. It would introduce (or complement the given reporting templates) more reflective reporting, including the hours spent per client, results achieved within a realistic timeframe, and additional results beyond getting into employment, education or active job searching.

Aditus is well known among the people it represents, beneficiaries recommend its services to others. We also discussed the issue of the presence of peer help within the target group with Dr Pisani and she called our attention to Spark 15.⁷⁵ This organisation was founded by young migrants and refugees in Malta, to empower others to actively participate in achieving a more inclusive society. The existence of this organisation is not directly related to the evaluated project but is related to the decade-long work of Aditus in representing and empowering young migrants and refugees through legal counselling, advocacy, reporting and alliances, and of course to other organisations' devoted work, like Integra or JRS.⁷⁶

⁷⁵ <https://spark15.org>

⁷⁶ [JRS Malta: accompanying people as they navigate their new lives](#)

The evaluator determined that the project is sustainable as Aditus intends to maintain its support for the most vulnerable social groups in Malta who face challenges related to proper documentation. Aditus will continue to provide assistance primarily through pro-bono legal counselling, among other provisions.

6.1.6 Impact

The project has tangible long-term impacts. Some of the cases from the project framework went to Court (or will go to Court) and may have an impact on national legislation as precedent cases. The concrete case of a Serbian national ESF client⁷⁷ of Aditus was also discussed in the national media⁷⁸. Milos Petrić has lived in Malta since 2010, married a Maltese citizen in 2012, and had three common children under the age of 10 in 2021 when they divorced. Since then, with the support of Aditus, he has been trying to secure what is known as a ‘Zambrano permit,’⁷⁹ which would allow him to remain in Malta based on the fact that he has Maltese children even though he is no longer married to a Maltese national. Although the above-mentioned right has also been confirmed by Maltese Courts, to date, Malta has yet to legislate clearly to offer third-country nationals the possibility for a Zambrano permit, and Identity Malta continues to process these applications on an *ad hoc* basis. At the time of drafting this report, there has been no decision on the case. Still, Aditus continues the legal representation of Petrić and makes all possible efforts for a positive decision which also serves as a precedent for 6 other ESF clients in the same situation.

The ‘Documentation=Employability’ project also highlighted significant discrimination existing in the documentation system. While Maltese non-binary persons can change their documents accordingly (with ‘X’ under sex), non-Maltese people cannot. Aditus works on achieving equal treatment in this field since it was recognised and advocated for based on ESF cases.

In the ‘Safe4All – Refugee stories’ booklet,⁸⁰ another ESF client’s case is highlighted. The authors intend to underline the inhumanity of the ‘safe country of origin’ approach and how it may easily lead to

⁷⁷ That is how the project implementers called the clients of the ‘Documentation=Employability’ project, thus we also apply it.

⁷⁸ [Undocumented and forgotten: Milos' struggle for residence after his marriage broke down - Newsbook](#)

⁷⁹ The term ‘Zambrano permit’ emerges through case-law as a derivative right following a landmark decision in *Gerardo Ruiz Zambrano v Office national de l’emploi (ONEm)* by the European Court of Justice. A ‘Zambrano parent’ is a third country national parent of an EU citizen (in this case the Maltese children) who is granted permission to reside on the basis of that fact that failure to grant that permit would mean that the dependent citizen would have to leave the territory of the European Union.

⁸⁰ Aditus Foundation (2022)

situations of Malta returning refugees to countries that criminalise LGBTIQ+ identities or behaviour. As the authors explain, in their experience, 'most LGBTIQ+ asylum-seeker applicants don't mention their sexual orientation to IPA or AWAS during the first instance procedure in detention. The booklet summarises the experiences of LGBTIQ+ refugees in Malta's asylum procedure, particularly following Malta's decision to rely on the 'safe country of origin' concept... Ismael did not come out to the case worker during his asylum interview. Instead, they opened up to UNHCR during their removal procedure and were subsequently referred to us for legal assistance.'⁸¹ Aditus represented Ismael (not their real name) during the asylum procedure within the 'Documentation=Employability' project, and they also received Rental Subsidy.

The project's website contains a report on a demonstration in Valletta in October 2021, titled 'Stability not Uncertainty: Migrant community demands fair rights.'⁸² The migrant community of Malta protested against the discriminatory and inhumane treatment at the hands of authorities and public bodies, such as Identity Malta. The message of the protest has a lot in common with the 'Documentation=Employability' project's goals. It is unknown how many of the participants were ESF clients, but the fact that the migrant community stood up for its rights is an achievement. As Aditus described in the proposal, their approach is a rights-based approach, which besides providing legal aid, also ensures self-awareness of clients' rights. This approach has an impact on the migrant community, who are not only passive beneficiaries of provisions but also activists claiming their fundamental rights.

As the project implementers explained, in many cases, the services provided within the framework of the 'Documentation=Employability' project are 'life changing.' Receiving proper documentation has an impact on beneficiaries' entire lives; they are safe, entitled to public services, and are able to work legally and under decent circumstances. The impact is personal and long-term, including for future generations of the family concerned.

The evaluator concluded that the project most probably has a tangible, long-term positive impact at the personal level, as well as on the ability of the migrant community in Malta to advocate for their interests, and potentially even on national legislation. It is important to note that this finding is based on secondary data, as the evaluator did not have the opportunity to directly meet with project beneficiaries to discuss the impact on their personal lives. As a result, the finding is not fully verified.

⁸¹ Aditus Foundation (2022) pp. 1 and 5.

⁸² [Stability not Uncertainty: Migrant community demands fair rights - aditus foundation](#)

6.1.7 Gender equality

As a human rights organisation, Aditus is exceptionally devoted to ensuring gender equality at all phases of the project implementation (and in all operations). The team mentions, in the project proposal, that many of the potential target groups are particular to women, 'such as domestic violence survivors needing autonomous residence permit, the reuniting family member of a refugee needing her residence papers to reflect her status, the victim of trafficking needing to file a police report to be identified as such, the dependant family member of an SRA applicant⁸³ needing for renewal application. This means that the identification of our target groups acknowledged the particular situation of women (often facing discrimination) with the understanding that our project will strive to eliminate those personal and structural imbalances.⁸⁴

The Aditus team has introduced the following measures to grant gender equality during the project implementation:⁸⁵

1. Ensuring that the service-provision team and interpreters are sensitive to the particular challenges faced by female beneficiaries through relevant internal debriefings.
2. Ensuring the availability of female lawyers and interpreters for those situations where beneficiaries require support from a female lawyer/interpreter. This is especially relevant for cases of trafficking, domestic violence and sexual violence.
3. Ensuring that the service delivery is gender-sensitive by promoting the empowerment of female beneficiaries.
4. In a situation of dependence, acknowledging the individual status of female beneficiaries.
5. In acknowledgement of the particularly challenging situation faced by female beneficiaries, the Rental Subsidy Scheme will adopt a positive discrimination approach in the formulation of its selection criteria.

As mentioned earlier, the proportion of women among all beneficiaries (29 per cent) reflects the proportion of women among refugees and asylum seekers, who are the vast majority of the target group. Among the beneficiaries, there were 6 persons who openly identified themselves as LGBTQ+.

The evaluator found that ensuring gender equality was a core element of the project implementation.

⁸³ Specific Residence Authorisation

⁸⁴ Project proposal pp. 18.

⁸⁵ Based on the project proposal

6.2 Learnings and recommendations

At the beginning of the Lost Millennials project, the team observed the characteristics of NEETs and 25+ NEETs in Malta⁸⁶ and found that it is a diverse group. It includes young people who are transitioning from school to work, young mothers or other family caretakers, young people with disabilities or mental health issues, youngsters living in deep poverty, young unemployed, and early school dropouts. Young refugees, asylum seekers, and members of the LGBTQ+ community are a small segment of the NEETs in Malta, less visible and less recognised by policies and initiatives. The Aditus 'Documentation=Employability' project reaches out to these people providing them with legal counselling and rental subsidy to achieve security, opportunities for decent work and living conditions and better chances for the next generations, employability and social inclusion.

Based on this analysis, it appears the Aditus initiative has great importance in Maltese society. It is relevant and coherent, builds on a decade-long experience and research evidence. The project involves many other stakeholders, creates synergies, is implemented on high professional standards, empowering its beneficiaries and already has a visible impact.

The primary concern is that its results (effectiveness) are measured by indicators unsuitable for the project. More precisely, the evaluator found that although the 'Documentation=Employability' project is in line with the goals of the Operative Programme and the Priority Axis, it is not measurable with the given ESF indicator system. Obviously, lacking proper documentation is the biggest obstacle for many of the project beneficiaries' employability, but providing legal counselling to gain documentation does not directly and quickly affect the employment status like a training course or internship programme. Change in the employment status due to the project's provision, in most cases, takes much longer than four weeks, but that is how the main result indicator is formulated and how the project was documented.

Many NGOs in Malta struggle with raising enough funds for their operations, especially the ones representing marginalised groups and being critical of the ruling political power. Because of this, accessible funding sources are lifesaving for the organisations, even if unsuitable for the project's design. The evaluated initiative has a direct impact on its beneficiaries' employability. However, based on the evaluator's observation it is still a human rights provision rather than an employment-related project. Pro bono legal counselling for the most disadvantaged groups is one of the crucial services of Aditus, making a significant impact on the personal, legal and societal level in Malta. However, squeezing it into the ESF funding framework is challenging. The evaluator assumes that the funder has also realised this

⁸⁶ The Transnational research report is available on the project's website. [Transnational research report on the situation of 25+ NEETs in the EU and in beneficiary countries | Lost Millennials](#)

discrepancy while appreciating the importance and achievements of the initiative by deciding to extend its funding.

Recommendations for Aditus:

- Conduct risk assessment and prepare risk mitigation plan during project planning phase.
- Conduct targeted needs assessment based on that realistic resource plan.
- Collect data more reflective on the services (not only ESF report data), add information in the narrative reporting on achievements (hours spent, legal cases started, other changes in the lives of beneficiaries than changes in the employment status).

Recommendations to the funder:

- Use a more flexible indicator system at least in the narrative report, and give space for reporting achievements other than changes in the beneficiaries' labour market status.

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8. Annex

Questions to the Managing Authority

General questions on 25+ NEETs target in the EU (ESF) funded interventions

- How are the needs of this cohort addressed in the European Social Fund (+) funded programmes? (Short, holistic review)
- Can you, please, name some programmes, projects in the OP II being under implementation (2021-2027) that especially target this social group?
- Do you think that NEETs should be identified as a target group in employment programmes or is it satisfactory to target broader groups that cover NEETs? (I.e. young unemployed, young people in school-work transition, etc.)

About the Aditus 'Documentation=Employability' project

- Do you recognise other (employment-related) interventions that address the same target groups as the Aditus project (asylum seekers, refugees, applicants of SRA, undocumented migrants, members of the LGBTQ, trans and non-binary community, victims of human trafficking, spouses of abusive relationships)?
- What kind of synergies can be identified or developed with other employment projects / programmes?
- How do you see the project contributing to the goals of the PA2 'Towards a more inclusive society'?
- In general, how successful / efficient do you find this project? Based on the given (mainly employment-related) indicators and based on other aspects?
- What do you think is the biggest added value of this project?
- Based on the experience of the Aditus project, would you say that similar projects (targeting excluded social groups with specific needs) should be funded in the future, too? If so, is there anything you would suggest changing from the funder's side?