

A policy-practice gap? A comparative case study of the implementation gap in Irish and Italian asylum policy

Thesis submitted in fulfilment of the requirements for the degree of PhD,

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Declaration

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This signed declaration describes the contribution of the candidate and the co-author(s) to each of the papers/chapters of this thesis in order to identify the candidate's independent contribution to each work.

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Chapter 2: Frames of forced migration: a comparative analysis of political and media discourses in Italy and Ireland

Claudia Peroni is the first author of this paper. This paper was co-authored with Dr Camilla Devitt and Prof Daniel Faas, and published in *Ethnic and Racial Studies* in August 2025. Claudia Peroni conducted the literature review, developed the theoretical framework and methodological approach, collected and analysed data and wrote the initial draft of the paper. Dr Camilla Devitt and Prof Daniel Faas assisted with the development of the theoretical framework, provided advice and feedback on methods and data analysis, and assisted with writing and editing the subsequent drafts of the paper.

Chapter 3: Workers' experiences in non-profit and for-profit managed asylum systems: a comparative analysis of Italy and Ireland

Claudia Peroni is the first author of this paper. This paper was co-authored with Dr Camilla Devitt and Prof Daniel Faas, and published in the *International Journal of Comparative Sociology* in February 2025. Claudia Peroni conducted the literature review, developed the theoretical framework and methodological approach, conducted interviews and data analysis and wrote the initial draft of the paper. Dr Camilla Devitt and Prof Daniel Faas assisted with the development of the theoretical framework, provided advice and feedback on methods and data analysis, and assisted with writing and editing the subsequent drafts of the paper.

Chapter 4: Community connections: understanding local dynamics in Italian asylum policy implementation

Claudia Peroni is the sole author of this paper. This paper was published in the *International Migration Review* in January 2025.

Chapter 5: Street-level bureaucrats in the Irish privatised asylum regime: experiences and professional identity

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Statement by the co-authors

We hereby confirm that the doctoral candidate's described contribution to the work where we are listed as co-authors is correct, and we consent to including the work in the named dissertation.

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Abstract

Over the last decade, the European Union experienced a sharp increase in the number of forced migrants, intensifying the challenge of receiving them in host countries. Asylum policy is highly contentious, increasingly securitised and involving multiple actors and governance levels. These complexities can produce gaps between asylum policy on paper and in practice. Yet, the many ways in which national and local context produce asylum policy remain understudied. This thesis analyses the factors influencing asylum policy implementation at the national, local and individual level. It compares asylum systems in Italy and Ireland, two countries which differ in political and economic context, numbers of forced migrants and asylum system design: the latter completely privatised in Ireland, public and heavily reliant on civil society in Italy. The thesis focuses on asylum street-level bureaucrats (SLBs), to examine whether different contextual elements cause differences in how they conceptualise their professional identity and carry out their work. The central research question of the thesis is: what shapes and characterises the implementation of Irish and Italian asylum policy at the national, local and individual level?

This thesis addresses some gaps in existing research on EU asylum systems. First, it provides an organic qualitative analysis of the different levels, actors, contexts and dynamics involved in the implementation of asylum policy, paying particular attention to the socially constructed and relational elements which create connections between these levels, and to what these connections imply in terms of outcomes and experiences for forced migrants, local communities and workers. Such a holistic approach is still relatively lacking in research on asylum policy, but ultimately key to understanding its concrete implementation at the ground level. In fact, this thesis finds that the specificity of local contexts of implementation produces unique local ideas and practices of asylum; both research and policy should acknowledge the ultimately local scale of asylum and adopt a truly fine-tuned approach that embraces this complexity and diversity. Relatedly, this thesis addresses the lack of explicitly comparative research contrasting different models of asylum governance and asylum policy, and the consequences of these different designs on the functioning of the system. This approach enables insight into the different challenges and characteristics of different policy models, and on how the macro-level ultimately affects the daily micro-level. Finally, the thesis centres the experiences and subjectivities of an understudied group which is nonetheless fundamental in implementing asylum policy, namely frontline asylum workers in their capacity as street-level bureaucrats (SLBs). Existing research tends to focus on the perspectives of forced migrants themselves, policymakers or workers in specific contexts (usually emergency or detention centres); this thesis argues that studying “ordinary” workers, who daily implement asylum policy

and construct asylum on a local level, offers an insightful lens into how system design, local context and individual characteristics combine to produce unique local policy.

The thesis examines different levels of production and implementation of asylum policy. National media and political narratives about forced migration are analysed to examine predominant interpretive frames, their use by different actors and their evolution over time. The framing of forced migration can impact the design and implementation of the asylum system, for example by influencing public discourses which in turn can shape local practices and attitudes toward forced migrants. In each country, predominant frames diverge across actors (politicians and newspapers) but tend to remain unchanged over time and in response to events perceived as pivotal. The construction, content and deployment of specific interpretive frames is a dynamic process: apparently divergent frames can reflect a similar discourse, or apparently similar frames can result from different country-specific processes.

The design of the two asylum systems is probed through the lens of workers' experiences, to assess whether the privatised vs non-privatised model influences their satisfaction, professional identity, practices and challenges. Semi-structured interviews suggest that a non-profit system improves workers' experiences by providing value-based meaningfulness and interconnectedness with other public services. Conversely, a for-profit system provides less support in terms of available networks, regulation, transparency and accountability, and thus appears ill-suited to asylum policy, especially when located within a broader context of marketised state services.

Finally, the thesis uses interviews with workers to examine the local construction of asylum policy at the local level within each country. In Italy, similarities and differences in policy implementation and outcomes are largely shaped by context-specific sociocultural and relational elements. Workers' off-duty mediation between migrants and community members fosters positive encounters that partially offset traditionally conservative political cultures and hostile attitudes; however, the same cultures cause workers to feel isolated and alienated from their community. Furthermore, SLBs' decision-making practices are always collegial and constrained by exhaustive rules, largely eliminating the need for individual discretion typical of SLBs and creating instead "group discretionary" bureaucrats. In light of these findings, increased focus is needed on locality beyond a simple urban vs rural lens, and on asylum SLBs as "doubly embedded" SLBs participating in both policy implementation and local context.

Interviews with Irish asylum SLBs, on the other hand, show that the staff of private reception centres detach their work from the idea of belonging to an institutionalised asylum system, implicitly rejecting their role in perpetuating the system and their categorisation as street-level bureaucrats. Conversely, civil servants and volunteers active in the asylum system are able to

critically reflect on the nature of the system, how it is influenced by its privatised character, and their own role within it. This disconnection between asylum SLBs and the policy regime they are an integral part of both influences and is caused by the marketised nature of the system, impeding the traditional role of street-level bureaucrats as bottom-up “policymakers”.

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Chapter 1: Introduction

Over the last decade, the European Union experienced an unprecedented increase in the number of forced migrants, known as the “refugee crisis”. Between 2013 and 2024, more than 10 million people applied for asylum in the EU (Eurostat 2024a). In early 2022, the Russian invasion of Ukraine prompted yet another mass exodus of displaced people to Europe. Conflicts, instability and climate change will displace more and more people in the future.

This research adopts a broad definition of “forced migrant” as any individual who enters a foreign country without having been able to obtain a pre-approved authorisation or visa, and thus applies for international protection due to a practical lack of other options to enter the host country. These individuals then become “asylum seekers” for the (often very long) period during which their application is being considered. A minority of them is eventually granted international protection, making them recognised “refugees”. This broad definition purposefully avoids making any claims or judgements about the background, trajectories and drivers of migratory processes, implicitly acknowledging that they are personal and extremely varied, and indeed cannot be adequately captured by the existing definition of “refugee” (see also Section 1.1). This definition also acknowledges that the difference between “refugees” and “economic migrants” is constructed by host countries: the lines between forced migration and voluntary migration to improve one’s prospects and living conditions are very often blurred, although host countries treat these two categories as clearly discrete and distinct. What forced migrants have in common, however, is how the host states where they seek protection manage their influx: hosting them through systems of reception and (on paper) integration characterised by specific rights, entitlements, norms and obligations, as well as procedures, policy practices, services and service providers. While Ukrainians displaced by the 2022 Russian invasion are technically not “forced migrants” because they were not required to obtain a visa in order to get assistance, their reception has been mainstreamed into the same broad policy regime, in many cases entrusted to the same actors and happening in the same facilities as non-Ukrainian migrants; therefore, throughout this thesis they have been included in the numbers of people hosted in asylum systems, while also acknowledging the differences in their definition and situation in the host country.

The upward trend of forced migration and displacement makes asylum policy a timely topic. However, the complexities of asylum policy and its relationship with other policy realms and contextual elements are relatively understudied in migration research. Asylum policy varies considerably within and across countries. Some general trends, however, are detectable across Western countries: rejection rates are growing and asylum systems are becoming increasingly restrictive and securitized (Beine et al. 2016; Campesi 2018). Asylum seekers tend to be physically, socially and legally segregated; they are often housed in centres where their everyday life is highly

regimented, and access to fundamental rights and support services is scarce; they are often criminalized as “illegal” immigrants and welfare scroungers, and therefore seen as undeserving of support. Another increasing tendency is to privatise asylum systems and services, subcontracting them to for-profit actors and thus creating an “asylum industry” (Darling 2016) which further impedes access to services and protection of migrants’ rights, while also dispersing expertise and institutional knowledge (Humphris and Sigona 2019; Vianelli 2021; Yin 2023).

Implementation of asylum policy is inherently messy, contradictory and complex (Alink et al. 2001; Breidahl and Brodtkin 2024). National asylum policies typically disperse asylum seekers throughout the territory of the host country. This means that asylum policy is implemented by many different actors, operating in different contexts. This configuration leaves plenty of room for variation in how policy is implemented on the ground, daily and within a specific context. Indeed, asylum policy comes to fruition first and foremost on a local level, although it is designed on a national scale (Glick Schiller and Caglar 2009; Hinger et al. 2016) and recent research has embraced this “local turn” in the analysis of how local-level contextual elements shape the social production of asylum policy (Zapata-Barrero et al. 2017).

Context-specific elements such as predominant public discourses (Triandafyllidou 2017; Krzyżanowski et al. 2018), macroeconomic trends (Heizmann et al. 2018), local dynamics, constraints and resources (Glorius and Doornik 2020; Ambrosini 2021; Schammann et al. 2021), institutional culture and individual factors (Giudici 2020; Shiff 2021) can all play a role in local-level policy implementation, and thus produce discrepancies between policy on paper and in practice. This “implementation gap” (Czaika and de Haas 2013) has been widely reported across European countries (e.g. AIDA 2019, 2020; O’Reilly 2018; Dallara and Lacchei 2021; Haselbacher 2019). The implementation gap can take various forms based on the specific configuration and interplay of relevant elements at the local level of policy implementation: forced migrants may thus have markedly different experiences, outcomes and interactions with the system based on where they are and which frontline workers they interact with.

Scholars have analysed single asylum systems in detail and conducted empirical research with some categories of workers directly or indirectly involved in asylum policy implementation (for example Humphris and Sigona 2019; Giudici 2020; Shiff 2021; Giacomelli 2023; Breidahl and Brodtkin 2024; Miaz 2024). However, there is no organic analysis of how political, institutional, local and individual factors interconnect to shape asylum policy implementation in a specific context. Existing studies also lack an explicitly comparative dimension assessing how the aforementioned factors may have varying effects on asylum policy implementation across different local contexts, institutional arrangements and models of asylum governance, for example in a privatised versus non-privatised asylum system. Finally, there is a lack of qualitative research

explicitly studying the daily mechanisms of asylum policy implementation from the perspective of the workers who implement it, such as the way workers make their decisions or conceptualise their professional identity and their role within a policy regime. The routines and decisions of asylum street-level bureaucrats have a direct and concrete effect on the lives of asylum seekers, including for example their physical segregation, autonomy and privacy, family life, and access to the job market (Scholten et al. 2017; Fontana 2019).

This dearth of context-grounded research is surprising given the recognised importance of locality in shaping outcomes and processes in migration and integration (Glick Schiller and Çağlar 2009; Hinger et al. 2016; Zapata-Barrero et al. 2017) and the pivotal role asylum street-level bureaucrats play in implementing policy embedded in its local context. This research assumes that asylum policy as a policy regime is constructed and influenced by multiple actors, structures and relationships (May and Jochim 2013); it focuses on how national discourses, system design, institutional culture and local interactions shape the way asylum policy is conceptualised and implemented, acknowledging that these elements influence each other as well; finally, it centres the perspective of street-level bureaucrats (Lipsky 2010) involved in the daily management of asylum systems as embedded in their context.

Ireland and Italy are both new countries of immigration, which developed their asylum systems between the late 1990s and the early 2000s. However, until recently they experienced forced migration in different ways. Ireland received relatively very few forced migrants, until a major spike in asylum applications starting in 2021; it also received a very high number of displaced Ukrainians in 2022. This is rapidly and substantially changing the migratory context of Ireland, leading it to become one of the EU countries with the highest number of forced migrants and displaced persons per capita. On the other hand, Italy is geographically at the core of the “refugee crisis”, and has consistently been among the countries hosting most forced migrants in the EU in both absolute and relative terms; however, the increase has been more gradual over time and the country’s population is much larger. Italy and Ireland are also very different from each other in other aspects that may influence the implementation of asylum policy, such as the national economic and political context, the structure of the welfare state, the design of the asylum system, and the level of multiculturalism and migrant integration. The implementation gap has been reported in both Ireland and Italy (Loyal and Quilley 2016; O’Reilly 2018; Kersch and Mishtal 2016; Ambrosini 2021; Giacomelli 2023) but its mechanisms, local declinations, and possible influencing factors have not been sufficiently studied in their specific context. The central research question is therefore: what shapes and characterises the implementation of Irish and Italian asylum policy?

This research analyses the implementation of asylum policy by looking at how asylum policy is implemented locally and daily by street-level bureaucrats operating in different contexts. In doing so, it will consider how factors operating at different levels may influence ideas, routines, responsibilities and decisions. National political and media discourses surrounding forced migration and asylum policy are analysed, assuming they play a role in framing the issue and influencing responses in policy implementation. The importance of institutional culture and administrative traditions, local context of implementation and possible individual factors is also probed. Investigating the implementation of asylum policies with particular attention to the context where it happens can help inform future policy choices for integration and asylum management, and direct further research toward a more comprehensive and informed analysis of the many facets of forced migration.

1.1 The relevance of forced migration in policy and discourse

Conventionally, the term “forced migration” refers to the displacement of individuals who are considered refugees by the criteria of the 1951 Geneva Convention and of the 1967 Protocol. According to the Convention, a refugee is

someone who, owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his (sic) nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it.

This classic definition of forced migrant is usually seen in juxtaposition to that of “economic migrant”, who according to the UNHCR is “a person who leaves their country of origin purely for economic reasons *that are not in any way related to the refugee definition*, in order to seek material improvements for their livelihood” (UNHCR 2006, emphasis mine). However, the lines between economic migrants and forced migrants are increasingly fuzzy and such a clear-cut distinction is not always applicable or useful, as pointed out by many scholars calling for an expansion of the definition of forced migration (Boucher and Gest 2015; Bartram 2015; FitzGerald and Arar 2018). The International Organization for Migration (2019) has already adopted a broader definition encompassing any “migratory movement which, although the drivers can be diverse, involves force, compulsion, or coercion”. Despite this, the traditional distinction continues to be the foundation upon which national asylum policies and practices are built. Practically speaking, this means that the only difference host states make between “economic migrants” and “forced migrants” often

concerns whether or not they obtained a visa before migrating. Forced migrants can then become “illegal migrants” or undeserving “fake refugees” in public discourse (Vollmer and Karakayali 2018; Paynter 2022).

In addition to the debate about who exactly is a forced migrant, other elements make forced migration an extremely contentious and fraught policy area. Forced migrants are a growing minority of the total migrant population (IOM 2024). Their influx is largely unpredictable for receiving countries, which combined with the legal obligation to at least assess asylum applications, creates “uncertainty and concern [...] easily exploitable by populist movements” (Dustmann et al. 2017: 500) and poses significant challenges to policymakers. Western host countries have responded to these challenges by increasingly adopting a securitising and criminalising approach in both policy and discourse.

Alink et al. (2001) believe that asylum policy is inherently likely to be contradictory and unsuccessful due to the nature of the policy problems it seeks to address. Asylum policy is under increased political scrutiny because it challenges state sovereignty and the competing needs of policymakers, disrupting the connection between public preferences and policymaking (Andersson et al. 2018); it is particularly socially salient because it calls into question issues of identity, group competition, social conflict and cultural threat (Dennison and Geddes 2021). Furthermore, asylum policy needs to address the varied and acute needs of forced migrants across areas as diverse as healthcare, legal assistance, welfare, education and integration, and thus it needs to coordinate multiple actors, institutions, networks, sets of norms and practices. The practice of dispersing forced migrants throughout the host country’s territory adds a layer of geographical complexity, as different areas might have different stakeholders, challenges and opportunities for policy implementation. The result is that asylum policy is likely to be implemented “in a disjointedly incremental fashion” (Alink et al. 2001: 297), i.e., privileging the status quo, continuously reformulating problems and questions and remedying existing problems instead of solving them completely.

Across Western countries, criteria for the recognition of all forms of international protection are becoming stricter, with principles as “safe third country” or “internal flight” being introduced. Forced migrants are deprived of their political subjectivity, keeping them confined in a “permanent emergency” liminality state which exposes them to abuses, constant surveillance, precarious living conditions and violations of their fundamental rights. On the other hand, many states fail to recognise that forced migrants need specific, tailored integration measures (Bolzoni et al. 2015), instead opting for mainstreaming forced migration into the broader spectrum of general immigration and welfare policies. This situation leads to forced migrants being on average more

vulnerable and less integrated compared to non-European economic immigrants (Ortensi 2015; Dustmann et al. 2017).

Public discourse also reflects the increasing visibility and contentiousness of forced migration. The “refugee crisis” of the mid-2010s caused “a huge degree of change in attitudes toward openness and inclusion with [...] increased hostility [...] towards the incoming asylum seekers” (Krzyżanowski et al. 2018: 1-2). Securitisation as an interpretative frame for the crisis is heavily present in political and mainstream media discourse (Greussing and Boomgaarden 2017; Triandafyllidou 2016). Sirriyeh (2018: 2) also notes “the rise of a cultural and political script of humanitarianism” that grounds the concepts of compassion and care “within a relationship of power disparity, control and subjugation”. In fact, while refugees were originally a political category, they have been increasingly inflated with humanitarian discourses (Fassin 2005) and presented as “figures of humanitarian rescue, qualifying for protection because of the absence of explicit economic aspirations” (Sirriyeh 2018: 103). This discourse pictures asylum seekers as completely passive subjects in the hands of smugglers, thus helping legitimise asylum systems that leave them no agency. The use of this humanitarian frame in public discourse about forced migration is not necessarily positive or constructive, as it can still be functional to a logic of categorisation, moral judgment and control (Bruno 2016; Vollmer and Karakayali 2018; see also Chapter 2).

It is important to note how predominant discourses about forced migrants contain a racialised element too. Non-Western asylum seekers are commonly depicted as “fake” or “bogus” refugees, disguising as persecuted people to “invade” and “overwhelm” receiving countries. Conversely, the Ukrainian conflict has shown how the dignity, legitimacy and narratives of white Western displaced people escaping from a “conventional” and highly visible conflict situation are seldom questioned by other Western countries. Indeed, with the unprecedented activation of the EU Temporary Protection Directive, EU host countries eliminated the requirement to prove one’s legitimacy and deservingness as a displaced person, which still heavily informs policy and discourse when managing non-Western forced migrants. This racialisation of forced migration draws a clear line between white and non-white migrants (Poynting and Briskman 2020; de Coninck 2023); the former are largely recognised as “true” and deserving refugees, whereas the latter’s deservingness, motives and migration experiences are doubted, based exclusively on their race and origin.

Discourses are directly related to deteriorating social attitudes toward non-Western asylum seekers (Bjanesøy 2019; Meidert and Rapp 2019) and have consequences on policy as well. For example, during the refugee crisis actors and portions of Italian civil society implementing asylum policy were criminalised and accused of using the rescue and reception of asylum seekers for publicity and profit. This resulted in such actors suspending their operations, including rescue

operations at sea, due to the hostile political and social climate; some were even indicted for human trafficking and other crimes (Carbone 2019).

1.2. The implementation of asylum policy: literature review

Literature about asylum policy is generally scarce and does not adequately cover the myriad scenarios, actors and instances of policy implementation. On a macroscopic level, research has tried to develop immigration and asylum regime typologies (Boucher and Gest 2015), but there is a trade-off between “parsimony and consistency on the one hand, and historical and comparative sensitivity on the other” (Bader 2007: 876). Despite transnational pushes for convergence, immigration and asylum regimes vary so much within and across countries that the question arises whether aggregating them makes sense in the first place (Finotelli and Michalowski 2012). This suggests that no theory or model can adequately grasp the whole breadth of the phenomenon and fit all cases (Beine et al. 2016; Boucher and Gest 2018). A different research approach, less concerned with rigid categorisation than with rich description, seems more appropriate.

This is not to ignore that some broad tendencies are detectable in the post-refugee crisis European context. Besides the growing restrictiveness of European asylum regimes (Beine et al. 2016), Boucher and Gest (2018) observe the general marketisation of immigration policies, which consists in a stronger preference for temporary labour immigration, a “reluctance to make permanent commitments to newcomers” (p. 6) and a streamlining of visas, services and opportunities offered “toward a more transactional style” (*ibid.*) at the expense of humanitarian immigration. Alink et al. (2001) have claimed that asylum policy has been undergoing a permanent crisis in most Western countries due to the unpredictable, highly salient and manipulable nature of forced migration. In this highly charged context, policy is likely to be contentious and contradictory, suffering from a chronic lack of legitimacy.

Asylum policy can be understood as “a social phenomenon assembled from different elements that operate at a multi-scalar level, including, for example, discourses, emotions, social actors, bureaucracies, histories, sectors, social and political events and relations of power” (Sirriyeh 2018: 8). Policy implementation is an integral part of the broader policy process where additional actors, scales of action and systems of relations complicate the realisation of policy (Howlett 2019). Asylum policy implementation is socially produced and therefore influenced not only by political and economic considerations, but also by cultural, relational and social elements (Betts and Orchard 2014). In addition to this, asylum policy is implemented not only at the national level, but also and most relevantly at the local level: it is first and foremost locally that forced migrants interact with

institutions and street-level bureaucrats, use services, encounter host communities and develop new notions of place and belonging (Gilmartin 2008). Research should therefore address a wide set of factors that may create an implementation gap across different scales, including not only the nation-state level, but also the local and individual (Glick Schiller and Caglar 2009; Hinger et al. 2016; Lara-García 2022).

Notwithstanding this, the connections between asylum policy and other political, economic, relational and cultural processes at the local level are scarcely addressed by research (Lara-García 2022). There is extensive literature about the determinants and processes of policy implementation in many policy realms, but not in asylum policy. As shown in the following literature review, the few studies who address asylum policy generally adopt a single case study framework and focus on a single explanatory factor, e.g. local political culture (Caponio et al. 2022; Schammann et al. 2021), social attitudes (Ellermann 2020), or individual interactions between asylum seekers and caseworkers (Giacomelli 2023). Such an approach can illuminate many important features of asylum policy implementation, but it risks overlooking what the “local turn” mode of analysis wants to assess: how different aspects relate to each other within a specific context, and with what specific consequences. There is a lack of comparative qualitative research bringing together national, local, and individual factors, and analysing how they interact to construct a specific way of implementing asylum policy and a specific configuration of the implementation gap.

1.2.1. National context: political and institutional factors

Research has illustrated how the prevailing political framework directly influences asylum policy implementation through its action on institutions and individuals (Hollifield and Wong 2014; Cetin 2015). National political discourses have significant power in framing policy issues: they produce selected claims about a certain problem, its solutions and possible policy interventions, selecting meaningful aspects of the problem and presenting them to the public as already connected in salient ways (Entman 1993; Chong and Druckman 2007). These “prepackaged” frames are reproduced and internalized by individuals and groups, influencing how a certain policy issue is discussed and addressed. The increasing polarisation of politics and the emergence of populist movements, coupled with the increasing salience of forced migration, have caused populism to co-opt asylum policy as one of the main elements of its agenda in many European countries (Krzyżanowski et al. 2018). National political debates about asylum have grown in relevance and intensity; they frame forced migration as an emergency, creating a widespread “moral panic” that justifies exclusionary practices (Armillei 2017; van Hootegeem and Meuleman 2018) and problematizes the asylum

system, seen as too permissive or as an opportunity for stakeholders to profit using public money opaquely (Carbone 2019).

Interpretive frames are also produced and reproduced by the media. In the framing and telling of asylum, the media have the power to select what information to broadcast and how, and thus they can influence the visibility of specific issues (Andersson et al. 2018), direct the formation of public discourse around those issues, and problematize them in particular ways (e.g., by implicitly or explicitly linking forced migration to notions of threat and security). Media representations often influence and are influenced by political and social attitudes, in a reciprocal relationship with political ideologies and parties, institutions and social groups. This relationship is not always or necessarily aimed at maintaining the status quo: in fact, the media also have the power to expose shortcomings in existing policy, which could offer a catalyst to latent feelings of social discontent and possibly an opportunity for change (Alink et al. 2001).

The broad economic context also plays a role in shaping asylum policy. For example, unfavourable economic circumstances have been connected with an increasing politicization of immigration and asylum policy and with an increasing restrictiveness of policies, especially toward non-Western migrants (Helbling and Kalkum 2018). Kuptsch (2012) has shown how in the aftermath of the 2008 crisis, EU states have implemented restrictive policies in response to public pressure linked to the widespread loss of jobs, noting how migrants become easy scapegoats in times of crisis. Furthermore, research has provided evidence of higher levels of hostility toward migrants displayed by host societies with higher levels of socio-economic inequality, job insecurity and welfare chauvinism (Mewes and Mau 2013; Heizmann et al. 2018).

Institutions and governance patterns are other driving factors. State institutions are assemblages of formal and informal norms, practices, instruments and resources to act on behalf of the state and exercise one or more of its powers, such as lawmaking, the administration of justice, or the redistribution of resources (Amenta and Ramsey 2010). States have different administrative traditions which translate to different ways of conceptualising their duties, their relationship with the market and civil society, and the extent to which their intervention in the economy is legitimate. In the current landscape characterised by a tendency to privatise and managerialise public services (Peters 2012), private, for-profit institutions are also more and more involved in the delivery of state services, including asylum services (Darling 2016). Different institutions have different identities, ways of distributing power, systems of relations, hierarchies, roles and goals; these different “institutional templates” (Johnson et al. 2000) can determine different patterns of institutional action and policy implementation, depending for example on what is the ultimate goal of the institution: public institutions may be more concerned with issues such as equal access to services and solidarity, while private institutions may be more preoccupied with cost-efficiency.

Different institutions may attract different types of workers and professionals, prescribe different appropriate ways of pursuing institutional goals (Olsen and March 2004), enforce different norms, promote different decision-making, information-sharing and feedback practices and different ways of relating to the external context and other institutions. For example, in Italy the traditional division of competences between the central state, the regions, and the municipalities contributes to the length of the asylum recognition process and to the bureaucratic obstacles asylum seekers face to access fundamental rights; in Ireland, scholars have argued that state institutions have left much of the discourse and groundwork on migrant integration policy to civil society and migrant-led organisations (Lentin 2012; Gilmartin and Dagg 2021; 2023).

Welfare state institutions are a visible point of contact between the host state and forced migrants and they mediate migrants' access to key services and thus integration outcomes. The welfare state is composed of all the institutions, actors, norms and policies aimed at redistributing wealth and granting services to citizens and residents. In this realm too, countries differ with regards to the extensiveness and characteristics of their welfare states and their relationship with the market economy, as well-known typologies illustrate (Esping-Andersen 1990; Hall and Soskice 2001; Fainshmidt et al. 2018). In recent decades, the adoption of new public management principles has resulted (with some exceptions, see Sacchi 2018) in a retrenchment of the welfare state. In Europe, the neoliberal turn, combined with the economic crisis of 2008 and the rise of far-right populist parties, has brought new relevance to the concept of welfare chauvinism, or the idea that immigrants reap the benefits of the welfare system without contributing to it and should therefore be excluded from it (Keskinen et al. 2016). Welfare chauvinism tends to be displayed more openly in less universalistic and generous welfare states and towards particularly vulnerable migrant categories such as forced migrants (Boräng 2015).

1.2.2. Social and cultural factors

Social and cultural factors play a role in shaping asylum policy implementation both at the national and at the local level. At the macrolevel, national identity has long been recognized as a determinant of migration policies: Meyers (2000: 1247) illustrates how “historical experiences, cultural idioms and social conflicts [...] have shaped past and current immigration policies”, interacting with domestic debates and social conflicts active in the host country. According to this theory, perceptions of what does and does not belong in the host country are derived from collective memory and past experiences; this implies that decisions made in asylum policy are not constructed in a vacuum or exclusively motivated by economic, demographic or security considerations, but rather by the interaction of cultural developments, concepts of nationhood and traditions with situational factors (Herbert 2000). Such concepts are believed to be a powerful driver in the construction of shared discourse about migration, to the point that some scholars argue that they

may be more influential than current events in shaping discourse and related responses (Triandafyllidou 2017; Consterdine 2018).

Asylum policies and shared ideas of identity are in a reciprocal relationship: Kleist (2017: 164) writes that “societies organize and negotiate political belongings and rights through the category of the refugee”. Predominant paradigms in Western societies range on a spectrum that goes from multiculturalism to assimilationism, through more nuanced concepts such as diversity (Schiller 2015), interculturalism (Zapata-Barrero 2017), or mainstreaming (Scholten et al. 2017). Governments and other relevant actors can implement measures shifting toward one or more of these paradigms, contesting and re-conceptualising group identities in ways that can be conflictual or controversial. Local actors implementing asylum policy are no strangers to this process: local policies of exclusion targeting asylum seekers have often been justified by mayors by claiming they were defending national or regional history, identity and culture (Caponio et al. 2022; Ambrosini 2021; Marchetti 2020a). There is also some evidence that notions of national belonging influence bureaucrats’ judgments on the deservingness of migrants claiming welfare benefits (Ratzmann 2021).

Social attitudes toward forced migrants also shape the implementation of asylum policies. Attitudes toward immigration “occupy a central position in [...] belief systems”, and were found to be “stable, accessible, and closely related to deep-seated values and identities” (Mader and Schoen 2019: 71), as well as to national identity and collective memory (Kappa 2018; Perron 2021). Several studies (Canetti et al. 2016; Cowling and Anderson 2019; Mancini et al. 2020) have found that attitudes toward refugees and asylum seekers are generally negative in Western countries; lower levels of education, high levels of national identification, religious affiliation and political or ideological conservatism were all associated with an increase in prejudice and a decrease in the willingness to engage in prosocial behaviour with asylum seekers. Other research has described how different groups of refugees are treated in different ways, based e.g., on their country of origin (FitzGerald and Arar 2018) or on whether they are constructed as legitimate refugees, as opposed to “illegal”, undeserving asylum seekers. Interestingly, Ellermann (2020) illustrates how public views can also change depending on the exact stage of the asylum policy process: even though the public is in favour of harsh policies when policy is formulated, they become more sympathetic when faced with the concrete implications of harsh asylum policy, therefore pushing bureaucrats to “adopt a more compassionate style of implementation” (p. 296).

In Ireland, cultivating a specific cultural and religious identity was an essential part of post-independence nation-building and generated an essentialist view of Irishness, which dismissed the claims of full social membership by minorities (Fanning 2010; 2018). This essentialist and isolationist approach was later complemented by a rhetoric of economic and social modernisation,

which accompanied social change and was better served by a more open stance towards immigration (Fanning 2015; Gilmartin 2017). However, the consequences of essentialism are far from extinct: following this line of analysis, Lentin (2016; 2018) has proposed an interpretation of the Irish asylum system centred around a specific, persistent element of shared Irish identity, namely the tradition of repression and hiding of the vulnerable “undesired” that produced Magdalene laundries, workhouses, and other similar institutions. According to Lentin, Direct Provision is another example of these institutions: a conscious policy choice which aligns with the Irish habit of physically, socially, and culturally removing the undesirable categories from mainstream society, while at the same time presenting Ireland as an open, hospitable society which cannot be racist because it was a colony itself, and which has a long tradition of welcoming guests and newcomers. This is reflected in the contemporary commodification of Irish hospitality, which has led for example to state-sponsored campaigns promoting Ireland as “the land of a hundred thousand welcomes” (Loyal and Quilley 2016; Joseph 2017); and more broadly, in Ireland’s insistence on distancing itself from ideas of racism and racial inequality as inherently impossible to reconcile with any idea of Irishness (Fanning 2018), re-emerging forcefully in the wake of the 2023-24 anti-immigrant protests. The fact that Direct Provision is not formally inscribed in statutory law can be read through the same lens: Irish society struggles to cope with the fact that Ireland is now a country receiving asylum seekers, and therefore strives to keep the asylum system temporary and invisible. Lentin argues that the presence of forced migrants in Irish society represents a “return of the repressed” which is at odds with Ireland’s self-conceptualisation. As illustrated in Chapter 2, Irish discourses on forced migration are undoubtedly influenced by shared national history, although the relationship is not as entirely straightforward as Lentin’s interpretation would lead to expect. In fact, as noted by Fanning (2007; 2015; 2018) and Joseph (2017), Irish attitudes towards immigration and especially towards episodes of racism, discrimination and anti-immigrant rhetoric are complex and characterised by a mix of covert uneasiness and complacency. While Irish society is rapidly changing, the definition and symbolism of Irishness are not; and while Ireland might construct itself as welcoming diversity as a key part of the “human capital” needed for its much-overdue modernisation (Fanning 2010 writes of a “modernisation of belonging”), the presence, visibility and social membership of migrants in Ireland is still restricted (Lentin 2016; Gilmartin 2017). As highlighted by research on discrimination and differential outcomes in both the labour and the housing market (Joseph 2017; 2019; Gusciute et al. 2022) Ireland is not immune to the spread of racialised structures: however, “stories of racism, discrimination and hardship are likely to be welcomed only in comfortable retrospect” (Fanning 2015: 9).

A similar concept exists in Italian popular culture and arguably prevents society from concretely addressing the shortcomings of the asylum system. The image of Italians as inherently “good people” has been popular in Italian culture ever since it was first used to justify the colonization of

East Africa during fascism (Del Boca 2011). It has subsequently been mobilised in connection with Italy's own history and experience of mass emigration, and ironically in claims that unlike other European powers, Italy has never been an imperialist or coloniser state. Favero (2010: 140) describes how this self-representation has been continuously co-opted as "an ideological platform useful for addressing situations of crisis and trauma [...] for reformulating and setting aside disquieting moments of national shame". This myth allows the Italian public to comfortably deflect confrontation with their role as white majority, ignoring the reality of marginalized minorities such as asylum seekers and the active role of the host society in their marginalization. In contemporary public discourse, the trope of the "good Italians" who can do no harm is still actively used in the discourse about immigration, juxtaposing Italian emigrants who supposedly respected the law and had honest jobs in their host countries to "fake" asylum seekers and illegal immigrants scrounging on Italy's welfare today. This trope, illustrated in more detail in Chapter 2, leads to an abandonment of all conscious responsibility and accountability towards forced migrants arriving to Italy today.

1.2.3. Local context

Asylum policy is typically based on the dispersal of asylum seekers throughout the territory of the state. Therefore, it is implemented by a range of different actors, who operate in varying local contexts. Many of the basic services related to asylum policy implementation, such as healthcare and education, are produced and delivered locally (Ambrosini 2021); interactions between forced migrants, institutions and communities happen first and foremost locally, as well as social and economic integration. This speaks to the extreme importance of local factors in the implementation of policy, and highlights the need for research to foreground locality and the "centrality of place" (Gilmartin 2008) in analysing all migration. National and global norms about asylum and forced migration are adapted and "localized" in their context, producing processes, interactions and practices that are embedded in a very precise environment (Hinger et al. 2016; Brumat et al. 2021; Caponio et al. 2022). Phillimore (2020) writes about specific "host society opportunity structures" that are produced by a specific local context and shape interactions and outcomes in important ways: examples include the presence or absence of civil society organisations and volunteers, the characteristics of the local housing and labour market, the diversity of the neighbourhood or local community, etc. Migrants and local actors co-produce community, place, belonging and integration, both materially and discursively, in a constant process of negotiation (Gilmartin and Dagg 2023).

First of all, local actors may operate in contexts with varying histories and political cultures. The existence of different "regional sub-cultures" (Morini 2016: 248) with distinctive electoral patterns has been extensively documented in many countries. For example, Ignazi and Wellhofer (2013) discuss how the north-east of Italy, a traditionally conservative, Catholic and rural area, has

transformed from the stronghold of the Catholic party to the core constituency of the League, maintaining conservative political values but adopting the League's populist and xenophobic rhetoric. The local political, economic and social context actively shapes how municipalities and individuals respond to forced migration and implement asylum policy. Local actors can oppose or improve national-level asylum policies by developing their own agendas, policy tools, discourses and practices. For example, Ambrosini (2021) illustrates how Italian municipalities governed by far-right parties or coalitions tend to implement more restrictive ordinances restricting the rights of immigrants and asylum seekers, whereas Schammann et al. (2021) discuss how municipalities in a traditionally left-leaning region with a strong network of cultural and social associations have mostly implemented inclusive and proactive policies. Glorius (2017) has studied how the history of emigration and economic underdevelopment of some rural regions in eastern Germany shapes local reception conditions.

Political and social cleavages partly reflect the divide between urban and rural society: cities tend to be more politically progressive, as reflected for example in the recent phenomenon of “sanctuary cities” (Oomen 2019; Bauder 2017) which have built an internal network of resources to informally implement asylum policy in a way that complements or directly opposes national policy directives. Organizations and individuals working in the asylum system in urban contexts may therefore have different values and approaches from those operating in rural contexts where conservative values are more widespread. In addition, the rural-urban divide can also affect the resources and infrastructure available to bureaucrats and organizations: rural areas are usually more isolated and less served by healthcare or educational facilities, imposing constraints on policy implementation; they are also less likely to have a lively and diverse culture of civic associationism, meaning that there are less actors to be involved (Semprebon et al. 2023). However, the urban/rural divide may not be the only or the most significant cleavage that shapes variations in how asylum policy is implemented locally: other contextual elements which are not a direct consequence of urban versus rural location, but rather highly specific to the context examined, may play an even greater role.

Secondly, the local-level institutions participating in the implementation of asylum policy, such as local branches of state institutions, civil society organisations or religious organisations, may have different institutional cultures, which may influence the judgments and practices of their staff (Watkins-Hayes 2009). Institutional culture includes “belief systems, shared values and institutional ideology [...] myths, symbols and norms [...] symbolic and practical boundaries constructed between different participants” (Jordan et al. 2003: 214). In some countries, cities and regions there may be a stronger tradition of civil society organizations actively involved in implementing policy; in other areas, religious organizations or government actors may be more prominent; lastly, grassroots mobilization and volunteer groups can fill the gap in some contexts

(Caponio et al. 2019). This is for example the case of northern Italy, where some regions (most prominently Emilia-Romagna and Toscana) have a long history of left-leaning civic associationism, whereas others (Veneto, Piemonte) have traditionally been characterized by a predominance of Catholic or other religious organizations.

Thirdly, local actors are often an extremely active part of the policy process. They develop their own agendas, practices, discourses and policy tools in the implementation of asylum policy: sometimes they fill policy gaps and act as “policy entrepreneurs” and agents of innovation (Kos et al. 2016; Oliver et al. 2020); in other cases, they explicitly counteract national policies. For example, between 2018 and 2020 some Italian municipalities refused to implement a change in national policy that would have prevented asylum seekers from being registered as city residents, thus restricting their access to many services including territorial healthcare and city-sponsored welfare measures. Clearly, this mechanism can also operate in the opposite direction, and there is ample evidence of lack of action or exclusionary local practices being developed in opposition to more favourable national and international laws (Ambrosini 2013; Bolzoni et al. 2015; Marchetti 2020b). Literature provides evidence that local context and its specificity also plays a relevant role in producing public discourses on forced migration (Hinger et al. 2016; Doomernik and Glorius 2016). Scuzzarello (2014) has studied how single municipalities can construct their own narrative of migration and integration, and use that narrative to implement policy: policy actors in Malmö, for example, have long used narratives of participation and inclusion to promote initiatives directed at migrants, complementing and extending national policy recommendations.

1.2.4. Individual factors

The key role of street-level bureaucrats (SLBs) and frontline workers in policy implementation has been widely acknowledged by many empirical studies (Hupe and Hill 2007; Thóren 2008; May and Winter 2009; Nothdurfter and Hermans 2018). SLBs play a key role in adapting policy norms to the constraints and specificities of their context, exercising individual discretion and flexibility in implementing policy (Lipsky 2010). Gender, age, ethnicity, personal history, attitudes and beliefs (Watkins-Hayes 2009), professional identity, systems of accountability (Hupe and Hill 2007) and perceptions of organisational values (Fuertes and Lindsay 2016) can all influence the way SLBs choose to implement policy.

In the case of asylum policy, SLBs involved in policy implementation range from mainstream social workers to lawyers, law enforcement officers, teachers and healthcare workers. These categories of SLBs encounter forced migrants with varying frequencies and levels of hands-on involvement. The most directly involved group of SLBs, which this research focuses on, is composed of the SLBs managing reception centres or projects, who daily and directly interact with

forced migrants and mediate contact between migrants, other public services and local communities. Because of their position and of the particular vulnerability of forced migrants, asylum SLBs have an exceptional degree of power and discretion in exercising their functions (Maculan 2022). Giacomelli (2023: 277) notes how asylum SLBs have power “in the visibility/invisibility of immigration-related issues, [...] to render secure/insecure a public service, to create a positive/negative narrative about migration and reception systems”. Ethnographic evidence by Manocchi (2017) illustrates how asylum SLBs can design and enforce arbitrary rules and punishments that often reflect a paternalistic and Western-centred idea of what an asylum seeker should be, do and expect. Asylum SLBs also have the power to gatekeep forced migrants’ access to services such as healthcare, education and welfare (Ellis 2011).

Research about asylum SLBs in different capacities and roles details how actors working in the asylum system are more likely to adopt political positions in favour of asylum seekers (Fleischmann 2017; Shiff 2021; Miaz 2024). However, the process of developing personal views and attitudes is very complex, and this relationship may not always be straightforward or positive (Caponio and Donatiello 2017; Ratzmann 2021). Some studies suggest that local stakeholders are more driven by pragmatic considerations than by their political orientation when implementing the reception of asylum seekers on their territory (Glorius 2017; Haselbacher 2019); others highlight how local policymakers proactively engage in migrant reception policy only if they can mobilise their relational resources and good reputation as forms of social capital (Caponio et al. 2021); yet others suggest that local actors may ignore local attitudes in favour of their own contextually bound perceptions (Pettrachin 2020). Studies of professionals working in emergency reception centres in Italy (Maculan 2021; Giacomelli 2023) illustrate the tension between an institutional role heavily influenced by the predominant political narrative, and a more personal notion of their position, based on interpersonal trust and individual discretion, which are used to navigate stress, policy gaps, unpredictability, and practical obstacles.

The importance of asylum SLBs points to a second gap in the literature which this research proposes to address. What is notably lacking in the literature about asylum SLBs is a distinct focus on the experiences and perspectives of “ordinary” asylum SLBs and a comparative focus on how they operate across different asylum regimes. Most existing studies on asylum SLBs examine professionals who are involved in the implementation of circumscribed and/or peripheral aspects of asylum policy, such as border authorities (Eule et al. 2018), policymakers (Caponio et al. 2022), legal caseworkers examining asylum applications (Shiff 2021), mainstream social and welfare professionals who interact with forced migrants, but not exclusively or predominantly (Andreetta 2019; Ratzmann 2021), or workers employed in EU “hotspots”, detention centres or emergency reception centres (where asylum policy is not fully implemented as much as withheld; see Tazzioli 2017; Campesi 2018; D’Angelo 2019; Novak 2021). There is a relative lack of in-depth research

centering the perspectives of SLBs working in “ordinary” reception centres and projects, examining how they conceptualise and relate to their professional identity and the broader policy regime, how they are embedded in specific local contexts and routinely interact with those contexts (partial exceptions are Giudici 2020; Artero and Hajer 2023). Existing studies also predominantly focus on one centre or national context, and so there is also a lack of literature comparing frontline asylum SLBs across countries or systems, assessing similarities and differences, investigating what features of the asylum system or of the surrounding context could cause them and what consequences they would have on SLBs’ professional experiences, migrants’ experiences and the overall functioning of the system.

1.3. Forced migration in Italy and Ireland

Italy and Ireland have been chosen for comparison in this research because they are both recent countries of immigration who developed their asylum systems roughly at the same time (between the late 1990s and the early 2000s), but in very different directions. The Irish Direct Provision system is currently the only completely privatised asylum system in the EU, whereas the Italian statutory SAI system is based on a specific model of partnership between the state and non-profit civil society organisations. Italy and Ireland are also different in other aspects which may influence how asylum policy is designed and implemented, including forced migration trends, respective political traditions and economic contexts, welfare state models, social attitudes toward migration and migrant integration. Accounting for implementation gaps in these two countries could uncover whether and how different contexts shape the implementation of asylum policy, and which factors are relevant to predict and explain similarities or differences.

Italy and Ireland also share some similarities in their sociocultural context, which could also potentially play a role in shaping how asylum policy is implemented. Both countries have a long-standing history of emigration and have only recently become net immigration destinations. Both countries share a sociocultural tradition heavily informed by Catholic values. In both countries, and in line with the rest of Europe, forced migration is consistently perceived and managed as a security problem and as a temporary emergency instead of a long-term trend. This tendency is evident in the proliferation of “emergency” reception centres in both countries over the last years; in Italy, “emergency” centres are hosting a majority of forced migrants, while only a minority find places in the statutory system. Despite these similarities, this research argues that the differences in the Irish and Italian political, institutional, economic and migratory context are potentially very relevant for the functioning of asylum systems, and constitute meaningful grounds for comparing and contrasting the two cases.

1.3.1. The economic, political and institutional context

Italy and Ireland were among the most heavily affected countries by the 2008 global financial crisis, and both implemented strict austerity measures. However, the aftermath of the crisis was different. After experiencing soaring unemployment and emigration between 2008-2012 (Fanning 2015; Gilmartin 2017), Ireland recovered successfully from a bailout and became the fastest-growing economy in the EU (Eurostat 2024b). Despite this successful recovery, the economic crisis and subsequent austerity, accompanied by sweeping cuts to public services and the widespread feeling that the country was facing an “existential crisis”, left a lingering collective sense of “anxiety, trauma and anger” (Fanning 2015: 2). On the other hand, Italy experienced a prolonged period of alternating stagnations and recessions and a sovereign debt crisis in 2011, which resulted in a long period of austerity, including severe public spending cuts and increased levels of taxation. This averted a bailout but kept Italy in a situation of economic stagnation and high unemployment that continues to this day (Eurostat 2024b).

Another important difference concerns political stability. Italy has long been characterised by instability and political fragmentation, with a constellation of variously sized parties populating the Parliament and coalition governments rapidly succeeding each other. Austerity measures implemented in the 2010s favoured the destruction of the traditional distinction between centre-left and centre-right parties in favour of a multipolar and fragmented equilibrium (Emanuele and Chiaramonte 2020). Populist parties such as the Five Star Movement, the League and Brothers of Italy attracted voters thanks to their anti-establishment agendas, which included xenophobic and chauvinist discourses specifically targeting forced migrants. These parties have been in government, alone or in coalitions, for the better part of this research’s timeline (2013-2022). The politicisation of immigration is not a new phenomenon in the Italian public discourse, having been consistently used for electoral purposes at least since the 1990s (Cetin 2015), but it has increased during the refugee crisis (Geddes and Pettrachin 2020). The few exceptions to this political landscape are at the local level: major cities in the North and Centre, as well as the area between Emilia-Romagna, Toscana and Umbria traditionally known as “the Red Belt” (Ignazi and Wellhofer 2013), continue to vote predominantly for centre-left parties.

On the other hand, Ireland is characterized by persistent political stability: governments were historically led by either Fine Gael or Fianna Fáil, that have alternated as the majority party until 2011, when Fianna Fáil lost a lot of its consensus in the aftermath of the economic crisis, in favour of the left-leaning Labour Party and Sinn Féin. This changed the political layout by ending the traditional distinction between Fine Gael and Fianna Fáil, who have been forced to form coalition governments with each other and smaller parties or actors instead. The 2020 and 2024 general

elections saw Sinn Féin achieving unprecedented success and receiving the highest number of votes, as well as a substantial increase in consensus for smaller centre-left parties. The 2020 election has been defined by some as the beginning of the fragmentation of Ireland's traditional "two-and-a-half party system" composed by Fine Gael, Fianna Fáil and Labour (Field 2020). Despite this, Ireland remains governed by the two establishment parties, and no radically anti-establishment formation has emerged outside of traditional cleavages. This also means that there is no significant far-right party or political formation like Italy's League or Brothers of Italy. The 2024 local elections saw several anti-immigration independent candidates elected across the country and a nascent and far-right anti-immigration movement, with protests and arson attacks targeting sites earmarked for the reception of forced migrants (Irish Times 2024). However, this success was not replicated in the general elections, and immigration continues to be a relatively less important theme in the political debate.

1.3.2. The sociocultural context

Despite the many differences in their political and economic context, Italy and Ireland share some similarities in their history and socio-cultural milieu. Both countries were historically characterized by heavy outflows of labour emigrants, and in both countries the phenomenon of emigration is a relevant part of national history and popular culture, sometimes explicitly juxtaposed with the current immigration trend. Over the last decades Italy and Ireland both shifted to being net immigration countries, despite maintaining continued emigration; this was accompanied by a process of institutional and social change in both countries, and reconciling a history of emigration with a newfound role as developed host country has not always been easy. For example, and as mentioned in Section 1.2.2. above, scholars of immigration and racism in Ireland (Fanning 2007, 2010, 2015; Gilmartin 2017; Gilmartin and White 2008; Lentin 2016, 2018) have noted the uneasiness and ambivalence of the country's shared identity and discourse in engaging with social change including diversity and growing immigration, and in reconciling this reality with traditional notions of Irishness. Both Ireland and Italy were forced to deal with unexpected inflows of migrants between the late 1990s and the early 2000s without having an established immigration and asylum policy. Particularly when it comes to forced migration and asylum, the institutional response of both countries has been largely or completely characterised by an emergency framework and a reactive, rather than proactive, policy stance (O'Leary and Negra 2016; Abbondanza 2017; Castelli Gattinara 2018; Gilmartin and Dagg 2021).

When it comes to the welfare state, Italy and Ireland are traditionally classified in two different categories (Esping-Andersen 1990). Ireland, whose policy has historically been modelled after the British example, is a liberal welfare state characterised by low levels of state intervention and

redistribution, low welfare expenses and largely means-tested instruments. This configuration is reflected by the tendency to mainstream immigration and migrant integration policy into routine public services, instead of targeting intervention (Gilmartin and Dagg 2021). Italy is traditionally placed in the corporatist regime group, characterised by a high level of state intervention and a low level of contestation around social rights. However, these classifications have been debated: for example, some scholars believe that Italy and other Mediterranean countries would be better placed in a “Mediterranean” group (Ferrera 1996) characterised by highly fragmented sub-regimes, multiple institutions, a reliance on clientelism and low levels of efficiency and effectiveness. Ireland’s place in the liberal category is also debated, due to the heavy influence of Catholic values and the state’s traditional reliance on families and the Church as a replacement in the provision of welfare. In fact, this is an element of similarity between Italy and Ireland and more generally, between liberal and corporatist regimes (see for example van der Waal et al. 2013). In both countries, welfare systems are historically based on a familist and corporatist notion of the economy and labour distribution (Ponzellini 2006; Cousins 2008; Canavan 2012) and thus comparatively less generous and less universalistic, with most measures being based on income and residency (Nothdurfter and Hermans 2018). Furthermore, both countries present a tendency toward welfare chauvinism, i.e., a tendency to consider citizenship or ethnic membership as the cornerstone for determining “deservingness” of social rights and welfare benefits, such as equal access to unemployment benefits or social housing (Pellegata and Visconti 2021). Larsen (2008) has argued that different welfare regimes perceive vulnerable categories in different ways: this could be arguably applicable also to the vulnerable category of forced migrants, whose perception and treatment differs based, among other criteria broadly pertaining to national identity, also on the welfare tradition of the host country (Boucher and Gest 2018).

Finally, Italy and Ireland both share a cultural predominance of Catholic values, comparatively high levels of religiosity among the population, and a tradition of Catholic social activism, involving both religious bodies and Catholic-inspired civil society organizations. While the Catholic Church has repeatedly addressed the phenomenon of forced migration by calling on the traditional Christian values of love, generosity and solidarity, religious values also correlate with socially conservative attitudes and negative perceptions of immigrants and refugees (Cowling and Anderson 2019). In Ireland, it has been argued that the prevalence of Catholic ethno-nationalism, whereby Catholicism was historically a linchpin of Irish identity, contributed to a history of marginalisation of Irish Protestant and Jewish communities; despite social and cultural modernisation in the decades since independence, this history of marginalisation and “antipathy” might still be an undercurrent influencing responses to immigration (Fanning 2010, 2018).

It is interesting to note that social attitudes toward immigration also differ across these two countries. Ireland has consistently had positive attitudes toward immigration (Fanning 2010, 2015;

McGinnity et al. 2018), although recent events may signal a turn. The country also scores among the top ten countries in the Migrant Integration Policy index (MIPEX), which measures immigrants' access to healthcare, education, labour market mobility, permanent residence and nationality. Ireland is also relatively high in the Multiculturalism Policy Index (MCP) for immigrant minorities, which includes indicators about school curricula, ethnic group funding, affirmative action and media representation of minorities (all data MIPEX 2020 and MCP 2020). Fanning (2010; 2015) notes how despite a 2004 referendum removing birthright citizenships for the children of non-citizens, public discourse continued to emphasise the economic benefits of immigration. However, while the referendum campaign populist discourse was not aimed at immigration per se, it was aimed specifically at forced migrants, and contributed to a politicisation of asylum and an increase in racialised hostility towards asylum seekers despite them being a very small percentage of Irish immigrants (Fanning and Mutwarasibo 2007). During the worst years of the economic crisis Irish attitudes towards immigration worsened, but not enough to sustain a populist anti-immigrant party as seen in other EU countries. Italy, on the other hand, is one of the EU countries with the most consistently negative attitudes toward immigration and one of the very few where approval of generous asylum policies has decreased in the last two decades (Ambrosini 2018; van Hootegeem and Meuleman 2018). Italy also has a lower MIPEX score than Ireland and one of the lowest MCP scores (MIPEX 2020; MCP 2020).

1.3.3. Forced migration and the asylum system in Italy

When it comes to forced migration and asylum, Italy and Ireland have long experienced the phenomenon at the opposite ends of a spectrum, although the situation in Ireland is rapidly changing. Italy is a first country of arrival at the Southern border of the EU, and therefore has consistently been a core entry point and destination for the Mediterranean migration routes. Until the 2020s, Ireland has hosted lower numbers of forced migrants in both absolute and relative terms, and unlike Italy, it mostly received relocated refugees arriving through resettlement schemes. While arrivals have been increasing in both countries in the 2010s and particularly in the 2020s (with a temporary lull in 2020/21 due to the effects of the Covid pandemic), the pace of this increase has been more varied and overall more modest in Italy. By contrast, after a long period of generally steady increases, starting in 2021 Ireland has experienced an unprecedented and exponential surge in asylum applications, which is still ongoing and reflected in asylum applications per capita, which rapidly became higher than in Italy. Starting in 2022, both countries also received substantial numbers of displaced Ukrainians; however, figures relative to population are again dramatically different, with Ireland having one of the highest number of Ukrainians displaced people per capita

in the EU. Table 1 summarises key population and applications figures and trends and paints a picture of Italy as a country with a relatively long and stable history of receiving forced migrants compared to Ireland, which is experiencing sudden and sweeping changes.

Country	Total population (2024)	First-time asylum applications received (2024)	First-time asylum applications per capita (2024)	First-time asylum applications average annual growth, 2014-2020	First-time asylum applications average annual growth, 2014-2024	Beneficiaries of temporary protection for Ukrainians (March 2025)	Beneficiaries of temporary protection for Ukrainians per capita (March 2025)
Italy	58,971,230	151,120	2.56	+22.7%	+66.9%	165,225	2.8
Ireland	5,351,681	18,435	3.45	+39%	+132.1%	111,770	20.9

Table 1. Population, asylum applications and beneficiaries of temporary protection by country; figures and trends. All data Eurostat and EMN 2025

In addition to this and perhaps reflecting the abovementioned history, the Italian asylum system has been frequently reformed by different governments, while the Irish system has remained substantially unchanged for two decades, despite widespread criticism (O'Reilly 2018; Murphy et al. 2019; Ní Raghallaigh et al. 2021) and a reform plan announced and then shelved in 2021. Finally, forced migration in Ireland does not yet represent a heavily politicised issue at the centre of the public debate as it does in Italy, although surging applications and recent anti-immigration protests may be anticipating a change in this regard.

Italy did not have a full-fledged immigration and asylum policy until the late 1980s, when the country was faced with the first heavy inflows of economic migrants. Policymakers initially reacted with a series of amnesties legalising huge numbers of irregular immigrants; while policy was fully formulated in a series of subsequent laws and decrees, mostly to comply with EU requirements, amnesties continued to be used as a remedy. Due to high political instability and constant politicization of the issue, Italian immigration and asylum policy has always been characterised by a “lack of continuity” (Cetin 2015), with reforms and changes introduced by successive governments often contradicting each other. The Italian statutory asylum system, currently called SAI¹, was first introduced in the late 1990s; it was originally inspired by grassroots

¹ Sistema di Accoglienza e Integrazione, or Reception and Integration System. The system has been known by different names throughout the years, reflecting reforms and policy changes, and is referred to with different acronyms in the literature (SPRAR/SIPROIMI).

reception experiences developed by some municipalities in Southern Italy, who had to face arrivals of forced migrants in the absence of a clear national-level law or policy. SAI is the official “diffused reception” system managed by municipalities, charities and NGOs on a local basis; however, an emergency reception system known as CAS² has developed from the early 2010s to manage rapidly increasing arrivals. CAS is managed directly by Prefectures, i.e., the local branches of the Ministry of the Interior in charge of security and public order.

Services and living conditions vary considerably between and within these two models, due to SAI being designed to promote autonomy and long-term integration, while CAS is explicitly designed for cost-effectiveness (Openpolis 2024; see also Table 2). This translates to a much wider offer of services and supports that SAI centres are mandated to offer: not only access to healthcare, living expenses such as rent and utilities, and a daily allowance for personal expenses, but also Italian language classes, legal aid to assist with the asylum application process, translation and cultural mediation services, mental health services, job market orientation and agreements with local employers for internship and apprenticeship placements, and a series of services broadly grouped under the umbrella of “social assistance”, which can entail for example subsidising residents’ participation in courses, leisure and cultural activities, or assisting them with childcare. Each resident is entitled to By contrast, the only services that CAS contractors are mandated to provide are room and board, a daily allowance, access to healthcare and the same vaguely termed “social assistance”; however, the per capita budget for CAS centres is also substantially lower than for SAI projects, while the staff to residents ratio is substantially higher (Openpolis 2024). In fact, staff is another area of difference: SAI regulations mandate a minimum number of staff members based on number of residents, minimum qualifications or experience for all members of staff, and the mandatory presence of members of staff dedicated to specific types of assistance, with relevant qualifications or experience (e.g. a “legal operator” to provide legal assistance). The “emergency” nature and cost-effectiveness orientation of CAS centres, on the other hand, means that staff numbers, qualifications, roles and tasks are not regulated in equal detail and reflects the lower number of mandated services and supports. While the CAS system has far fewer norms and regulations and its prescribed standards of service are lower than SAI, it should be noted that CAS centres can be managed by the same actors managing SAI projects in the same area (including the two sites where this research was conducted in Italy); in practice, these actors often consciously decide to extend the same modes of operation used in SAI to the CAS centres, but have to contend with fewer resources and bureaucratic obstacles (see Chapter 4).

The surge in the number of asylum seekers reaching Italy started in 2011 with the so-called Arab Springs and was initially treated as an emergency and centrally managed. This resulted in

² Centro di Accoglienza Straordinaria, or Extraordinary Reception Center.

clashes with municipalities and regions and attracted considerable criticism due to the poor quality of reception standards. Local authorities and NGOs were involved by introducing multilevel consultations; this represented the first informal step toward the institutionalisation of multilevel governance of forced migration. Interestingly, at this early stage border police in charge of supervising arrivals were actively encouraging migrants to apply for asylum, in order to stall expulsions and prevent an amnesty for irregular migrants, which has traditionally been the main instrument used by Italian policymakers to mitigate the phenomenon of undocumented immigration (Bontempelli 2016). Between 2014 and 2016, arrivals to Italy increased considerably, as is shown in Figure 1. The “refugee crisis” reached its peak in 2016, with 181,062 estimated arrivals and 4,578 dead or missing at sea. The crisis was met with a proliferation of “emergency” CAS reception centres, whose capacity doubled between 2014 and 2015, while the SAI system remained severely undersized (Campesi 2018a). Growing concerns about the heterogeneity of actors involved and quality standards prompted a reorganisation of the system: in 2015 Italy adopted the “hotspot approach” promoted by the EU, aimed at streamlining procedures of identification and medical screening at ports of disembarkation. Furthermore, the government harmonized reception standards across regions and strengthened the co-participated decision-making approach to reception. The SAI system was prioritized and strengthened, and many CAS centres were converted into SAI; however, many municipalities still declined to participate in the SAI system, and this resulted in Prefectures bypassing them to establish CAS centres “whenever they were able to find contractors” (Campesi 2018b: 501).

From 2017, reasons of political consensus prevailed and forced migration started to be treated once again as a short-term emergency and a security threat. The then Minister of the Interior Minniti finalised a controversial agreement with Libya that partly curbed arrivals (see Figure 1). In May 2018, the leader of the League party Matteo Salvini was appointed Minister of the Interior and radically reformed the asylum system, introducing more restrictive criteria for protection and excluding asylum seekers still awaiting a decision from integration services. As a consequence of this reform, asylum seekers could no longer be hosted in SAI facilities, but had to be returned to CAS centres; this caused considerable issues, as many CAS centres had been converted to SAI, tenders for new CAS openings went deserted, and Prefectures struggled to find suitable facilities. Moreover, the daily per capita expenditure for CAS centres was decreased. In 2020, a new government re-introduced humanitarian protection and readmitted asylum seekers in the SAI system, thus essentially reinstating the previous system. In 2023, the newly elected Brothers of Italy government once again introduced restrictions in the system, going back to a model similar to that of 2018 and finalising an agreement with Albania to host detention centres for asylum seekers believed to be from “safe third countries” (this initiative was subsequently shut down by EU courts). Between 2013 and 2023, Italy received approximately 650,000 first-time asylum applications

(Eurostat 2024a). Latest estimates (Centro Astalli 2024) indicate that approximately 600,000 forced migrants currently reside in Italy, including asylum seekers, recognised refugees and persons entitled to humanitarian protection; of these, 121,000 live within the asylum system, predominantly (60%) in CAS centres.

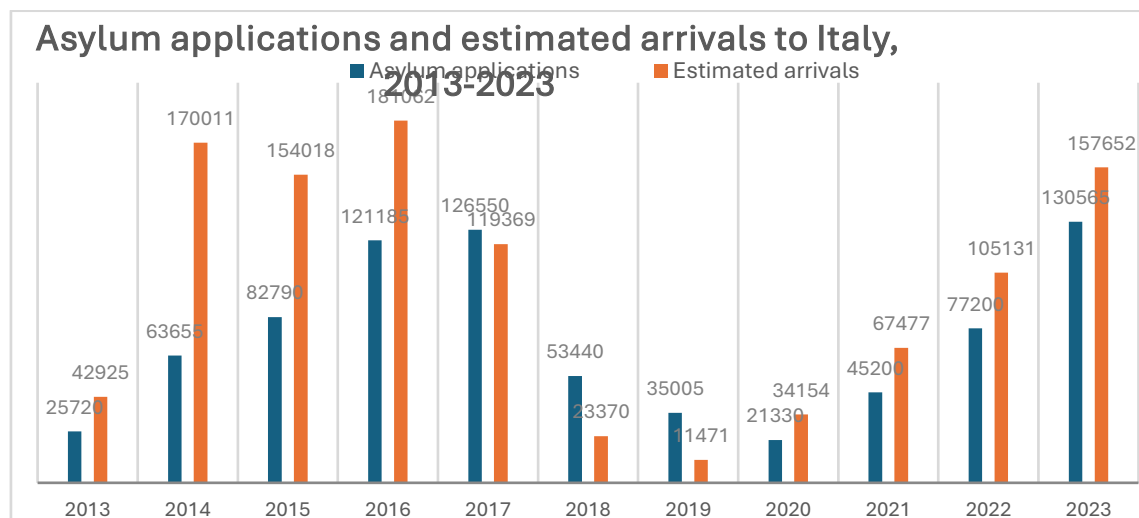


Figure 1. First instance asylum applications and estimated arrivals to Italy, 2013-2023 (personal elaboration based on Eurostat 2024a; IOM 2024)

Between 2013 and 2023, Italian authorities adopted almost 700,000 first instance decisions over asylum applications: most of them were denied and the rejection rate has been steadily increasing in the last decade (Eurostat 2024a). According to EUAA (2024a), in May 2024 almost 200,000 applicants were still waiting for a decision on their application. The most represented nationalities among asylum seekers are Bangladesh, Pakistan, Egypt, Tunisia and Nigeria. These data exclude Ukrainians, who were granted protection through the EU Temporary Protection directive.

Currently, the governance framework of Italy's asylum system preserves its multi-channel structure (see Table 2). The CAS emergency reception system was originally intended to be temporary, and therefore must only ensure basic services such as food, boarding and healthcare; it has also been criticized because it does not set clear standards for reception, thus exposing asylum seekers to poor living conditions, constant surveillance and punitive measures (Campesi 2018a; Acocella and Turchi 2020; Openpolis 2024). On some occasions, this has created issues of transparency and accountability, as well as clashes with hostile local communities (Campesi 2018b). The SAI system was instead conceived as the standard reception system, meant to

encourage self-reliance and full-fledged integration, and therefore also offers integration services such as Italian classes and job orienteering. Community-based initiatives provided virtuous examples of how the system should work even before its official implementation on a national scale, proving that a decentralised, locally based asylum system has positive outcomes for both asylum seekers and host communities (Bolzoni et al. 2015; Carbone 2019; D’Angelo 2019); but such initiatives have been systematically hindered by lack of funding, lack of long-term support by policymakers and state actors, and an increasingly hostile political and public discourse. The SAI system is also penalised by lack of voluntary participation on the part of local non-profit entities, municipalities and regions which manage reception centres (Giannetto et al. 2019) which translates to a chronic lack of hosting capacity; the multilevel framework and the substantial autonomy left to local authorities means that they can also introduce local-level barriers (Ambrosini 2021).

While the SAI system continues to be promoted as a successful example of diffused integration, CAS centres have not been dismantled; on the contrary, they currently host a majority of the total forced migrant population (Openpolis 2024). The management of both systems presents a patchwork of different stakeholders; quality standards and services offered vary depending on the local context (Novak 2021); delays in decisions mean that forced migrants experience prolonged stays in reception facilities (Campesi 2018a); many CAS facilities still suffer from suboptimal living conditions, overcrowding, isolation and lack of easy access to community services (Acocella and Turchi 2020; Ambrosini 2021; Openpolis 2024). The legal framework for protection looks similarly chaotic, with several forms of protection being awarded based on criteria which sometimes appear confusing and overlapping, and recent reforms further blurring the lines. Overall, and despite a well-designed system on paper such as SAI, the Italian asylum system continues to appear as operating in a constant condition of emergency rather than treating forced migration as a systemic, long-term phenomenon (Kuschminder 2019).

1.3.4. Forced migration and the asylum system in Ireland

Ireland has historically been one of the EU countries receiving the least requests of international protection (Arnold et al. 2021), despite registering a steady increase in applications since the early 2010s. This increase, however, became dramatic after 2020 (see Figure 2), and in 2024 Ireland had one of the highest number of new asylum applications per capita in the EU (Eurostat and EMN 2025); starting in 2022, this was also accompanied by one of the largest per capita influxes of Ukrainian displaced people in the EU (see Figure 2). Interestingly, the refugee status recognition rate in Ireland also substantially grew over the 2010s, and in 2020 it was the highest among all countries of the EU. According to the International Protection Office (2024), the most represented nationalities in 2024 are Nigeria, Jordan, Pakistan and Somalia, but in previous years Ireland has

also had a consistent number of applications from Albanian, Georgian and Zimbabwean nationals. As of May 2024, Ireland also had more than 20,000 pending asylum applications (EUAA 2024b).

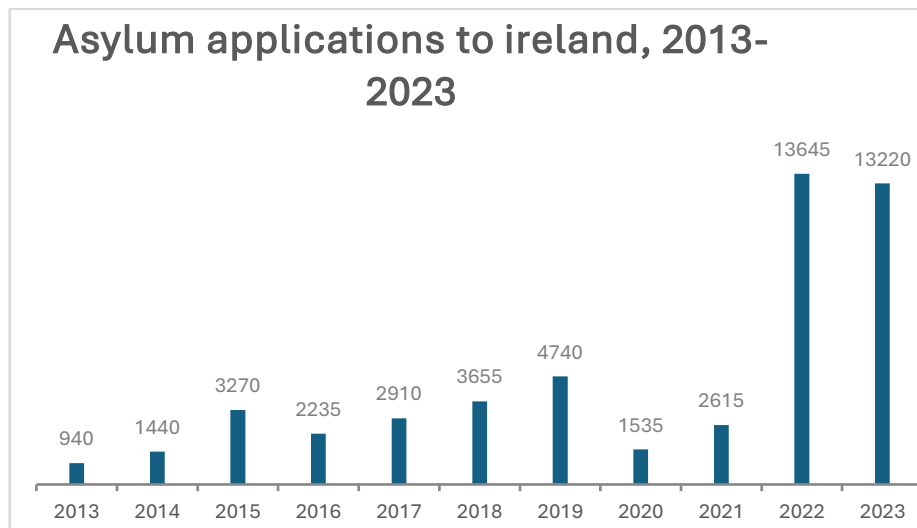


Figure 2. First instance asylum applications received in Ireland, 2013-2023 (personal elaboration based on Eurostat 2024a)

Despite having the possibility to opt out of EU measures pertaining to asylum and immigration, Ireland has aligned its asylum system with EU harmonising directives, including the Dublin Agreement. However, Ireland was one of the last EU countries (in 2018) to sign the EU Reception Directive, which set minimum reception standards and allowed asylum seekers to work in host countries while awaiting decision. In 2017, the International Protection Act came into law, reforming the asylum process and establishing the new International Protection Office. The Act identifies two separate forms of protection: refugee status and subsidiary protection; moreover, the Minister for Justice can also award an individual with the status of humanitarian protection on a discretionary basis in case there are founded reasons justifying their permanence in the country.

The main form of forced migration management in Ireland is represented by the Direct Provision (DP) system, established in 1999 as a response to growing asylum applications between 1996 and 2002. DP provides forced migrants with board, accommodation, pocket money and basic services in collective housing facilities dispersed across the country. Similar to what happens in the Italian system, DP was originally intended for short-term stays, but decisional delays keep migrants within the system for longer periods, even for several years (McMahon Report 2015; Irish Refugee Council 2021). Importantly, DP has no statutory footing, but is based on a series of administrative decisions. This means that the management of forced migration in Ireland is completely discretionary and not ruled by hard law. DP is the only completely privatised asylum system currently operating in the EU. DP centres are privately run by firms financed by the state through public tenders. Managing actors include corporations engaged in prison management in USA

(O'Reilly 2020), catering and events management companies, real estate management firms and family-run hotel businesses. The Irish system has been criticised as offering substandard and overcrowded living conditions, providing little to no support to the integration of residents, and being geared more toward security and physical confinement of migrants rather than toward the respect and protection of human rights (Murphy et al. 2018; O'Reilly 2020; Arnold et al. 2021); in fact, Direct Provision has been defined as “a site of warehousing and alienation” (Murphy 2021) which permits not only physical, but also social segregation. Arnold et al. (2021) also point out that the Direct Provision system does not offer effective integration services, especially to asylum seekers, and many migrants leaving the system face integration difficulties, e.g., in accessing the labour market and mainstreamed integration support (Gusciute et al. 2016). On a broader level of analysis, other scholars (Fanning 2018; Lentin 2016, 2018; Loyal and Quilley 2016) have inscribed Irish asylum policy into a legacy of exclusionary state practices aimed at marginalising minorities, rendering them invisible and dismissing their claims to social membership. 2020 data gathered by the Irish Refugee Council show that the Direct Provision system still hosts 82% of all forced migrants in Ireland, while the remaining 18% is hosted in emergency reception centres or EROCs, often managed by the same actors with very similar contracts as ordinary DP centres. In September 2021, the Irish government announced a comprehensive reform plan aimed at dismantling the Direct Provision system and replacing it with an own-door accommodation system by 2023; however, this plan was halted in 2022 due to the sudden influx of Ukrainian displaced people, and all but shelved.

The Direct Provision system presents many similarities with the Italian CAS system, including its “permanent emergency” governance approach, a low entry barrier for contractors, and a low level of regulation in terms of mandatory services for residents. Table 2 presents an overview of the three main systems to better illustrate similarities and differences.

Country	System	Mandatory type of facilities	Status of migrants hosted	Managed by	Mandatory services	Mandatory roles and qualifications for staff	Expenses
Italy	SAI	Small-scale first, e.g. shared apartments	Asylum seekers, recognised refugees	Municipalities, civil society	Living expenses, daily allowance, healthcare, linguistic and cultural mediation, social integration	Yes (minimum number, general relevant experience/education, dedicated “operators” with specific qualifications, e.g. in law for legal aid)	Daily flat rate per resident (higher), reimbursed <i>ex post</i> with justified expenses

					assistance, Italian language classes, professiona l training assistance, job market orientation, internship agreements , legal aid, mental health services		
	CAS	No regulation, in practice mostly large-scale	On paper asylum seekers only; in practice, recognise d refugees too	Prefectures, private contractors, occasionally civil society	Room and board, daily allowance, cleaning services, healthcare, linguistic and cultural mediation, social integration assistance	No	Daily flat rate per resident (lower), paid <i>ex ante</i>
Ireland	DP	No regulation, in practice mostly large-scale	On paper asylum seekers only; in practice, recognise d refugees too	Private contractors	Room and board, daily allowance, cleaning services	No	Daily flat rate per resident, paid monthly <i>ex ante</i>

Table 2. Main features, services and entitlements of SAI, CAS and DP

Ireland also established a Refugee Protection Programme (IRPP) to accept resettled refugees and asylum seekers from other EU countries, notably Italy and Greece, in accordance with relocation programs promoted by the EU and UNHCR. At the end of 2019, 3,788 persons had been resettled to Ireland through these schemes, but Ireland could not receive the full assigned quota of asylum seekers due to issues with security assessments being conducted in Italy (DCEDIY 2021).

In December 2019, the Irish government announced a second phase of IRPP that would accept up to 2,900 persons between 2020 and 2023 through a combination of resettlement schemes and community sponsorship initiatives. Resettled refugees are typically managed with a slightly different system, which involves an initial orientation program in a reception centre and a series of integration measures that vary greatly compared to those offered to spontaneous asylum seekers (Arnold et al. 2021). A similar model, in stark contrast with Direct Provision, seems to have been applied to Ukrainian nationals in early 2022. Ukrainian refugees were granted immediate protection and the right to healthcare and social welfare through the mainstream PPS number system; while some were hosted in existing DP centres and new dedicated centres were opened to host them, private accommodation was also sourced through calls for volunteers. These differences in the treatment and perception of Ukrainian refugees vs. non-white refugees highlight the racialised understanding of asylum predominant in Western societies.

1.4. Research question and subquestions

The central research question is: how do national, local and individual factors shape the implementation of asylum policy in Italy and Ireland? Within this broader question, four specific subquestions were identified; each of these research questions also represents a separate, self-standing paper composing the cumulative structure of the final thesis.

- What frames can be identified in Ireland's and Italy's political and media discourse on asylum and asylum policy? The Irish political system is relatively stable, and it is not characterised by the presence of relevant far-right parties or movements: forced migration has traditionally not been a heavily politicised or controversial issue in Ireland (Munck 2016), although recent events suggest this might be changing. This is in stark contrast with the Italian political landscape, characterized by high instability (Emanuele and Chiaramonte 2020) and the recent rise of far-right populist formations such as Brothers of Italy and the League party, with an agenda heavily centred on contrasting "illegal" immigration (Albertazzi et al. 2018). Parliamentary debates and media content about asylum and asylum policy in both countries will be analysed using frame analysis. This question investigates how political and media debates frame, describe and react to asylum-related events and asylum policy.
- Is the difference in ownership and management of the asylum system relevant for workers' experiences and the functioning of the system? There are many similarities between the two systems, including a late harmonization of policies and actors, extended delays in

recognizing protection claims, and the spatial segregation, confinement and dispersal of asylum seekers (Campesi 2018a; Giannetto et al. 2019; O'Reilly 2020). However, there are also fundamental differences in how the two systems work, including their ownership: Ireland completely subcontracts Direct Provision centres to private, for-profit firms, whereas the Italian SAI system is managed by city councils, who subcontract management to a range of non-profit actors including charities and social cooperatives. This question asks whether such a difference is relevant in influencing asylum street-level bureaucrats' experiences, opinions and practices.

- How does the implementation gap work in the local context in Italy? Asylum seekers are dispersed throughout the Italian territory, which is characterised by a high diversity of local contexts and the existence of multiple “regional subcultures” (Morini 2016). Relevant cleavages include the North-South cleavage, the rural-urban cleavage, and a political cleavage between a traditionally left-leaning “Red Belt” (Toscana, Umbria, Emilia-Romagna), a more conservative and Catholic northern region (Piemonte, Lombardia, Friuli, Trentino), and a South increasingly leaning toward populist positions. This paper selected two SAI projects in different local contexts (a large, traditionally progressive city and a small town in a traditionally conservative region) and used interviews to analyse how asylum policy is implemented in each context and experienced through the perspective of street-level bureaucrats. The aim of this question is to find out whether and how the implementation gap operates in a specific context and which factors influence it.
- How does the implementation gap work in the local context in Ireland? The Direct Provision system is based on a centralised form of governance, but it is also the only system in the EU who completely subcontracts management and service provisions to private actors, and many reports claim that different centres implement policy in different ways (AIDA 2019; O'Reilly 2020). This question will select different Direct Provision centres in different local contexts (rural and urban) and investigate how asylum policy is implemented in each of them by investigating street-level bureaucrats' opinions and perceptions. The aim of this paper is to explore possible factors that may explain differences in implementation, and to compare and contrast these findings with the findings from the Italian context.

1.5. Theoretical framework

This research will focus on the implementation gap in Italian and Irish asylum policy, adopting a multilevel comparative framework. As this phenomenon is understudied, this project will approach the issue with no preconceived hypothesis. Thematic analysis, discourse analysis and frame analysis

will be used to generate themes, patterns and ideas from the data. However, some foundational theoretical premises inform the research process by positioning the researcher with regards to the issue at hand. These include a constructivist understanding of reality, social processes and policy processes including implementation; an analytical lens which pays particular attention to the concept of locality and the importance of local context in examining how policy is socially produced and implemented; and an analytical focus on street-level bureaucrats as key actors in this implementation process, due to their embeddedness in both the policy process and the local context. Figure 3 visually illustrates the overall theoretical framework, highlighting the interrelations of different conceptual tools (explored in more detail below) and how they connect to each empirical chapter.

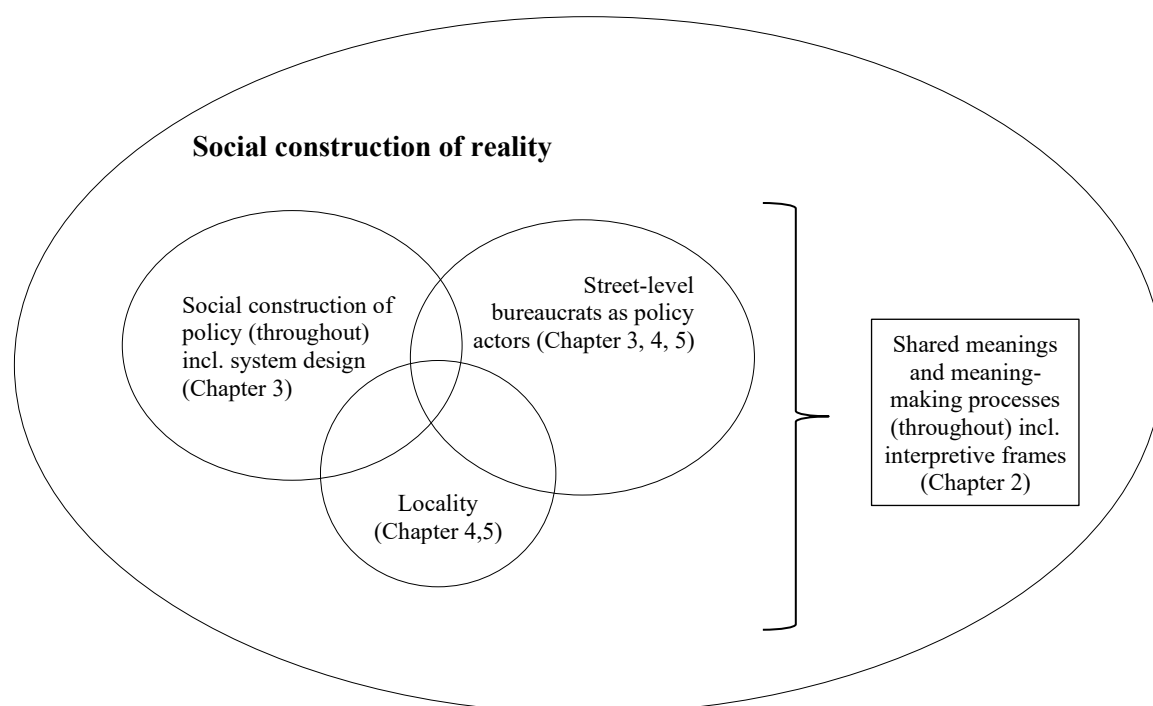


Figure 3. Theoretical framework: elements influencing the implementation of asylum on a national and local level. Within a socially constructed reality, shared meanings and meaning-making processes influence the social construction of policy, the construction of localities and the action of street-level bureaucrats, which are interrelated in producing asylum locally.

Critical race theory (CRT; Stefancic and Delgado 2011) provides a valuable lens for examining systemic constructions and relations of race and racism, which are intimately linked to relations of power and inequality. CRT has its origins in legal studies, but has expanded to explore, critique and deconstruct relations of power in other areas, such as education and public health. Despite the potential relevance of CRT in an analysis of the relational and contextual elements producing policy, the theoretical framework does not explicitly include it. The key tenets of CRT, particularly its focus on the social construction and systemic salience of categories, the intersectionality between race and other categories, the embeddedness of power relations in daily

interactions and practices, and the fundamental relationship between narratives and the structures of power they strengthen and reproduce, are instead subsumed into the broader theoretical approach of this research, grounded in a constructivist and relational framework that explicitly examines the ways in which meaning, identity, power and policy are constructed through social interaction. In this sense, the concerns of CRT are addressed through a looser and more flexible analytical lens, even if not framed in its specific terminology. Such flexibility avoids preconceived hypotheses; it also enables the adaptation of the theoretical framework to diverse sociocultural and institutional contexts, thus addressing one of the main criticisms of CRT (for example by Goldberg and Essed 2002; Bonilla-Silva 2007), namely that its origins are grounded in the specific context of the United States and that it ultimately remains a state-centric and institution-centric approach (even though there are examples of the framework being expanded to other countries and levels of analysis, e.g. Meghji 2019; Warmington 2020). This choice reflects my broader orientation to theory while exploring such a multifaceted and complex subject matter, inclined towards theoretical pluralism and synergy more than synthesis (Meghji 2019). At the same time, more punctual theoretical frameworks such as CRT could certainly be productive starting points to conduct further examinations of the rich data resulting from this research, which would yield additional insights into the intersectional dimensions of power and identity underpinning the local production of asylum.

1.5.1. The social construction of policy

Social construction theory (Ingram et al. 2019) sees policy, including implementation, as socially produced and mediated by institutions and culture. Elements such as public opinion, resource distribution patterns, belief systems, ideologies, preferred knowledge systems, social attitudes and collective past experiences produce context-specific shared narratives, interpretive frames and sets of meanings used to make sense of issues perceived as salient. These narratives about issues perceived as salient in turn define the boundaries of policy by prescribing how issues should be conceptualised, prioritised and discussed, which solutions can be identified, which actors should be involved, which principles, tools and methods should guide policy action. Thus, policy is not merely the result of rational choice or calculation, but instead it is produced through the interaction of many other factors. The results of these interactions are “policy regimes” (May and Jochim 2013) including all the interrelated arrangements in place to deal with a certain policy issue.

The concept of social construction of policy reflects a broader understanding of reality as constantly constructed by means of social and interactional practices which elaborate and reinforce shared narratives used to make sense of reality. Such narratives are a constitutive element of relations of power and of processes of change, including policy implementation. Discourses and interpretive frames are the building blocks of narratives: they are tools used in the meaning-making process to present, connect and discuss salient issues in a certain way (Chong and Druckman 2007;

van Gorp 2007; Fairclough 2013). Such tools are both “socially constitutive as well as socially conditioned” (Blommaert and Bulcaen 2000: 448): social processes influence predominant frames and commonly used discourses, and are influenced by them in return. In fact, it can be argued that “all social structure is discursive in nature” (Jacobs 2018: 298).

Narratives are used in policy implementation processes through the “everyday mobilization of different actors around specific initiatives and measures” (Caponio and Donatiello 2017: 14). These operations can involve competing repertoires, ideologies, and subjectivities, but the same narratives can also be used for competing purposes: for example, the same themes of compassion and empathy toward human suffering can be used by competing parties to claim more permissive or more restrictive asylum policies (Sirriyeh 2018). This research will analyse national-level shared narratives in Italy and Ireland, observing what frames and discourses are constructed and used by political and media elites when discussing forced migration, whether political alignment explains different uses, and how frames may have changed in response to key forced migration events, developments in asylum policy and in the context where policy operates.

1.5.2. Policy implementation: plurality, locality and the role of context

Several theories have examined policy implementation as a distinct and especially complex stage of the policy process. These include, for example, the multiple stream framework (Kingdon 1984), the advocacy coalition framework (Sabatier and Weible 2019), multilevel governance theories (Bache et al. 2016) and Howlett’s (2019) five-stream model. All these theoretical models bring attention to the plurality and diversity of actors included in the policy process and particularly in the policy implementation step. These actors have different priorities, professional ethos, available resources and ways of conceptualising policy problems and related solutions. Their interactions, happening across multiple levels and occasions, defines policy problems, goals and appropriate practices (Olsen and March 2004). In line with the assumption that policy is socially constructed, these models see policy as the result of complex, sometimes conflictual interactions between different groups and processes. The resulting policy instruments are often a compromise or a mix between different views of the problem, priorities, and goals.

The multilevel governance approach (Bache and Flinders 2004) can be seen as a more focused application of the abovementioned concepts to the realm of policy implementation. The multilevel governance analytical approach has been applied to the study of many different policy areas, including immigration (Scholten and Penninx 2016). Multilevel governance has not been extensively used in asylum policy studies yet, but it offers useful conceptual tools to analyse the complexity of asylum policy implementation. Caponio and Jones-Correa (2018: 1998) summarize the main features of this approach as follows: “the involvement of different levels of government

[...]; the involvement of nongovernmental actors at different governmental levels; [...] the emergence of complex, heterogeneous, and non-hierarchical networks among autonomous and yet interdependent actors”. The multilevel governance framework emphasizes the tendency to devolve policy implementation to regional and local actors, the increasingly relevant role of non-state actors, and the interactions between these two realms in the concrete “battleground” of policy implementation (Campomori and Ambrosini 2020). Such interactions can be cooperative but also conflictual: frames, identities, political interests, and institutional norms often shift between governance levels and across actors, potentially producing policy gaps.

Addressing policy implementation with particular attention to its nature as the result of a complex set of interrelations between different stakeholders also means analysing in detail the context where policy is implemented. The importance of local context in migration studies and migration policy has been highlighted by several theoretical and empirical studies (among others, Gilmartin 2008; Glick Schiller and Caglar 2009; Hinger et al. 2016; Zapata-Barrero et al. 2017; Phillimore 2020; Brumat et al. 2021) that have called attention to how context can fundamentally shape and change the way policy is implemented, the actors involved, the specific opportunities and obstacles and the outcomes for both migrants and communities. The concept of “locality” developed in migration studies and the related call for a “local turn” in migration studies invites researchers to look at local contexts, and not nation states or transnational entities such as the EU, as the fundamental unit of migration and asylum policy implementation. Migrants and migration policy practitioners are situated in a specific context and experience policy in that immediate context first and most importantly: this includes for example access to services, interactions with the community and with other local institutions, job market integration and access to educational opportunities. Inclusion or exclusion are produced predominantly at the local level, thanks to the principle of dispersion which governs the distribution of forced migrants in the host country’s territory. Attention to the concept of locality and “place” and to the local scale of migration and asylum also allows to more insightfully conceptualise the fuzzy notion of migrant “integration” as processual and relational, “a site of negotiation where meaning is constantly being made and remade” (Gilmartin and Dagg 2023: 279) by migrants and non-migrants alike. Research must reflect this reality by focusing on the elements of the local contexts that may interfere with policy implementation (institutions, governance systems, political and economic circumstances, local history, urban or rural location); on the local experiences, discourses and perceptions shaping encounters between migrants and communities; and on the locally constructed structures of opportunities and obstacles that render policy implementation highly specific. In line with the assumption that policy implementation is largely constructed bottom-up starting from its local context, this research will not assume that a specific set of contextual elements is necessarily

relevant or drives policy in a certain direction; rather, it will observe the relationship between context and policy as it emerges from the experiences of street-level bureaucrats.

1.5.3. The role of street-level bureaucrats

The local implementation of asylum policy cannot be adequately analysed without paying attention to the minimal units of implementation, i.e. individual bureaucrats, caseworkers, civil servants, volunteers, and other similar figures. The key role of these figures has been long recognized by theory, most notably by Lipsky's seminal work (2010) on "street-level bureaucrats". The definition of "street-level bureaucrat" is deliberately open, and it can include various professional roles such as teachers, social workers, judges, and law enforcement officers. It is interesting to note how the implementation of asylum policy involves all these figures and more; this research will focus more specifically on the frontline workers, volunteers and civil servants involved in the daily management of asylum centres and projects.

Lipsky describes how street-level bureaucrats are forced to work with limited time and resources, in complex environments characterized by a lack of clear rules and goals. Bureaucrats are often required to develop specific skills and norms starting from field experience, since existing norms are too general and ambiguous. Uncertainty increases when policy goals are particularly complex, or the policy field is relatively new and contentious. The implementation of asylum policy has all of these characteristics (Alink et al. 2001; Giacomelli 2023) and furthermore, it is heavily based on the interaction of different actors and organisations delivering services at different levels. Street-level bureaucrats therefore deploy various "coping mechanisms" to face the daily challenges and competing constraints of this complex work environment. This can involve using patterns, routines, and stereotypes to simplify work and maximize the use of time and resources, as well as changing "the conception of their job to narrow the gap between objectives and resources" (Dallara and Lacchei 2021: 87). Coping mechanisms can be developed at the organizational or at the individual level (Brodtkin 2011).

A key element of bureaucrats' action is individual discretion, or the freedom each individual has to make autonomous decisions while exercising their duties. The existence of discretion is inherent to the structure of complex organizations: discretion is required to manage complex situations and devise real-world solutions. Individual discretion can have positive and negative aspects for bureaucrats and beneficiaries (see Nothdurfter and Hermans 2018 for a review) and can be shaped by several elements: these include interactions between bureaucrats and beneficiaries of services; the environment of the implementing organization, including relational factors and informal rules (Evans 2011); and the broader social context, including social constraints and broader

institutional regimes (Fuertes and Lindsay 2016; Miaz 2024). Personal values, worldviews, moral judgments, understandings of policy goals and professional knowledge also influence how bureaucrats act (Nothdurfter and Hermans 2018; Senghaas 2021).

The practices of street-level bureaucrats are the result of their individual discretion interacting with the context they operate in. First, street-level bureaucrats are part of a complex web of horizontal and vertical relations with other steps of the policy process and other actors and organisations active in the policy regime (Hupe and Hill 2007). This web of relations influences their self-conceptualisation and the way they perceive their actions and professional identity. The concept of “professionalism”, i.e. conceptualising oneself as part of a distinct, recognised group of professionals characterised by a shared work ethos, skills and practices, has been applied to street-level bureaucrats to inform analyses of how they act and relate to each other and the rest of society (Evans 2011; Belabas and Gerrits 2017). Professionalism is largely predicated on belonging to a formal organisation and having obtained formal qualifications or experience in a certain field. However, “informal street-level bureaucrats” also exist (Witcher 2021) and in many contexts their presence and role have become increasingly relevant due to neoliberal economic policies which have led the state to retrench from the provision of many public services (Peters 2012). Informal street-level bureaucrats do not fit the classic definition of professionals, but they perform the same duties, interact with the same beneficiaries and often face the same challenges and obstacles in complementing the action of “formal” street-level bureaucrats. Their different positionality may influence their self-conceptualisation as street-level bureaucrats and their relationship with “formal” institutions and street-level bureaucrats, as well as their values, practices and modes of actions.

Secondly, street-level bureaucrats, be they formal or informal, are also deeply embedded in the local context where policy implementation happens and where asylum policy most directly and tangibly comes to fruition. Managers and staff of reception centres, local civil servants, activists and grassroots volunteers are at the same time asylum street-level bureaucrats and member of the local host community. This double embeddedness is generated by the principle of dispersal and the multilevel structure of asylum policy implementation. As double embedded actors, street-level bureaucrats are in a unique position: they are the connection link between the policy process and local context, which both influence their self-identity, values, practices and interactions with each other, with beneficiaries and the rest of the community. They realise policy bottom-up and can send feedback up the policy process (Lipsky 2010). This research adopts an analytical lens which links the policy process to the core concept of locality through the professional figure of the street-level bureaucrat, which constitutes the site where these two elements encounter and combine to produce context-specific policy outcomes and practices. Street-level bureaucrats and their professional

action in context represent the synthesis of national, local and individual elements which shape how policy is implemented while also shaping each other.

1.6. Methodology

This research will apply thematic analysis, frame analysis and discourse analysis to the study of asylum policy implementation. This topic is both understudied and complex, therefore the flexibility afforded by such methods is useful to observe themes or patterns within data and uncover relevant elements as data collection and analysis proceed. The process is informed by existing literature and an understanding of core theoretical concepts, but it does not rely on preconceived notions or hypotheses about what the findings should be. The researcher observes how actors construct their reality and how they operate in it, analysing emerging concepts and building links between them, with a process-oriented and context-conscious approach (Maxwell 2013).

1.6.1 Research design

This research is designed as a comparative case study (Yin 2009). This design involves comparing and contrasting the phenomenon of interest across sites and scales. Case study research enables the investigation of a phenomenon within its real-life setting, making it especially suitable when the boundaries between an object of study and its context are blurred, as it inevitably is with policy and its implementation. Rather than seeking statistical representativeness or significance, this approach prioritises richness and depth, allowing the researcher to explore the “how” and “why” of social processes. More specifically and given the lack of rich, context-bound research in this area, this thesis adopts an exploratory case study design (Yin 2009), with the aim of discovering a particular phenomenon in its context, in order to achieve a nuanced understanding of the relations and processes involved. Extending this logic to comparative research, comparative case studies allow for a holistic, multi-scalar perspective (Bartlett and Vavrus 2017) which goes beyond mere comparison based on isolated, strictly bounded variables. A comparative case study does not isolate units of analysis, but examines them while also looking at processes of change and linkages across groups, levels, time and place. Case studies play “a crucial part [...] in helping us to understand complex systems”, where the main goal is not necessarily “definitive explanation or maximizing ‘explanatory power’” (Astill and Cairney 2015: 137). In this sense, comparison is not simply about identifying static similarities or differences between cases, but about illuminating how social, political, institutional and cultural processes interact to produce unique cases.

One of the main strengths of the comparative case study approach is its “process orientation” (Maxwell 2013), assuming that events and situations are interconnected and investigating such connections. This process orientation enables the researcher to capture both the

specificity and interconnectedness of social phenomena, producing rich and contextually grounded insights that still allow for theoretical transferability, while acknowledging and indeed emphasising the unique characteristics of each case. This approach is therefore particularly suited to the complexity of social phenomena in context, which result from the interaction of macro-, meso- and micro-level structures and relations. Comparative case studies also have an iterative and reflexive design: a process orientation implies that research evolves and changes around the phenomenon of interest as it progresses. This is partly in contrast with the traditionally emphasized need for case studies to be accurately circumscribed and bounded (Yin 2009); however, flexibility and openness are crucial methodological stances that derive from the relational and constructivist perspective of reality which is at the basis of this approach. Indeed, as Bartlett and Vavrus (2017: 10) note, comparative case studies are based on a “spatially and relationally-informed understanding of context and [...] a processual notion of culture”. In a comparative case study approach, where “each case [...] might prove to be a distinctive pathway to the outcome of interest” (Bennett 2004: 33) due to its specific configuration of interactions, flexibility helps the researcher ensure that these possibilities are not overlooked. Case studies have the merit of heuristically identifying new factors or hypotheses, examining potential causal mechanisms within particular contexts, and incorporating complex relations into the analysis. The comparative case study approach aims at including the perspectives of different structures and actors, and their role in constructing the phenomenon of interest. In this methodological context, flexibility and iteration are perhaps more important than rigorous bounding.

At the same time, the comparative case study approach presents some challenges and limitations. As a qualitative approach which centres not only context and relational elements, but also the subjectivity and interpretation of the researcher, comparative case studies inevitably make themselves vulnerable to issues of coherence and generalisability across cases, especially when they differ in institutional structure, cultural context, or data availability. The approach often generates a large amount of rich qualitative data, which can disperse the analytical focus. The high degree of reflexivity inherent to the method, while a strength in interpretive terms, also presents a risk of overemphasising subjectivity at the expense of analytical parsimony or clarity. Indeed, decisions about what to compare and highlight, how to interpret and present cases are always shaped by the researcher’s positionality, increasing the need for the researcher to remain aware of their theoretical orientation and implicit biases in all stages of the process (Bartlett and Vavrus 2017). The theoretical starting point and tenets of this approach also complicate replicability and standardisation in the strictly positivist sense of the term. Findings from context-specific settings naturally do not often translate well to other settings or broader populations; although replicability is not an utmost concern for the research questions and objects of study that this design generally applies to, this limitation needs to be acknowledged when considering the place of comparative

case studies in the broader context of social research. Finally, comparative qualitative research is inevitably time- and resource-intensive, which can constrain the number of cases included in the analysis and therefore the strength of cross-contextual insights. Despite these limitations, the comparative case study approach, when used transparently and critically, remains a potent tool for generating in-depth, contextually embedded knowledge about social processes which moves beyond static or generalising understandings of social phenomena.

In this research, Italy and Ireland have been selected as meaningful cases because even though they both developed their asylum systems recently and at the same time, and they share some sociocultural similarities, they are profoundly different in some aspects that may influence the implementation of asylum policy, such as the number of asylum applications received, the public or private ownership and management of the system, the political and economic context and the structure of the welfare state. The comparative case study will potentially uncover a series of factors that drive policy implementation in their specific context; it may explain the implementation gap in asylum policy in these countries, and possibly provide a framework to study it in other contexts.

1.6.2. Access and sampling

This research assumes that national discourse about asylum and local contextual factors can both influence the way asylum policy is implemented on the ground. Therefore, both national-level media and parliamentary sources and local-level interview sources were identified and sampled. In order to analyse political discourse, parliamentary debates taking place in Italy and Ireland on asylum and forced migration between 2013-2022 were sampled and analysed to verify how the issue of forced migration and asylum is constructed across parties and over time, and to identify narratives that may influence policy implementation on the ground. Parliamentary transcripts were accessed through institutional online databases. In each country, both legislative chambers were sampled (Dáil and Seanad in Ireland; Camera and Senato in Italy). The timeline 2013-2022 was chosen to provide an overview of how interpretive frames and discourses may have changed from the pre-“refugee crisis” baseline through the peak years of the crisis (2014-2016), the COVID-19 pandemic and the Ukrainian crisis.

Similarly, national newspapers in both countries were selected based on data on their reach and circulation (Accertamenti Diffusione Stampa [ADS] 2023; ABC 2020), under the assumption that newspapers with the most circulation and largest readership are most likely to influence discourse by propagating certain frames and narratives. The most circulated daily national newspapers in Italy are Corriere della Sera, Repubblica, and la Stampa; the most circulated daily national newspapers in Ireland (including both broadsheets and tabloids) are the Irish Independent, the Irish Times, and the Irish Sun. Newspaper archives were sampled using both their own online archives and the ProQuest European Newsstream database. Archives for the Irish Sun only go back

to 2017 and there were no alternative sources, so the timeframe was reduced to 2017-2022 for this newspaper only.

The initial corpus resulting from the first round of sampling consisted of more than 30,000 separate items including newspaper articles (both printed and online) and parliamentary transcripts. Given the high volume of data in the initial corpus, subsamples were created from the main samples (Italian parliamentary transcripts, Irish parliamentary transcripts, Italian newspapers and Irish newspapers). A random date generator was used to identify a day in each month of the timeframe 2013-2022. Newspaper articles and parliamentary transcripts from that day were then selected and included in the subsamples. When no content was available from a specific source for the selected date, the closest available date after that was chosen. When more than one relevant article was present in a newspaper for the selected date, all articles were included in the subsample. The final subsamples collectively include 1263 items, including for each date at least one article from each newspaper and one transcript from each parliamentary chamber of each country. All these items were analysed using qualitative coding and frame analysis.

Finally, reception centres or projects were also sampled to obtain firsthand data about the local implementation of asylum policy in its context, and the experiences and perspectives of SLBs involved in it. Table 3 shows an overview of the interviewee sample across countries and sites, with key characteristics. Based on the assumption that local political culture and social structures influence implementation, one or more centres located in a major city and in a politically progressive area were studied in each country, as well as one or more centres located in a rural and more conservative area. The goal was to assess how asylum policy implementation may vary based on the characteristics of the local context, such as local political culture, urban versus rural environment, local history, local institutions, and interactions with local communities. The expectation is that the different contexts of policy implementation will present different challenges and structures of interaction between asylum seekers, bureaucrats, and the local context. For Italy, two centres were selected: one in Bologna, which is a large, historically left-leaning city in one of the wealthiest regions of the country, and one in a small rural locality in Veneto, a traditionally right-leaning region with a history of poverty and emigration until the 1980s. Centres were approached between late 2022 and early 2023 and both agreed to participate in the study. The participation of individual members of staff was voluntary: in both centres, a majority of staff volunteered, including managers, for a total of 20 interviewees.

The same sampling and access strategy was initially adopted for Irish interviewees. However, it soon became clear that more centres needed to be involved, given that the number of staff available in each centre is typically much smaller and there were difficulties in accessing participants due to the considerably negative public attention that Direct Provision was receiving at

the time. Eventually, participants from three urban locations and three rural locations were interviewed, for a total of 19. The sample was expanded to include not only paid staff of DP centres, but also civil servants and community volunteers, as it became clear that these persons were also heavily involved in the daily functioning of the asylum system at the local level.

Country	Total interviewees	Location		Role			Gender		Migratory background	
		Urban	Rural	Employees	Civil servants	Volunteers	M	F	Yes	No
Italy	20	8	12	19	1	0				
Ireland	19	8	11	12	3	4				

Table 3. Overview of interview sample with key characteristics of interviewees

1.6.3. Data collection

This research employed several methods of data collection and analysis based on the different research subquestions and the different nature of the sources and samples. The collection and analysis of new data was informed by existing literature on the two countries' asylum systems obtained through a review of scholarly literature, national statistical data, laws and policy documents, and reports compiled by international, national and local organisations. New data was collected by examining the national political and media discourse to investigate how the topic of forced migration and asylum policy is constructed and discussed, and finally by conducting interviews with frontline stakeholders of the asylum system, such as staff working in reception centres, civil servants, and volunteers.

The parliamentary and newspaper subsamples were searched for relevant keywords related to the topic of forced migration and asylum. These included generic keywords which were the same for both countries, such as “migrants”, “asylum seeker(s)” and “refugee(s)”, as well as country-specific keywords chosen based on the literature and national context. For example, the Italian subsamples were searched for acronyms related to the Italian asylum system such as “SAI”, “SPRAR” or “CAS”; similarly, the Irish subsamples were searched for keywords such as “Direct Provision” or “DP”.

Semi-structured individual interviews were held between January and May 2023 with key stakeholders involved in implementing asylum policy in the selected local contexts, such as managers and staff of centres, civil servants and volunteers. Overall, 39 stakeholders were interviewed, 20 in Italy and 19 in Ireland. The Italian sample was composed exclusively of professionals working in SAI centres, whereas the Irish sample also included civil servants and

volunteers collaborating with DP centres. Semi-structured interviews allow the researcher to capture complex structures of meaning, perceptions and opinions at the individual level. As they are an interactive one-on-one process, they can be designed to accommodate flexibility and encourage the interviewee to lead the process: for example by keeping questions as open as possible to allow the interviewee to express their thoughts with minimal constraint and reduce the possibility of asking leading questions; or by giving the interviewee the freedom to add additional details, expatiate, extend the conversation and ask questions in turn. Interviews also facilitate the development of a rapport which may encourage the interviewee to share more freely. At the same time, interviews are ultimately tools to explore salient questions in a meaningful way, and the appropriate focus must be maintained on the issue at hand (Bryman 2016).

To ensure both flexibility and methodological rigour, an interview guide was developed based on theoretical assumptions and insights from the literature. The interview guide was drafted separately in two languages (Italian and English); no version was directly translated into another, but rather the interviewer's knowledge was used to adapt terms, phrases and sentence structure based on the specificities of the language and the context, while keeping the form and meaning of questions consistent across languages. The interview guide was not intended as a rigid and prescriptive set of questions and themes, but as a blueprint to guide the conversation, with considerable space for adaptation given to both the interviewer and the interviewee (Bryman 2016). The interview guide (see Appendix I) was broadly divided into three sections. The first section, after introducing the research project and its aims, asked questions about the interviewee's personal and professional background. The second section explored the institutional setting of the interviewee's organisation and their typical work routine, including common practices, perceived challenges and other stakeholders involved in daily management. The third section asked for interviewees' perceptions and reflections on their professional identity, the broader asylum system and asylum policy regime, their relationship with forced migrants, coworkers and the local community. The guide was adapted on a case-by-case basis on emerging information and inclinations of the interviewee: for example, in some cases some questions could be merged or skipped, while others were expanded upon.

While recognising their agency and personal insight into the asylum system, and the need for research to incorporate their perspective and contribution, this project did not interview forced migrants. This is primarily because the focus of this research is on the other side of the policy-beneficiary interaction, i.e. the institutions and individuals actively implementing policy. Research has already extensively addressed the perspective of asylum seekers, whereas that of bureaucrats and civil servants remains understudied, notwithstanding its potential in explaining implementation mechanisms and issues.

1.6.4. Data analysis

This research used secondary research on existing material and a host of content analysis methodologies to analyse interview transcripts, political debates and newspaper articles, including frame analysis, thematic analysis and discourse analysis. All the methodologies used for data analysis were chosen for the ability they afford the researcher to interrogate rich qualitative data beyond simple description and comparison, analysing them as embedded in their context and as produced through a series of complex interrelations, meaning-making and identity-making processes. Moreover, these methodologies all assume that reality is socially and relationally constructed and that shared meaning-making processes are a key part of that construction. In particular, frame analysis and discourse analysis bring attention to the fact that language is not inherently neutral, but is used to produce and reproduce specific salient meanings and ways of interpreting reality. These meanings form part of a shared culture and therefore influence social relationships, hierarchies and structures of power (van Gorp 2007; Fairclough 2013). This research produced data in both Italian and English. Italian transcripts, articles and interviews have been personally and manually translated into English by the author where verbatim quotes appear, to convey a meaning as close as possible to the original.

1.6.4.1. Frame analysis

Frame analysis (Chong and Druckman 2007) was used to review parliamentary debates and newspaper articles discussing forced migration and the asylum system in the timeframe 2013-2022. This timeframe was chosen to allow an exhaustive analysis of how frames and shared narratives may have changed along with the evolution of the “refugee crisis” and its aftermath: from the pre-crisis years (2013/14) to the height of the emergency (2015/16), also incorporating the years of the Covid pandemic (2020/21) and the initial influx of Ukrainian displaced persons (2022) to assess whether these developments caused variations in frames and discourses.

Frame analysis aims at examining how multiple meanings are produced and reproduced around the same issue, which aspects of the issue are selected are meaningful and why, and how these aspects are presented as interconnected (Chong and Druckman 2007). It is based on the concept of interpretive “frames” (Entman 1993) as narrative devices which select and connect aspects of an issue perceived as salient, in order to present easily understandable prepackaged interpretations of the issue which are then discussed and reproduced. Frame analysis acknowledges that frames are constructed in a dynamic process involving a series of social and cultural influences (van Gorp 2007) and seeks to capture this process, its goals and effects, and the actors involved (Björnehed and Erikson 2018). Frame analysis can help uncover assumptions and strategies behind

commonly used interpretive frames, which elements of a specific issue are selected and connected to compose a frame, who uses certain frames and in what circumstances.

Matthes and Kohring (2008) point out that frame analysis can proceed both inductively and deductively, and with a qualitative or quantitative focus. This flexibility, which sometimes lends itself to criticisms of the analysis' reliability and validity, derives from the fact that frames and framing are quite elusive concepts, and it is still unclear how exactly frames are produced, how to measure their effects, or indeed how to clearly identify and describe them for operational purposes (van Gorp 2007). These methodological pitfalls can be partly offset by carefully and systematically analysing the elements which compose the content of frames and their patterns of association (Matthes and Kohring 2008).

In this project, parliamentary debates were analysed to check whether the frames predominantly used in Ireland and Italy align with the tendency to politicise, securitise and stigmatise forced migration detected across European countries (Crawley and Skleparis 2017; Krzyżanowski et al. 2018; McMahon and Sigona 2021), and how such narratives may influence the implementation of asylum policy. Secondly, frame analysis was also used to analyse the findings from the review of the two countries' most relevant daily national newspapers: selected media content was analysed to see how the media in each country have portrayed forced migration, asylum seekers and asylum policy, in order to verify what interpretive frames have been used to narrate the issue of forced migration and asylum policy, and how they can influence policy implementation.

1.6.4.2. Thematic analysis

Thematic analysis (Braun and Clarke 2006, 2019) analyses qualitative data by identifying, organising, describing and connecting themes and patterns in the data. Thematic analysis is deeply embedded within the specific context where the data have been produced and proceeds by keeping in mind context-specific processes, biases and meanings. It was therefore judged as the most appropriate method to analyse interviews with asylum street-level bureaucrats for the purposes of this research. Indeed, Joffe (2011: 212) maintains that thematic analysis "is best suited to elucidating the specific nature of a given group's conceptualization of the phenomenon under study", which makes it a perfect fit for analysing SLBs' experiences, subjectivities and perceptions. The ultimate aim of this analysis is to shed light on the implementation of asylum policy in different local settings, and to identify local- and individual-level factors and processes that may influence policy implementation.

Thematic analysis is a versatile method that allows for considerable flexibility and can be fitted to the subject or material at hand while still maintaining a systematic and rigorous approach (Braun

and Clarke 2006). It is consciously unbound from any *a priori* theoretical assumption, and can therefore be successfully applied to a wide variety of research paradigms and frameworks. Thematic analysis proceeds by familiarising oneself with the data and systematically identifying interesting features or codes. These building blocks of meanings are then interpreted and connected to construct broader potential themes connected to a central meaning or concepts; reviewing, refining and linking themes produces “meaning-based interpretative stories” (Braun and Clarke 2019) or “salient constellations of meanings” (Joffe 2011) capturing the organisation, structure and interconnection of meanings (some explicit, some latent) in the data. The coding process helps maintain rigour while applying a methodology which is often poorly defined and demarcated (Braun and Clarke 2006) precisely because of its flexibility and extremely large field of application.

Thematic analysis does not consider the researcher’s personal perspective and positionality as a limit, but rather as an integral part of the process. The researcher plays an active part in generating themes and interpretative stories and Braun and Clarke (2019) encourage the researcher to “own their perspective” by consciously and transparently reflecting on their assumptions and analytical practices.

1.6.4.3. Discourse analysis

Discourse analysis (Fairclough 2013) was used as an additional step in analysing interview transcripts, under the assumption that deeper patterns of meaning lie below simple thematic categories and allow for more nuanced insights into interviewees’ perceptions, opinions and self-conceptualisations. While thematic analysis does not have a specific goal or orientation in analysing data and constructing patterns of meaning, discourse analysis comes with a set of assumptions about reality and language which inform the process. However, the two methods share tools and steps (Herzog et al. 2019).

Discourse analysis posits that language has a close relationship with reality: in fact, it has the power to shape reality by constructing systems of shared meanings which are socially accepted and reproduced. In turn, reality shapes how language is used. This relationship is investigated by discourse analysis by paying close attention not only to what meanings are conveyed and what language elements they are composed of, but also to who conveys them and in what circumstances. A key assumption informing discourse analysis is that language is manipulated and deployed by individuals and structures in order to strengthen and maintain relationships of power and control. The use of language to construct specific discourses is never casual or neutral, but always has a specific aim. Therefore, discourse analysis must proceed with awareness that individuals producing and reproducing meanings are embedded in complex and overlapping systems of relations and hierarchies of power, and have different and changing positionalities. Like thematic analysis and

frame analysis, this methodology also sees its units of analysis not as isolated, but as an integral part of their specific context, and seeks to encompass that context while examining how and why language is used in a certain way, and what purposes its use may serve.

1.6.5. Ethical considerations and positionality

This research largely used publicly and readily available data such as EU and national statistics on forced migration, transcripts of parliamentary debates and archived newspaper articles. In addition, this research did not involve forced migrants directly; therefore, many ethical concerns that must be considered while conducting fieldwork with particularly vulnerable groups (see for example Krause 2017) were also tempered.

Nevertheless, semi-structured interviews involve direct contact with interviewees, and therefore bring forth a series of concerns surrounding the interviewer's rigor, trustworthiness and transparency (Hochschild 2009), as well as appropriate sampling of respondents, formulation of questions and general context-awareness (Harvey 2015). These concerns were addressed by carefully preparing and reviewing the interview guide, adjusting the interview process based on interviewees' cues and preferences, and providing interviewees with extensive information in their preferred language (Italian or English) about the study, its purposes, data management and protection.

Furthermore, forced migration and asylum policy are a fraught and controversial topic in the societies where interviews were conducted; in particular in Ireland, at the time of the interviews, Direct Provision was being extensively scrutinised by the media and political elites due to the growth in forced migrants entering Ireland putting considerable strain on the system. This scrutiny was accompanied by an apparent deterioration of public attitudes toward forced migration and forced migrants, with several protests, some of which violent, taking place across the country, an increasingly hostile online discourse and several attacks to sites selected for new DP centres. Irish interviewees were influenced by these events and by the awareness that the Irish asylum industry is particularly small, involving only a few dozen centres and a few hundred workers; this increased the risk of being identified. To address these concerns, research was conducted in compliance with Trinity College Dublin ethical guidelines. The information form was accompanied by a consent form presented to all interviewees in their preferred language (Italian or English) before beginning the interview. Interviewees were pseudonymised and sensitive personal information was altered and/or removed as much as possible before the writing stage.

Finally, some considerations about the researcher's positionality must be made. This research project stemmed from personal professional involvement in the Italian asylum system, and specifically in one of the SAI projects where interviews were later conducted. My professional

involvement in the SAI system in turn was the consequence of a long-standing academic and personal interest in forced migration as experienced by my country of origin, Italy, during the “refugee crisis”. This interest led me first to a traineeship in an organisation providing support and assistance to forced migrants in Cyprus, where I collected data and materials which formed the basis of my master’s dissertation, on the relationship between Cypriot history and the current institutional form of its asylum system; and after that, it led me to a job in the SAI system. My work in SAI provided me with a network of professional relationships that was used to gain access to interviewees (although none of the interviewees had been my former colleagues), but my professional experiences also provided a starting point to elaborate a research question, fundamental insights about how the system works, and certainly some assumptions and biases derived from my practice as an asylum street-level bureaucrat myself. My past experience, which I explicitly mentioned when introducing myself and illustrating the project, allowed me to construct a shared language and set of references with Italian interviewees which contributed to shaping our interviews and certainly helped me in gaining access and trust. This was somewhat true in Irish interviews as well: while Irish interviewees were considerably harder to access and arguably less willing to share information about their professional life and opinions, mentioning my experience in Italy inevitably led to curiosity and questions about similarities and differences with the Irish system, which helped set the interviewees at ease and established my *bona fide* credentials as at least a partial “insider” who could understand their challenges and experiences without being judgmental.

In the relationship with interviewees and gatekeepers, other elements of my identity also played a role, some always, some others only at times. For example, my gender arguably helped my relationship with women interviewees (a majority of the sample) by adding another element of similarity and shared experience fostering trust and understanding; my age and generational experiences (including for example moving to Bologna from a smaller Southern Italian context to pursue my studies) arguably had the same effect with Italian interviewees, who were all close to me in age, and with some Irish interviewees; Irish interviewees with a migratory background expressed appreciation of that shared element, too. In short, my positionality generally helped situate myself in a favourable position for conducting interviews. Engaging with interviewees confirmed some of my implicit expectations about the findings I would encounter, especially in the Italian context, of which I had a deeper knowledge; some of them, however, were dispelled or changed, and the final picture that emerged from interviews was far more complex and nuanced than my individual experience or perspective would have allowed me to glimpse. I have sustained a conscious effort to remain open and flexible at all times, in order to ensure that research remained rigorous while also not negating my subjectivity as researcher.

Beyond relationships with interviewees, my approach to research in general and to this research project in particular were shaped by my Italian nationality and EU citizenship, my leftist political orientation and progressive personal values, and my personal history of engagement with the political and social issues of both my country of origin and my country of residence, including instances of activism in both countries. Indeed, the very research question underpinning this project would not have been ideated and developed, or not in the same way, if I had not been interested and active not only in forced migration, but also in the broader political and social landscape of both countries. Similarly, my personal views and experiences led me to investigate the perspective of asylum street-level bureaucrats instead of other potential groups of interviewees involved in various stages of the asylum policy process, and to phrase questions in a specific way which was shaped, for example, by my ideas and impressions about the biggest challenges on the job, or about which interactions with other stakeholders it would be interesting to explore. My choice of qualitative methodologies, the development of my theoretical framework and of the interview guide, which all inevitably informed the process and findings of this research, were also influenced by my academic background in social sciences and my personal interests and inclinations, including a predilection for text over “hard” data which is reflected in the type of phenomena, research questions and answers I am interested in. Some elements of my positionality (arguably all, if a constructivist paradigm is followed) evolved as I was conducting research, fine-tuning the research questions, drafting the interview guide and conducting interviews, analysing and interpreting data, and constructing narratives out of findings. In this respect too, while taking care to maintain rigour and transparency, I acknowledged and embraced my subjectivity as an enrichment of the research process rather than an impediment (Braun and Clarke 2019).

1.7. Structure of the thesis

The following chapters each correspond to one paper which resulted from this research project and was submitted to a peer-reviewed journal. The four chapters can be briefly summarised as follows:

Chapter 2 investigates the predominant frames used in Irish and Italian parliamentary and media content discussing forced migration, forced migrants and asylum policy between 2013 and 2022. A sample of parliamentary transcript and newspaper articles from the most circulated national newspapers was analysed using frame analysis to detect predominant frames and assess their composition and possible evolution over time, as well as any differences between countries or between political and media language. The analysis reveals consistent patterns in the two countries across the selected timeframe, showing that predominant frames have remained the same despite key events in the area of forced migration, such as the Covid pandemic and the Ukrainian war. However, in each country frames diverge across parliamentary and newspaper content. Italian

parliamentary discourse predominantly uses the threat frame, while media coverage leans towards humanitarian perspectives. In Ireland, on the other hand, politics tends to use a humanitarian frame, contrasting with more negative media narratives making wide use of the threat and emergency frame. Economic circumstances, political cleavages and social attitudes do not completely predict these findings; rather, country-specific drivers of frame emergence lead to frames being differently constructed and used in different country contexts. Furthermore, frames that appear to be similar may actually be the result of different processes, and frames that appear to be divergent might not accurately reflect actual divergence in discourse.

Chapter 3 analyses the Irish and Italian asylum system in light of their different design: Ireland has the only completely privatised asylum system in the EU, whereas Italy uses a unique model of partnership between the state and co-opted civil society actors. The chapter asks whether these differences can cause differences in how the system works and how it affects the experiences and perceptions of frontline street-level bureaucrats. Interviews show that workers in both systems are generally satisfied with their job; however, Irish workers report a sense of isolation and disconnection from other public services which complicates their work, and receive fewer supports in terms of regulation, transparency and accountability. Italian workers, on the other hand, find meaning and motivation in the value-based nature of their job, and their experience is improved by the interconnectedness of the asylum system with other public services. A privatised system seems thus to be ill-suited for a complex policy area such as asylum, where there is a need for many professional figures, services and supports; the low level of regulation and accountability also contribute to uncertainty, which negatively affects workers' experiences. Conversely, a public system which is more stringently regulated and embedded in a network of similar services can better meet its stated goals and provides a better experience for its staff.

Chapter 4 compares asylum policy implementation across two different localities in Italy, examining how local context shapes workers' experiences and the functioning of the system. Semi-structured interviews were conducted in a project from a rural, traditionally conservative area and in a project from a traditionally progressive, large city with a thriving economy. The findings show that the urban or rural location of the project does not sufficiently explain similarities and differences in policy implementation and outcomes, which are largely shaped by sociocultural and relational elements specific to the local context itself. In these contexts, SLBs are "doubly embedded" both in their locality and in the reality of the policy regime. In smaller communities, they mobilise this double embeddedness to mediate interpersonal contact between migrants and community members: this can foster positive encounters that partially offset traditionally conservative political cultures and hostile attitudes. However, the same cultures and attitudes, fueled by predominantly hostile national discourses, cause workers to feel isolated and alienated from their community because of their profession and related opinions. Urban environments, on the other hand, while providing SLBs with a more supportive personal network, do not appear to offer

the same opportunities for meaningful connections between migrants and the community. Furthermore, the interviews show how SLBs' decision-making practices in both projects are always collegial and constrained by exhaustive rules, largely eliminating the need for individual discretion which is a defining trait of SLBs and creating instead "group discretionary" bureaucrats, which derive meaning and support from collective decision-making.

Finally, chapter 5 compares the experiences and perceptions of asylum SLBs across different sites in Ireland, including not only the staff of Direct Provision centres but also civil servants and community volunteers, which play a complementary role in the provision of services and support to forced migrants. Data emerging from interviews illustrates how the same flaws and problems already found to be negatively affecting migrants' lived experiences in DP also affect SLBs managing the system, and how increasingly negative and prominent public discourse on forced migration complicates the daily practice of all stakeholders involved. Furthermore, this chapter details fundamental differences between staff and other interviewees: DP employees do not perceive themselves as SLBs, but instead they see themselves as completely separated from state institutions and the rest of the policy regime, and do not reflect on its nature or on their own position within it. This disconnect is both a result and an enabling factor of the privatised design of DP, which does not require specialised subcontractors or professionals to manage centres, and has powerful consequences on the way the system itself functions: for example, it prevents staff from exercising the traditional role of SLBs as bottom-up policymakers, sending feedback up the policy chain and fostering change based on their experiences on the ground. Civil servants and volunteers, on the contrary, display a deep and organic critical awareness of the system and its shortcomings.

Chapter 2: Frames of forced migration: a comparative analysis of political and media discourse in Italy and Ireland

2.1. Abstract

The European "refugee crisis" spurred heightened political and media discourses on forced migration. Research has surveyed and compared typical frames and discourses, but there are few studies attempting to explain cross-country similarities and differences using contextual elements. This study uses frame analysis to compare Italy and Ireland's parliamentary and media discourses from 2013 to 2022, revealing consistent yet contrasting patterns. Italian politics predominantly uses the threat frame, while media coverage leans towards humanitarian perspectives. In Ireland, politics tends to use a humanitarian frame, contrasting with more negative media narratives. Economic circumstances, political cleavages, numbers of forced migrants hosted and social attitudes do not completely predict these findings; rather, country-specific drivers of frame emergence lead to frames being differently constructed and used in different country contexts. Similar frames may be the result of different processes and divergent frames might not accurately reflect actual divergence in discourse.

2.2. Introduction

Over the last decade, increasing numbers of forced migrants entering Europe and inadequate policy responses have sparked a "refugee crisis" and produced extensive public discourse on asylum (Krzyżanowski et al. 2018). Political and media discourses are particularly powerful in influencing public preferences and social attitudes, especially regarding contentious issues like asylum (Hellwig and Kweon 2016). This paper compares interpretive frames used in parliamentary and media discourses, and analyse how national context, including political, economic, migratory and cultural factors, may influence their emergence. The central research question is: how does national context influence the use of frames by political actors and the media in discourses about forced migration? Italy and Ireland were selected as case studies as two countries that experienced the "refugee crisis" in different ways over the last decade, and share some sociocultural similarities but a markedly different political and economic situation, characterised by prolonged stability and growth in Ireland, and by chronic instability, increasing populism and stagnation in Italy.

This study adds to the literature on framing and the use of frames in forced migration discourse by identifying and comparing predominant frames across different country contexts, and analysing how contextual elements may influence their development, addressing similarities and differences analytically and not just descriptively (van Gorp 2007). The comparison includes not only media discourse, but also political discourse, addressing the interplay between the two (Eberl et al. 2018). We use contextual elements in the chosen cases to inform expectations on what drives the relevance of specific frames in a specific context and assess these expectations against our findings.

2.3. The EU forced migration crisis in public discourse

The crisis starting in 2014-15 brought forced migration to the fore in European political and media debates. While arrivals in 2014-2019 were mostly from Sub-Saharan Africa and Southeast Asia, Afghan and Ukrainian forced migrants predominated between 2020 and 2022. Between 2013 and 2022, more than 11 million people applied for asylum or temporary protection in the EU; Ireland managed approximately 131.000 applications, including 95.000 Ukrainians; Italy managed approximately 850.000, including 160.000 Ukrainians (Eurostat 2023a). Forced migration is unpredictable and largely uncontrollable; it introduces a visible element of racial and cultural diversity in host societies; and it questions the distribution of resources and the functioning of the welfare state. These elements draw on powerful notions of identity and belonging, creating a sense of uncertainty, chaos, and existential threat which lends itself easily to politicisation and discourse polarisation (Landmann et al. 2019; Verbalyte et al. 2022). The rise of far-right populism in Western political arenas has pushed mainstream parties to respond by hardening their position on immigration, further normalising and mainstreaming populist anti-immigrant discourse (Mudde 2013; Ekström et al. 2025).

Throughout this paper, we focus on “forced migration” and “forced migrants” as migrants arriving in Europe without having previously obtained a visa, and typically applying for asylum. The traditional definition of forced migration refers to the displacement of individuals considered refugees by the criteria of the 1951 Geneva Convention, which lists a limited number of clear-cut grounds for refugee status including persecution for reasons of race, religion, nationality, political or social membership. This definition is quite outdated and does not encompass the multifaceted, ever-changing reasons or circumstances compelling people to migrate today: the International Organization for Migration (2019) has adopted a broader definition encompassing any “migratory movement which, although the drivers can be diverse, involves force, compulsion, or coercion”. We deliberately use a broad term to encompass and emphasise this diversity of circumstances. Political and media outlets use different terms to describe forced migrants, including “asylum seekers”, “refugees”, “migrants” and “illegal” or “irregular migrants”, sometimes interchangeably and quite unclearly: we have not changed these terms in direct quotes.

Research has identified several typical frames that are consistently used in public discourse on forced migration across countries (van Gorp 2005; Nickels 2007; Heidenreich et al. 2019). Although studies mostly examine media discourse and less so political discourse, and while the relevance of specific frames or concepts varies over time and across countries, it has generally been found that both media and political discourse typically depict forced migrants negatively, as a threat to the host country, an uncontrollable and dehumanised mass, and/or as passive victims with no agency.

Public discourse about the European “refugee crisis” depicts forced migration as an emergency and a physical, economic and cultural threat (Triandafyllidou 2017). Labelling the phenomenon as an unprecedented “emergency” builds a sense of exceptional menace and impending catastrophe, creating a moral panic (Krzyżanowski et al. 2018; Verbalyte et al. 2022). The emergency frame, encompassing ideas of chaos, security and the lack thereof, feeds the physical threat frame by implying that host countries cannot control such immense numbers of forced migrants, increasing crime and insecurity (Colombo 2018). The economic threat frame depicts most forced migrants as “fake refugees”, in reality “economic migrants” disguising as refugees only to gain entry and improve their material conditions or exploit the host country’s welfare system; finally, the cultural threat frame sees (non-Western and non-white) asylum seekers as threatening European liberal values and culture by spreading or imposing incompatible, backward values and social norms, often associated with Islam (Landmann et al. 2019).

Another widely employed frame is the humanitarian or victimisation frame: “legitimate” forced migrants are perceived as vulnerable victims with no agency or resources, deserving to be rescued and assisted (Wright 2014). The humanitarian frame has been observed in political and media representations of forced migrants, often together with the threat frame (Krzyżanowski et al. 2018; Padilla et al. 2024). The humanitarian frame is often deployed in connection with a national identity predicated on shared experiences of emigration, which engender empathy towards forced migrants (Heidenreich et al. 2019; Padilla et al. 2024). Similarly, Ukrainians displaced by the Russian invasion in 2022 were met with discourse emphasising their status as “fellow Europeans”, their vulnerability and the senseless atrocities being committed against them, in stark contrast with the negative frames used to depict non-Western forced migrants (Ongenaert and Soler 2024). Importantly, the humanitarian frame is not necessarily a positive depiction of forced migrants and can also strengthen populist discourse (Vollmer and Karakayali 2018; Verbalyte et al. 2022). The humanitarian frame also includes a “moral responsibility” subframe (Triandafyllidou 2017) calling on EU countries to uphold shared values of solidarity and compassion.

The concept of deservingness, widely used in shared narratives on forced migration (Nickels 2007; Vollmer and Karakayali 2018), informs and underlies all typical frames. The categorisation of forced migrants as threats or humanitarian figures, and the subsequent use of related frames, ultimately hinges on the perception of their deservingness: the threat frame judges this deservingness as absent or defective, whereas the humanitarian frame emphasises it. While “real” forced migrants are a few persecuted people who deserve protection and help, most are “fake”: unknown freeloaders, possibly criminals, who want to exploit the generosity of host societies without truly qualifying for asylum. This behaviour elicits suspicion, hostility and frustration that public resources are being “wasted” on undeserving foreigners instead of citizens. Deservingness is negatively correlated with the agency of forced migrants: those who were forced

to leave are deserving, whereas rational choice migrants are undeserving “asylum shoppers” (Vollmer and Karakayali 2018). The definition of deservingness often includes forced migrants’ capability or willingness to integrate into Western liberal democracies and contribute to the host country’s economy and culture (Haw 2021; Valente et al. 2021)

Notably, the interpretive frames described above are generally unchanged not only across countries, but also across political orientations and over time (Nickels 2007; Vollmer 2017; Beck 2021; Valente et al. 2021), leading some scholars to suggest that the emergence of frames to discuss forced migration may be more influenced by long-established national or international practices or conceptualisations (including self-conceptualisations) than by actual events (Nickels 2007; Pottie-Sherman and Wilkes 2014; Triandafyllidou 2017; Vollmer 2017; Consterdine 2018; Padilla et al. 2024). In other words, the way a society discusses forced migration speaks volumes to that society’s “national self-conception” broadly constructed (Pottie-Sherman and Wilkes 2014).

Accordingly, this research seeks to offer a focused perspective on the use and emergence of frames in discourses about forced migration. First, we identify and compare predominant frames found in the media and political discourses of two countries with different political, economic and migratory contexts. We then analyse similarities and differences beyond simple comparison, elucidating what contextual factors may drive frame emergence in different arenas of public discourse (van Gorp 2007). We see this analysis as aimed less at pinpointing the exact initiatives, reasons and moments when a specific frame came into existence, and more at exploring the continuous process of change and evolution in the salience, articulation, and internal configuration of interpretive frames across time and contexts. Our research addresses the lack of comparative qualitative research explaining cross-country differences beyond a systematic survey and comparison of frames (Eberl et al. 2018). We incorporate both political and media discourse in our analysis, acknowledging their reciprocal relation in constructing shared meanings (van Gorp 2005). The two chosen countries are not often included in comparative studies on depictions of migration (Eberl et al. 2018), and they differ in some areas that could potentially be relevant in determining how and why different frames are produced and reproduced, even when those frames appear similar.

2.4. Theoretical framework

We draw on framing theory (Entman 1993; Chong and Druckman 2007) in conceiving reality as socially and relationally constructed by individuals and structures through continuous meaning-making practices. Our conceptualisation of frames as culturally embedded interpretive structures aligns with foundational and cultural approaches to framing theory (Goffman 1974; Gamson 1992; Rein & Schön 1993) emphasising frames as carriers of social norms, moral evaluations, and shared meanings. Building on these assumptions, framing theory focuses on how issues are made salient, presented and discussed. Frames are pre-packaged interpretations of salient issues that select and

connect meaningful aspects of the issue to facilitate meaning-making: they construct certain issues as problems and present acceptable causes and solutions. Although frames change little over time, framing is a dynamic process (van Gorp 2007) in the sense that competing or interchangeable frames can exist on the same issue; the content and boundaries of frames can be redefined; and the same frame can affect different groups in different ways.

It is still contested what exactly drives the emergence of frames, and separating the role of different contextual elements that may influence emergence is extremely complex (Chong and Druckman 2007; van Gorp 2007). Frames are theorised as an expression of cultural norms, moral judgments and shared patterns of thought and communication (Entman 1993): they are largely independent from the actions of any single individual and may be best conceptualised as a part of culture (van Gorp 2007; Pottie-Sherman and Wilkes 2014), built out of sociocultural blocks that as such can be variously constructed, changed, arranged and prioritised. Because of this, frames are rarely created *ex nihilo*, even if actors can craft novel articulations and change their internal arrangement. Nonetheless, there are some hypotheses: for example, scholars posit that new social or policy issues can cause individual perceptions and beliefs to reorganise around a new frame; and perceived “crises” can make certain frames more salient than others, including through heightened emotional salience (Chong and Druckman 2007; Verbalyte et al. 2022).

In focusing on political and print media discourses, we recognise the key role of political and media elites as powerful (although not exclusive) shapers and reproducers of frames: they have the authority and wide reach to select, organise and broadcast aspects of a salient issue (Chong and Druckman 2007). In this process, political and media discourses are often closely intertwined (Consterdine 2018). Individuals often adopt frames presented by elite actors such as politicians and mainstream media outlets, in a process known as cue-taking. Cue-taking from elites is influenced by many different factors, but particularly likely to occur when issues are multidimensional, diverse, and not easily relatable to individuals’ life experiences: forced migration ticks all these boxes (Hellwig and Kweon 2016). While acknowledging the important role of elites, our broad cultural understanding of frames makes it analytically unproductive to isolate their precise originators. Our focus is therefore on how frames operate and resonate, rather than on their potentially unknowable origins.

Framing theory maintains that language is not neutral, and through frame analysis it seeks to examine how multiple meanings are produced and reproduced around the same issue. Following van Gorp (2007: 73), we believe the purpose of frame analysis is “to assess [...] the impact of the implicitly present cultural phenomena conveyed by all these elements as a whole and to relate them to the dynamic processes in which social reality is constructed”. By focusing on the role of elites as producers of meaning and reflecting on how these meanings shape our idea of power, public

opinion and policy, framing theory analyses how language and meaning-making interact with systems of power (Chong and Druckman 2007).

2.5. Methodology

This paper is a comparative case study (Yin 2009) observing a phenomenon across different contexts to understand the underlying relations and processes involved. Italy and Ireland present different circumstances which may influence the way they produce and use frames on forced migration. Italy has long been at the coalface of the “refugee crisis” for geographical reasons, receiving hundreds of thousands of migrants during the selected period and consistently figuring in the top three or four EU countries by number of asylum applications received (Eurostat 2025). Italy also has historically negative attitudes toward immigration, which significantly worsened after the 2008 economic crisis (van Hootegeem and Meuleman 2018). Historically, Ireland did not experience significant influxes of asylum seekers; however, asylum applications have been steadily increasing since the early 2010s and have surged since 2022, with Ireland hosting one of the largest shares of Ukrainians in the EU in relation to its population (Eurostat 2023b). This surge contributed to increasing contentiousness and visibility of forced migration in the Irish public discourse, with events including anti-immigrant protests, violent riots and attacks on reception centres signalling a possible deterioration of traditionally positive Irish attitudes towards immigration (McGinnity et al. 2018; Irish Times 2024).

The political context in the two states also varies considerably: Italy is characterised by chronic instability, with rapidly alternating governments, a strong prevalence of multiparty coalitions, and the recent emergence of new populist and far-right parties, such as the Five Star Movement, the “new” League and Brothers of Italy (Emanuele and Chiaramonte 2020). Forced migration has been consistently high on the agendas of all major parties since the early 2010s (Colombo 2018). Ireland, conversely, is characterised by long-standing political stability: two moderate establishment parties (Fine Gael and Fianna Fáil) have governed the country for decades, and despite Sinn Féin and smaller centre-left parties gaining support in recent years, there are no radically anti-establishment political actors, and immigration is traditionally not a political issue (Munck 2016). Finally, while both countries were hit hard by the 2008 global financial crisis, Ireland recovered successfully and became one of the fastest-growing economies in the EU, whereas Italian GDP grew less or declined more than average EU levels (Eurostat 2024b). At the same time, the two countries share sociocultural similarities, particularly a history of emigration and Catholic social values.

One might expect contextual variation to result in the emergence of different frames on forced migration. The economic threat frame could be more readily adopted in a stagnating economy and less relevant in a growing economy. The different nature of the welfare state may also

affect the relevance of the economic threat frame and the deservingness frame (Fietkau and Hansen 2018): a country with higher welfare expenditures and a higher portion of the population relying on social welfare may be more threatened by the additional “burden” represented by “undeserving” migrants. The stable Irish political context is likely to result in less polarisation in forced migration discourse, while we may expect the opposite in Italy. At the same time, a similar use of the humanitarian frame may derive from analogous sociocultural elements such as the predominance of Catholic values and a past shared experience of emigration. Given the traditional homogeneity of Irish and Italian societies, both comparatively new countries of immigration, we could also expect a similar relevance of the cultural threat frame.

Parliamentary debates and newspaper articles in Italy and Ireland were analysed to study depictions of forced migration. While other types of text, including most prominently social media content, are undoubtedly prolific sources of discourse on salient social issues and would constitute fruitful starting points for frame and discourse analyses, we chose to focus first on texts and narratives produced by actors with a long-established and (wholly or partly) institutionalised authority in producing and reproducing meanings, under the assumption that these elites (Chong and Druckman 2007) have more power and reach than the average social media user in broadcasting prepackaged interpretations of issues, and indeed can influence meanings and content produced by members of the public in more egalitarian and informal contexts such as social media. While it must be acknowledged that the readership of physical copies of newspapers is shrinking, all the newspapers we sampled provide digital versions of their print editions online, as well as extra online-only articles which were included in our sample. Circulation data (ADS 2023; ABC 2020) do not always include online articles, whose circulation is harder to measure; the actual reach of the sampled newspapers is thus conceivably greater than captured by these statistics.

Using institutional online databases, parliamentary debate transcripts in both chambers of both countries (Camera and Senato in Italy; Dáil and Seanad in Ireland) were searched for keywords related to forced migration. The timeframe 2013-2022 was chosen to establish a pre-crisis “baseline”, examine the peak of the crisis (2014-2016) and the Ukrainian crisis, to detect potential changes in the type and content of employed frames. The three most read national newspapers in each country were identified using circulation data (ADS 2023; ABC 2020; see Table 3) and searched for the same keywords using their online archives and the ProQuest European Newsstream database.

Country	Name of publication	Political orientation
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Italy	<i>Corriere della Sera</i>	Conservative
	<i>Repubblica</i>	Progressive
	<i>La Stampa</i>	Progressive
Ireland	<i>Irish Times</i>	Centrist
	<i>Irish Independent</i>	Conservative
	<i>Irish Sun</i>	Tabloid, conservative

Table 4. Names and political orientation of sampled newspapers.

Keywords included generic terms such as “asylum” or “migrants” as well as country-specific keywords, such as “Direct Provision” (DP)³ for Ireland and “SAI”⁴ for Italy⁵. From the initial corpus, a smaller sample was selected using a random date generator. One date for each month of the 2013-2022 timespan was generated. When content was not available for that specific date, the closest available date after that was chosen. The final sample consists of 1263 items: for every month, each newspaper and each parliamentary chamber is represented at least once⁶.

Texts were analysed qualitatively using frame analysis (Chong and Druckman 2007). Analysis identified recurring topics and themes in the sample through qualitative coding and examined how they fit into broader interpretive frames, such as the threat or humanitarian frame, and how discourse was employed within these frames: who spoke and when, how specific words were mobilised, which tropes were used concurrently or in competition. This critical analysis aimed at interpreting the findings beyond simple description and comparison of frames, to uncover interrelated meanings used in specific circumstances and ways, with specific purposes. Table 4 lists the frames initially included in qualitative coding based on relevant literature.

Physical threat
Economic threat
Cultural threat

1. Direct Provision is the Irish system for the reception of asylum seekers.

2. SAI (*Sistema di Accoglienza e Integrazione* or Reception and Integration System) is the acronym for Italy’s asylum system.

⁵ Keywords for Irish data search: asylum, asylum seeker(s), refugee(s), immigrant(s), migrant(s), migration, immigration, reception, integration, Direct Provision, RIA, IPAS. Keywords for Italian data search: migratori*, asilo, migrant*, migrazione*, richiedenti*, clandestini*, sbarco*, immigrati*, accoglienza, immigrazione, SPRAR, CAS, CIE, CARA, CPR, rifugiati*, profughi, invasione, scafisti, barconi*, rimpatri, respingimenti*, salvataggi, soccorsi, trafficanti*, integrazione. Asterisks indicate that all versions of the noun (masculine/feminine, singular/plural) have been included in the search.

4. The Irish Sun online archive only goes back to 2017 and there was no other database available; its sample is therefore limited to 2017-2022.

Humanitarian/victimisation
Emergency/exceptional situation
Chaos/lack of control
Moral responsibility/values
Migrants' positive contribution

Table 5. Frames included in coding

2.6. Findings and discussion

We first present and discuss the main frames identified in the sample; we then explore other relevant discursive elements, including tone of discourse, use of the concept of deservingness, themes of self-reflection and national identity, and role of the EU.

2.6.1. *Frames*

All the most common frames used to discuss forced migration in Europe (Krzyżanowski et al. 2018) were identified in the Italian and Irish data, including the emergency frame, the threat frame in all its declinations, and the humanitarian frame. Table 5 recaps frames identified in the sample and some examples of words or phrases for each (selected on the basis of clarity and illustrative value rather than frequency). Secondary frames identified by literature, such as the “moral responsibility” frame or the “migrants’ cultural contribution” frame (Triandafyllidou 2017; Valente et al. 2021), were scarcely relevant in the sample.

Frame	Examples
Threat	Physical threat: “Dangerous increase”, “socially dangerous illegal immigrants”, “terrorists obtaining refugee status”, “no background checks”, “widespread fear among citizens”,
	Economic threat: “strain on our resources”, “paid double our pensioners”, “freeloaders”, “it’s a free-for-all”, “skilled people who can contribute”, “economic migrants”

	Cultural threat: “incompatible cultures”, “subversion of our civilisation”, “ethnic substitution”
Emergency, chaos	“Record arrivals”, “state of emergency”, “destitute horde”, “invasion”, “risk of collapse”, “extreme urgency”, “unprecedented”, “unrelenting”, “uncontrollable”, “out of control”, “more are coming”, “unfathomable consequences”
Humanitarian	“Human dignity”, “saving lives”, “people looking for a better life”, “victims of criminal smugglers”, “tragic deaths”, “poor people”, “helpless”, “drifting”

Table 6. Main frames used in Italian and Irish political and media discourses and examples of common words/phrases

Parliamentary discourse and media discourse remain fairly consistent over time in both countries. Topical events, such as shipwrecks in the Mediterranean in the 2010s and the displacement of Ukrainians following the Russian invasion in 2022, typically resulted in more articles and parliamentary discussions in the immediate aftermath, but did not substantially alter the type and content of commonly used frames, or drive the emergence of new frames. This finding confirms that frames on migration tend to remain stable over time (Nickels 2007; Triandafyllidou 2017). However, in each country media and political discourses are contrasting. In Ireland, parliamentary discourse is almost identical across parties. It paints a predominantly positive picture of forced migrants and tends to adopt the humanitarian frame. Migrants are depicted as victims of “appalling circumstances” and “trauma” both before and after arriving in Ireland; the flawed nature of DP, which “leaves asylum seekers de-skilled, institutionalised, vulnerable to mental health issues and socially excluded” (Seanad, independent, 20/10/2013) is the main culprit. Emphasis is placed on migrants’ suffering, which should elicit empathy: speakers construct a sense of vicinity with migrants by drawing parallels between Irish and migrant life experiences and using locutions such as “one can imagine” or “if we were in that situation”. However, migrants’ agency is also emphasised, with frequent mentions of “skills” and “willingness to work”. Failing institutions are presented as the only obstacle in a country that considers migration “a success story [...] and a sign of a healthy country” (Dail, centre-left, 29/04/2015).

Irish media also present remarkable uniformity, despite the *Irish Times* adopting a more neutral and nuanced tone compared to the *Independent* and the *Irish Sun*, reflecting its more moderate stance (Eberl et al. 2018). The humanitarian frame is still relevant: shipwrecks and rescues are reported using emotionally charged terms such as “ordeal” and “tragedy”. The victimhood of forced migrants is enhanced by communicating their powerlessness and hopelessness: “luck has run out [...] they don’t stand a chance” (IT, 25/11/2021). However, media discourse prominently features the physical threat frame and the emergency frame, especially with reference to crime and social unrest: new centres cause “alarm” and threaten to “split families” and communities over whether forced migrants should be welcomed (IT, 07/12/2019); Ireland could be “flooded with migrants and jihadis” hiding in their midst (IT, 10/03/2015). Indeed, Breen et al. (2006) already noted Irish newspapers’ negative coverage of forced migration nearly twenty years ago.

Italian parliamentary discourse is more polarised, reflecting the polarisation and volatility of Italian politics (Emanuele and Chiaramonte 2020). While political orientation does predict a slightly different use of certain frames (see below), there is uniformity in which frames are used, despite the fragmented political panorama. Political discourse disproportionately focuses on a negative depiction of forced migrants. Migrants are “bandits of every race” (Camera, far right, 05/07/17), “being paid double the social pension” (Camera, centre-right, 06/06/2018) and “importing cultural models of abuse and violence” (Camera, centre-left, 17/05/2016).

Italian newspapers, conversely, heavily employ the humanitarian frame and the language of pain and suffering. Events involving forced migrants are “tragedies” and “massacres”; migrants are passive victims of “endless horrors” and “callous” smugglers before being “saved” by Italy: “walking skeletons [...] exhausted, similar to survivors of Nazi camps” (CS, 13/09/2022). Mentions of the threat frame are much sparser and often presented together with reassuring statements from authorities or experts, which offer readily available cues (Hellwig and Kweon 2016): for example, “the Pope invites [Italians] not to be afraid. Reception is not a threat” (CS, 17/04/2016). The more conservative *Corriere della Sera* tends to use less emotionally charged language than *Repubblica* and *La Stampa*, but similarly to Ireland, the predominant frames are the same⁷.

This unexpected mismatch between predominant frames in parliamentary and media discourse could be explained by examining the interplay of different drivers of frame emergence, which may be constructed differently in different contexts. Variation in the relevance of a particular frame may be explained by cross-country differences in contextual elements that drive the

5. Several other Italian newspapers (*Liberio*, *il Giornale*, *la Verità*) are very vocal broadcasters of negative discourse toward immigrants. However, their reach is comparatively small (Accertamenti Diffusione Stampa 2023).

emergence of that frame; however, the relevance of the same frame in both contexts may not result from similarities in contextual drivers, but from different country-specific processes.

For example, assuming that economic circumstances influence the relevance of the “immigration as economic threat” frame, the positive Irish political discourse and the negative Italian political discourse are easily explained. The Irish economy is fast-growing and immigrants do not significantly raise expenditures in a marketised welfare system (Murphy and Dukelow 2016); on the other hand, the Italian economy is stagnant and faces an imminent crisis in welfare financing (Sacchi 2018). This is consistent with literature describing how larger welfare states fuel anti-immigration economic concerns (Fietkau and Hansen 2018). Political contextual factors may also partially explain the internal homogeneity of political discourse: the instability of Italian governments, coupled with the increased relevance of populist parties and the salience of immigration, may push all political actors to “stoop down” to the discourse of far-right populist parties in order to maintain electoral appeal (Mudde 2013). In Ireland, on the other hand, the political system is characterised by stability, broad consensus and a moderate tradition. Radical anti-immigration discourse has not yet entered the mainstream political arena (Munck 2011), so political actors may not feel compelled to adopt populist tones. The uniformity of Italian political discourse is explained by polarisation and competition, whereas the uniformity of Irish political discourse is explained by consensus and moderation.

National economic and political circumstances, however, are not the only drivers of frame emergence and thus cannot completely explain what frames will be relevant and how they will be constructed. Forced migration engages many other elements that may have an influence on the relevance and content of frames. The continued predominance of negative frames in Irish newspapers, for example, may reflect the increasing relevance of the “immigration as a socio-cultural threat” frame in the Irish context, exemplified by the recent spate of anti-refugee protests across Ireland (Irish Times 2024). In this case, the media is exercising its role of “watchdog” by providing alternative depictions of reality to political discourse (Fawzi and Mothes 2020) and in doing so, amplifying the relevance of a specific frame already echoing elements of national history such as the rejection of “unwanted others” (Breen et al. 2006).

On the other hand, the coexistence of different frames may not necessarily mean they are truly competing. The humanitarian/victimisation frame typically adopted by Italian newspapers reflects a general tendency to use highly evocative terms (Sciortino and Colombo 2004) and does not necessarily indicate a more positive stance: rather, it constructs a hierarchy of deservingness through suffering, which is used to organise and prioritise state and societal responses in a context of drastically limited resources (Vollmer and Karakayali 2018). While the media discourse may appear to downplay the threat of immigration by showcasing migrants as powerless victims, the

focus on arrivals implicitly plays into the discourse of emergency and chaos, and thus into an ultimately negative discourse. The relationship between media and political discourse is more covert: they appear to differ but are ultimately part of the same system of meanings, and thus used concurrently and not competitively.

Despite Irish and Italian discourses using the same frames, other elements differ. Frames are containers of meanings that may be constructed differently and encompass different combinations of elements, connections and tones. These differences are key to obtaining a more detailed understanding of what shapes the content and boundaries of a certain frame used in a certain context, and thus explaining the specific relevance and use of that frame. We focused on characteristics and elements that recur across frames, such as the tone and intensity of discourse, the role of national identity and of the EU.

Overall, Irish discourse is more nuanced and neutral. This is evident, for example, in the appellatives used for forced migrants: Italian actors routinely use charged terms such as *clandestini* or “illegal migrants”, which implies surreptitiousness and lawlessness; “immigrants”, which emphasises the perspective of the burdened host country; or even “self-defined refugees” to suggest a morally dubious status. Irish actors mostly use “refugees”, which implies membership of a vulnerable category protected by law, or the more neutral “migrants”. The role of deservingness, national identity, and the EU also differ across countries, and plays a role in strengthening or qualifying different frames (see Table 4).

Theme	In Irish discourse	In Italian discourse
Tone	More nuanced; tends to be more neutral and bureaucratic, especially in parliament; limited use of dramatizing and emotional language; language related to emergency, threat and violence rare and only in the media	Less nuanced; ample use of dramatizing and emotional language; language related to emergency, threat and violence is very common in parliament, very rare in the media
Deservingness	Positive in parliamentary discourse i.e. forced migrants are deserving	Negative in parliamentary discourse i.e. most forced migrants are

	people; more negative in media discourse	undeserving people; more positive in media discourse
Self-reflection	Both positive (Ireland as a model EU country, a small state that does more than its share, and a country with a strong sense of hospitality) and negative (national sense of shame due to past institutions of confinement, falling behind other EU states). Exceptionalism in managing forced migration is a conscious effort	Positive view of Italy as a country with a strong tradition of hospitality, piety, and support of human/civil rights. Exceptionalism in managing forced migration is forced
Views of the EU	Nuanced but overall positive; non adversarial	Negative; adversarial

Table 7. Main similarities and differences in Italian and Irish political and media discourses about forced migration

2.6.2. *Tone*

Italian discourse on forced migration is heavily charged. Parliamentary discourse frequently uses terms from the semantic field of aggression, war and violence: arrivals of migrants are “hordes” or “invasions”, and the whole political spectrum calls for assertive action, “fighting” and “defending” citizens from “a large attack to security and social cohesion” (Senato, far right, 25/10/2016). This semantic field is frequently associated with that of uncertainty and chaos, which conveys a sense of ominous threat; the crisis is “uncontrollable” or “unstoppable”, and Italy is perpetually “on the brink of collapse” (Camera, centre-right, 05/07/2017). This inability to cope is almost never presented in terms of structural inadequacy, but rather as the natural consequence of monstrous numbers of arrivals: no country could possibly cope. This discursive artifice removes responsibility from Italian institutions and shifts it on the migrants themselves. The language of emotions and suffering is also widely used, albeit weaponised differently by different political actors, in line with the polarisation of Italian parliamentary politics (Emanuele and Chiamonte 2020). Right-wing actors use the humanitarian frame to call for restrictive measures: “The true humanitarian gesture

is stopping arrivals: encouraging them means increasing deaths in the Mediterranean” (Senato, centre-right, 12/09/2018). Left-wing actors use the same frame and morally grounded reasoning to call for more rescue operations and the opening of humanitarian corridors.

Irish parliamentary discourse appears more nuanced and less charged. The central element is the inadequacy of DP, a “broken”, “disgraceful” institution, “a system of shame” (Seanad, centre-left, 27/04/2017) and “a blight on our State” (Seanad, centre, 12/12/2017). Unlike Italian discourse, Irish discourse is inwardly focused, placing responsibility internally and creating a lasting sense of shame and inadequacy. The language of emotions and suffering is used to mobilise a sense of empathy for fellow humans, which must drive policy improvements: “behind the campaign for change and the necessity for reform are real people” (Dail, centre, 22/04/2021). The semantic field of violence, aggression and defence is not commonly used, and calls to action are centred on respect for international law and human rights instead. The more detached tone of Irish parliamentary discourse speaks to its tradition of broad consensus, moderate politics and scarce politicisation of immigration (Munck 2016).

As previously mentioned, the tone of media discourse is quite different from parliamentary discourse in both countries. Italian newspapers typically use emotionally charged language within a humanitarian frame, to depict migrants as helpless victims of smugglers or of an incorporeal “tragic destiny”: “the sea has swallowed them and will never give them back” (S, 24/08/2014). Articles often use narrative devices and metaphors to increase dramatisation: for example, a migrant boat is described as “carrying its cargo of death” (S, 22/10/2022); a migrant is “emanating pain from every part of himself. His torment is mute and tearless, and yet it is tangible and seems to fill up the room” (R, 17/01/2019). In this narrative framework, Italians are often the “heroes” who save desperate migrants; positive actions are claimed and attributed to relatable human figures, whereas inaction that leads to death is ascribed to “fate” or to traffickers, removing Italian responsibility.

Irish media discourse is more charged than parliamentary discourse. While still using the humanitarian frame when referring to the “plight” of forced migrants travelling to Europe, it features the threat frame when discussing arrivals to Ireland and Irish reactions: dangerous, “unvetted”, possibly “fake” asylum seekers. Discourse is organised in concentric areas: when forced migration takes place outside of Ireland the humanitarian frame prevails, but it is replaced by a growing sense of uneasiness when events happen in Irish communities. This apprehension is generated not only by forced migrants, but also by those Irish people who oppose them, presented as an anomaly in the fabric of Irish society: unidentified people, possibly “organised criminals”, attack centres, forcing asylum seekers to be relocated (IT, 27/08/2022); locals are “shocked” and “appalled” by anti-refugee protests organised by unknown people “not from the town” (II,

03/12/2022). Once again, discourse constructs a dangerous and uncertain environment, but in Ireland this uncertainty comes from within as well as from without.

2.6.3. *Deservingness*

Italian parliamentary discourse denies the deservingness of migrants. Deservingness is seen as originating in suffering: “fake” and “real” refugees are labelled and juxtaposed, assuming that “real” refugees are an infinitesimal minority adhering to a stereotyped image of extreme vulnerability. Migrants’ appearance and actions are scrutinised for elements that do not fit this image, and thus give them away: “They have smartphones, but who are they talking to if they are poor and malnourished? Not all who arrive look malnourished” (Senato, far right, 25/10/2016). Undeserving migrants who “spend their days doing nothing” (Senato, centre-left, 17/02/2016), are also unfavourably compared to Italian citizens, who are vulnerable – pensioners, disabled people and families - or self-sacrificing – taxpayers, hard workers and members of law enforcement who selflessly save migrants. The traits attributed to Italians are thus exclusively and exactly the opposite of those attributed to migrants.

In media discourse, deservingness is also earned through pain and suffering, which are central elements of the migrant experience and therefore painstakingly explored, as this excerpt (S, 22/10/2022) on a rescue operation exemplifies:

[Rescue crews] approach the boat and find the horror within: the burnt bodies of two children in a corner of the cramped boat, a pregnant woman in the throes of death, 35 more migrant women crying in shock. Some are looking for friends and relatives lost at sea, some are crying, some are trying to muster the strength to recount what happened [...].

Forced migrants are mostly portrayed as vulnerable, with an emphasis on pregnant women and children. They are victims, with no recognition of agency or individual identity: they are reduced to their painful migration experience and therefore to figures of “humanitarian rescue” (Wright 2014). There is a hierarchy of deservingness (Ongenaert and Soler 2024) that results from a hierarchy of suffering: newspapers often report the different nationalities of arrivals, remarking how “most of them” or “only a few” are from countries that produce “real refugees”, such as Syria or Eritrea. Deservingness is also constructed as being earned through willingness to integrate: good migrants accept to be identified, learn Italian, and “make themselves useful to the community” (R, 01/10/2016) by volunteering, fulfilling criteria set unilaterally by the host country (Haw 2021).

In Ireland, by contrast, parliamentary discourse depicts migrants as victims, but also as skilled “entrepreneurs and innovators” (Dail, independent, 29/04/2015) who “should be allowed to demonstrate their talents, contribute to society, build the economy” (Seanad, centre, 27/01/2016). This discourse affirms migrants’ agency, but also circumscribes it as strictly linked with employment and economic integration: migrants are deserving because of their potential

contribution to the economy (Haw 2021). The depiction of migrants as victims is also qualified: their victimhood is not inherent, but perpetuated by failing Irish institutions. “No one in DP wants to be on social welfare” and they “could make a massive difference to our communities and the country if they were not caught up in the system year upon year” (Dail, centre, 22/06/2021). Irish media echo this discourse by telling the “success stories” of integrated migrants who pursue education and volunteer: “Claiming benefits would be an embarrassment for us” (IT, 20/09/2017). However, Irish media also feature stories about less deserving asylum seekers, who committed crimes, did not comply with the “good” refugee stereotype, or submitted unfounded claims. For example, the *Sun* (21/06/2017) describes a “roaring” “ISIS terror suspect” being deported after his application was rejected and “terrifying Aer Lingus passengers” on the flight, conflating the two labels of “fake” refugee and possible terrorist; while the *Independent* published an account of a Pakistani woman who “refused to shake hands [with a man] on the grounds it is against her religion [*sic*]”, which “isn’t acceptable in our societies” (16/01/2017). These different discourses on migrant deservingness are linked to the different relevance of the economic threat frame in the two countries, as in both cases deservingness is constructed as being largely based on potential economic contribution. While the latter is anticipated in Ireland, Italian discourse rejects the possibility, assuming that most migrants are “fake” and all “fake” migrants will be burdens. At the same time, the Irish media questions deservingness by hinting at an emergent sense of cultural threat.

2.6.4. Self-reflection and national identity

There is not much critical self-reflection in Italian discourse. In parliamentary discourse, parallels with Italian emigration are drawn to mark a stark difference between hardworking, law-abiding Italian emigrants and undeserving, freeloading “fake” refugees: “Our emigrants would migrate to work [...] they lived in extremely harsh conditions [...] and were not idle all day like many illegal immigrants in our cities” (Camera, centre-right, 03/12/2020). Italy paints a totally positive image of itself, emphasising a strong tradition of Christian compassion, respect for human rights, and a capacity “to give our best in the face of difficulties” (Senato, centre-left, 11/06/2014). Italians are selfless people “who open their homes to migrants [...] they consider their adoptive sons” (R, 04/10/2014) and greet migrants “as if they just opened their front door to a friend” (R, 29/08/2015). Similarly to Ireland, Italian politicians present Italy’s efforts in rescuing and receiving forced migrants as exceptional, but discourse is ambivalent on this: while this outstanding effort reflects the exceptional character of Italian citizens, it also stems from the unwillingness and incompetence of other countries and EU institutions, the only failing institutions contemplated in Italian discourse. Exceptionalism is at least partly forced by circumstances: Italy does not shy away from active engagement, “singlehandedly starting the *Mare Nostrum* rescue operation [...] giving lessons in civilisation to Europe and the rest of the world” (Camera, centre-left, 06/08/2018), but does so begrudgingly and against its best interest.

Irish discourse, conversely, is marked by frequent self-reflection. Politicians and the media reflect on what Irish asylum policy says about the national character and compare it to the historic institutionalisation of “unwanted” people in places like Magdalene laundries or mother and baby homes. DP is seen as another manifestation of Ireland’s inability to deal with unwanted people: it is “the Magdalene laundries of our day” (Dail, centre-left, 13/11/2018). This discourse is heavily permeated by themes of shame: “we cannot hold our heads up as a country if the situation continues” (Seanad, centre-left, 23/10/2013). Moved by this sense of shame, Ireland must and can do better, to live up to its reputation as the “country of a thousand welcomes”. Calls to action are centred upon deep-rooted elements of national identity such as the “Irish welcome”, but they also imply a sense of inferiority, and again shame, toward other countries: “we have left the poorer countries to pick up the refugees [...] what number have we taken in?” (Dail, independent, 21/04/2016). Parallels with Ireland’s own experience of emigration are used to strengthen these calls to action: “Of all the countries in Europe, one would imagine that we would do our best to support [refugees]” (Dail, centre-left, 09/06/2015); “We owe it to the millions who left our shores fleeing famine [...] to do better” (II, 27/02/2021). At the same time, this discourse emphasises Irish exceptionalism: Irish people are doing more than their share thanks to a proverbial welcoming spirit and unique empathy with those who suffer due to Irish experiences of emigration and famine. Irish exceptionalism is the result of a conscious national effort to welcome forced migrants: “It is to our credit in Ireland that when it comes to our moral and historical obligation to open our doors, our families and our communities, we step up and it is not a point of political debate” (Dail, centre-left, 01/07/2022). These themes are uniformly used across parties and newspapers, drawing a distinction between institutional action and the character of the Irish people.

Shared notions of identity can have a role in frame emergence: narratives about immigration often say as much about the host country’s self-identity as they do about newcomers (Pottie-Sherman and Wilkes 2014). Italy’s self-conceptualisation as a deeply altruistic society which is constantly attacked and seldom rewarded strengthens the relevance of the threat frame. Conversely, the element of shame in Irish collective identity fosters a desire to make up for past wrongs: an emphasis on the humanitarian frame offers an opportunity for collective redemption linked to easily recognisable tropes and public conversations. This finding suggests the importance of shared history and ideas of collective self in determining how and why certain frames are adopted.

2.6.5. *The EU*

In line with their different experiences of forced migration, Italy and Ireland produce different discourses on the EU. In Italy, where populist, anti-EU rhetoric has been particularly powerful in recent years (Emanuele and Chiaramonte 2020), the EU is presented as ignoring a problem which is pointedly conceptualised as European, and not just Italian. In both parliamentary and media

discourse, Italy is a “designated victim”, “abandoned”, slowly becoming the dystopian “Europe’s refugee camp”. EU rules are “unfair”, “opaque” and “imperfect”; EU summits and resolutions are “useless”. This discourse reinforces the idea of Italy as an exceptional country in its martyrdom, by placing it, alone, on one side of a clearly antagonistic relationship with the EU: “We did not pull back and [...] we saved not only thousands of lives, but the honour of our country and Europe” (Camera, centre-left, 17/01/2018). At the same time, right-wing actors use it to strengthen a general anti-EU rhetoric: “these institutions don’t care about our problems” (Camera, far right, 14/06/2017). The Italian approach to the EU is presented as an adversarial show of force by governments of all colours: for example, centre-left Prime Minister Gentiloni claims that “Italy will attend the next EU Council with her head held up high, thanks to the results we obtained” (Camera, centre-left, 12/12/2017); shortly thereafter, far-right Minister Salvini is praised for having “finally let our country’s voice be heard loud and clear,” having “rebelled against the impositions of other [EU] countries who completely mocked and forgot Italy” (Camera, far right, 19/06/2018).

In Ireland, discourse about the EU is more nuanced: “fortress Europe” is sometimes criticised, especially by members of the opposition, for its “inhumane”, “cold” and “bureaucratic” approach to the migration crisis. At the same time, there is a strong shared sense of the importance of EU policy and institutions: unlike in Italy, EU meetings and resolutions are described in detail and amply debated. These findings support existing literature about Irish attitudes to European identity and the EU (Simpson 2019): Ireland is conscious of its small size and believes the EU is the only arena where it can play a decisive international role; it places itself firmly within the EU camp and never questions its adherence to European values and rules. This extends to the media, where usage of “we” to signify “Europe” in phrases such as “we must embrace desperate people” (II, 23/09/2016) conveys a sense of identity and collective action.

In this case too, the two countries’ conceptualisation of their relationship with and role within the EU, not only in the present but historically, drives how frames are mobilised, constructed and used. Italy’s self-image as a country that has been abandoned and its controversial relationship with the EU in recent years, especially on matters of migration (Consterdine 2018), fuels the relevance of the emergency frame and the threat frame. On the other hand, the collective self-image of Ireland involves much less contestation and much more appreciation of EU membership and its advantages for a small, peripheral country (Simpson 2019): in this context, and considering that asylum policy is increasingly a EU prerogative, it makes sense to emphasise how forced migration should not be an element of contention and how Ireland can constructively play its part.

2.7. Conclusion

We analysed political and media discourses on forced migration in two countries characterised by some sociocultural similarities but different political, economic and migratory contexts. Ireland is

a country with a stable political and economic system and peripheral in the refugee crisis, while Italy is politically unstable, economically stagnant and at the coalface of the crisis. We examined commonly employed frames to assess whether these differences determine a difference in how frames on forced migration are constructed and used. Furthermore, based on the literature on the drivers of frame emergence, we expected key events perceived as “crises” to rearrange frames.

We found that different political, economic and migratory contexts do not accurately predict the emergence of different frames in public discourse about forced migration. Instead, differences and similarities may be better explained by analysing country-specific processes and contextual elements, and can also be only apparent (van Gorp 2007). First, political and media discourses in Italy and Ireland remained consistent over time between 2013-2022, suggesting that key events result in temporarily increased coverage but do not significantly change frame relevance or use. Secondly, in each country conservative and progressive newspapers and left-wing and right-wing politicians systematically use very similar frames and tropes when discussing forced migration. Traditional political cleavages and ideological differences thus do not necessarily predict the use of different frames (Beck 2021; Valente et al. 2021; Padilla et al. 2024). Furthermore, this internal homogeneity in political discourse may emerge from opposite processes of consensus and polarisation.

Third, observing the relationship between a country’s collective identity and history, and the way it conceptualises and frames forced migration provides insights into the use of different frames. Especially in political discourse, preexisting institutionalised national framings tend to prevail: countries shape discourses based on shared identity, historical legacies and traditions in EU relationships (Nickels 2007; Triandafyllidou 2017; Consterdine 2018; Padilla et al. 2024). In our sample, this is exemplified by the inter-frame relevance of themes such as national history and the role of the EU. However, even in this case similarities do not necessarily result in similar use of frames. Ireland is an example of a country where national identity and values have been moulded by a history of emigration and a history of collective trauma, anger and shame deriving from the systematic institutionalisation of the unwanted. Discourse about asylum policy is informed by these elements and is largely an exercise in self-criticism and self-flagellation. Contrast this with Italian discourse, where a history of emigration is deployed to shirk moral and political responsibility for asylum policy, and migration is constructed as an attack on a country which is unable to cope. The discursive relationship between national identity and forced migration results in specific ways of conceptualising, constructing and deploying communicative frames.

Fourth, while media and political discourse are internally homogeneous, they appear to be in contrast with each other. In Ireland, attitudes and political discourse on immigration are positive; however, the Irish media predominantly use the threat frame, perhaps reflecting increasing anti-

immigration unrest, and suggesting that different contextual elements are constructed differently across arenas of public discourse and thus result in different frames acquiring relevance. The Irish media may be following their tradition of otherisation (Breen et al. 2006) in constructing migrants as a threat, perhaps also influenced by the popularity of British media and of Irish versions of British tabloids (Sweetman 2006), which are largely anti-migrant; while political discourse uses the Irish tradition of excluding the “unwanted” as a counterpoint to and strengthen the humanitarian frame. In Italy, despite negative social attitudes and a hostile political discourse, media outlets disproportionately employ a humanitarian frame; however, this frame may still be implicitly functional to a negative discourse and thus the mismatch may only be apparent.

This paper focused on frame emergence and found that countries produce and use frames in unique ways based on the specificities of their context and on what contextual elements acquire salience; thus, findings are hardly generalisable. However, this approach can provide a blueprint for broader comparative research: our analysis can be expanded to more countries to investigate how each set of country-specific elements produces frames with unique contents, boundaries and modes of employment. The analysis should be informed by our findings that apparently similar frames may be the result of profoundly different processes of conceptualisation and construction, and that conversely, seemingly diverging frames may mask convergence around the same underlying discourse perpetuating certain structures of power. A context-driven analysis of framing practices and resulting frames should then interrogate the effects of such frames and their policy implications: for example, the possible relationship between mismatched media and political frames and the increasing perceived distance between elites and citizens, accompanied by the emergence of populist policies. Frames’ relatively unchanging nature, their deep-seated cultural origin and their impermeability to “crises” or pivotal events should also lead research to ask what is the true role of frames in influencing public opinion, social attitudes and policy choices.

Chapter 3: Workers' experiences in non-profit and for-profit managed asylum systems: a comparative analysis of Italy and Ireland

3.1. Abstract

Does the management of asylum systems by non-profit as opposed to for-profit organisations affect workers' experiences and satisfaction? This study explores this question through interviews with workers and other stakeholders involved in the daily implementation of asylum policy in Italy and Ireland: Italy has a public system managed by civil society actors, whereas Ireland subcontracts management to for-profit actors. We find that job satisfaction is generally high; however, a non-profit system improves workers' experiences by providing value-based meaningfulness and interconnectedness with other public services, whereas a for-profit system provides less support in terms of available networks, regulation, transparency and accountability. We argue that each system is the product of its state's administrative tradition, which also shapes workers' conceptualisation of job satisfaction; however, a for-profit implementation model is ill-suited to asylum policy, especially when located within a broader context of marketised state services.

3.2. Introduction

Forced migration has been at the forefront of European public debates over the last decade. Despite repeated attempts at policy harmonisation within the European Union and calls for the fair redistribution of forced migrants, European states continue to implement their own very diverse asylum policies. This includes reception conditions for forced migrants, which vary considerably across countries (AIDA 2020).

Asylum policy implementation is also flawed: in various national contexts, reports have highlighted long waiting times for decisions on asylum status, cramped, unhygienic and unsafe living conditions, scarce access to services such as healthcare, education and employment opportunities, and episodes of racism and discrimination from local communities, asylum services staff and other institutions, especially towards non-white migrants (AIDA 2020). Variation in implementation has also been observed within countries: the "localised" element of asylum policies, or the influence of local context in shaping how policy is implemented, is consistently more relevant than the "globalising" impact of international norms pushing for uniformity of practices across and within countries (Glorius and Doornik 2020).

While it is evident that asylum policies are highly diverse and imperfectly implemented, it remains unclear what combination of factors determines implementation outcomes. Asylum systems are state institutions, embedded in a context which influences their design. System design in turn influences organisational culture, working conditions and workers' practices. Within this complex chain of relations, we focus on the possible relevance of asylum systems' non-profit or for-profit nature for asylum policy implementation. How does the non-profit/for-profit orientation of organisations implementing asylum policy impact working conditions for their workers, and

therefore the functioning of asylum systems? We compare the asylum systems in Ireland and Italy. The Italian SAI system (*Sistema di Accoglienza e Integrazione* or Reception and Integration System) is managed by city councils through non-profit actors such as charities and social cooperatives, whereas the Irish Direct Provision system is entirely subcontracted to private, for-profit actors. Interviews with workers, civil servants, and volunteers are analysed to assess whether and how their experiences and perceptions are influenced by the privatised or non-privatised design of the asylum system.

Research on asylum systems has not fully explored the perspectives of the workers who are responsible for their daily functioning, nor how the non-profit or for-profit design of the system may influence their experiences. We seek to compare how workers and other stakeholders involved in the daily management of asylum systems experience their job in two different models, one for-profit and one non-profit. Based on our findings, we argue that non-profit models may be ill-suited to addressing the complexities of asylum systems and adequately supporting asylum workers in their tasks.

3.3. Literature review: asylum policy and its privatisation

Countries which receive asylum applications are responsible for hosting applicants while the application is processed. Asylum policy has some characteristics that make it distinct and particularly contentious compared to other policy areas such as healthcare or education. It has to respond to an unpredictable phenomenon such as forced migration, which introduces a visibly different group into the polity that cannot be rejected due to international law obligations; it is explicitly targeted toward non-citizens; its beneficiaries have particularly complex and acute needs, which require an accordingly complex system of concerted policy actions; the dispersal of forced migrants across the receiving country's territory involves a wide and diverse range of actors, processes and local contexts in service delivery. For all these reasons, asylum policy choices are likely to be particularly contradictory, polarising, and often unsuccessful (Breidahl and Brodtkin 2024).

If asylum policy is conceptualised as a process from first reception of asylum seekers to recognition of refugee status and full integration, there are many points along the way where this process could vary, thanks to the influence of multiple factors. Research has highlighted several of these factors: political and media discourses (Krzyżanowski et al. 2018), macroeconomic trends (Heizmann et al. 2018), social attitudes toward migrants (Wang and Kim 2020), local constraints and resources (Glorius and Doornik 2020), the culture of the specific organisation tasked with implementing policy (Shiff 2021) and even the individual characteristics of workers (Giudici 2020). All these interact at different levels to produce the daily implementation of policy grounded in its specific context.

The design of an asylum system as publicly or privately managed is one of these multiple influencing factors, whose significance has not been thoroughly explored. Privatisation of asylum services follows the neoliberal turn in public administration adopted by Western countries from the 1980s (Peters 2012). This approach introduced privatisation, managerialism and principles of cost-effectiveness into public services to various degrees. The choice of privatising state institutions has wide-ranging consequences on their functioning, including the experiences of its workers. Organisational sociologists have long drawn attention to how institutional context affects the behaviour of workers by creating shared cognitive and normative frameworks (Olsen and March 2004). Privatising public services changes their organisational context, and therefore workers' attitudes and practices.

The literature on the non-profit versus for-profit delivery of public services, while not always adopting a comparative framework, illustrates how privatisation opens public services to market competition, increasing fragmentation and inequality in working conditions and undermining both job quality and labour protections (Mori 2017; O'Neill et al. 2023); by blurring the boundaries between public and private, it creates new categories of "private state workers" (Maron 2020) employed by private companies but delivering public services, who must balance private sector practices and priorities with the imperatives and boundaries of public service provision; it even changes the nature of workers' attachment to their job, emphasising ideals of self-management and self-entrepreneurship instead of community and solidarity (Musilek et al. 2020). These changes add complexity to workers' experiences and create new puzzles and analytical categories for research.

The nascent for-profit "asylum industry" (Darling 2016) involving private actors to varying extents has caused a public/private divide in asylum service provision, which is not extensively addressed by comparative research on asylum systems (Caponio et al. 2019; Glorius and Doomernik 2020). Conversely, research examining the consequences of privatisation on the implementation of asylum policy lacks an explicitly comparative element, and it mostly focuses on its effects on migrants rather than workers. Nonetheless, these studies (Darling 2016; Humphris and Sigona 2019; Vianelli 2022) highlight how privatising asylum services encourages budget-saving decisions and the emergence of multiple providers; this in turn causes uneven delivery of services, disperses expertise and increases insecurity, ultimately widening the distance between upper management and field workers and between field workers and service users. Distance and fragmentation hinder accountability, leaving more space for violations of migrants' rights (Yin 2023).

Despite increasing privatisation, public or non-profit provision of asylum services remains common, usually within a multilevel governance framework which allows local governments to

control many aspects of it (Caponio et al. 2019). This multilevel structure creates the potential for conflict between levels (Ambrosini 2021), normative confusion and breakdowns in communication which can negatively affect the functioning of the system (Caponio et al. 2019). The increasing involvement of civil society, often only at the local level and for selected services, implies that fragmentation, uneven quality of service and lack of coordination between providers can be obstacles in this model, too. However, civil society involvement also fosters the social inclusion of migrants thanks to pre-existing links with local communities (Galera et al. 2018).

The literature also tends to overlook frontline workers and other stakeholders managing the asylum system in favour of other subgroups involved in asylum policy, such as legal caseworkers assessing asylum applications (Shiff 2021, Miaz 2024) and mainstream social workers occasionally interacting with migrants (Humphris and Sigona 2019). Very few studies (Giudici 2020; Giacomelli 2023; Breidahl and Brodtkin 2024) examine the staff of reception centres; yet these are the workers implementing asylum policy in its most tangible and ordinary way, catering to the daily needs of forced migrants and mediating their contact with the host society (Giacomelli 2023). They are “street-level bureaucrats” (Lipsky 2010) who implement policy in its context. Existing research has highlighted the complex, delicate and highly relation-oriented nature of their daily practices (Giacomelli 2023); their ability to critically appraise and challenge the system (Giudici 2020); and their discretion in adapting policy to its context, concretely determining its content and form (Breidahl and Brodtkin 2024). Including the perceptions and experiences of frontline workers is crucial to understanding how the system works and why, and could provide insights that research on other aspects of asylum policy, such as legal procedures, overlooks. Furthermore, none of the existing studies compare asylum workers’ experiences across different countries, institutional contexts and models of asylum governance, for example public versus private.

We ask how privatisation impacts asylum policy implementation as observed through workers’ perspectives. This approach views the asylum system’s design, the working conditions of asylum street-level bureaucrats and the final outcomes in terms of workers’ actions as part of the same continuum in asylum policy implementation. While acknowledging that many other elements influence how an asylum system works, we focus on the non-profit versus for-profit nature of the system due to its wide-ranging implications and its understudied relevance. At the same time, we highlight the perspective of street-level bureaucrats due to their role as ultimate agents of policy implementation whose work is affected by the for-profit or non-profit institutional context. This study seeks to complement our understanding of how asylum policy works on the ground and to provide a starting point for analysing the link between institutional context and outcomes for forced migrants.

3.4. Asylum in Italy and Ireland

Both Italy and Ireland have adopted EU directives on asylum policy. The resulting asylum process is very similar: migrants apply for asylum and can receive refugee status, other forms of protection or a rejection. Rejections can be appealed. While the application is processed, migrants can avail of reception systems which include accommodation and other forms of assistance. While there are minimum EU standards, the nature and extent of this assistance vary widely across countries.

The Italian SAI system was introduced in 2001 based on pre-existing community-based reception systems, developed by some municipalities in 1999 in the absence of a clear legal and administrative framework. It is based on bottom-up, multilevel governance, devolving many powers and responsibilities to local authorities and civil society actors.

SAI is predicated on the concept of “diffused reception”, whereby forced migrants are dispersed through a city in own-door accommodation or small shared facilities. Ownership of SAI lies with municipalities, who volunteer places according to capacity; they then subcontract management to non-profit actors, such as social cooperatives and NGOs, selected via public tender. The Ministry of the Interior establishes minimum standards for accommodation and services, distributes beneficiaries, and periodically inspects facilities and staff. SAI is regulated by “operators’ manuals” containing exhaustive rules and guidelines for the management of beneficiaries and the composition of the working team. These documents acknowledge that integration looks different for each individual; the ultimate goal is thus to develop personalised pathways to integration and autonomy for asylum seekers and refugees. This involves a holistic, flexible and individualised approach, with multiple professionals addressing different dimensions of integration, such as job training and job security, Italian language proficiency, healthcare and childcare, access to welfare and leisure activities. Manuals emphasise teamwork and recommend close cooperation with other state institutions and civil society actors, relying on the resources the community offers. SAI also mandates regular staff meetings with psychotherapists. Financial transparency and budget requirements are particularly strict: SAI projects must provide detailed quotes to participate in tenders, but are only funded through reimbursements after they have justified appropriate expenses with receipts, according to detailed lists of reimbursable items and services. SAI has been praised for its long-term perspective, organic approach, and emphasis on own-door accommodation and autonomy (D’Angelo 2019; Giacomelli 2023).

SAI is, however, also challenged by its decentralised nature and participatory framework. Because participation is voluntary, local authorities can and do refuse to receive migrants (Ambrosini 2021). Beneficiaries are distributed randomly, based almost exclusively on availability, and experiences differ significantly across regions and cities (Oxfam 2017). The decentralised nature of the system means that local authorities have the power to create formal and informal

barriers to rights (Ambrosini 2021). Finally, the heavy regulatory and bureaucratic requirements can cause confusion and conflict with the central state (D'Angelo 2019; Giacomelli 2023).

It should be noted that while SAI is the official Italian asylum system, a growing number of “emergency” reception centres (*Centri di Accoglienza Straordinaria* or CAS) have been established since 2011, in response to increasing and unexpected numbers of asylum seekers. CAS centres require much less bureaucracy and resources and are oriented to cost-effectiveness, resulting in large, self-sufficient structures, a reduced budget, fewer staff, and fewer services for migrants. Unlike SAI tenders, CAS tenders are open to private firms. Latest figures (Ministry of the Interior 2023) show that SAI is hosting approximately 25% of all forced migrants in Italy.

The Irish Direct Provision system (DP) offers a completely different picture. It was established in 1999 and has remained unchanged since. It has no footing in statutory law, but it is based on a series of administrative circulars. It is the only EU asylum system where executive responsibility is entrusted exclusively to service providers (EMN 2014). DP is overseen by the International Protection Accommodation Service (IPAS), part of the Department of Children, Equality, Disability, Integration and Youth (DCEDIY). All DP centres are privately managed by for-profit actors, including multinational corporations, property management firms, events management firms, and hospitality firms. Ireland uses a European tender procedure targeting suppliers of “hotel services and other accommodation services” for the provision of “catering services, cleaning, laundry facilities, provision of certain consumables and security services” (DCEDIY 2022). Sample contracts (IPAS 2016) cover minimum accommodation standards, catering services, security norms, payments to the contractor and penalties in case the contractor fails to deliver “mandatory services” such as food and cleaning. Contracts require an “appropriate” number of staff vetted by the police. No other services are mentioned, although the contractor is required to “conduct regular meetings with residents to disseminate information and allow residents to raise any issues of concern”, and to “maintain all existing arrangements with outside agencies (e.g. NGOs, Health Boards, and educational or other support groups)” (IPAS 2016).

DP is mostly based in large collective facilities where residents share rooms. Access to healthcare, welfare, education, and other services is mainstreamed: the system does not mandate assistance beyond a weekly allowance of around €40, and residents are expected to use mainstream channels to access public services (Office of the Ombudsman 2018). DP has been described as a system of institutionalised legal, social, and spatial exclusion (Ní Raghallaigh et al. 2019). Various studies have documented substandard living conditions and their detrimental effects on the mental health of residents (Moran et al. 2019), family life and child wellbeing (Ní Raghallaigh et al. 2019). Inequalities in accessing services and resources have been reported, in some cases due to workers’ individual discretion (Office of the Ombudsman 2018). DP has also been criticised for a lack of

transparency and accountability, as contractors are not directly subject to the scrutiny of public law (IHREC 2019). In 2021, the Irish government announced a reform plan to overhaul DP, which however was never implemented. Moreover, the increase in the number of asylum seekers has caused the proliferation of emergency accommodation centres (EROCs), managed by the same actors under very similar contracts (DCEDIY 2022). As of July 2023, the IPAS website states that single asylum seekers arriving in Ireland “will not be immediately offered a place to stay”.

The design of asylum systems in Italy and Ireland mirrors their different administrative traditions. Esping-Andersen’s welfare state typology (1990) places Italy in the corporatist state group. These states display a high level of state involvement in the provision of welfare and a low level of contestation around social rights, which typically prevail over free-market considerations. Corporatist states tend to preserve social stratifications and rely on nonstate institutions such as families to provide services. Ferrera (1996) further theorised a “Mediterranean” welfare regime, characterised by fragmentation and regional diversity, an over-proliferation of institutions, high levels of clientelism, and low efficiency and effectiveness. A neoliberal restructuring of the Italian state commenced in the 1990s, though a more comprehensive welfare state developed after the 2008 crisis (Sacchi 2018). Civil society organisations, which have always had a key role in the provision of social services in Italy, were increasingly co-opted after the 2008 crisis, leading to their “hyper-embeddedness” with each other and with state institutions (Busso 2018). Italian public service workers in areas such as home care and social work have reported chronic understaffing and underresourcing, and an excessive dependency on political dynamics (Dorigatti et al. 2020), but also high levels of job satisfaction, especially linked to intrinsic motivations (Borzaga and Tortia 2006). The “Mediterranean” tradition of centralisation, hierarchy and plurality of service providers (Ferrera 1996) results in workers relying on networks and inter-institutional cooperation across policy areas (Rizza and Lucciarini 2021).

In Esping-Andersen’s classification, Ireland is a liberal state, characterised by low state expenditure and limited welfare services. The Irish state has a “relatively minimal role” (Murphy and Dukelow 2016: 13) and historically relied on families or the Church for the provision of many welfare services (and in this respect resembles some corporatist welfare regimes). Capital-friendly and competition-oriented economic policies adopted from the 1990s further shrank the role of the state. Furthermore, until very recently Ireland has lacked a distinct left/right political divide, thus neoliberal policy preferences could be adopted with consensus across the spectrum (Kitchin et al. 2012). The combination of post-crisis austerity measures, an economic strategy aimed at attracting foreign capital, and neoliberal policies has resulted in the state using different forms of marketisation and privatisation to retreat from the provision of services (Murphy and Dukelow 2016). The negative consequences of marketisation on workers’ experiences, including lower skill-related barriers for staff, fragmentation of expertise, lack of adequate communication and

coordination with other stakeholders and generally poor working conditions, have been noted across Irish policy sectors such as healthcare (Jalili et al. 2024) elder care (O'Neill et al. 2023) and childcare (Mooney Simmie and Murphy 2023), although levels of job satisfaction are mixed.

3.5. Theoretical framework

Asylum systems are one of the many institutions which compose a state and are responsible for designing and implementing asylum policies. Institutions are “formal or informal procedures, routines, norms, and conventions in the organisational structure of the polity or the political economy” (Amenta and Ramsey 2010: 18). Institutions are both a product and an active part of their context: they are shaped by interactions with individuals and other institutions and by external shocks, and in turn, they contribute to shaping their environment (Pierson and Skocpol 2002). Consequently, different states will vary in their administrative tradition, or in how they distribute power, organise and use bureaucracy, and interact with the market (Esping-Andersen 1990; Hall and Soskice 2001).

States also differ in the extent to which they involve civil society and/or private actors in service provision. These partnerships are increasingly common (Peters 2012; Mori 2017) and complicate service provision by involving non-state actors characterised by different “institutional templates” (Johnson et al. 2000). For analytical purposes, public and non-profit institutions can be considered as having a distinct and similar identity, based not on profitability but on solving social problems (Radić et al. 2021). Public institutions are often integrated within a network of state resources and knowledge which workers can mobilise. However, they are also argued to be more bureaucratised and more rigidly hierarchical; less likely to innovate and more prone to path dependency, i.e. the tendency to resist change in order to remain on a course of action dictated by previous choices (Sydow et al. 2020); more likely to be underfunded and understaffed due to overstretched public resources; and more influenced by political change and clientelism. Underfunding and political logics can also affect non-profit institutions entering partnerships with the state, since they depend on public resources and on maintaining positive relationships with funders (Venter et al. 2019).

For-profit institutions are also increasingly involved in the provision of public services. They seek cost-efficiency, so other concerns, including quality of service, may be secondary; they are less bound by state regulations and therefore by duties of transparency and accountability (Schmid 2003); because they operate in a competitive market, they are arguably more incentivised to attract expert staff, and to innovate (Bysted and Hansen 2015). However, there is no consensus on whether marketised institutions are always more cost-effective, innovative and attract better personnel (Leroux and Feeney 2013, Radić et al. 2021).

As previously mentioned, different institutional templates also create different environments and experiences for workers. Institutions influence the behaviour of their members and shape the boundaries of their action by prescribing appropriate goals, shared values, roles, identities, modes of action and ways of relating to colleagues, managers, service users and other stakeholders (Olsen and March 2004; Breidahl and Brodtkin 2024). Research on various elements of workers' experiences, such as stress, intention to stay and commitment to institutional values, has reached mixed conclusions: differences appear to be largely related to the specific job or to demographic factors, and not to the public/private cleavage. However, some trends are clear. The public and non-profit sectors typically offer lower wages, fewer fringe benefits and fewer promotion opportunities than the private sector; yet workers often perceive that this is compensated by higher job security (Leroux and Feeney 2013) and a better work-life balance (Buelens and van den Broeck 2007). Motivational structures also differ. Workers in a public or non-profit institution are more likely to be motivated by intrinsic and value-based factors, such as the opportunity to serve the community or change society, reflecting their institution's concern with social problems and solidarity over profit and cost-effectiveness. Conversely, private workers are more likely to be motivated by external factors, such as pay or advancement prospects (Buelens and van den Broeck 2007; Venter et al. 2019). Finally, different institutional features force workers to deal with different norms and practices: for example, the bureaucratisation typical of public institutions encourages workers to value hierarchies, processes and compliance with regulations, while private institutions value individuality, outcomes and flexibility. This can make the connection between workers' actions and visible results less evident to public sector workers, leading to a lower sense of control (Lyons et al. 2006).

Organisational culture, together with individual factors such as gender, age or self-esteem, has a direct influence on job satisfaction, or the degree to which workers like their job and workplace experience, and perceive it as rewarding and appropriate to their skills and aspirations (Lange 2015). A high level of job satisfaction increases workers' sense of agency, morale and commitment; decreases stress and turnover; and improves performance (Leroux and Feeney 2013). Arguably, a high level of job satisfaction is particularly important when workers operate in a complex and constrained environment such as public policy implementation; and even more so in the field of asylum, which not only requires multiple skills to perform diverse tasks, but is also highly contentious and ethically salient, as it concretely shapes the living conditions and prospects of service users.

3.6. Methodology

The potentially differential effect of profit versus non-profit management in the functioning of asylum systems was explored through a comparative case study approach. This approach

(Bartlett and Vavrus 2017) allows the researcher to observe a phenomenon not only across sites, but also across its micro, meso and macro dimensions. It adopts a context- and relationship-oriented understanding of cases, acknowledging that relevant cases are socially constructed, and sees analysis as an iterative and flexible process. Accordingly, we paid particular attention to the interplay of contextual elements in shaping policy-as-produced (Breidahl and Brodtkin 2024). Ireland and Italy were chosen as their asylum systems were developed at roughly the same time but evolved in opposite directions; Ireland has a completely privatised system, while Italy has a public system subcontracted to non-profit and civil society actors.

Individual, semi-structured interviews were conducted with 39 workers (including staff and managers of centres), civil servants, and volunteers (see Table 1); of these, 19 were working in Ireland and 20 in Italy. Interviewees perform various tasks related to the management of the asylum system and the needs of forced migrants. These vary considerably based on what the systems prescribe and on interviewees' specific roles, skills and inclinations; they can include distributing food and other material goods, following the legal asylum application process, assisting migrants in seeking employment, overseeing medical issues, delivering language classes, and more.

	Location		Job type			Gender		Ethnicity		Nationality	
	Urban	Rural	Staff (incl. managers)	Civil servants	Volunteers	M	F	White	Other	Native	Immigrant
IT	8	12	19	1	0	7	13	20	0	20	0
IE	8	11	12	3	4	7	12	19	0	16	3

Table 8. Interviewees' location, job type, gender, ethnicity and nationality.

Ethical consent was obtained for the study prior to interviews. Potential interviewees were approached using public lists of SAI and DP centres. Emergency centres were excluded to ensure that interviews reflected the context of the “ordinary” system. Interviewees were initially selected with the goal of covering diverse contexts in both Italy and Ireland. In each country, a centre in a major city and a centre in a rural, historically more conservative location, were contacted. In Italy, the interviewer's personal contacts and previous experience working in the urban SAI project helped recruit participants. Difficulties in recruiting Irish interviewees due to scheduling conflicts and concerns about privacy resulted in the Irish sample being broadened to multiple centres, located in three cities and three rural locations. The key role of volunteers and civil servants in the Irish

system emerged from initial interviews and the Irish sample was subsequently broadened to include them. The final sample was limited to 39 interviewees due to time constraints and access issues in Ireland.

Interviews were conducted both online and in person between January and May 2023; the interviewer personally conducted interviews using English in Ireland and Italian in Italy. An interview guide was developed prior to interviews, based on existing literature on the two countries' asylum systems and on available legal and policy documents, such as SAI manuals, which provided a benchmark for institutional goals and procedures. The interview guide included questions about personal and organisational background; work routine, including main tasks, decision-making processes, and interaction with other stakeholders; perceptions and opinions of the job, including challenges and sources of reward, relationship with residents and the local community, and reflections on the nature of the system at a broader level. These questions aimed at obtaining a comprehensive picture of the system as perceived by the workers within it and ascertaining whether some of the perceived challenges or flaws might be a consequence of the system being for-profit or non-profit. All interviewees signed informed consent forms provided to them in their preferred language (Italian or English).

Data were analysed using thematic analysis (Braun and Clarke 2006). This method qualitatively analyses rich texts to identify common themes, shared meanings and patterns. It is particularly suited to analyse complex subject matters, as it proceeds from the data and adapts to them, analysing emerging concepts and building connections between them. Thematic analysis also assumes that reality is socially constructed, and thus is particularly conscious of the context within which actors produce and reproduce meanings.

Interviews were transcribed *verbatim* and transcripts were then coded and analysed. First, simple thematic categories were created by letting broad themes emerge from transcripts. A theme being present only in one national case, or in both, was considered potentially significant due to the comparative nature of this research. In the second stage of analysis, thematic categories were further analysed and coded for discursive patterns and categories related to the main thematic categories, such as "professional identity and personal identity", "empathy" and "uncertainty." This allowed the analysis to move beyond a simple description of findings, and towards a deeper understanding of the dynamics at play.

Asylum is a highly contentious topic in both countries and particularly in Ireland at the time of the interviews. Furthermore, the asylum sector is quite small, particularly in Ireland, which caused concerns about interviewees being identified and potentially exposed to backlash. As such, centres which accepted to participate were perhaps less concerned about possible repercussions; a mechanism of self-selection cannot thus be excluded.

3.7. Findings

Interviews with the staff of SAI and DP centres highlighted how the profit versus non-profit design of the system concretely affects their experiences in many respects. The rural/urban location of centres did not significantly affect interviewees' accounts, which were remarkably similar across locations in each country. Table 5 summarises the main cross-country differences and similarities emerging from interviews.

Theme	Italian interviewees	Irish interviewees
<i>Skills and background</i>	Third-level education, relevant prior experiences	Third-level education rare, no relevant prior experiences (exception: civil servants and volunteers)
<i>(Initial) Motivation and job satisfaction</i>	Intrinsic motivation: prominent value-based element High levels of satisfaction.	Extrinsic motivation: job chosen for practical reasons, intrinsic rewards developed in job Generally high levels of satisfaction.
<i>Interconnectedness with other services</i>	High level: • Makes the job easier • Plurality of actors can result in delays	Low level: • Lack of communication/support • Sense of isolation
<i>Regulation</i>	High level: • Teamwork and collegiality • Bureaucracy and strict requirements sometimes frustrating	Low level: • Overall adequate • Lack of training; lack of disciplinary measures for residents
<i>Opinion of non-profit/for-profit dimension</i>	High level of critical reflection: • Public sector unstable, underfunded and politicised. • Low level of societal recognition	Low level of critical reflection: • Private model not questioned (exception: civil servants and volunteers)

Table 9. Main interview themes with main findings from Italian and Irish interviews.

3.7.1. Skills and background of staff

The first relevant aspect is the professional profile of staff members. Findings confirm that the private sector does not necessarily attract more skilled workers (Leroux and Feeney 2013). Almost all Italian workers have a third-level qualification in a relevant subject, such as political sciences or education. Most also have relevant previous experience, for example in social work. Furthermore, they receive extensive and ongoing job training. By contrast, very few of the DP centre staff have third-level education, and none have relevant educational background. Previous work experiences are diverse, mostly in hospitality and administration. Most workers reported they “dropped in CVs everywhere” or “fell into the job” by applying for entry-level positions; in some cases, they did not know they were going to be working in a DP centre before their interview. Others got the job through acquaintances or family members who worked in DP centres. On the other hand, all Irish civil servants interviewed have relevant educational and professional background, and all volunteers have third-level education.

These differences in skills and expertise are a consequence of differences in system design. Italian non-profit organisations use their long-established experience in the asylum sector and SAI’s detailed regulations to hire workers with specific qualifications and backgrounds, whereas in Ireland there is no skill-related barrier to working in DP, for either organisations or individuals. Subsequently, Italian workers have specific skills and expertise to deal with the complex management of the system and the multi-faceted needs of forced migrants, whereas Irish workers are less equipped with specialised knowledge and tend to learn informally on the job. These differences result in different daily implementation practices, modes of relationship with migrants, coworkers and other institutions that may impact outcomes: for example, Irish interviewees do not have frequent and regular staff meetings and they do not maintain a detailed file for migrants, which makes it harder to track individual needs and circumstances and to implement tailored policy actions.

It is also noteworthy that unlike the staff of centres, Irish civil servants and volunteers are highly educated, even though volunteers may not have relevant skills. To different extents, civil servants and volunteers also consciously choose to devote their career or their time to this policy area, unlike most workers who happen into the job. Again, these differences exemplify how privatisation can lower requirements for actors delivering services, dispersing expertise and knowledge (Mori 2017) and causing the proliferation of multiple actors with different capabilities operating in the same policy area (Darling 2016). This trend has been observed in other sectors of Irish public services (Jalili et al. 2024). In the Irish asylum system, relevant competences are confined to “complementary” stakeholders and not to the “ordinary” service providers. As illustrated below, this is not without consequences.

3.7.2. Motivation and job satisfaction

Workers' motivations are intimately linked to the institutional context: in a non-profit system, motivation has a prominent value-based component which enables the attraction and retention of skilled workers, even in the absence of incentives such as career progression and pay (Venter et al. 2019). Intrinsic motivation seems much less relevant in a private system (Buelens and van den Broeck 2007). In line with other public service workers in Italy (Borzaga and Tortia 2006), SAI employees emphasised their personal values and interests in seeking and retaining the job: "going to work just to make money [...] is not really my thing. The idea is that you're doing something good, this is the good side of having this job" (Ezio). This desire to contribute to society, help others and "make a difference" is more important than career prospects or financial gratification. Working in an organisation whose values aligned with workers' personal values was recognised as fundamental for personal and professional wellbeing. Many interviewees explicitly linked their satisfaction to working for a non-profit, which follows shared principles of solidarity and social justice:

"I feel like I am on the right side of society in many respects [...]. This element was lacking in my previous jobs, I was dissatisfied [...] I was bored. Being able to say 'I am on the right side of society' pays me back. [...] This is a workplace where there is not only... the logic of profit". (Dario)

Motivation structures are more varied and pragmatic among Irish workers: while civil servants and volunteers cited a previous interest in migration and social justice, and a sense of duty toward vulnerable people, many staff members remarked how they were doing the job only temporarily, because it suited their family circumstances, they had found no other opportunity locally, or simply because it pays the bills:

"[What keeps me in this job is] the paycheck. Yeah. That's it. It's a job. It's probably not going to last forever. I seem to have a different job for each of my children's birth certificates" (John).

Workers in both countries reported high levels of job satisfaction. This finding is interesting given the many differences in both system design and workers' daily experiences. Observing how one's work was improving beneficiaries' lives is the main source of job satisfaction for both Italian and Irish workers. This sense of achievement constitutes an intrinsic reward that is present even when motivations for taking the job are extrinsic, as in the case of the Irish workers. Job satisfaction is influenced not only by organisational factors, but also by individual and societal factors (Lange 2015). The interaction of these factors in different contexts produces ideas of job satisfaction based on different elements: what an Irish worker sees as a component of their job satisfaction may be irrelevant for an Italian worker. The systems have a different organisational culture and tend to

attract workers with different skills, background and motivations, who will construct their idea of job satisfaction differently. For example, the Italian system's emphasis on recruiting specific professional figures will attract workers who derive satisfaction from being able to exercise valued high-level professional skills, whereas the same element is less relevant to Irish workers, who do not have to be professionals to work in DP. Similarly, satisfaction may also be linked to different conceptualisations of the system: if Irish workers adopt the institutional logic (Olsen and March 2004) prescribing that DP only has to provide minimal material assistance, they will use it to define the boundaries and success criteria of their job; satisfaction from being successful at one's job will thus be based on a much shorter and simpler list compared to an Italian worker.

This finding suggests that the constitutive components of job satisfaction may also change over time. In a for-profit system attracting workers with an externally driven motivation structure (Buelens and van den Broeck 2007), but in fact providing public services, an element of intrinsic motivation may intervene, creating a new version of the committed public servant adapted to the neoliberal market (Maron 2020), who draws satisfaction not only from pay and benefits but from perceiving that their job has a positive social impact. Differences in motivation may be resolved over time as workers adapt to their hybrid environment, and thus may not impact policy implementation significantly.

3.7.3. Interconnectedness and support

Implementing asylum policy involves providing many services and coordinating with other public services, organisations and private citizens. These interactions are experienced differently in the two countries. In Italy, SAI and other public and non-profit actors are highly interconnected, supporting the idea of Italian non-profit organisations as “hyper-embedded” in a close-knit network of public services (Busso 2018), where differences between state and non-state actors are blurred and cooperation is an established tradition (Rizza and Lucciarini 2021). Interconnectedness supports workers in several ways. Firstly, workers who came from other public or non-profit services had a straightforward transition because the same organisational models and processes were used. Secondly, workers can tap into a wide network of resources, including organisational expertise and personal contacts from previous jobs in similar areas. Finally, future career choices are facilitated, providing the possibility of expanding careers horizontally if not vertically. Interconnectedness can, however, be a double-edged sword:

“It is a mammoth bureaucratic system, you have to run everything by eight different people [...] if a part slows down even a little bit, everything slows down”.

(Fabio)

The lack of similar connections is arguably the starkest difference between the Italian and the Irish system. DP staff complained about a consistent lack of support and interaction with other

stakeholders, such as HSE or IPAS. Issues caused by this lack of communication were previously solved through informal phone calls and personal connections with civil servants and the staff of other centres; however, IPAS recently changed communication procedures by setting up a single email address for all correspondence. Because of this, centres feel more isolated. A related complaint was never being able to interact with the same contact person in public services or local charities, thus unnecessarily complicating the task at hand. Staff members frequently find themselves providing services that state bodies should provide instead. Civil servants reported this disconnection as well: for example, sometimes they are not informed when a new DP centre opens in their area, and must rely on word of mouth.

“[DP] was small enough that the IPAS team knew the people on the ground, we got to know each other on the phone [...] sometimes it’s very difficult to put that into an email, to show the extent of what you’re trying to cope with. [...] Now it’s all done through a helpdesk. [...] it worked better when we were all able to connect”.

(Caoimhe)

3.7.4. Regulation

Levels of regulation differ, reflected in the experiences of Italian and Irish workers. SAI rules and guidelines are perceived to be very strict and detailed. Some workers felt this rigidity was limiting and unrealistic: for example, the time limit for beneficiaries’ stay is too short and does not allow them to achieve full autonomy, despite being often extended.

“If I were working with a team that blindly applies all guidelines, I’d have already switched jobs by now. All regulations and manuals are too rigid [...] I don’t think we need such a high level of control on people”. (Alberto)

However, one aspect of this regulatory complexity is unanimously appreciated: the emphasis on teamwork. The SAI manual contains lengthy and elaborate prescriptions about team composition, collective decision-making, and frequency of team meetings. These prescriptions are not seen as an imposition; rather, all interviewees agreed that having a collegial framework and a formal meeting schedule greatly help to give structure to their work, provide an avenue for quick problem-solving, and allow them to feel valued as professionals. SAI represents an example of successful horizontal accountability (Lipsky 2010), which uses teamwork and mutual support to foster commitment in workers.

Many Irish workers cited the dynamic nature of the job as a positive aspect, saying that every day at work is different and unpredictable. While this “doing a little bit of everything” was generally presented in a positive light, DP staff also reported they have no detailed list of task and responsibilities. Staff also reported receiving little to no training besides standard fire safety and child safety. When asked directly, most workers said they believed existing rules and guidelines are

exhaustive enough. However, they also reported having to upskill themselves to face the requirements of the job, or coming up with their own rules, initiatives, and solutions when there is no blueprint. Some interviewees are concerned about the absence of clear disciplinary rules for residents, which adds to their feeling of being left alone to manage a very complex situation. Overall, it appears that while more detailed procedures could solve many of the cited issues, Irish DP workers tend to accept the *status quo*. This shows how powerful institutional discourses can be in fostering a specific idea of what is acceptable and achievable (Olsen and March 2004), and how readily workers can adopt neoliberal discourses that ground their attachment to work on ideas of individual action and flexibility rather than collective solidarity and protection (Musílek et al. 2020).

3.7.5. *Opinions on non-profit/for-profit dimension*

Interviewees in both countries reflected on the public or private management of the system. In SAI centres, such reflections are common, perhaps due to the higher average level of professional expertise. SAI workers are overall happy with the system, but also conscious that the public and non-profit sector is unstable and fragmented, as it is predominantly project-based and depends on precarious and inadequate public funding. This results in understaffing, which in turn makes it difficult to closely follow beneficiaries as the guidelines prescribe; a finding corroborating previous studies conducted among other public service workers in Italy's fragmented system (Dorigatti et al. 2020). Secondly, workers feel that their professional role as "social workers" is undervalued in society: it is commonly misinterpreted as "volunteering", and the responsibilities and professional skills the job entails are often ignored. This negatively impacts wages and job stability. Finally, as is the case in other Italian public service areas (Dorigatti et al. 2020), workers feel that SAI is influenced by political logics. Because migration has been heavily politicised in recent years, when governments and policies change negative consequences follow: "We're quite confident the project will be renewed for the next three years, because the current city government wants to do it. But then again, we have elections here next year, and if there's a new mayor, who knows?" (Eva). Workers also perceive that recent political developments are legitimising racist behaviour in local institutions:

"I see this in institutions [...] The local healthcare branch put the Ukrainian flag on their website when Ukrainians started coming in, they put up a 'how to' section... When I sent emails about Ukrainians they would immediately get back to me, and in all other cases they wouldn't. Same issue, same email, different name". (Cecilia)

The staff of Irish DP centres, in contrast, did not fully engage with the theme of private management. The only exception was one offhand comment by a manager: "There's a lot of people wanting DP to become non-profit. I don't see how that's possible, because there's no business in

the country that's non-profit, because why would you do that?". The fact that DP is and must be a business is not questioned by staff. This represents another example of institutional context shaping the attitudes and beliefs of workers: in a context where public services are perceived as lacking and institutional discourse is centred on cost-cutting, streamlining and simplification, workers accept a lean, market-oriented system as appropriate (Olsen and March 2004). Volunteers and civil servants, conversely, have a very negative view of the fact that DP centres are managed by for-profit entities:

"They're an events company. [...] And the other centre is a guy who's ex-army, his mum is the cleaner in the place, [there's] a couple of random security people...there's no structure in there. [...] it's just a funny setup, it seems like anyone can just decide to [open a DP centre]. [...] There's no minimum standard, there's no accountability for people running it, [...] they sign a contract and then it's basically free rein". (Margot)

"There is a huge deficit of knowledge about what would be required and what might happen [...] How do these people sleep at night? Is that how you want to make your money?" (Rita)

This different level of critical reflection on the system between paid DP staff and individuals operating in non-profit organisations reflects not only different levels of education and experience, but also the influence of institutional context on organisational discourses and individual opinions: non-profit workers are more likely to problematise a private system that they perceive as inadequate because it lacks the attributes of a non-profit system (Buelens and Van den Broeck 2007, Venter et al. 2019). Low levels of critical reflection may translate into a higher level of acceptance of the *status quo*, and subsequently to a lower probability of implementing changes and improvements at the individual and institutional level, even when low levels of regulation leave space for discretion.

3.8. Discussion and conclusions

SAI and DP are asylum systems managed in markedly different ways. Interviews show how the non-profit/for-profit dimension of management changes workers' experiences and perceptions of what is working and what is not. Italy has created a system where a plethora of bodies, manuals and forms occasionally gets in the way, and workers can feel frustrated by a hyper-inflated, controlling bureaucracy. But SAI also attracts motivated workers who place a premium on organisational values aligning with their personal values of community, service, and solidarity, thus compensating for low wages. SAI also explicitly promotes teamwork and group support, favours full integration with other public services, and ensures a division of labour that allows workers to tackle the many aspects of asylum policy implementation more efficiently. In contrast, a private model appears ill-suited to a complex sector like asylum policy: both DP residents and workers are left to themselves

and may not receive the support they need. DP is located within a broader context of marketised and streamlined state services (Murphy and Dukelow 2016), further compounding system deficits.

The different “institutional templates” (Johnson et al. 2000) of non-profit and for-profit systems and their tangible consequences on how these systems function are especially apparent when considering the broader network of services within which asylum systems need to exist in order to promote the integration of forced migrants. A non-profit system appears significantly better connected to other services typically provided by the state, such as healthcare, education, and social welfare, and thus arguably better equipped to meet its stated goals. By contrast, a privately managed system is more likely to be disconnected from public services, and interactions between the two are often challenging and inadequate. Furthermore, a privately run system driven by a market logic may not have the same level of transparency and normative development as a non-profit system. This leads to unclear responsibilities and tasks for workers, which in turn cause confusion, the overlapping of roles, or neglect of key services due to lack of time and expertise. This malfunctioning private system prompts volunteers to intervene, replacing the state in the provision of services without having the same resources or reach. The stated goals of the asylum system could be pursued more efficiently and effectively by providing services through appropriately trained staff or closer cooperation with public services. Our findings on asylum systems corroborate research about the privatisation of public services more broadly, which appears to have a number of negative consequences for workers and service users alike and fares unfavourably compared to a non-profit model (Darling 2016; Mori 2017; O’Neill et al. 2023; Jalili et al. 2024)

Both systems have limitations which should be weighed against the benefits. A public system is more complex to establish, as proved by privately run “emergency” centres increasingly becoming the standard; it requires the concerted work of multiple actors and the development of comprehensive norms; it depends on the willingness of public actors, often including civil society, and is therefore potentially more exposed to politically driven motivations. A private system driven by cost-effectiveness considerations ultimately appears to lack norms protecting beneficiaries’ rights, services, worker supports, financial transparency, and connection with other state services, as well as with civil society and communities. Further research could examine more cases to establish if similar mechanisms are at work elsewhere, and to add more nuance to this institutional, context-based approach to the study of asylum policy implementation.

Finally, this investigation illustrates how asylum systems, like all institutions, are the products of their contexts (Pierson and Skocpol 2002). It is clear from our findings that states follow their administrative traditions in establishing organisational models for their asylum system: Ireland is on a liberal path of streamlining and marketisation of state services, whereas Italy continues to opt for the co-optation of the non-profit sector and bureaucratisation. The trends we identified

among asylum workers are not exclusive to asylum policy, but rather typical of each country's tradition in managing the provision of public services. However, the different system design does not seem to significantly impact workers' job satisfaction. This may be explained by the fact that institutions produced by states with different traditions are designed to provide different services, and thus will attract workers with a different understanding of their professional identity who measure their wellbeing differently. In fact, this hints at a two-way relationship between a state as a discursive notion and its institutions as practical emanations of that notion: the establishment of a non-profit or for-profit asylum system is a consequence of how the state views its duty to forced migrants, and more broadly, to vulnerable individuals; and the system's outcomes reflect this underlying discourse. A non-profit system organised around the principles of holistic action, teamwork, and integration can go far in achieving these goals thanks to its public nature, and it is public precisely because the state is seen as the best conduit to achieve those goals. A private system only offers basic services due to its private nature, and it is private because the state believes its duty toward asylum seekers is exhausted in providing basic services. The recent trend of privatising asylum systems observed across Western countries can be further analysed in light of this.

This article adds to the scholarship about asylum systems by bringing in the underexplored perspective of the workers responsible for their daily functioning, a vital component of the system providing unique insights that are not necessarily glimpsed by studying formal policy instruments or migrants' perspectives. It also addresses the emergent trend of privatisation in asylum services to assess whether and how it impacts the system by changing workers' experiences and perceptions. In doing so, the article contributes an explicitly cross-country comparative framework lacking in previous studies.

Despite these contributions, this article only represents a first step in the analysis of how broader institutional context, formal policies and the daily practices of stakeholders in their local context interact to produce asylum policy outcomes. Our work has limitations that can be overcome by further research. The comparison, which is currently limited to two countries, can be expanded to other states and systems. Secondly, due to the central aims of the research and the focus on system design and institutional determinants of workers' experiences, this paper does not explicitly employ a gender or race lens in its interpretation of interviews and analysis of findings. While gender and race did not emerge as the most explicitly articulated or recurring themes in interviews, it is undeniable that they are relevant to their experience, as they are to any relational and social phenomenon and indeed especially in social interactions characterised by power imbalances such as the ones occurring between asylum workers and forced migrants. Future research can build on these findings to analyse individual-level elements such as workers' gender, age, and prior professional history in more depth and complement our findings with other possible explanatory factors for workers' motivations, satisfaction and critical reflection on the system. Given that

asylum systems appear to reflect broader administrative traditions in their design, a detailed comparison of workers' experiences across policy areas in the same country would also complement our analysis. Finally, although our study did not involve migrants, the focus on asylum workers should not divert attention from the fact that asylum policy outcomes directly affect forced migrants' lived experiences. Future research should investigate the connection between our findings on workers' perspectives and the experiences of migrants in for-profit or non-profit asylum systems. Bringing together these two complementary perspectives will provide a more well-rounded understanding of the trajectories and results of specific asylum systems.

Chapter 4: Community connections: understanding local dynamics in Italian asylum policy implementation

4.1. Abstract

Italy hosts significant numbers of forced migrants throughout its territory. The implementation of asylum policy thus occurs in diverse and sometimes fraught contexts, presenting different resources and obstacles. This paper examines how local context shapes the experiences and practices of street-level bureaucrats (SLBs) implementing policy in the Italian statutory asylum system. Semi-structured interviews with workers in two projects, one in a conservative rural area and one in a progressive urban area, show that the urban/rural divide alone is not an appropriate predictor of similarities and differences in policy implementation and outcomes, which are largely shaped by context-specific sociocultural and relational elements. Workers' off-duty mediation in interpersonal contact between migrants and community members fosters positive encounters that could partially offset traditionally conservative political cultures and hostile attitudes; however, the same cultures and attitudes cause workers to feel isolated and alienated from their community. Furthermore, SLBs' decision-making practices in both projects are always collegial and constrained by exhaustive rules, largely eliminating the need for individual discretion typical of SLBs and creating instead "group discretionary" bureaucrats. In light of these findings, I argue for increased attention to locality beyond the simple urban vs rural lens, and increased focus on asylum SLBs as a distinct category of "doubly embedded" SLBs participating in both policy implementation and local context.

4.2. Introduction

For the last decade, forced migrants have been arriving to Europe in unprecedented numbers, and the trend is constantly growing (Eurostat 2023a). As a country of first arrival, Italy bears the brunt of this "migration crisis", receiving approximately 850.000 forced migrants between 2013 and 2022 (Eurostat 2023a). In Italian asylum policy, the statutory asylum system (SAI) coexists with many "emergency" centres (CAS) that were set up to respond to increasing numbers of forced migrants and are by now essentially a permanent feature of the system. The two branches of the system are both based on the dispersal of migrants throughout the territory, but have different governance structures, budgets and regulations and offer different services to migrants. These differences, together with dispersal, imply that migrants may have very different experiences and opportunities depending on the type and location of the centre they are assigned to (Novak 2021). Workers involved in the daily management of the system have a pivotal role in interacting with migrants, mediating their relationship with the host environment, and enforcing rules; thus they are a relevant example of "street-level bureaucrats" or SLBs (Lipsky 2010), exercising a significant degree of discretion with important implications on the living conditions and outcomes of forced migrants. This paper focuses on the statutory asylum system or SAI, which is publicly managed by municipalities in partnership with civil society actors, such as charities and local NGOs. SAI adopts

a team-based holistic approach to reception and integration, and an emphasis on migrants' agency and autonomy. Using semi-structured interviews with workers in the SAI system, this paper examines and compares their experiences and perceptions in two SAI projects in northern Italy, one in Bologna, a historically progressive large city, and the other in a historically conservative rural area in the Veneto region. The paper asks whether and how location and local context influence SLBs' experiences and perceptions of their job and their professional identity, and thus the way they implement policy in context.

4.3. Local implementation of asylum policy

Asylum policy is typically based on the dispersal of people throughout the territory: policy implementation, access to services, interactions with institutions and encounters with the community happen first and foremost on a local level, involving different local actors who provide different services. Thus despite national and international norms pushing for convergence (Brumat et al. 2021), scholars have been advocating for a "local turn" (Zapata-Barrero et al. 2017) in the study of forced migration, arguing that the local element is key in creating "host society opportunity structures" (Phillimore 2020) which shape policy implementation and integration. Research has outlined how local actors develop their own discourses, agendas, practices and policies in the governance of forced migration (Dekker et al. 2015). Local policies and practices can complement or contrast flawed or hostile national asylum policies by introducing innovative and inclusive measures (Kos et al. 2016; Oliver et al. 2020), but they can also exclude migrants or create selective barriers to services (Ambrosini 2021; Semprebon et al. 2023). For example, some Italian municipalities have issued ordinances preventing migrants from obtaining the registered residency status and thus accessing certain services; others enforce fines on citizens who rent accommodation to asylum seekers (Ambrosini 2021).

Implementation of policy goes beyond formal policy instruments and actions performed by bureaucrats, to encompass indirect ways in which policy comes to fruition. For example, migrants' social integration is produced through relationality, which encompasses a variety of possible interpersonal encounters, networks and interactions and is a key component of locality (Glick Schiller and Çağlar 2009). Local context influences relationality by defining its boundaries, forms and opportunities, thus determining at least partly the outcomes of policy for migrants, workers and host communities (Valenta 2007; Hinger et al. 2016). Other context-specific elements such as rural or urban setting, local history and political traditions, economic circumstances, civic cultures and social attitudes toward migrants can all shape how asylum policy is implemented locally. Existing scholarship has often adopted a rural versus urban analytical lens to assess variations in implementation, illustrating for example how cities tend to have a more diverse population and a healthier economy, and thus may respond more proactively and positively to forced migrants

compared to marginalised rural localities, with limited diversity and economic opportunities and a perception of relative deprivation (Bock 2018; Crawley et al. 2019; Whyte et al. 2019; Oliver et al. 2020). On the other hand, declining rural localities may be revitalised by an influx of foreigners requiring work and services and renewing social practices (Membretti and Lucchini 2021). Local context can also influence individual variables which affect social attitudes toward migration: younger, more educated and progressive individuals tend to have more positive attitudes toward migrants (Mancini et al. 2020) and are more likely to live in urban areas (Eurostat 2022). Some research also linked negative attitudes in rural areas to their increased social capital, which causes higher social control and stronger in-group cohesion; however, findings are mixed (Valenta 2007; Fratesi et al. 2019; Semprebon et al. 2023). Importantly, attitudes change through frequent contact with migrants (Herslund 2021).

The urban/rural divide is not the only relevant factor in shaping how asylum policy is implemented locally, although other contextual aspects not strictly linked to this cleavage have received less attention. For example, the political affiliation and leadership style of local policymakers influence the way they perceive reality and make decisions (Caponio et al. 2022); local context can encourage or discourage intergroup contact depending on the availability of shared public spaces (Irgil 2024); different contexts can produce different patterns of associationism and civil society mobilisation, which may result in different ways of conceptualising and implementing policy (Ataç et al. 2020; Semprebon et al. 2023). In sum, many elements of local context amalgamate in building “opportunity structures” (Phillimore 2020) for the reception of forced migrants and the implementation of asylum policy. Rural/urban environment is only one of those elements, and its explanatory power when it comes to policy variations may be limited (Semprebon et al. 2023).

From this complex picture, it is clear that how asylum policy is implemented in one place largely depends on the characteristics of that place. Research in this area has focused on a variety of urban and, more recently, smaller, rural or remote localities (Ataç et al. 2020; Kreichauf and Glorius 2021; Membretti and Lucchini 2021; Novak 2021; Moralli et al. 2023; Semprebon et al. 2023; Irgil 2024) but often lacks an explicit comparative framework assessing how policy is implemented across different local contexts (but see Valenta 2007). Moreover, despite increased attention to the importance of local context in shaping forced migrants’ experience (Phillimore 2020; Wessendorf and Gembus 2024), research findings are mixed and there is still no clear consensus as to exactly which elements of that context provide the best environment for forced migrants, host communities or asylum workers: our understanding of how local context and immigration influence each other is still poor (Lara-Garcia 2022). This article situates itself in this locally-focused, context-conscious line of inquiry and provides an in-depth comparative case study

explicitly considering the unique characteristics of each locality's context and how these may interact with the asylum system "on paper" to produce different modes of implementation.

Furthermore, this article examines asylum policy implementation as performed and experienced by SAI workers. These SLBs are uniquely positioned to understand and reflect on the daily functioning of the system: they are asked to navigate a particularly complex and contentious policy realm on a daily basis, and they are immersed both in the process of policy implementation, as professional members of formal organisations implementing specific policy guidelines through appropriate actions, and in the concurrent local processes which shape implementation, as members of the community having to routinely interact with an array of other actors both officially and informally. They represent the point of contact between local context and policy, and the professional figures where these two realms meet, producing context-bound policy outputs. This "double embeddedness" produces a synthesis between the external context of implementation and the institutional and individual elements shaping asylum SLBs' professional actions; policy actions and outcomes are produced by both these areas interacting.

There is a large body of literature focusing on different groups of stakeholders involved various stages of asylum policy, including border authorities (Eule et al. 2018), caseworkers adjudicating asylum and citizenship applications (Fontana 2019; Shiff 2021; Haller and Yanasmayan 2024), policymakers (Caponio, Donatiello and Ponzo 2022), the staff of EU-managed "hotspots" and other emergency centres (D'Angelo 2019; Novak 2021) or mainstream social workers (Andreetta 2019; Ratzmann 2021). Some studies adopt a psychological perspective addressing the well-being and burnout of asylum workers (Gemignani and Giliberto 2021). However, there is a dearth of comparative qualitative research studying the specific category of SLBs running asylum projects and their interaction with different local contexts in the ordinary performance of their duties, which represents the intended everyday functioning of the asylum system (partial exceptions are Giudici 2020; Artero and Hajer 2023). The role, routine and potential challenges for these SLBs differ from those of other asylum workers and therefore merit distinct attention and analysis. This article adds to the literature by observing how asylum policy is implemented by SLBs in localities characterised by different geographic, political and sociocultural circumstances, and how local context affects not only day-to-day implementation and policy outcomes, but also the ways in which workers conceptualise their job and professional identity.

4.4. The asylum system in Italy

In Italy, increasing numbers of forced migrants, slow policy responses and political instability have created a fragmented policy environment, marked by a state of "permanent emergency" (Carbone 2019) and by a hodgepodge of contradictory policies implemented by rapidly alternating governments. The statutory Italian asylum system or SAI is public, centrally regulated and

supervised by the Ministry of the Interior. Municipalities volunteer to host forced migrants according to capacity and devolve daily management to local NGOs, social cooperatives and charities. SAI has been praised for its flexible, long-term approach to integration and its high level of coordination with other public services (D'Angelo 2019; Acocella and Turchi 2020). However, SAI coexists with “emergency centres” or CAS which have proliferated over the last decade. These centres are run directly by the *Prefettura* or local office of the Ministry of the Interior, operate under much looser regulations and with the explicit goal of minimising costs, and thus offer worse living conditions and fewer services (Acocella and Turchi 2020). It is estimated that approximately 25% of forced migrants in Italy are part of the SAI system, while a growing majority are hosted in CAS centres (Openpolis 2024). Recent reforms implemented by right-wing governments (2018-2023) have restricted access to SAI and cut budgets for both SAI and CAS projects.

Both SAI and CAS models distribute forced migrants across the territory. Diffused reception means that forced migrants may find themselves in very different local contexts and circumstances: some projects are in major cities, whereas others are located in remote rural villages, where access to services such as healthcare, education, vocational training, public transport and leisure facilities may be more difficult (Novak 2021); availability, location and quality of accommodation may also vary. Being in the North versus the South of Italy may also affect available services, infrastructure and opportunities: most migrants are hosted in the South, which has long been suffering from depopulation, higher levels of unemployment and a worse quality of services and infrastructures (Acocella and Turchi 2020; Openpolis 2024).

Similarities between the systems end here. In every other respect, CAS and SAI differ considerably. The “emergency” nature of CAS means less careful planning and monitoring of their management, including when selecting suitable facilities or managing organisations (Ambrosini 2021). CAS are more likely to be large collective facilities instead of apartments (Openpolis 2024), and minimum standards for facilities set by the Ministry of the Interior are less strict and less comprehensive than for SAI. CAS budgets are significantly lower than SAI budgets and acceptable expenses do not include as many items and services; financial reporting requirements are also less strict than in SAI and therefore potentially less transparent. These differences have a significant impact on migrants’ experiences: being hosted in the SAI system means enjoying better living conditions, while CAS centres can be cramped, unsanitary and occasionally unsafe (Openpolis 2024); it also means having access to more resources and services, such as Italian language courses or counselling services (compulsory in SAI projects, but optional in CAS).

Another key difference in the functioning of the SAI and CAS systems pertains to staff. The SAI manual regulates staff very thoroughly, prescribing the number, tasks and desired expertise of the different figures required. Every SAI project has a coordinator who is nominally responsible

for overseeing the project, liaising with municipal and state authorities, and coordinating the work of several “operators” who are assigned individual migrants’ files and/or cross-cutting areas of action, e.g. job training, language skills or legal casework. The project also has a designated point of contact within the municipality, with regular meetings. Staff-related requirements are much less strict in CAS centres, where no specific qualifications are needed and the workers to residents ratio is also significantly higher (Ambrosini 2021). The SAI manual also emphasises teamwork and collegial decision-making even if operators have different areas of action and expertise. This reflects the system’s holistic approach to migrant integration, which is seen as composed of multiple different areas that should be addressed concertedly, in order to devise a completely personalised integration path. In a system like SAI, workers are involved firsthand in the daily lives of migrants by taking care of essentially every aspect of their life. Because of this they have authority and discretion in mediating migrants’ access to services and opportunities. For example, they broker relationships between migrants and possible employers for work placements, or they select which educational and training opportunities they think fit best the individual profile of each migrant; they conduct inspections in accommodation to ensure it is adequately clean and safe; they enforce curfews and other rules; they can administrate punishment for violations of such rules, by withdrawing of pocket money or even, in extreme cases, by excluding the migrant from the project, meaning that they will not be entitled to accommodation or any form of assistance. In doing so, workers embody the concept of street-level bureaucrats who exercise their discretion in performing their tasks, with the potential to shape the experiences of forced migrants.

4.5. Theoretical framework

The close attention paid in this study to how asylum policy interacts with local context derives from a theoretical understanding of policy as socially and contextually produced by actors and institutions interacting with each other and with other social and cultural elements, such as public opinion, belief systems, social attitudes and collective past experiences (Ingram et al. 2019). A prolific theoretical strand, including for example multilevel governance theories (Bache et al. 2016) and “multiple streams” policy process theories (Howlett 2019) has brought attention to the plurality of actors and relations involved in every step of the policy process with diverse degrees of involvement, priorities, ideologies or practices. The final outcome is policy implemented as a “messy” product, which often changes based on the unique configuration of actors, interrelations and local context active in a certain site. The concept of “locality” (Glick Schiller and Çağlar 2009) applies the same attention to context, plurality of actors and interrelations to the study of migration and migration policy, inviting research to focus on local areas as units of analysis. Migrants are situated in a specific local context and interact with it: research should reflect this reality by developing scalar approaches that address migration not only as a phenomenon involving entire nation states and populations, but also and especially cities and communities. Forced migration and

inclusion are produced first and foremost at the local level, by a multiplicity of individual and organisational actors and practices.

Within this context-informed conceptualisation of asylum and asylum policy, I focus particularly on relational elements and on their role as indirect instruments of policy implementation. If asylum is locally produced and localities are “continuously produced forms of socio-political relations and discourses” (Hinger et al. 2016: 446), then relationality can be a conduit through which policy goals come to fruition. For example, if one of the stated goals of asylum policy is migrants’ social integration, events producing social integration can be seen as realising policy, albeit in ways that cannot necessarily be controlled. This approach acknowledges the importance of relationality as an analytical lens and indeed extends it, by interpreting relationality also as a possible way of indirectly implementing policy.

This research focuses on the minimal units of asylum policy implementation, i.e. workers in the asylum system. To do so, it draws on the seminal concept of street-level bureaucrats (Lipsky 2010): individuals in various professional roles implementing policy firsthand, in contexts characterised by time and resource constraints and complex, sometimes confusing or contradicting goals and rules. SLBs develop coping strategies and original solutions to work in a challenging environment. A key part of their role is the personal discretion they exercise when implementing policy. Discretion and flexibility are needed to manage competing constraints and unique situations, create ad-hoc solutions and reinterpret norms and roles (Belabas and Gerrits 2017). Bureaucrats exercise discretion in different directions and to different degrees, based on the specific organisational culture they operate in, their interaction with actors and institutions outside their own, and individual characteristics such as value systems, professional experience and moral judgments (Tummers and Bekkers 2014). The practices and results of bureaucrats’ work can thus vary within the same organisation and sometimes with the same individual as well. Asylum SLBs in particular operate in a policy area where interactions with local context play a pivotal role: they have to contend with a particularly fraught and confusing policy environment, including fragmentary, contradictory and fast-changing norms; because of the all-encompassing nature of the asylum system, they are called to interact with many other institutions and actors, which constraints and complicates their action; variation in their practices and their use of discretion can have concrete effects on the living conditions and outcomes of forced migrants.

The uniqueness of their position as SLBs is also enhanced by their “double embeddedness” in both the policy process and the local context. This adds to the complexity of their job and shapes their perceptions and practices. Arguably, “double embeddedness” is experienced and mobilised to different extents by all SLBs whose work is locally focused. However, it is particularly important in the work of asylum SLBs. These SLBs work with acutely vulnerable individuals who rely on

public services, the local community and SAI for virtually all their needs, who are visibly different from the local community, and whose presence in the locality can be contentious. Hence, “double embeddedness” is particularly important and useful for asylum SLBs: they can mobilise their double status as professionals and community members to coordinate multiple actors and resources more quickly and efficiently, perhaps using informal ties; to mediate potentially hostile community responses, which are more likely in a contentious policy area; to bridge distances and fill gaps between individuals, communities and institutions that are wider than they would be for non-migrants.

4.6. Methodology

The research is a comparative case study (Yin 2009), seeking to identify two asylum projects located in areas with different spatial, socioeconomic and political characteristics, in order to assess whether these differences cause differences in the functioning of the system as seen through the perspective of its workers. Comparative case studies are particularly appropriate in the study of complex phenomena characterised by multiple processes and systems of interrelations, such as the implementation of asylum policy in its local context.

Italy is at the geographical borders of Europe; this, combined with EU migration regulations, makes the country responsible for an exceptionally high number of forced migrants. The SAI system was developed in the early 2000s, inspired by grassroots reception experiences developed by some municipalities (Carbone 2019). Its multilevel governance structure and co-optation of civil society in the daily implementation of asylum policy represent a peculiar exception in EU asylum systems, which are mostly based on public-private partnerships or entirely managed by states. Italy is also characterised by a traditionally volatile and increasingly polarised political system, which often sees local governments in contrast with the central government (Dallara and Lacchei 2021); a stagnating national economy; and deep socioeconomic disparities between regions and between urban and rural areas (Ballatore and Mariani 2019). This high level of diversity and local complexity, combined with the high numbers of forced migrants dispersed across the territory, makes Italy a significant case study in how asylum policy is implemented in different contexts.

This study obtained ethical approval prior to the first contacts being made with SAI projects. I selected two SAI projects based on their location and local context, using the Ministry of the Interior’s public database of SAI projects. CAS centres were deliberately excluded from the search, as it was determined that SAI, due to its wider resources and broader scope, allowed a more comprehensive and detailed study of asylum policy implementation. Furthermore, the holistic approach of SAI projects promotes both a higher level of integration within the territory for forced migrants and a higher level of involvement and active decision-making for the workers. Therefore, SAI offers a better opportunity to observe the plurality of actors and practices involved in asylum

policy implementation, and how local context shapes workers' experiences and migrants' outcomes. However, both municipalities studied also host CAS projects and both projects did at some point manage CAS centres as well, because they offered a quicker way to set up reception in a context of rapidly growing demand. This was not known when first contacting the projects and the interviews remained predominantly focused on the SAI experience. However, it is relevant because workers' past experiences with CAS allowed for deeper reflection and critical appraisal of the system. Both SAI projects host a mix of recognised refugees and asylum seekers still waiting for a decision (typically having appealed after their application was initially rejected). Project A is located in a small town in a mountainous area of the Vicenza province of Veneto region, currently among the richest in Italy but characterised by a history of widespread poverty and mass emigration until the 1980s. Veneto has been historically governed by centre-right or far-right parties, such as the old Christian Democracy and the League, which was born precisely in this area. Project B is located in Bologna, a major city in a wealthy area of Italy which consistently ranks highest in the country for quality of life, and has traditionally been a stronghold of left-wing voters and civic engagement. The interviewer's past experience working in project B facilitated access.

A majority of staff members accepted to be interviewed in each project. Between January and May 2023, individual semi-structured interviews were conducted with 20 workers in the two chosen locations (12 in Project A and 8 in Project B). Table 6 illustrates the location, gender, role and assigned pseudonym of interviewees.

Pseudonym	Location	Role	Gender
<i>Agata</i>	Project A (Veneto)	Operator	F
<i>Aurelio</i>	Project A (Veneto)	Operator	M
<i>Cecilia</i>	Project A (Veneto)	Operator	F
<i>Dario</i>	Project A (Veneto)	Operator	M
<i>Eva</i>	Project A (Veneto)	Coordinator	F
<i>Flavia</i>	Project A (Veneto)	Operator	F
<i>Frida</i>	Project A (Veneto)	Civil servant	F
<i>Franca</i>	Project A (Veneto)	Operator	F

<i>Gaia</i>	Project A (Veneto)	Operator	F
<i>Giada</i>	Project A (Veneto)	Operator	F
<i>Nunzio</i>	Project A (Veneto)	Operator	M
<i>Sara</i>	Project A (Veneto)	Operator	F
<i>Alberto</i>	Project B (Bologna)	Operator	M
<i>Azzurra</i>	Project B (Bologna)	Operator	F
<i>Amanda</i>	Project B (Bologna)	Operator	F
<i>Ezio</i>	Project B (Bologna)	Operator	M
<i>Fabio</i>	Project B (Bologna)	Operator	M
<i>Guido</i>	Project B (Bologna)	Operator	M
<i>Marina</i>	Project B (Bologna)	Operator	F
<i>Sonia</i>	Project B (Bologna)	Coordinator	F

Table 10. Pseudonym, location, role and gender of Italian interviewees.

Interviews used a three-section guide consisting of open-ended questions. The first section asked about the workers' personal and professional background, as well as the organisational background of the project; the second section explored the workers' daily routine, tasks, decision-making processes and interactions with other stakeholders, such as colleagues, public services and migrants; the third section centred on the workers' opinions and perceptions of their job, their professional identity and their community, including the biggest obstacles they faced and the job's impact on their personal life. Interviews were conducted in Italian, recorded and transcribed verbatim; selected quotes were translated to be included in the text. Interviewees were pseudonymised and identifying details were removed from the transcripts wherever possible.

Transcripts were coded and analysed using thematic analysis (Braun and Clarke 2006) and discourse analysis (Fairclough 2013). These methods allow to identify recurring themes and patterns in texts inductively and bottom-up. Broad thematic categories emerged through simple analysis are then further analysed to uncover deeper meanings. This process assumes that individuals are constantly engaged in a process of meaning-making performed through language and discourse, which therefore have a strict reciprocal relationship with reality, both constructing it

and being influenced by it (Fairclough 2013). Analysing language and discourse offers insight into interviewees' experiences and opinions as mediated by their shared systems of meanings and by the interrelated systems of power in which they operate. Being mindful of these systems is particularly important when studying institutions such as asylum systems, which are based on relations of power and care between states, workers and migrants.

4.7. Findings and discussion

Although they expanded upon topics with different degrees of detail, interviewees in both projects displayed remarkably similar experiences and opinions. Several key areas shaping policy implementation emerged from interviews. These include available resources and services, interactions with institutions, interactions with the community, social attitudes toward the interviewees' profession and decision-making style. Crucially, according to interviewees these areas do not have the same relevance in determining the practices and outcomes in policy implementation. The urban versus rural location of the project partly affects the availability of resources such as job opportunities, training and leisure activities, but this is not perceived as especially relevant. Veneto interviewees remarked on the geographical isolation and scarce availability of public transport limiting job opportunities for migrants, but also on the relative liveliness of their small town, which has a library, a small cinema and a sports centre. Bologna workers praised the abundance of resources and leisure opportunities available in the city, including volunteering opportunities, free psychotherapy and independent Italian classes; they also noted how the city's thriving economy and renowned university attract young, active and diverse people and keep the city vibrant. However, Bologna workers also noted the increased precarisation of work, which disproportionately affects forced migrants (Chacko and Price 2021). Most migrants hosted by Project B only have zero-hour contracts in food delivery or monthly contracts in logistics. Lack of affordable housing and a general increase in the cost of living were reported as an issue by both projects.

Overall, interviewees perceived relational elements involving either themselves and local context or migrants and local context as particularly important. These relational elements are more important than material resources or obstacles deriving from the project's urban or rural location in shaping implementation and experiences. In particular, interactions with community members are perceived by workers as much more important than institutional frameworks or structural resources in fostering integration and building a welcoming, mutually beneficial environment. This applies to both migrants' and workers' interactions and relationship with the community; it confirms that workers construct relationality as actively constituting policy implementation; and it suggests the need for policy to explicitly target the informal social and relational aspect of migrants' integration

as a two- or even three-way process closely involving a specific local community of residents and practitioners, which plays an active role in shaping practices and outcomes.

4.7.1. Interactions with institutions

Interactions with institutions were mixed in project A, but overwhelmingly positive in project B. Project A reported positive interactions with the city council, who is responsible for coordinating and monitoring SAI projects. A cooperative atmosphere was reported, with some exceptions related to individual members of the city council staff who “have very rigid views about how this should be done” (Aurelio), implying there have been clashes before. The same positive atmosphere was reported with reference to the *Prefettura*, who is responsible for processing asylum applications. Some workers said that being in a smaller project allows them to have a firmer grasp on the situation at all times and to communicate more quickly with institutional stakeholders (Sempredon et al. 2023). On the other hand, project A reported very negative experiences with other institutions, including some schools, the local police and most notably the local healthcare office, who systematically refuses to issue healthcare cards to forced migrants, asking for unnecessary documents or using other bureaucratic loopholes. Workers in project A unanimously remarked on how stressful, frustrating and traumatic this situation was for both them and the migrants involved. Many interviewees explicitly mentioned hostile attitudes toward immigrants and the personal political beliefs of managers in the institution as causes for this. At the time of the interviews, project A had sought legal counsel about the situation, a move which was perceived as inevitable but also likely to increase hostility.

Workers in project B believed that the success of the SAI project in Bologna was attributable to the “far-sighted”, “enlightened” political leadership who allowed the project to develop with a horizontal and participative framework. These features are already inscribed in SAI manuals, but the city council, regional authorities and other local institutions (including the *Prefettura*) went above and beyond their mandate to promote inclusion, plurality and diversity of actors and participative decision-making. Tasks are divided across organisations so that migrants are not managed by one actor only, and there is constant cooperation and knowledge exchange instead of competition for resources (Sara). Interviewees linked these participative practices to a long-standing political and civic tradition predominant in Bologna, where civil society organisations have long enjoyed an important social and political role and legitimacy as institutional partners. This long-standing partnership allows to use more “common sense” and flexibility while implementing policy, knowing that local authorities will not rigidly enforce bureaucratic rules (Ezio). Some workers believed “there is no better city in Italy to be doing this [receiving forced migrants]” (Marina). Some recent developments were unwelcome: for example, the city council had just decided to cut the budget for intercultural mediation and interpreting services, which workers believed was sorely needed in interactions between migrants and institutions, or sometimes

between migrants and themselves. However, most workers constructed this issue as the city doing what they can in the face of increasingly strict national policies and decreasing funds.

In line with the decentralised, municipality-focused design of SAI, significant interactions happen not with national institutions but mostly with local and regional institutions, pointing to the crucial importance of the local dimension of policy (Brumat et al. 2021). However, both projects have engaged with recent national political developments in asylum policy. In 2018, a far-right government approved a legislative package retroactively restricting access to SAI to recognised refugees only. Existing projects were required to shift all asylum seekers still awaiting a decision (the large majority of migrants) to a CAS model. At the same time, the budget and available services for the CAS system were slashed, creating a “frankly insulting [situation, rations were] a fistful of rice a day, three biscuits [...] completely embarrassing [...] you were basically asked to manage a dormitory” (Dario). These measures were widely regarded as unfair, counterproductive and undignified for both migrants and workers. Both projects refused to participate in the new asylum regime: project A decided to close the smaller CAS project it had been running in parallel with its SAI project, whereas project B allied with the local *Prefettura* and stalled by claiming there were no suitable CAS facilities in the area. Doing so allowed them to use a series of “exceptional stay extensions” to keep migrants in SAI until the law was changed. These creative interpretations of the law were used to fight hostile state authority from a distance, while not openly violating rules; in the case of project B, they were possible thanks to the already experimented successful partnership with other local institutions. Such cooperation in defiance of national policy did not occur in many other localities, where perhaps *Prefettura* did not display similar initiative (Ambrosini 2021). Where there is consensus between local actors, they can resist official policy, adopt creative strategies and operate within grey areas, increasing territorial variations in policy outcomes and “twisting” top-down policy guidelines in unanticipated ways.

4.7.2. Interactions with the community

Positive social contact with members of the host community is believed to be fundamental to foster integration and a sense of mutual belonging, as well as facilitating access to resources such as jobs and housing (Glorius et al. 2020; Herslund 2021; Fuchs and von Scheve 2023). Workers from project A reported mostly positive interactions with the community. Personal mediation in intergroup contact seems to have a key role in facilitating positive interactions between migrants and members of the host community. Informal, “off-duty” interactions with workers not acting in their professional capacity, but as ordinary members of the community, seem to be particularly constructive. Several workers mention that locals “came around when they saw I was interacting with [the migrants] and talking to them on the streets” (Franca) or expressed more openness after talking to them about their job. One interviewee reported running into a migrant from the SAI project in the café and exchanging some words with them. This elicited the curiosity of the café

owner and of other local patrons and led to an informal conversation where the worker shared some thoughts about her job and the daily lives of migrants in the town. After this conversation, all people present made positive statements on the migrant they had encountered and on the SAI project. These encounters use relationality to create an accepting social landscape, fostering the potential for social integration. Informal interpersonal relations are also used by workers to mediate easier access to resources for migrants, such as housing or jobs. Veneto's conservative, anti-immigration political tradition is not irrelevant: interviewees agreed that the community still has prejudices and hostility toward the idea of non-white migrants, and several reported overhearing hostile comments or participating in heated conversations about immigration. However, this does not necessarily translate to hostile attitudes toward individual migrants in the community, especially when workers are able to act as informal "ambassadors" bridging interpersonal distances:

Politically, in this whole area, I think it's clear that solidarity, integration and reception are not strong values here. But [...] all this hostility toward foreigners is largely idealised, it is not concrete, and then when one finds oneself directly interacting with that person, gets to know their story and everything, then they get closer and something happens, this is fairly common. (Dario)

This finding echoes previous research concluding that local communities can create their own pragmatic modes of interaction with forced migrants despite polarised political discourses (Whyte et al. 2019). However, the effect of mediated interpersonal encounters is context-dependent and may not be enough to broadly and permanently alter deep-seated political beliefs or the widespread "mistrust even towards people from the near valley" (Dario) typical of the area. The effect may be only temporary or on a purely individual basis (Matejskova and Leitner 2011; Irgil 2024); furthermore, migrants or community members may have a different perception of these encounters than SLBs. In fact, further findings about community perceptions of SLBs working in asylum partially contradict this positive conclusion (see below) and other research suggests that SLBs intervening can reinforce prejudices, power imbalances and marginalising narratives (Ambrosini 2021; Giudici and Boccagni 2022).

The importance of participation in the labour market as a dimension of perceived integration is also linked to local context: "Our territory is really Calvinist in this respect, work is a religion for most [...] so if a migrant comes here and understands this, he's quite likely to stay [and integrate]" (Eva). Successful migrants are those who embrace the local work ethics and are recognised as committed workers by their local employers and colleagues. In this context, work has the potential to strengthen interpersonal relationships. Membretti and Lucchini (2021) point out that positive, constructive interactions with the community are not a given and need a favourable context, including shared spaces of existence and mutually beneficial opportunities for synergy and

cooperation. In the context of Veneto and Project A, work and work ethics may offer such an opportunity, allowing forced migrants to adopt the local ethos in ways that are visible and legitimised by members of the community. Of course, the importance of work as a way for migrants to conform to concepts of “deservingness” promoted by host societies and nation states is not a prerogative of Veneto, but rather a widespread feature of Western immigration policy and discourse and a key part of Western-centric definitions of integration (Marchetti 2020b; Novak 2021). However, its importance here is enhanced by Veneto’s sociocultural tradition. Local context can thus selectively emphasise or qualify specific components of a broader policy framework, such as migrants’ economic integration, in ways that are socially salient. Once again, this adds depth and complexity to the ways policy is translated into practices and outcomes on the ground, and poses challenges to top-down policymaking.

Microlevel intergroup encounters in shared spaces are known to influence “everyday strategies” of coexistence and integration employed by members of the local community in reaction to the presence of migrants (Irgil 2024). These encounters are not always positive, but when they are, they significantly help migrants’ wellbeing and to the community’s shared sense of belonging (Glorius et al. 2020; Fuchs and von Scheve 2023). These findings add another dimension to intergroup contacts: encounters and strategies can be shaped by the presence of individuals who employ their double status as members of the local community and asylum workers as a tool to mediate positive intergroup contact. As such, informal mediated encounters represent an indirect policy instrument, which implements asylum policy “out of hours” and outside of offices by capitalising on the key importance of unorganised microlevel encounters and *de facto* working towards social integration as one of the stated goals of asylum policy. They also speak to the key importance of SLBs’ “double embeddedness” in community and policy, which provides them with additional tools to gather community feedback and to informally promote social integration and acceptance.

Similar tools and modes of interaction are not equally available to workers in Bologna. Despite the positive institutional environment, interactions with the community are not perceived as positive. In fact, there is a perception that the progressive tradition of the city does not match social attitudes towards forced migrants. Project B workers report covert hostility and mistrust in interactions with locals, which do not correspond to the open, cosmopolitan and progressive attitude that Bologna prides itself on. For example, workers assisting migrants in finding independent housing all reported episodes of discrimination, where landlords did not want to rent their house to migrants. In other occasions, shop owners addressed the Italian worker accompanying a migrant and not the migrant, even though they knew Italian and were the intended customer. Many interviewees reported surprise in encountering this dissonance (Azzurra, Guido). The element of personal mediation is also much less present in a large city: workers do not know the community

members with which they interact in a professional capacity, nor do migrants. This removes the possibility of mediating microlevel encounters through pre-existing interpersonal relationships, and of collecting informal feedback from community members. Urban workers typically cannot use their social capital to “introduce” forced migrants to the social fabric and moderate positive interactions, or to promote a change in predominant narratives by raising awareness about their job. These findings appear in contrast with previous research (Fratesi et al. 2019) which found that increased social capital in rural areas could be used to close ranks against the reception of forced migrants. In this case, an abundance of social capital in a small rural town is mobilised to produce positive interactions. Conversely, a lack of strong community bonds in a large city negatively affects interactions with outsiders. In both cases, encounters with forced migrants conform to the broader script of locally produced social relationships, even when local political traditions may suggest otherwise. This finding once again points to the importance of relationality as a potential policy instrument, and suggests that migrants’ social integration should be conceptualised and promoted not as part of an asylum policy superimposed on a territory from the top down, but as an integral part of a locally constructed, bottom-up milieu of social relations; accordingly, policy should strive to strengthen social capital broadly defined, and not compartmentalised areas of social interaction between specific groups.

4.7.3. Social attitudes toward profession

As a result of the dispersal of migrants and the composite structure of asylum systems, frontline asylum workers frequently belong to different organisations, have different tasks and operate disjointly from each other. It is thus harder to develop a recognisable professional group identity to extract meaning and legitimacy from (Gemignani and Giliberto 2021). Interviewees in both locations shared similar impressions of their professional role not being adequately recognised by society. All interviewees have third-level education and/or significant experience in relevant areas, such as anthropology, social work or politics. They noted that the complexities of the job are not adequately reflected in compensation, career stability and advancement prospects. Interviewees linked this to a general lack of recognition of the professionals involved in social work, which the asylum system is part of: “most people think you’re volunteering when you say you are working with migrants” (Alberto). This lack of recognition can have a negative impact on workers’ sense of professional identity, wellbeing and performance. However, social awareness improves through interactions with institutions and communities, and workers are conscious that it is part of their job to educate the public on their profession (Agata, Alberto, Franca).

Many interviewees in project A reported a deterioration of personal relationships after taking the job: discussing work, they realised that their friends had incompatible values or political beliefs and distanced themselves from them, even though they had been friends “forever” (Giada). Others in project A reported that even though their family and friends have not been alienated, there

is a feeling of prejudice, lack of understanding or interest when discussing their job. Some are hostile to the whole idea of working with forced migrants:

When I say I work for a cooperative, people say ‘How nice, and who do you work with?’, and they expect to hear ‘people with disabilities’ or something. When I say what we do, they’re floored. ‘Are you crazy? With all the money being stolen [by asylum cooperatives]?’ Or ‘What’s the point? These people are never going to integrate anyway, I don’t care about these people’. (Eva)

Others consider working with migrants for mediocre wages “useless” in a local culture that rewards saving and accumulating resources through work and is historically prejudiced against outsiders. For some workers, this causes a reluctance to disclose their profession to acquaintances.

Conversely, no interviewees in project B reported similar personal dynamics, instead expressing the belief that “we already surrounded ourselves with people who think like us before getting this job” (Azzurra). Most interviewees from project B originate from towns in Southern Italy and compare social attitudes toward migration in their areas of origin and in Bologna, saying for example that their families “do not understand why I do this” (Azzurra, Ezio) but this is not an issue in their social circles in the city. This suggests that one way in which an urban context may be more favourable to receiving forced migration is its pre-existing population of progressive, educated, proactive and upwardly mobile young people, who are more supported by their community in their career choices because they consciously built it to match their personal beliefs and inclinations. However, as we have seen, the support workers receive from their personal circles is not matched by a supportive broader social milieu for forced migrants, perhaps suggesting that workers’ Italian identity is still a powerful force in mediating social attitudes. In smaller contexts characterised by little physical mobility, a conservative and xenophobic culture, and lifelong family and friendship ties, when these ties are strained by working with migrants, fewer alternative relationships can be cultivated with like-minded people. Rural workers may feel more “out of place” or isolated for being openly “pro-migrant”, and experience deeper negative personal consequences from their job (Valenta 2007). This hostility toward the professional aspect of workers’ identity may be linked to the fact that they are more successful as mediators of microlevel encounters when they are not perceived in their professional capacity. However, they may also be more incentivised to react to the reality of their environment by being more active in mediating encounters and promoting a positive narrative of migration in their interactions with hostile community members. These findings again highlight how relational dynamics involving migrants, workers and community members are not only context-dependent, but also mutually constitutive. In this case, forced migrants do not need to participate in the interaction in order to influence it: workers’

professional identity and wellbeing are shaped by relationships formally uninvolved in their work, and in turn they shape their practices and choices.

4.7.4. Decision-making practices

Decision-making practices are remarkably similar across the two projects. The SAI decision-making style is based on collegiality and teamwork, as explicitly prescribed by SAI manuals. This creates a collective mode of working which contrasts with the individual, discretion-based practices of other asylum workers (Ratzmann 2021; Shiff 2021). The teamwork element was recognised by all interviewees as very positive. Interviewees in both projects run all decisions by each other and brainstorm strategies and ideas in weekly meetings. They believed these practices greatly help their efficiency, effectiveness, problem-solving skills and morale:

Being able to work in a team and getting each other involved is fundamental. We can speak openly to each other; we can get support. It is fundamental to me, because sometimes it's not easy to do all this. It helps carry the weight, so to speak, because everyone is carrying it and not just you. (Agata)

Furthermore, the SAI system is regulated by comprehensive manuals that leave very few scenarios uncovered. The clarity this provides is appreciated by many workers, despite others noting that regulations can sometimes be unnecessarily complex, and that they reflect a paternalistic and securitarian attitude to forced migrants (Alberto, Ezio).

While this system helps workers implement policy by providing clear flowcharts and instructions for most scenarios, it also leaves little to no space for SLBs' individual discretion (Lipsky 2010). While SAI workers do operate in a complex, fraught and sometimes contradictory environment, with time and resource constraints, they do not report exercising individual discretion. Roles and tasks within the team are clearly defined and respected. Rules are sometimes slightly bent in favour of the migrants, but this is always a group decision, and it only happens when it does not cause risks or larger expenses and it can easily go undetected. For example, projects can organise "integration activities" such as library visits or art workshops; however, these activities are only reserved for recognised refugees and not for asylum seekers. Despite this, workers in project B allow asylum seeker to attend these events without including them in the official attendance list they have to attach to their reports, because the events would have been organised anyway and more people attending would not have made a difference. Asylum seekers were also included in day trips when a bus had been booked and there were extra available seats. Other than this, no interviewee reported having ever felt the need to sidestep or violate rules. For most workers, exhaustive rules provide certainty and predictability to navigate a complex set of interrelated tasks, while group decision-making provides consensus, transparency, support and mutual accountability. The individual action of SLBs is thus constrained in a way that is generally welcomed by

bureaucrats themselves: they are non-discretionary at the individual level and exercise discretion only as a team.

The use of teamwork as a governance tool and the collective aspects of discretion are a relatively new focus of research on SLBs (Jacobsson and Hollertz 2021). Rutz and de Bont (2020) suggest that bureaucrats may welcome rules and use discretion to involve others in decisions. This study presents a slightly different case, where mutual involvement is already built into the rules and not produced as a form of discretion or a creative coping strategy. The emergence of “group discretion” in this case may be the result of the peculiar structure of the SAI system, which is publicly led but heavily relies on the co-optation of NGOs, charities and other civil society actors. Extensive, detailed rules are put in place to manage the diversity of actors and situations involved in policy implementation. The lack of a perceived need to bend the rules, which results in less individual discretion, could also derive from value alignment between personal and organisational values. SLBs exercise discretion to the extent that they perceive existing norms and resources to be deficient or disagreeable (Tummers and Bekkers 2014). If workers perceive their personal values to be in line with the foundational values of the SAI system and the extensive rules to be an adequate expression of those values, there is less incentive to exercise discretion or reinterpret norms. It should be noted that these findings come exclusively from interviewees’ reports about decision-making practices and not from observation; since individuals’ ability to faithfully self-report actions is flawed, they should be appraised critically and potentially confirmed by further research.

4.8. Conclusions

As this paper has shown, a simple rural versus urban framework is not adequate to explore the local production of asylum. In fact, the rural versus urban location of asylum reception appears less relevant than the area’s specific political, social and community fabric and how it interacts with the practices of SLBs. It appears that interpersonal contact through the mediation of local citizens who successfully act as “off-duty ambassadors” can be a fundamental way in which asylum policy is implemented on a daily basis, constructing meaningful relational practices which can foster integration and improve local attitudes toward migrants (Irgil 2024) even if migrants themselves are not always directly involved. In both projects sampled, this factor (or its lack) was perceived as the most important relational component of integration, more important than economic opportunities or a welcoming or hostile institutional framework. A smaller, tighter-knit community seems to be better poised to achieve change in attitudes and perceptions through personal encounters and microlevel interactions, even though initial attitudes and political traditions may be conservative and less open to outsiders. Relationality is thus not only part of integration as a policy outcome, but also an instrument of policy implementation. While local political traditions still play a part in shaping how institutions and communities react to forced migration, their importance appears to be limited in the context of mediated everyday interactions. Urban localities with more

favourable attitudes and a more diverse, progressive population may still present unique social and economic challenges to the social integration of migrants (Whyte et al. 2019; Chacko and Price 2021). On the other hand, the same conservative political traditions and anti-immigrant attitudes seem to play a far greater role in isolating and alienating Veneto workers from their own communities. In fact, SLBs' experience of hostility toward the professional aspect of their identity and the fact that they are more successful as mediators of microlevel encounters when they are not perceived in their professional capacity may be linked. In Bologna, a diverse and progressive community can develop around asylum SLBs that supports their professional identity, although community encounters with migrants are overall less fruitful. Here, the concept of SLBs' "double embeddedness" allows research to recognise the interconnectedness of SLBs' personal and professional subjectivities and statuses, to incorporate it in the analysis and to use it to inform more punctual conclusions about SLBs' practices in context.

These findings point to the necessity of disaggregating the different components of local context and their reciprocal relations in order to assess how they shape asylum policy implementation, beyond the mere urban versus rural opposition. Positive institutional attitudes and broader social attitudes may not be enough to counterbalance the absence of meaningful, positive interactions with the community. On the other hand, hostile institutions may not reflect the positive nature of everyday community encounters. Secondly, the findings reinforce the need to investigate how context changes the identity, roles and practices of asylum SLBs, and add more elements to the complex mosaic of social attitudes, political traditions and everyday encounters which seems to influence the social production of asylum policy in context. This reaffirms the importance of analysing the figure of asylum SLBs as "doubly embedded" in policy and context. These workers not only mediate daily encounters between migrants and the community in their capacity as "off-duty ambassadors", but also conduct and reflect on their practices meaningfully. Their self-perception, relationship with the community and other institutions are integral parts of this reflexive and socially informed bureaucratic practice and concretely shape their action in policy implementation. SLBs' statuses as professionals within a complex organisation and at the same time as community members cannot be separated from each other, and the study of the social and relational production of asylum policy at the local level cannot prescind from this consideration.

This research also reveals that not all assumptions about how SLBs operate apply to the complex and contentious field of asylum policy, and the unique figure of the asylum street-level bureaucrat merits further exploration. While bureaucrats' individual discretion is fundamental in determining migrants' outcomes in other aspects of asylum policy implementation (Fontana 2019; Ratzmann 2021; Shiff 2021), these findings suggest that discretion is not applied in the same way in all areas. The SAI system is an example of asylum policy where rules are so detailed and exhaustive that workers never feel the need to fill the gaps with creative solutions or interpretations:

they are non-discretionary SLBs at the individual level and they only exercise a modicum of discretion as a group, through strictly collegial decision-making practices. This lack of need for individual discretion provides a welcome sense of security and clarity. These findings expand on the body of research concerned with the collective dimension of discretion (Rutz and de Bont 2020; Jacobsson and Hollertz 2021) and invite to reconsider the role and characteristics of SLBs based on where and how exactly they are performing their duties.

This research does not address all elements that may shape asylum policy implementation in context. Economic context is fundamental in shaping reactions to and interactions with immigration (Bock 2018). Both projects studied are in relatively wealthy areas: projects in economically marginalised areas may tell a different story. Similarly, this research focuses on municipalities which voluntarily decided to host forced migrants: where reception is imposed by the central government, interactions and practices are likely to be different. Accordingly, these findings are not generalisable in a strict sense, but rather seek to further highlight the need for research firmly grounded in local context, in order to include different configurations of local elements. Finally, further research should certainly examine how the perspectives of asylum SLBs relate to those of forced migrants within a specific context. In this regard particularly, and more generally in the context of analysing the local production of asylum as a social and relational phenomenon, not explicitly engaging with gender and race as analytical lenses represents another limitation of this study. Examining how gendered and racialised structures intersect with the relationships of care, power and belonging which characterise asylum work is an important direction for further research building upon these rich findings, which deserves dedicated treatment given the depth of theoretical and empirical analysis it demands and the sustained salience of these frameworks.

In light of these findings, research and policy should move toward a more fine-grained conceptualisation of how asylum policy is designed and implemented, where and by whom (Wessendorf and Gembus 2024). Policymakers should also be aware of the many ways in which top-down policy goals and instruments can be changed, manipulated and adapted to and by local contexts, and incorporate these possibilities in the policy process. For example, community-based approaches using pre-existing interpersonal networks to strengthen social capital and thus increase the opportunity for informal interactions between migrants and members of the host community could complement the provision of other services to promote micro-level social integration. In all cases, both research and policy should adopt a sharper focus and a flexible outlook when addressing the interactions between asylum systems and localities, avoiding a “one for all” approach in favour of a truly localised one.

Chapter 5: Street-level bureaucrats in the Irish privatised asylum regime: experiences and professional identity

5.1. Abstract

Forced migration to Europe is growing in numbers and salience. In response, EU asylum services have been increasingly securitised, externalised and privatised. We investigate the functioning of marketised asylum regimes through the perspective of street-level bureaucrats (workers, civil servants and volunteers) working in the Irish asylum system, the only completely privatised asylum system in the EU. Interviews show that street level bureaucrats' experiences are negatively affected by the same systemic flaws previously found to be violating migrants' rights. Furthermore, unlike civil servants and volunteers, staff of private reception centres detach their work and professional identity from the idea of belonging to an institutionalised asylum system, implicitly rejecting their role in perpetuating the system and their categorisation as street-level bureaucrats. We posit that this disconnection both influences and is caused by the marketised nature of the system, impeding the traditional role of street-level bureaucrats as bottom-up "policymakers".

5.2. Introduction

From the early 2010s, an unprecedented number of forced migrants sought asylum in Europe. EU countries treated this "refugee crisis" as a short-term emergency, adopting a security-oriented approach, introducing new forms of filtering, surveillance and confinement (Campesi 2018). Many countries established "emergency" reception centres, which became permanent fixtures in their asylum systems (AIDA 2019). This practice increased the pre-existing tendency of asylum systems to segregate and institutionalise migrants, creating a "policy-imposed liminality" (Hynes 2011) with detrimental effects on their wellbeing and integration. Asylum regimes also typically mainstream asylum policy into general immigration and welfare policy, instead of adopting an approach tailored to the specific needs of forced migrants (Alink et al. 2001). The securitising response to the "refugee crisis" is reflected in worsening public attitudes and discourses around forced migration (Triandafyllidou 2017).

In this context, asylum services are increasingly subcontracted or privatised. This nascent "asylum industry" (Darling 2016) follows imperatives of cost-effectiveness and procedural standardisation, without benefitting migrants, workers or local communities (Humphris and Sigona 2016). Neoliberalisation does not simply shift service provision from public to private, but creates new arrangements, practices and mutual expectations (Darling 2016): workers become "private state workers" (Maron 2021) balancing the constraints and practices of both public service delivery and market-oriented managerialism. It is, however, still unclear how this emerging institutional setup impacts asylum workers' identities, experiences and practices.

This paper explores the experiences and perspectives of stakeholders managing asylum in Ireland, where the number of forced migrants has grown exponentially in the last decade and especially since the 2022 war in Ukraine. This rapid increase has polarised discourse around

immigration and brought the Irish asylum system, Direct Provision (DP), under the spotlight. DP is the only completely privatised asylum system in the EU and has been widely criticised by scholars and civil society for promoting the physical and social segregation of migrants, undermining their access to fundamental rights and their social and economic integration.

We ask how asylum street-level bureaucrats (SLBs), including staff, civil servants and volunteers, conceptualise their work and professional identity within DP, and specifically how the privatised nature of the system influences their experience. The paper makes three contributions. It adds to the critical literature about how European asylum regimes are responding to the ongoing “refugee crisis” by complementing migrant-focused research with SLBs’ understanding of their action in context (Belabas and Gerrits 2017). It focuses specifically on the worker-centred analysis of a privatised system, due to the comparative dearth of research on how privatisation impacts asylum workers. Finally, it contributes to the sociological literature on SLBs by addressing the diversity of SLBs in the Irish asylum system, including private employees, civil servants and volunteers, and analysing whether and how the differences in their motivation, background and involvement influence how they perceive and relate to DP. Incorporating this plurality of actors is important given that fragmentation and loss of professionalism is another consequence of the privatisation of public services (Brodikin 2007; Ellis 2011). Examining how “complementary” stakeholders differ from “standard” SLBs in delivering services allows a more nuanced understanding of fragmented policy implementation, which is already the norm in other policy areas.

5.3. Asylum regimes in Europe

An abundant literature on forced migration focuses on the macrolevel design and functioning of asylum regimes (for example Boucher and Gest 2015), and on the microlevel consequences of asylum regimes on the lives of forced migrants (Hynes 2011; O’Reilly 2018). Research has also focused more on borders and detention centres, as sites where asylum is denied and contained (Tazzioli 2017; Campesi 2018), than on sites where asylum policy is implemented in full. Subsequently, despite the key importance of locality in asylum policy implementation, the relationship between asylum systems and their context of implementation is still understudied (Hinger et al. 2016). A vital component of this context are the workers responsible for the ordinary management of reception centres. Given the decentralised nature of asylum policy, they are the ultimate locus of asylum policy implementation, where asylum regimes come to fruition most tangibly. While research has studied mainstream social workers occasionally interacting with migrants, workers adjudicating asylum applications or assisting with voluntary returns (Eggebo 2013; McGhee et al. 2016; Shiff 2021), few studies examine the experience of frontline workers: how their practices are embedded within a larger asylum regime, how they conceptualise and situate themselves professionally in this regime, and how their professional identity interacts with their

context, for example local communities hosting asylum centres (partial exceptions are Giudici 2020; Peroni 2025). This lack of attention to the interaction between asylum SLBs, their organisation and their context obscures the key role these interconnections play in shaping asylum policy implementation (Hinger et al. 2016).

Research on the privatisation of asylum and its consequences is relatively new and it too focuses predominantly on border management and detention rather than daily asylum policy implementation, and on migrants' rather than workers' perspectives. Privatisation fragments the chain of responsibility, causing uneven provision of services and a lack of accountability which enables the violation of migrants' rights (Yin 2023). It creates further obstacles to accessing services and supports due to cost-cutting imperatives (Humphris and Sigona 2019); redefines asylum as an economic problem rather than a political one, discouraging contestation and cementing the image of migrants as a "burden"; and disperses institutional expertise (Darling 2016). The mechanisms linking privatisation and policy outcomes via the action of SLBs are not entirely known. Our analysis of workers' perspectives, subjectivities and experiences aims to elucidate exactly how privatisation impacts the system. By adopting this perspective, we add perspective to the study of asylum regimes implementation, shedding further light on how policy is experienced by policymakers, practitioners, outside observers and direct beneficiaries, and on how these different perspectives are interrelated.

5.4. Theoretical framework

This research understands asylum policy as a policy regime. Policy regimes are "the governing arrangements for addressing policy problems" (May and Jochim 2013: 428), including multiple subsystems, sets of norms, institutional arrangements and actors operating to address a specific policy issue. This analytical lens considers policymaking and implementation as highly diverse processes, characterised by the interrelation between norms, institutions, scales of policy design and implementation (transnational, national, local) and individuals (May and Jochim 2013).

Within the asylum regime, we focus specifically on SLBs (Lipsky 2010), or the diverse frontline workers delivering and managing asylum policy. SLBs enjoy a unique position in policy regimes. They are in direct contact with service users, and due to their position and the ambiguity of rules, they can use varying levels of individual discretion, flexibility and creativity in their work, depending on institutional culture, personal values and interactions with users (Tummers et al. 2015). They operate in complex environments, grappling with time or resource constraints and with multiple sets of interrelated norms. This applies particularly to asylum regimes, which are inherently complex and contradictory due to the ethical contentiousness of asylum policy, the many actors involved and their cross-cutting nature across policy subsystems such as healthcare, education and welfare (Alink et al. 2001; Eggebø 2013).

Professionalism plays a key part in how SLBs see themselves and their actions (Hupe and Hill 2007; Evans 2011). The concept of professionalism is strictly linked to the identification of certain occupations as “professions”. Exactly what constitutes a profession is disputed by scholars. Evetts (2015) compiled a list of traits composing a socially constructed “image” of professions: closed membership based on specific training and knowledge, autonomy and self-regulation, collegiality, a guiding ethos, a degree of social authority, and a trust-based and service-based relationship with society.

Professionalism is then a set of behaviours, values and attitudes towards one’s job which characterises professionals. Professionalism has an internal normative value (Freidson 2001): it defines expectations and offers tools for group self-governance which allow professionals to preserve their autonomy. However, it is also a discourse and thus an instrument of control, which is imposed from outside but reproduced and maintained from within the professional group (Fournier 1999). These two broad interpretations on the “external” versus “internal” origins of professionalism have fuelled a long-standing debate (see Saks 2016) on who controls its definition and for what purposes, especially considering the changes affecting professionals in increasingly managerial, globalised and diverse organisational contexts. Some suggest a holistic interpretation building on previous functionalist and critical approaches to professions and incorporating insights on institutional theory (Muzio et al. 2013; Evetts 2015; Saks 2016). In this interpretation, conceptualisations of professions and professionalism are shaped both by professionals’ practices and identities and by logics of co-optation and control promoted by other actors, including states, organisations and managers.

Commonality is a key element of professionalism and the very characteristics that define professionals, such as self-regulation and a sense of common ethos, encourage and strengthen the development of shared identities (Muzio et al. 2013; Evetts 2015). Professional identity, or individuals’ self-understanding of their role as professionals, is created and strengthened through processes of workplace socialization based on shared norms, practices and patterns of interaction. However, it can also be shaped by personal attributes or membership of other social groups (Ashforth et al. 2008). A strong, positive professional identity provides context and meaning to one’s life and work, positive psychological effects and societal benefits (Dutton et al. 2010); it influences values and behaviours both at work and outside, as individuals embody their “professional self” (Ashforth et al. 2008).

In SLBs, professionalism influences group identity, action and use of discretion (Evans 2011; Belabas and Gerrits 2017). Professionalism enables critical reflection and resistance when the shared ethos conflicts with goals and tasks imposed by organisations, policymakers or subcontracting entities (McGhee et al. 2016; Belabas and Gerrits 2017; Giudici 2020). SLBs adapt

ideas of professionalism to face complexity and interactions with actors driven by different logics. For example, “informal SLBs” (Witcher 2021) such as grassroots activists and volunteers may rationalise the policy regime differently due to their different position within it and their relationship with formal institutions and bureaucrats. This may translate into different forms of action and self-conceptualisation, including different ideas of professionalism. SLBs are reflexive actors, constantly engaging, adapting and reinterpreting their professional identity based on multiple features and experiences.

The importance of autonomy and expertise makes horizontal accountability and peer judgment particularly important for SLBs (Lipsky 2010). Group self-governance and horizontal accountability are a regulation mechanism and a source of meaning both based on and justifying autonomy and expertise (Ellis 2011; Evans 2011); they inform group norms and values and can promote change and resistance (Thomann et al. 2023). Collective governance and accountability are constructed by shared beliefs on which tasks and values are important, and by shared perceptions on the boundaries of SLBs’ role (Hupe and Hill 2007). However, regulation and accountability also operate towards superiors, service users and the public, and so it is more appropriate to speak of multiple overlapping “accountability regimes” (Hupe and Hill 2007). Accountability regimes illustrate how SLBs are embedded in a complex web of horizontal and vertical relations, with other SLBs, systems and institutions in the policy regime (Hupe and Hill 2007), which influences their identity, norms and practices. Asylum workers interact with national institutions, public services and local communities, although these interactions have not been thoroughly explored by research (Hinger et al. 2016). The actions of SLBs result from the interaction of their individual discretion with the context they operate in; such actions constitute bottom-up policy outcomes and provide feedback to other actors in the policy regime. SLBs are thus not only policy implementers, but also policymakers (Lipsky 2010).

Following institutionalist theories of professionalism (Saks 2016), SLBs are also influenced by the nature and structure of their organisation (Hill and Hupe 2009; McGhee et al. 2016). The privatisation of public services does not necessarily negate the identity of workers as SLBs: in fact, scholars theorise the emergence of a new, hybrid category of “private state workers” (Maron 2021), private employees providing state-mandated services. This hybrid category, more common as public services adopt the logics and structures of business corporations, must balance neoliberal imperatives with the demands and obstacles of public service provision. Privatisation generally reduces the quality of both services provided and working conditions (Kirton and Guillaume 2019), while managerialism disperses accountability and discretion (Brodkin 2007). For SLBs, privatisation and marketisation cause a “dismantling of bureau-professionalism”, which is redefined around new managerial values, and generate new “differing micro environments of frontline practice” (Ellis 2011: 221). Privatisation may change how bureaucrats relate to their role

and organisation, since private sector workers generally differ from public or non-profit workers in organisational commitment and motivational structures (Maron 2021). Privatisation could increase the importance of informal SLBs through the retrenchment of services and introduce further diversity in how policy is implemented by actors with similar tasks, but different positionalities (McGhee et al. 2016; Witcher 2021). Despite the burgeoning literature about SLBs, their intersection with privatisation has not been extensively explored, especially in asylum policy. More work is needed on the impact of privatisation on SLBs' identity, positionality and practices, and on how the emerging categories of "private state workers" or "informal SLBs" relate to their organisation.

5.5. Methodology

5.5.1 Case selection

Ireland is a particularly interesting case as the only EU country with a completely privatised asylum system, making it ideal for observing how privatisation impacts the experiences of asylum workers. Ireland received limited numbers of forced migrants for years; between 2012 and 2022, asylum applications increased steadily, with a temporary decrease in 2020 due to the Covid pandemic; after the onset of the Ukrainian war in 2022, arrivals spiked by 400% (Eurostat 2024a).

DP is supervised by the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) through its International Protection Accommodation Service (IPAS). While IPAS assigns migrants to places, inspects centres and assists with queries, executive responsibility and daily management are entirely entrusted to private, for-profit firms with backgrounds in prison management, event organisation, hospitality or real estate development. Some centres are family-run hotels. IPAS contracts (2016) only cover contractors' basic duties to provide food, shelter, basic safety measures and cleaning services. DP does not provide for dedicated assistance for forced migrants, besides a weekly allowance of approximately €38 per person; residents are not entitled to mainstream welfare supports and are expected to follow mainstream channels to access healthcare and education. Contractors are not required to offer integration or orientation services. Provisions concerning the number, expertise and role of staff are scarce and vague. DP has been at full capacity since 2018 (AIDA 2019) and several emergency accommodation centres with similar contracts have been created since. A comprehensive reform was approved in 2021, but never implemented due to sudden increases in numbers.

Literature describes DP as a site of physical and social segregation, preoccupied with security and surveillance rather than migrants' access to services and successful integration. Long delays in asylum decisions (Irish Refugee Council 2021) result in people being stuck in DP for several years, typically spent in shared rooms in large collective structures, where conditions are

generally inadequate, cramped, unhygienic and occasionally unsafe (O'Brien 2013; Murphy et al. 2019). One of the most pressing issues is the inadequate supply of food: residents of most centres cannot cook or eat what or when they want, and management often overlooks dietary restrictions (O'Brien 2013; O'Reilly 2018). The lack of privacy and personal autonomy (Ní Raghallaigh et al. 2021), the many restrictions and repressive disciplinary practices imposed on residents and the emphasis on surveillance and control (O'Reilly 2018) are deeply harmful for migrants. DP deprives individuals of self-esteem, sense of purpose and belonging (Murphy et al. 2019) and particularly harms families and children (Ní Raghallaigh et al. 2021). The lack of integration services ignores the complex needs of forced migrants and hinders their ability to integrate even after leaving the system (Foreman and Ní Raghallaigh 2020). Staff is often perceived by migrants as lacking adequate skills (Ní Raghallaigh et al. 2021) and exercising disciplinary power and discretion arbitrarily (O'Reilly 2018). This sometimes results in migrants not being able to access supports or resources (Office of the Ombudsman 2018). While researchers have interviewed forced migrants and policymakers, no studies examine the Irish asylum system through the perspectives of its workers, or attempt a deeper analysis of how privatisation impacts policy implementation through their actions.

Ireland is generally categorised as a liberal market economy and the marketisation of state services has increased after the 2008 financial crisis (Dukelow and Kennett 2017). The privatised and underregulated design of Direct Provision reflects this tradition. However, attitudes toward immigration have been comparatively positive (Laurence et al. 2024); and Ireland ranks well overall in migrant integration (MIPEx 2020). In recent years, nevertheless, anti-migrant protests and attacks on sites earmarked for reception centres have become more frequent (Carroll 2023), while several independent candidates ran on a heavily anti-migrant platform in the 2024 elections. Ireland thus presents a peculiar combination of a highly criticised, rigid asylum system, traditionally positive but shifting social attitudes on immigration, and good integration outcomes.

5.5.2. Sampling, data collection and analysis

We selected stakeholders involved in the daily operations of DP as an understudied group which is nonetheless centrally involved in asylum policy implementation. Semi-structured interviews were held with 20 interviewees including staff of reception centres, civil servants and community volunteers across six locations in Ireland. Both urban and rural locations were sampled, to detect differences attributable to different local contexts (e.g. in rural centres, lack of public transport may cause more difficulties in migrants accessing services). Our focus was originally only on the staff of reception centres, as the figures officially tasked with daily policy implementation. However, it soon became clear that civil servants and/or community volunteers were also often involved in daily activities, and we included them in the sample. These groups are affiliated with different organisations (private contractors, city/county councils and grassroots organisations; see Table 1),

but perform similar tasks: providing material goods, assisting with bureaucracy, linking migrants with existing services such as healthcare or leisure clubs. Civil servants and volunteers typically intervene when staff cannot or will not adequately provide services, and thus also have to liaise and mediate with staff; furthermore, they organise social events and initiatives such as English classes, art labs and activities for children.

DP centres were contacted using a list published by IPAS. Most centres refused to be interviewed, citing scheduling conflicts or an unwillingness to attract attention in a charged social climate. This makes self-selection a limitation of this study: DP staff who accepted to be interviewed are likely to be less targeted by (real or perceived) hostility and less worried about potential backlash. Access to civil servants and volunteers was achieved through the interviewer's personal contacts and subsequent snowball sampling.

Interviews took place between February and April 2023. Table 7 details pseudonyms, location, involvement capacity and gender of interviewees.

Pseudonym	Location	Involvement capacity	Gender
<i>Caoimhe</i>	Rural	Paid staff	F
<i>Donal</i>	Rural	Paid staff	M
<i>Ella</i>	Rural	Paid staff	F
<i>Laura</i>	Rural	Paid staff	F
<i>Mark</i>	Rural	Paid staff	M
<i>Matthew</i>	Rural	Paid staff	M
<i>Mandy</i>	Rural	Paid staff	F
<i>Maeve</i>	Rural	Paid staff	F
<i>Niamh</i>	Rural	Paid staff	F
<i>Patricia</i>	Rural	Paid staff	F
<i>Sean</i>	Rural	Paid staff	M
<i>Cora</i>	Urban	Civil servant	F
<i>John</i>	Urban	Paid staff	M

<i>Juliet</i>	Urban	Volunteer	F
<i>Miriam</i>	Urban	Civil servant	F
<i>Margot</i>	Urban	Volunteer	F
<i>Oran</i>	Urban	Civil servant	M
<i>Peter</i>	Urban	Volunteer	M
<i>Rita</i>	Urban	Volunteer	F

Table 11. Pseudonym, location, involvement capacity and gender of Irish interviewees.

A review of the literature on SLBs, European and Irish asylum policy guided the selection of key themes for the interview guide. This included questions on daily routines, perceived challenges, interactions with other bureaucrats, institutions and local communities, public discourse on forced migration, professionalism and professional identity. Interviews were recorded and transcribed verbatim. Identifying information was removed from transcripts whenever possible. This was particularly important due to the increased hostility and public attention to forced migration in Ireland. The small size of the DP “industry”, which only counts a few hundred employees, increases vulnerability and makes protecting the identity of interviewees even more crucial.

Transcripts were analysed through thematic analysis (Braun and Clarke 2019) to identify common themes and more complex underlying patterns, possibly pointing to notions of identity and relations of power. Thematic analysis is a flexible, exploratory and iterative method that allows deep engagement with the data and its context. This method is particularly suited to analysing data from individuals operating within a complex system of norms, constraints and interrelations, which is also perceived as socially and politically salient. Simple thematic categories were identified and systematically coded in NVivo; then, categories were analysed more in-depth and assessed against each other for shared patterns and interconnections, following Braun and Clarke (2019). This resulted in the identification of three main thematic clusters, illustrated below.

The nature of this research increased the importance of reflecting on researcher positionality throughout the process. The interviewer acknowledged that her nationality, social class, academic background, personal beliefs and previous experience in the asylum system of another EU country, could bring assumptions into her work. Some of these elements also helped interviewees feel more comfortable and open: for example, the interviewer’s past work in the asylum system provided a shared experience. During data collection and analysis, all efforts were made to maintain openness and flexibility while rigorously engaging with the data.

5.6. Main findings

The main findings clustered around three themes: challenges in SLBs' daily work; SLBs' conceptualisation of their identity and professional role; and interactions with the context, including communities and the broader public discourse on forced migration.

5.6.1. Challenges

SLBs reported similar challenges across locations and echoed previous research on migrants' perspectives (Murphy et al. 2019; Foreman and Ni Raghallaigh 2020; Irish Refugee Council 2021). These include long delays in asylum decisions; unsuitable living conditions, especially for families and children; the inability to cook and eat autonomously; a lack of basic goods such as heating and bedsheets in newly opened centres; a systemic lack of housing and public services such as GPs and public transport, which affect communities at large but especially migrants, due to language barriers and a lack of orientation services. SLBs noted the sense of apathy, despair and lack of meaning this caused in residents, sometimes leading to problematic behaviours: "It is hard to get them to show up for meetings or show up on time [...] but I can understand that" (Cora).

Due to these diverse issues, workers spend most of their time performing tasks that are not in their job description, like filling out forms or booking appointments on behalf of residents: "everyone just comes to me for anything" (Laura). DP staff effectively gatekeep services and supports (Ellis 2011) as migrants can only access them with their assistance. Indeed, despite what IPAS contracts (2016) prescribe, in practice DP staff need to be available and able to do much more than merely providing food, board, cleaning and security. DP staff are thus constantly shifting the acceptable boundaries of their position, in a common pattern for SLBs (Belabas and Gerrits 2017). However, because this is not explicitly provided for, they can feel undertrained and underprepared for what they are called to do, especially when dealing with residents' "mental health and personal issues" (Caoimhe). The use of discretion, the feeling of under-preparedness and the perception that such assistance is an "extra" and not a contractual duty may pose obstacles to access, as indeed proven by interviews with migrants (Office of the Ombudsman 2018; O'Reilly 2018).

Interviewees respond to these challenges creatively. Some have introduced policies and practices beyond IPAS requirements to fill perceived gaps (John, Niamh): for example, one centre introduced an internal debit card system for managing food purchases. Some mobilise skills acquired in previous jobs, for example intercultural communication or conflict de-escalation (Donal, Matthew). Others mobilise their personal experiences of migration and hardship (Maeve, Niamh) or of motherhood (Patricia, Juliet) to bridge emotional distances with residents and foster empathy and mutual understanding. This is evidence of the personalised coping strategies commonly adopted by SLBs when faced with complex, unique challenges (Lipsky 2010; Tummers

et al. 2015). Here, this necessity is compounded by the lack of significant formal training, relevant qualifications or experience that may provide a well-tested repertoire of tools or solutions.

The need to constantly improvise and learn on the job reflects the complex, challenging nature of working in asylum policy implementation, which requires appropriately qualified and trained professionals (Alink et al. 2001). It is also the result of a “permanent emergency” approach to the entire DP system, which was originally supposed to be a temporary fix rather than a long-term institution employing qualified staff. Finally, the “improvisation” approach exemplifies the Irish centre-right government tendency to marketise public services and limit state intervention (Dukelow and Kennett 2018): DP contracts are simply awarded to the lowest bidder and the diversity of firms involved proves that relevant expertise is not a consideration (Ní Raghallaigh et al. 2021). Contractors in turn are not required or motivated to hire employees with relevant experience or qualifications. With the exception of civil servants, SLBs in DP cannot draw upon a pre-existing body of specialised knowledge, and although they build it on the job, there is no official repository, knowledge exchange or training system.

5.6.2. Professional identity and system problematisation

The staff of DP centres see state institutions like IPAS as implicitly or explicitly responsible for most of their issues. IPAS is seen as the designer and enforcer of rules and punishments, oftentimes with no connection to staff. For example, IPAS informs migrants rather than centres when they are no longer entitled to accommodation in DP: many residents thus stay for longer, while IPAS urges centres to free beds for incoming migrants (Matthew). Poor communication with centres is a recurring theme: for example, when a migrant is transferred to a centre, IPAS fails to communicate the reasons for the transfer or the person’s specific circumstances and needs. This further complicates the job of staff members trying to liaise with public services to address the migrants’ needs (Niamh, Laura), and in at least one case has led to a serious medical emergency (Caoimhe). Staff also criticised IPAS using transfers as punishment for violent or unruly residents, which circumvents problem-solving and may incentivise rule-breaking among residents who want to move (Patricia, Caoimhe). One manager ascribed these issues to a lack of political will to plan a functioning system:

Nothing is thought through. It’s kick the can down the road, let somebody else worry about it. [...] So I don’t see a political will a lot of the time. I see people working on the ground here [...] working, working, working all the time. But it’s like that guy pushing the stone up the hill [...] and then every time, it rolls back down. (John)

However, DP staff generally have a pragmatic approach to their job, and do not reflect on the system’s for-profit nature and its implications for their work. In fact, there is an interesting

disconnect in how staff experience the widespread lack of planning, expertise and established norms: they do not necessarily believe that the absence of detailed guidelines and their lack of specialised skills and experience betrays a flaw in system design, but they complain of the same lack of planning and guidelines when discussing interactions with IPAS and other services (Matthew, Niamh, Laura).

Unlike typical SLBs (including asylum SLBs in other countries; see Belabas and Gerrits 2017; Giudici 2020; Peroni 2025), they also do not reflect on the fairness or appropriateness of the policies they implement (Belabas and Gerrits 2017). This question was not explicitly posed to avoid leading interviewees, but the interview guide was designed to stimulate reflection in this area. Staff do not experience their own professional role as contributing to the malfunctioning of the system, even though they recognise that they are often unprepared to face issues arising. Following Hupe and Hill's (2007) proposition that differing perceptions of task importance result in different self-accountability criteria, DP staff believe their only official duty and the only measure of their performance is providing migrants with food and board. Any other task is voluntary, and despite being readily taken up, escapes the accepted boundaries of the accountability regime. The disconnect is thus between the system and the workers as units of that system: IPAS and other public institutions are seen as separate from the working lives of employees (and indeed on paper they are, since employees work for private companies). This disconnect causes staff to compartmentalise issues as stemming exclusively from the government side and prevents organic understanding of the connections between their daily tasks and the system at large. This distance is evident in the staff's language:

They're not moving them along [...] they're not really helping the people [...] to me, that's a huge issue with them [...] A lot of residents think we work for the government directly, and we try and explain, no, we're just here, we're independent. (Patricia; emphasis added)

Any possibility of resolving issues “is not about us” and it is IPAS that should change things “to make it better for the proprietors” (Matthew). Workers do not see themselves as part of a continuous policy regime, but as receptionists or hotel managers who occasionally have to interact with the regime due to the nature of their clientele. This is reflected in many statements (Laura, Donal, John, Sean, Maeve), describing the job as “just a job”, taken because of practical needs and not because of a value-based calling or sense of professionalism. The notion of belonging to a distinct professional category with shared values, goals, skills and practices is absent, and this absence impacts workers' performance and perceptions, including where issues come from (Evans 2011). In this sense, DP staff do not see themselves as SLBs.

This disconnect starkly contrasts with the view of civil servants and volunteers. These actors criticise several aspects of DP, including the “permanent emergency” framework (Oran), the practice of subcontracting management to diverse actors with no expertise (Rita), the lack of transparency and accountability (Margot), the excessive institutionalisation and surveillance (Miriam), the low bar for living standards and the lack of comprehensive support services (Juliet). These groups experience the same challenges as DP staff, but their problematisation of DP includes the staff of centres as integral parts of the system: they are hired “haphazardly” and deliver services “superficially” (Margot, Miriam, Oran). Volunteers and civil servants provide an informed “semi-outsider” perspective (McGhee et al. 2016) which more accurately and exhaustively draws connections between different levels of the asylum regime. This perspective supports existing critiques of privatised public services, highlighting how privatisation disperses accountability and lowers the quality of services (Brodkin 2007; Kirton and Guillaume 2019), and echoes reports problematising the privatised nature of DP (Office of the Ombudsman 2018).

Civil servants and volunteers reported that some DP staff would engage with them and with residents earnestly despite being untrained, but others would be uncooperative or hostile. One civil servant (Miriam) had to plead with a centre manager after a resident who clashed with a staff member was expelled with no alternative accommodation. Another (Cora) had to mediate when staff refused to allow residents in the common areas of the centre outside of mealtimes. Newly opened centres are particularly challenging: “Some of the newer centres still have a hotel mentality [...] and it’s been really, really, really difficult getting our foot in the door” (Miriam). Even when staff is open to dialogue, poor planning and regulation create issues. One volunteer (Juliet) described how female residents were supplied the wrong period products and were embarrassed to raise the issue with predominantly male staff. Another recounted a manager showing her around the same centre:

[The manager] was like, ‘Come, I’ll give you a tour’. And he was like, ‘What we’re going to do is put up pictures of the West of Ireland’. And I was like, okay, but maybe heating before we do that. Like, you know, maybe start with basic [things].
(Margot)

Civil servants and volunteers go deeper in their critical appraisal of the system, reflecting on how “in so many ways it strips migrants from their humanity” (Juliet). They recognise that having untrained staff who is constantly improvising increases inconsistency and inequality in service provision, and call for more specialised professionals delivering a wider variety of structured services. Both groups are very conscious of their separation from DP staff: while civil servants cultivate this separation as part of their distinct professional identity, volunteers ascribe an ethical value to it and explicitly “don’t want to be in bed with management” (Margot). This attitude

echoes common concerns in the voluntary sector of losing independence, reputation and organisational values when partnering with other organisations in the policy regime (McGhee et al. 2016). Both groups are also conscious that a better system would not need volunteers at all: “I think the state should be doing it. [...] I think it’s very convenient for the state that volunteers step up” (Rita). Finally, civil servants and volunteers understand DP as embedded in the Irish institutional tradition:

When you see in Ireland the government making [...] formal apologies on behalf of the state about mother-and-baby homes, about industrial schools, about the role of the Catholic Church, I used to always say, someday we’ll be making those apologies for Direct Provision. (Peter)

The different nature of stakeholders’ involvement and motivations explains the different degrees of critical reflection in their conceptualisation of the system. First, it is arguably easier to appraise the interconnections between policy design and street-level implementation from an ancillary but external position. Civil servants are of course SLBs and see themselves as such by virtue of their training and experience, which they often recall in interviews (Miriam, Oran); they display a conscious professionalism, or the idea of belonging to a distinct group characterised by shared salient practices, underlying principles, ideas about one’s professional role, and ways to relate to service users and colleagues (Hupe and Hill 2007; Evans 2011). Volunteers are informal SLBs, getting involved in DP for altruistic reasons (Rita, Margot) but remaining independent for both practical and ethical reasons. Conversely, DP staff see themselves as ordinary workers, and not necessarily as SLBs with a specific vocation, group identity or sense of professionalism. The more superficial level of involvement caused by the system’s design results in a more unreflective, uncritical analysis of the broader work environment (Belabas and Gerrits 2017). This example illustrates how privatisation dismantles or impedes the formation of a structured form of bureaucratic professionalism (Ellis 2011) which helps workers make sense of their positionality and ethos as part of a policy regime. It also prevents workers from sending feedback up the policy cycle, precluding them the possibility of being bottom-up “policymakers” (Lipsky 2010).

5.6.3. Community and public discourse

Staff and civil servants sensed mixed attitudes on DP from local communities. They were aware of the anti-immigrant protests and attacks happening in Ireland at the time of the interviews, but did not report hostility directly involving their centres, with one exception. This may reflect self-selection: centres which have not directly experienced hostility may be more willing to participate in interviews. Some interviewees reported that community members’ complaints about DP residents getting free housing or not undergoing background checks can be misinformed, but “understandable” (Laura, Sean) and contain a legitimate element of grievance.

All interviewees agreed that it had taken time for the local community to adjust to the DP centre. Furthermore, they believed timing and media exposure were crucial in determining community response: long-established centres mostly had no issues, whereas new openings were more likely to have encountered opposition (Matthew). This acknowledges the increasing salience of the issue and the growth of polarised reactions in the community. John, a manager working in DP for twenty years and the only worker who reported discrimination targeting his centre, stated that “Ireland was more welcoming back then” and cited “[people getting] fooled by social media” and “the actions of the far right” as reasons for the deterioration of attitudes. Nonetheless, most centres reported examples of positive community involvement, including volunteers coming to teach English or residents enrolling in local sports teams.

Volunteers from a city marked by frequent anti-immigration protests reported being “on eggshells” (Juliet) about anti-immigration attitudes in their community and experiencing hostility while canvassing the neighbourhood to recruit new volunteers. Firsthand experience of increasing visibility of asylum and related hostility increased their motivation to get involved: “Our area kept being used [to showcase anti-migrant sentiment] even though this was happening kind of all over Ireland [...] I was, like, mortified that people would think that that was representative of everybody” (Juliet). Negative neighbourhood reactions and unprecedented public attention thus determined at least partly the intervention of a new group of stakeholders, motivated by a desire to change and “clean up” the narrative about their own community, and by extension themselves.

Interestingly, volunteers believed that greater media and public attention also had positive effects, raising awareness and allowing them a platform to counter the anti-migrant narrative. DP staff, conversely, generally believed increased attention only led to more tension and an unjust stigmatisation of DP workers by uninformed outsiders (Caoimhe, Patricia). Again, different groups see the broader playing field differently: external stakeholders are more conscious of the interrelation of forces and discourses at play and of how they can leverage it, while DP staff mostly believe that media and public discourse represent undue, unnecessary external interference. These findings demonstrate how the perceptions and behaviour of SLBs are influenced by factors that go beyond individual and organisational traits to include the broader context of policy regime implementation (Hill and Hupe 2009; Belabas and Gerrits 2017). These factors interact with bureaucrats’ self-constructed identity and role and produce complex patterns of action.

5.7. Discussion and conclusions

A crucial element emerges from this research, which has implications not only for the system’s daily functioning, but also for how it is internally and externally perceived: workers in the Irish asylum regime do not see themselves as part of the system. Staff locate all problems in the clearly separate, antagonistic realm of state institutions and public policy. Accordingly, they do not reflect

on the broader significance of the asylum regime: they perceive themselves as ordinary people doing ordinary jobs, and not part of a policy regime. DP workers fit the classic description of SLBs (Lipsky 2010) but do not perceive themselves as such. Conversely, civil servants and volunteers, who have different motivational structures and ideas of bureaucratic professionalism, are able to critically examine the system and their own distinct position within it, and can even maintain a vocal stance against the system without experiencing ambivalence (McGhee et al. 2016; Giudici 2020). The ability to critically situate and examine one's own professional identity within a broader regime appears a key element enabling the use of professionalism in SLBs' work.

We argue that the disconnect between high-level policy design and governance systems and lower-level implementation units and practices is a two-way disconnect: a lack of top-down coordination and accountability (Hupe and Hill 2007) built into the privatised design of the system, and a lack of a bottom-up professional identity acting as a horizontal binding agent (Evans 2011). From a top-down perspective, DP as a combination of poor services, high institutionalisation and poor connections with other public services stems from the Irish state tradition of economic liberalism (Dukelow and Kennett 2018) and a short-sighted "permanent emergency" approach to asylum. In this approach, contractors and their employees do not need specialised skills, a sense of shared professional ethic or service to deliver these basic services; they can interpret contracts differently; they can work untrained and largely unsupervised. From a bottom-up perspective, being an asylum SLB can easily be perceived as "just a job" if skill-based entry barriers are low; any work beyond the bare minimum prescribed by contracts is left to the goodwill of staff, in a distorted form of discretion which escapes the norms of bureaucratic professionalism and group accountability (Hupe and Hill 2007; Ellis 2011). The lack of training and professional identity exacerbates systemic flaws already embedded in the policy regime and removes another foundational element of professionalism (Belabas and Gerrits 2017). Furthermore, if SLBs do not see themselves as part of a system, there is no effective feedback mechanism that could spur change from below (Thomann et al. 2023), and little to no horizontal accountability (Hupe and Hill 2007). The action of SLBs is curtailed by their failure to see themselves as such.

Our findings reaffirm the key importance of professionalism as a group-constructed concept strictly linked to reflexivity, relationality and group identity (Evans 2011): without a shared notion of professionalism, frontline practices lose their defining characteristics (Tummers et al. 2015). They also contrast other studies exploring the subjectivities of SLBs in non-privatised asylum regimes and providing evidence of critical reflection on their role (Eggebo 2013; McGhee et al. 2016; Giudici 2020; Shiff 2021; Peroni 2025), suggesting that a privatised asylum system does not provide the conditions for SLBs to engage in such reflection and therefore to enact professionalism. The importance of identity and relationality points to the need to expand this analysis to important dimensions of workers' identity which mediate their action and interactions

with their context, such as race and gender. These dimensions were not explicitly integrated into this first analysis, despite being inevitably embedded in the social and institutional context of SLBs' action and self-conceptualisation: future research could productively revisit the material through a critical race or gender framework, to complement existing findings and illuminate how questions of gender and race contribute to shaping SLB's identity, positionality (or lack thereof) and interaction with their context.

We argue that conceptualising and treating asylum policy implementation as an ordinary job, disconnected from policy and power regimes, removes the possibility for SLB critical insight by removing their sense of belonging to an organic system proceeding from high-level policymakers to their daily tasks. With no insight informed by SLBs' privileged position, no bottom-up feedback or change is possible, and SLBs' defining capacity to exercise discretion and flexibility is impaired (Lipsky 2010; Tummers et al. 2015). Policy implementation and the delivery of public services are thus deprived of important adaptability mechanisms that permit the realisation of policy outcomes in underresourced and constraining environments (Thomann et al. 2023). This insight is particularly important considering the growing tendency to privatise asylum and to establish "emergency" reception centres (Darling 2016; Humphris and Sigona 2019). The Irish case offers a compelling account of what can malfunction in a privatised asylum system, which in the name of cost-effectiveness fails to deliver for all stakeholders due to a lack of planning and adequate investment, resulting in inaction at the street level. Our analysis can be applied to more cases where asylum services are being subcontracted or privatised, to examine whether the same or other context-specific factors are relevant.

Our findings confirm that the perspective of SLBs is crucial in a comprehensive analysis of policy regimes, especially in asylum regimes, where bureaucrats' role intersects with forced migrants' wide-ranging needs and vulnerabilities and with the regime's broader societal and political implications (Alink et al. 2001). Indeed, the features of a policy regime shapes policy outcomes precisely through the skills, identities and perceptions of its SLBs (Hill and Hupe 2009). Examining the bureaucrats' perceptions and experiences illuminates street-level practices and dynamics which may explain systemic flaws, but are typically overlooked by higher-level analyses (Darling 2016; Yin 2023). These practices and dynamics shaped by the private nature of the system have tangible repercussions on the way SLBs perform their job, and therefore on the living conditions and outcomes for migrants living in DP. Our study points to an underexplored way in which privatisation changes public service delivery, through its influence on workers' professionalism and sense of identity; building on a relatively underdeveloped body of work focusing on SLBs' identity and professionalism in privatised regimes (Ellis 2011; Maron 2021). Comparing and contrasting the perceptions and critical assessments of staff with those of parallel stakeholders with different backgrounds and levels of involvement, such as civil servants and

volunteers, further highlights how the design and features of an asylum regime determine what kind of workers it will have, and consequently the experiences of forced migrants. Incidentally, the shortcomings of DP emphasised by SLBs confirm existing findings based on interviews with migrants. There is a specular correspondence between the experiences of migrants and workers, which points to the importance of workers' perspective not only per se, but also as a sounding board and a fundamental link in the bottom-up feedback chain that goes from service users to policymakers (Lipsky 2010). One final suggestion is therefore for research and policy not to overlook the experiences and subjectivities of "ordinary" frontline workers in asylum regimes in favour of SLBs who manage asylum policy far from forced migrants (Shiff 2021) or only occasionally (Eggebo 2013).

Chapter 6: Conclusion

6.1. Overview

This thesis set out to investigate the implementation of asylum policy in different contexts across two countries which present significant differences in their political and economic circumstances and in the design of their asylum systems. Each paper examined different dimensions of the national-level and local-level context to investigate how they may shape asylum policy implementation, under the core assumption that policy is not a neutral or purely administrative product, but a socially produced, contextually embedded process. The research question that this thesis sought to address is: what shapes and characterises the implementation of Irish and Italian asylum policy at the national, local and individual level?

The simplest and most accurate answer to this question, in light of the thesis' findings, is that asylum policy implementation is highly dependent on, and arguably unique to, the context where it is happening. There is no ready-made, universal and transferable set of elements that can steer it in a specific direction, produce or ensure certain outcomes: rather, the production of asylum is continuously shaped and reshaped by the interplay of specific national, local, organisational and individual-level contexts where policy implementation is taking place. This process is iterative, relational and situated; it evolves through interactions between actors, institutions and communities; and it produces outcomes that are deeply specific to their context. Such outcomes are the final result of multiple contextual levels interacting with each other, from the national public discourse and asylum system design to the local political culture, infrastructure of challenges and opportunities, community structures; from the rules and regulations governing the action of asylum street-level bureaucrats to their individual values, motivation, experiences and relationships with other stakeholders. While all of these elements and more play a role in constructing and shaping how asylum policy is implemented in a certain place at a certain time, no element alone is able to predict or explain a certain outcome. For example, an asylum project located in a wealthy and progressive urban environment does not necessarily result in positive encounters between forced migrants and the local community, or in successful social integration. Similarly, an asylum project located in a rural, conservative area does not always mean a hostile local community.

The central argument of this thesis and its first contribution to knowledge is that the implementation and outcomes of asylum policy cannot be reduced to a static or deterministic model. On the contrary, they result from each unique, multi-scalar configuration of structural conditions, institutional frameworks, sociocultural milieu and human agency defining each implementation context. By adopting a comparative, locality-focused approach, the thesis shows that commonly used analytical cleavages such as urban/rural or progressive/conservative are insufficient to capture the complexity of how asylum is produced on the ground. Instead, it argues for a richer conceptualisation of locality as a dynamic, relational and socially constructed context. This directly

contributes to the growing scholarship on the “local turn” in migration governance by providing detailed empirical evidence of how specific local configurations shape the construction and practice of asylum in distinct ways.

Second, the thesis offers a theoretical and empirical contribution to the study of asylum street-level bureaucrats, a group whose practices, identities and experiences remain understudied. It demonstrates that asylum SLBs are doubly embedded actors, simultaneously shaped by national policy frameworks and by the social environments of the places where they work; and that their actions are crucially shaped by this embeddedness or by its absence. By analysing how discretion, professional identity and organisational structure operate differently across diverse asylum settings, the thesis extends classic street-level bureaucracy theory to a fragmented, increasingly privatised policy domain. In doing so, it illuminates how privatisation disrupts professional identity, accountability and institutional coherence, offering new insight into the consequences of marketisation for frontline workers.

Together, these contributions deepen theoretical understandings of how asylum systems function in practice and provide a more grounded, context-aware framework for analysing and improving policy implementation. The importance of contextual elements and structure and the myriad combinations possible between them highlight the extremely nuanced, dynamic and complex character of this particular policy area, and discourage any analysis or policy recommendation that does not take this nuance and complexity into account. In practice, the implementation of asylum policy does not follow a linear trajectory from design to outcome and does not respond well to one-size-fits-all approaches: it needs flexible, context-sensitive strategies that can adapt to diverse local realities.

6.2. Contributions

This thesis sought to critically advance understanding of how asylum policy is implemented in its local context, which elements and processes shape the practice of implementation, and with what consequences. To achieve such an understanding is particularly meaningful, given the complex and contentious nature of asylum policy, the continued relevance of forced migration in the public debate of European countries, and the persistent policy need to absorb forced migration in a way that is constructive and beneficial to forced migrants, host communities and frontline workers. I have focused on two main elements which I argue are key in shaping policy implementation, namely the influence of locality and local context and the role of street-level bureaucrats. The main contributions that this thesis provides to the knowledge and debate about forced migration and asylum policy centre around these elements. First, the thesis provides new conceptual and empirical insights into the local production of asylum policy, showing how the characteristics of individual localities and their institutional ecologies shape implementation outcomes in diverse and sometimes

unexpected ways, and how attention to locality should always encompass an analysis of its multiple aspects. Second, it advances the understanding of street-level bureaucracy by highlighting the unique position of asylum SLBs as actors “doubly embedded” in both institutional structures and the social and political environments where they work. Third, it integrates these two dimensions into a multi-scalar framework that links national discourses, system design, local context and individual action, offering a richer and more situated understanding of how asylum policy is actually produced and experienced.

With regard to the first contribution, the thesis emphasises the key role of locality and local context in constructing, shaping and producing asylum within asylum regimes which are themselves the product of specific national and institutional cultures. Building on the already established importance of locality in producing and shaping asylum and immigration policy (Glick Schiller and Caglar 2009; Hinger et al. 2016; Phillimore 2020), the thesis deepens the insights of this research strand by providing a rich, in-depth exploration of exactly which elements of specific local contexts act and interact in which way to shape policy implementation. This context-focused approach takes into account not only formal policy instruments and asylum system designs, but also indirect ways in which asylum policy comes to fruition, for example through interactions between migrants and the community. By understanding and analysing asylum policy implementation as an organic ensemble of relations and interactions happening at multiple levels, this thesis provides an alternative and more nuanced perspective compared to existing research in this area, which is often limited to the analysis of specific elements of local context such as urban or rural location, economic circumstances or social attitudes (Bock 2018; Crawley, Drinkwater and Kausar 2019; Whyte, Larsen and Fog Olwig 2019; Fratesi, Percoco and Proietti 2019; Semprebon et al. 2023). The continuous attention to locality in its entirety shows that commonly used analytical categories such as urban versus rural, while still insightful, cannot adequately capture the complexity and variety of the local production of asylum when used on their own, and not within an all-encompassing, fluid understanding of locality. Indeed, focusing on specific cleavages or categories may lead to oversimplify the analysis or to overlook important elements which cannot be easily ascribed to e.g. an urban/rural divide, or a difference in the local political culture. This thesis in fact showed that local contexts interact with other factors to shape asylum policy implementation in diverse and sometimes unexpected ways: for example, political culture alone fails to coherently explain community attitudes toward forced migrants.

To truly advance understanding of how asylum policy is implemented in specific contexts. I argue for a rich, detailed analysis of policy implementation in context, without necessarily aiming for generalisation or replicability, fully adopting the “local turn” perspective that many scholars in migration studies advocate for (Zapata-Barrero et al. 2017) and acknowledging that such an analysis is the only way to improve our understanding of how local context shapes migration, which is still

limited and imperfect (Lara-Garcia 2022). This does not mean that higher-level elements are not worth exploring, as the ultimate result of the policy process is influenced by multiple scales of interrelated factors. Indeed, this thesis also analysed national-level political and media narratives and interpretive frames used to discuss forced migration and asylum. However, such higher-level elements are a part of the whole just as local and individual-level elements are, and their analysis should only provide a starting point for a more narrowly focused study of how localities implement asylum policy by adding their own unique sets of obstacles, opportunities and characteristics to the mix. This approach contributes to and strengthens the current empirical and theoretical literature on the local production of asylum policy, which conceptualises policy implementation as a socially produced, locally driven and contextually bound process; and it strengthens the argument that any adequate understanding of how asylum systems and asylum policy work in practice must be grounded in a fine-grained, locally focused and context-sensitive analysis.

The second major contribution concerns the role, identity and agency of asylum street-level bureaucrats. Throughout this thesis, I have sought to bring more attention to the category of asylum SLBs, whose diversity, roles, professional identity, positionality and experiences have not been extensively explored in research analysing asylum systems. In the Irish case, this was the first study conducting semi-structured interviews with Direct Provision staff, and providing insight into how they perceive and enact their roles. The findings demonstrate that asylum SLBs represent a fundamental link between the policy process and the context where policy is implemented: in fact, they are the point where institutional design, national discourses and political orientations, and local realities converge, producing specific practices and policy outcomes. This thesis therefore introduces the concept of asylum SLBs' "double embeddedness" in the institutional policy process and in the external local context, which I argue constitutes a unique feature of SLBs. Double embeddedness is particularly relevant in a policy regime like an asylum system, which works through repeated interactions between SLBs and their context across several areas such as law and security, healthcare, education, informal interactions with community members and forced migrants, and more. All these interactions are social and relational processes which are shaped by SLBs' skills, identities, ways of relating to each other, to migrants and to other institutions, ways of thinking about their job and the system they are part of. In this thesis, I argue that SLBs' perspectives and routines offer a unique insight into the complexity and locally produced nature of the implementation process, and that these figures should be at the centre of any in-depth analysis of asylum policy implementation and any policy consideration aimed at improving it.

Further, this thesis adds perspective to classic understandings of street-level bureaucracy by showing that classic definitions and traits of SLBs, such as the use of individual discretion and the presence of professionalism, do not always apply to asylum SLBs, or apply differently to different groups of SLBs characterised by a different positionality and self-conceptualised identity.

The importance of investigating the role, identity and practices of different groups of asylum SLBs is heightened by recent tendencies toward the fragmentation, commercialisation and privatisation of asylum services (Darling 2016; Humphris and Sigona 2019; Vianelli 2021), a relatively new phenomenon whose consequences, especially on asylum workers, have not been fully examined yet. The emergence of different groups of formal or informal SLBs working side by side with each other, sometimes with each other and occasionally even against each other, speaks to the key importance of focusing on the different subjectivities, shared ethos, modes of organisation and practices that can coexist within the broader galaxy of asylum SLBs.

Third, the two complementary dimensions of locality and SLB agency are located within a broader system which encompasses higher-level elements as well, such as the top-down design of national asylum systems, the political and institutional culture predominant in the country, and national shared discourses, frames and processes of meaning-making which both reflect and influence policy. This thesis integrates all these elements in a multi-scalar approach that allows to appraise meaningful interconnections between levels and examine each element in relation to the others, while at the same time acknowledging and exploring it in its complexity. Moving from the general to the particular, the thesis connects national-level frames and discourses to the design of the asylum system, to local contexts of implementation and individual experiences of SLBs. All these elements are interconnected in multiple meaningful ways to produce and reproduce asylum policy, and connections never go in one direction only. For example, national interpretive frames construct a certain idea of forced migrants and asylum which influences top-down policy orientations, but also bottom-up community responses and SLB practices; at the same time, communities and SLBs can co-opt frames in their daily action, but also adapt them to their local context and potentially introduce new meanings through their daily practices and encounters. Similarly, in an increasingly fragmented and under resourced policy environment, contextual embeddedness and identity fluidity as elements of SLB practice are both a symptom and a consequence of the neoliberal restructuring of asylum governance. In this research, I have linked privatisation to negative work experiences for asylum SLBs through a lack of development of a distinct professional identity and feeling of belonging to an institutionalised system. In turn, the failure of some asylum SLBs to see themselves as such breaks the feedback cycle that can influence policy design from the bottom up, and possibly implement change thanks to the professionalism and experiences of frontline workers connected with and through a larger policy regime. These findings shed light on previously overlooked effects of privatisation on professional identity, and on their particular relevance in a contentious policy area such as asylum.

The comparison between Italy and Ireland, the two countries chosen as case studies for this research, illustrates these findings. Findings from interviews conducted at different sites underscore that even within each country, each local context is fundamentally shaped by its own history,

infrastructure and sociocultural traditions. Therefore, directly comparing local contexts of implementation within or across countries would be analytically inaccurate and conceptually misplaced, as each context should be examined in its own right to avoid fruitless generalisation. However, some cross-country insights emerge from the comparison at the level of institutional design.

The completely privatised Irish system results in a lack of regulation, peer accountability and interconnectedness with other institutions which is the opposite of what can be observed in the Italian SAI system. This difference plays out not only in the services and supports offered to forced migrants, but also in the role and identity of asylum SLBs. In Italy, asylum SLBs are professionals with relevant backgrounds and motivational structures who are better integrated with broader social services thanks to system design; in Ireland, on the contrary, they are largely employees of private companies with minimal training and prior experience. The design of the Italian system builds peer accountability and support, shared decision-making and a holistic approach to the integration of forced migrants into the everyday practices of asylum SLBs, making their work simpler and less stressful and strengthening their perception that it is aligned with their personal values; in Ireland, no such structure exists, leaving SLBs isolated and structurally discouraged from critically reflecting on their own positionality within a policy regime. The space for critique and systemic reflection is instead filled by complementary SLBs such as civil servants or community volunteers, who are able to perform this work precisely because they are outside the system proper. To summarise, the Irish system offers a glimpse into the shortcomings and consequences of the privatisation of asylum in its different areas, while the Italian system provides a perspective on what an alternative could look like. Despite this, it is important to note that even in the Italian context, a highly privatised and streamlined model of asylum governance, relying on “emergency” centres and similar to the Irish Direct Provision system, is emerging as a shortcut in times of “crisis”, and the SAI system has actually come to host a minority of the country’s population of forced migrants. This suggests that tendencies to privatise and externalise asylum are not by any means unique to Ireland.

Finally, despite the uniqueness of each local context of implementation, the comparison between Italy and Ireland also illustrates the role of national-level shared narratives and political climates: broader discourses about forced migration and asylum policy influence every step of the process, from policy formulation to everyday practice, from interactions with communities to processes of systemic change (or lack thereof). In this respect, it is interesting to observe how national-level frames are remarkably similar and stable across countries and over time, despite Ireland and Italy having a fundamentally different history with forced migration. It will remain highly interest to trace the evolution of this and other aspects of asylum policy as Ireland continues to experience a fast-paced and momentous change in the number of forced migrants hosted,

accompanied by a nascent change in historically positive attitudes. Italy, on the other hand, has a more established history with forced migration which could perhaps lead to continued stability in national discourses and policy regimes.

6.3. Implications

The findings of this thesis have implications for the formulation of asylum policy and its implementation at different levels. A more nuanced insight into what determines variations in implementation outcomes allows policymakers and SLBs to better understand their own practices as embedded in specific contexts, and thus to fine-tune, improve and tailor policies to the specific environment where they are being implemented. Rather than treating policy implementation as a standard, isolated and neutral process of execution of national policy, the evidence presented in this thesis highlights the need for context-sensitive, adaptive and multi-scalar policy designs recognising the key importance of locality and SLB agency. For example, the crucial role of off-duty mediated encounters between forced migrants and communities could be the starting point for the ideation of social integration initiatives that use this “intermediate link” to overcome hostile local attitudes and political traditions. A policy regime such as the Italian SAI, heavily based on decentralisation and on the devolution of day-to-day management to civil society actors often operating exclusively on the small scale of their locality, should be informed by a more thorough understanding of context-based local dynamics and their possible influence on the functioning of the system. These considerations should be more explicitly incorporated in the formulation of strategies and implementation of policy at the local level, taking advantage of the flexibility and “group-based discretion” that the system design already affords SLBs. This research has shown that local contexts do not always respond to forced migration as their location, political leanings and cultural traditions may predict, and this is all the more reason to focus on the exact local context.

Moving up to the policy regime level, this thesis underscores the risks associated with privatisation in asylum policy, which often counteracts stated policy goals and is likely to result in added obstacles and worse experiences for migrants and workers alike. Privatisation tends to disperse accountability, professionalism and specialised knowledge (Brodkin 2007; Evans 2011); by discouraging SLB’s forming a clear professional identity and becoming embedded in a policy regime, it negatively affects their capacity for critical reflection, accountability and meaningful feedback; it makes their job harder by hindering interconnectedness and transparency. This set of findings is particularly interesting in light of the increasing tendency to subcontract or privatise public services, including asylum services, observable across host countries (Darling 2016). It questions the viability, assumed benefits and ultimate utility of privatising and marketising such services for cost-effectiveness reasons, and it does so through the previously underexplored perspective of asylum workers.

Lastly, moving up yet again to a broader level, while the thesis focuses predominantly on the local and individual level, it does not ignore the relevance and persistence of national-level political and media narratives, nor their influence in how forced migration and asylum policy are conceptualised at the policymaking level, perceived and enacted at the community level, and reflected upon, internalised and repurposed by individual SLBs. The analysis of interpretive frames included in this thesis has shown how these frames tend to remain unchanged in response to key events that have the potential to change the narrative on forced migration. National-level interpretive frames used by politicians and mainstream media are the product of social and cultural elements that predate recent developments in forced migration and are deeply embedded in shared identities; as packages of meanings produced and reproduced by elites with institutionalised authority and broad reach, they have particular prestige and power in shaping shared understandings of asylum policy. The persistent use of national discourses depicting asylum, forced migrants and national responses in certain entrenched ways has powerful consequences in shaping how asylum policy is conceptualised, discussed and implemented.

The first effect of shared narratives is on policymakers themselves and translates into how asylum systems are designed, how they function, and what possibilities are there for constructively changing them. For example, a narrative portraying the arrival of forced migrants as a chaotic “emergency” certainly does not favour a conceptualisation of asylum policy as a long-term policy problem, which needs to be accompanied by long-term planning, a careful consideration of the local context of implementation, and the work of skilled professionals. On the contrary, such a narrative does not stand in the way of the “permanent emergency” policy framework which results in haphazard subcontracting, the proliferation of centres where forced migrants are offered far fewer services and supports than they are entitled to under the statutory system, or the failed implementation of any statutory system at all, as is the case with Ireland and Direct Provision. Generally, the immutability of frames perhaps offers an explanation for the apparent incapacity (or lack of political will) to truly reform and improve asylum systems towards their stated goals; or for the persistence of a securitised, one-size-fits-all approach even in the face of evidence to the contrary. Being aware not only of the power of frames in shaping policy, but also of the building blocks that compose them and of the true narratives and meaning-making processes lying behind their immediate appearance, can promote an informed use of discourses and critical awareness of their consequences in all actors involved in the policy process.

The second effect of national-level shared is at the local and individual level: they are a fundamental part of how individuals and communities perceive and construct themselves and the other, and as such they play a prominent role in the mix of elements which determines how communities and individuals, including asylum SLBs, respond to forced migration. National-level frames trickle down and compenetrates pre-existing social and cultural frameworks, influencing how

community members and double embedded SLBs interact with forced migrants, institutions and each other. Especially when the system design does not allow for everyday encounters between migrants and their host communities, shared narratives and frames provide the foundation for attitudes and perceptions which can be hostile or exclusionary when those narratives emphasise a sense of chaos, powerlessness and lack of control amid the arrival of unknown others. The interaction between frames produced and reproduced at the national level and other actors and moments within the policy regime is complex and not necessarily straightforward, precisely because it happens in widely different local contexts and influences different individuals. Indeed, it can often work in unpredictable ways, as noted for example by some of the Veneto interviewees when remarking that the political tradition of conservatism and the social attitudes of distrust towards outsiders are undoubtedly supported by national-level narratives, but turn out to be less monolithic and strong than expected in everyday encounters. Nonetheless, national-level narratives influence the action of institutional actors, the interactions between migrants and host communities, the way in which asylum SLBs conceptualise their professional identity and the motivation for their action. A clear example of this is informal SLBs in Ireland getting involved as volunteers in response to a narrative reproduced in the media all over the country, depicting their specific community as particularly hostile to newly arrived forced migrants. In this case, a national-level narrative directly shaped the intervention of informal SLBs in a policy area and local context where they had previously been inactive, and which their action contributed to change.

6.4. Limitations and directions for further research

This research presents several limitations linked to its methods and the nature of the subject matter. The first limitation is inherently linked to the qualitative methods used for this thesis, including semi-structured interviews, content analysis, frame analysis and discourse analysis. These methods are all based on the analysis of texts and meanings produced by individuals; they also offer considerable flexibility in the collection, interpretation and analysis stage, not being constrained by a rigid normative or procedural structure. These features imply an inevitable level of subjectivity as the researcher designs the research, collects and analyses data. The researcher's positionality and views influence this process in ways that are difficult to predict or recognise completely (Braun and Clarke 2019). Qualitative data are open to multiple interpretations, and one cannot discount the role of the researcher's positionality and background in choosing what questions to ask and how to interpret the answers (Braun and Clarke 2006; Diefenbach 2009). This should not disqualify the methods in question, but rather be taken into account when considering the richness and complexity of the findings.

In this case, an important element to note in regard to researcher positionality is my long-standing interest, experience and involvement in research and practice on forced migration and

asylum policy. My personal trajectory in this respect started with personal interest in forced migration as I came into contact with the phenomenon of the “refugee crisis” and its salience in my home country of Italy; it continued with my choice to pursue a traineeship in Cyprus in a non-profit organisation providing assistance and advocacy to forced migrants, which resulted in a first research project about how Cypriot history and society mediated Cypriot responses to the “refugee crisis” and shaped the country’s asylum system; it progressed to my professional involvement as a worker in the Bologna SAI project, and finally to the ideation of this research project. This history, intersecting with my personal values and political views, gave me not only insider knowledge on EU asylum policy in general, the Italian asylum system and the functioning of a specific project, but also contacts I could use to recruit participants. While these advantages helped me in gaining access to interviewees and fostering an atmosphere of trust and mutual understanding, they also introduced the possibility of bias. Of course, no researcher can ever be completely unbiased; in my case, having had a sustained interest in forced migration and professional experiences in the sector, including most notably in the SAI system, added to the baggage of assumptions and personal perspectives which informs every researcher’s approach and analysis. Some of these assumptions were indeed complicated or disproved by the data I collected, for example when many SAI workers in Bologna reported difficulties in connecting forced migrants with the local community. As Braun and Clarke (2019) suggest, I have tried to “own my perspective” throughout this process, being constantly aware of it without letting it hinder my judgment or obfuscate the findings. Nonetheless, and while it is of course difficult to flesh out exactly how, my framing of the research questions, my choices in collecting and interpreting data, and my identification of key themes and findings were inevitably shaped by my location within the field, socially, professionally and politically.

Beyond professional experience, other aspects of my identity, including gender, race, age, citizenship, migratory background, class, educational background and political views all affected interaction with interviewees and the analytical lens I brought to the research. These positional elements sometimes enabled rapport, particularly with women and younger interviewees, or interviewees sharing a migratory background in the Irish context; but they may also have narrowed my interpretive scope as a researcher, for example leading me to more readily empathise with perspectives I felt were resonant, or to overlook certain dynamics that were less visible or went against my implicit assumptions. My Italian and EU background positioned me as both insider and outsider in the Irish context: familiar with the institutional logic of asylum, but also partly external to the everyday experiences of interviewees. My broader social and political values, themselves shaped by engagement in progressive and activist spaces, may have influenced the framing of the research questions, the choice to focus on SLBs, and the interpretation of findings: for example by directing attention to themes that aligned with my intellectual, political and ethical concerns, while potentially downplaying other dimensions (including for example gender and race) that could have

emerged with a different analytical lens. Recognising my own positionality as a limitation does not invalidate the research, but helps further situate it and highlight the impossibility of complete neutrality in qualitative inquiry.

Furthermore, this research used semi-structured interviews based on the recruitment of willing participants. This method introduces other individuals in the process, with different subjectivities, different motivations to participate (or not) and different expectations about the process and its results. For this thesis, participants were asked to discuss elements of their professional and personal life which were perceived as meaningful and sometimes problematic, and to self-report facts about their work routine and related events which could have been reported less than accurately (Diefenbach 2009). Moreover, forced migration and asylum policy are deeply contentious themes in both Italy and Ireland, the asylum industry in both countries and especially in Ireland is relatively small, and some interviewees or potential interviewees shared concerns that participating would expose them to negative public attention. This resulted in significant issues in accessing Irish interviewees in the preliminary phases of the project, issues that were partially solved once again thanks to personal contacts. It is likely that the interviewees who did agree to participate were less vulnerable or less worried about negative repercussions, and perhaps less likely to hold or express particularly negative or contentious views; therefore, and despite interpreting findings critically in light of this, I cannot exclude the possibility of a participant bias in my sample, which constitutes one of the biggest limitations of this study. The potential vulnerability of interviewees also raised ethical issues regarding the protection of their anonymity, which were addressed by strictly adhering to ethical guidelines in terms of anonymisation, informed consent and data protection.

Both the methods used and the fact that this research has willingly focused on local contexts and individual experiences imply limitations in terms of generalisability and replicability of the findings. This is a common concern when conducting qualitative research (Bakewell 2008; Diefenbach 2009) which is by its nature limited in scope. Indeed, this thesis focuses on two specific countries and on specific contexts within those countries, and the assumption that every local context is unique and produces asylum policy in specific ways underpins this research. This does not discount the value of the findings: the point of qualitative research is not necessarily to generalise, but rather to engage in-depth with rich material in its context, and to achieve a nuanced understanding of a complex phenomenon of interest, which could then lead to formulating theory inductively, problematising existing knowledge and questioning ingrained ways of thinking (Köhler et al. 2022). Qualitative research typically deals with unquantifiable elements of human behaviour that cannot be easily operationalised, such as ideas, identities and relationships (Maxwell 2013). Case studies in particular are by their very nature unique, but emerging themes, patterns and trends can constitute the starting point for broader, informed insights which do not try to erase complexity,

but instead acknowledge and incorporate it. This makes case studies an appropriate methodology to analyse complex phenomena composed of multiple interrelated parts, and to complement or challenge existing knowledge in a specific field (Queirós et al. 2017).

Despite its limitations, this research raises some questions and insights that are worth exploring further. First, it renews the invitation to examine asylum policy in its local context and thus to analyse more examples of localities implementing asylum, in order to identify processes and elements that may not have been relevant in the cases examined here. For example, both SAI projects sampled in Italy are located in areas with a thriving economy and a low level of unemployment relative to the rest of the country; arguably, research conducted in economically marginalised or deprived areas could yield different findings and uncover different mechanisms that contribute to the local production of asylum policy. Secondly, the temporal dimension could also be relevant, and therefore it is worth exploring how local implementation of asylum policy changes over time: for example, by sampling centres in Ireland again as the theme of forced migration becomes more and more salient and contentious and public attitudes change (Irish Times 2024). The same logic can be applied to reception centres and local asylum projects in other localities, communities and countries. More rich, qualitative data are needed from different country contexts and different localities within them. Ultimately, such an incremental approach to asylum policy research could help reveal whether there is in fact an “ideal” mix of contextual elements which guarantees good integration outcomes for forced migrants and local communities and a positive working experience for asylum SLBs, and perhaps inform subsequent policy choices accordingly.

Secondly, this thesis advances some important considerations regarding asylum SLBs, and principally that they are a distinct and peculiar category of SLBs which may not strictly adhere to the classic SLB definition, and thus merits more focused attention. It is necessary to further distinguish between the different groups of asylum SLBs involved in asylum policy in different capacities: for example, SLBs who conduct asylum interviews and adjudicate asylum claims are likely to operate differently from SLBs who run reception centres, or from dedicated integration SLBs who are external to centres but interact with forced migrants for specific purposes. Since every country has its own asylum system, even a simple mapping of what kind of asylum SLBs are active in each national system, in what roles and in what kind of relation to each other is a complex task, which nonetheless could set the basis for a more rigorous and informed analysis of each group. Even just focusing on asylum SLBs who manage centres and projects, some interesting elements emerge from this research which should be investigated further, such as the role of collective discretion as a positive element reinforcing workers’ morale and resolve, or the pivotal role of professional identity in ensuring that SLBs perform their roles as intended, and the negative consequences that a lack of such identity can have on policy implementation and feedback in the

policy process. These dynamics could be explored more in depth and across different groups of SLBs to assess whether they are at play, whether they function in the same way across different contexts, and whether they have different consequences on policy implementation. Finally, this research has highlighted how in certain contexts, civil servants and informal SLBs involved in the implementation of asylum policy can differ significantly from “standard” asylum SLBs in their motivations, critical engagement with the system and the policy process, and self-identity. Given the diversity of actors involved and especially the increasing importance of informal SLBs in asylum policy and other policy areas across Western states, this finding elicits further attention and reflection on its consequences, e.g. to assess who gets involved when, with what motivations and with what consequences on the policy process, how this changes relationships and balances with formal institutions and SLBs, forced migrants and local communities.

Thirdly, and moving to a broader level of analysis, this thesis has shown that frames and public narratives about forced migration, forced migrants and asylum policy are resistant to change and remain stable and consistent across an extended timeframe characterised by numerous key events which had the potential to change predominant frames and discourses, but did not. At the same time, this research has shown that political elites and media outlets may adopt different frames when discussing the same phenomenon, but these differences may only be superficial. These findings prove that the development and mobilisation of narratives, frames and discourses is more complex than it may seem at first glance, not necessarily explained by commonly cited elements such as political cleavages or economic circumstances, and heavily dependent on context. Shared national identities, traditions and historical legacies may play a more relevant role than previously hypothesised and should be analysed more in-depth to explain the often unique pathways of development of national-level narratives, even when these narratives seem similar across countries. The mutually constructive relationship between shared sociocultural elements and public discourses must be explored further and with deeper attention to country-specific dynamics. Further analysis could then examine what happens when these country-specific frames are deployed, for example by exploring further the apparent mismatch between political and media discourses and the relationship between frames and social attitudes, or the consequences of frames remaining relatively unchanged over time.

Finally, this research problematises the privatisation and marketisation of asylum services, and while certainly not being the first to do so (Humphris and Sigona 2019; Vianelli 2021; Yin 2023) it introduces a new angle of observation of the consequences of privatisation, through the experiences and perceptions of asylum SLBs. Findings show that privatisation affects workers’ experiences in complex and interrelated ways, leaving them underprepared and isolated in performing their tasks. A privatised asylum system also compares unfavourably to a non-privatised one, despite the latter having its limitations as well. Future research can broaden this comparative

analysis to other contexts where asylum services are being subcontracted or privatised to assess whether privatisation always operates with the same mechanisms and affects workers in similar ways. In doing so, it should pay attention to the relationship between workers' and migrants' experiences of a privatised or non-privatised system, and to the broader administrative, institutional and political traditions of the state in question, in order to encompass multiple elements that may determine how an asylum regime is organised.

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Appendices

Appendix I: Interview guide

- **Personal background questions:**
 - How did you get this job? (Educational and professional background)
 - How would you define your political orientation? Do you think it matters for this job? *Might be leading but it's very relevant*
- **Institutional background questions:**
 - Who is your direct employer/superior?
 - What is the history and nature of your organization/institution? (How long has it been working in the asylum system, what are some formal/informal rules, etc.)
 - Do you believe organizational values align with your personal values?
- **Description of tasks and decisions:**
 - Walk me through a typical day on the job.
 - What happens when a new person is admitted into the centre? (Admission procedure, making sure all procedures to access healthcare/welfare/education are started, etc)
 - What kind of decisions do you typically make?
 - Which criteria do you use? (Personal values, pragmatism, guidelines, ad-hoc basis, etc.)
 - Has it ever happened that your instructions/guidelines were in conflict with your personal values or with the solution you believed would be best? What did you do in that situation?
 - How would you describe the bureaucracy surrounding your job?
 - Which other agencies/governmental services/NGOs/community services do you typically interact with? Do volunteers visit the centre? Do you have a specific point of contact in the HSE/social welfare/other relevant agencies? What obstacles do you encounter? (What are the most pressing daily challenges you face?)
 - What are some accomplishments you have achieved in your professional capacity? (Some good moments)
- **Opinions and perceptions:**
 - How do you feel about this job overall?
 - How do you feel about your personal contribution? (Do you feel like you're making a difference?)
 - Do you think this job has effects on your personal life? (e.g. mental health? Why? How could it be better?) *this might be leading, maybe could be rephrased to be*

more generally about identity, e.g. how much do you identify with your job/professional role

- **External perception and external interactions:**
 - How do you feel about the way society sees your profession/role?
 - How would you describe your interactions with asylum seekers seeking your assistance? (What problems do they ask your help for, what's the process, do they give feedback, are they satisfied with your proposed solutions, etc.)
 - How would you describe your interactions with the local community? (Do you think there's a favourable/unfavourable environment, what influences this in your opinion, etc.)
 - How would you describe your interactions and relationship with your coworkers? (Do you think the workload/case distribution is even, do you ever make decisions collectively, have you ever witnessed some cases where you would have made a different decision, why do you think you had different ideas/perspectives, etc.)
 - How would you describe your interactions with other civil servants (e.g. city, state, healthcare system) involved in managing the system?
- **Evolution and future prospects:**
 - How long have you been here and what changes did you observe over your time here?
 - How do you wish your job/environment/system to change in the near future?
- **Do you have any questions for me?**

Appendix II: interviewee consent form



Trinity College Dublin
Coláiste na Tríonóide, Baile Átha Cliath
The University of Dublin

STUDY NAME: A paper-to-practice gap? A comparative case study of the implementation gap in Irish and Italian asylum policy

Consent Form

There are 11 sections in this form. Each section has a statement and asks you to tick the box if you agree. The end of this form is for the researchers to complete.

Please ask any questions you may have when reading each of the statements.

Please leave the box blank if you do not agree.

Thank you for participating.

General

Tick box

I confirm I have read and understood the **Information Leaflet** for the above study. The information has been fully explained to me and I have been able to seek clarification and ask questions, all of which have been answered to my satisfaction.

I understand that this study **is entirely voluntary, and if I decide that I do not want to take part, I can stop taking part in this study at any time without giving a reason.** I understand that I may decline to answer certain questions and may stop the interview at any time.

I understand that I **will not be paid for taking part in this study.**

I agree to take part in this research study having been fully informed of the **risks, benefits and alternatives** which are set out in full in the information leaflet which I have been provided with.

I know how to contact the researcher if I need to.	
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I agree to being contacted by the researcher by email and/or phone as part of this research study.

I agree to take part in an audio recorded individual interview as part of this research study.

(If applicable) I consent to observation being carried out by the researcher as part of this research study.

Data

Tick box

I understand that any identifiable information about me (personal data) will be protected in accordance with the General Data Protection Regulation (GDPR).

I understand that anonymous information from this study may be shared with third party academics worldwide for research and learning purposes.

I understand that the audio recording of my interview will be retained by Trinity College Dublin for 5 years for use solely by Trinity College Dublin, and then destroyed.

Participant Name (Block Capitals)

Participant Signature

Date

To be completed by the Principal Investigator or nominee.

I, the undersigned, have taken the time to fully explain to the above participant, the nature and purpose of this study in a way that they could understand. I have explained the risks and possible benefits involved. I have invited them to ask questions on any aspect of the study that concerned them.

I have given a copy of the information leaflet and consent form to the participant with contacts of the study team.

Researcher name

Title and qualifications

Signature

Date

2 copies to be made: 1 for participant, 1 for PI

Appendix III: interviewee information sheet

INFORMATION LEAFLET

NAME OF STUDY: A paper-to-practice gap? A comparative case study of the implementation gap in Irish and Italian asylum policy

You have been asked to be involved in this research study because we are trying to find out how stakeholders in the asylum system experience their involvement in it.

Before you decide whether or not you wish to participate in the study, it is important for you to understand why the research is being done and what taking part involves.

Please take time to read the following information carefully and discuss it with others if you wish. Please ask us if there is anything that is not clear or if you would like more information.

Background information to the study

This project will use interviews and observation to study the working conditions and decision-making process of people involved in the management of the asylum system. As part of this process, we will collect information about your background, your daily job/engagement routine, your opinions and perceptions about your job/activities.

Benefits

There will be no direct benefits to participants, however we hope the results of the study will help us to understand how asylum policy is implemented in different contexts and on a daily basis. This deeper understanding will hopefully help design better policies which will improve the work life of individuals involved in managing asylum systems, as well as potential outcomes for beneficiaries of the system.

Disadvantages

The interview will take approximately 1 hour. There is a small risk of your personal data being breached and your identity being revealed.

Do I have to take part?

It is your choice whether you would like to take part in the study or not. If you do not wish to participate, you do not have to give a reason and you can change your mind at any time. Please contact the researcher if you wish to withdraw from the study at any time.

What happens if I take part?

If you decide to take part in this study, an interview will take place and be recorded in audio form. The recording and any other information from the interview will be safely stored by the researcher in encrypted devices for the duration of the research project, in order to allow analysis.

Access to the raw data will be exclusive to the researcher. To facilitate long-term, secure storage, the data files will be encrypted using an encryption software, stored using cloud-based technologies provided by TCD, and backed up on an external hard drive which is kept in a safe and secure space.

Personal data will be anonymized or pseudonymized for publication and any further research.

After the end of the research project, personal data will be archived in a safe location in Trinity College Dublin. Data will also be uploaded to TCD's TARA repository for long-term storage and reusability, thus abiding by open access and FAIR guidelines. Data will be retained no longer than is necessary for the specified purpose of this research.

Will my records remain confidential?

The interview will be audio recorded. Your personal information will be stored securely in Trinity College Dublin for up to 5 years. Any information that leaves Trinity will have your personal information anonymized so that your identity remains confidential.

We will never share your audio files with any third parties.

Anonymised data may be shared with the scientific community and industry.

What will happen to the results of this research?

The information from this study may be published in scientific papers and presented in scientific conferences. It will also be included in the final dissertation submitted to Trinity College Dublin as part of the PhD programme. Your identity will remain confidential, and no one will know that you took part in the study.

Please note that by law we are obliged to report any inadvertent discovery relating to physical, emotional or sexual abuse, concerns for child protection, rape, self-harm, suicidal intent or criminal activity.

What do I do if I have any further questions?

Please ask the researcher that gave you this information sheet. They will be happy to answer any questions that you may have.

THANK YOU

DATA PROTECTION INFORMATION

Data Controller	Trinity College Dublin
Data Protection Officer	Data Protection Officer Secretary's Office Trinity College Dublin Dublin 2 Dataprotection@tcd.ie

What is the lawful basis to use my personal data?

We will use the information you provide to us for this research study which is **social research**⁸ in the public interest⁹.

What are my rights in relation to your use of my personal data?

You are entitled to:

- The right to access to your data and receive a copy of it
- The right to restrict or object to processing of your data
- The right to object to any further processing of the information we hold about you (except where it is de-identified)
- The right to have inaccurate information about you corrected or deleted
- The right to receive your data in a portable format and to have it transferred to another data controller
- The right to request deletion of your data

unless the request would make it impossible or very difficult to conduct the research. You can exercise these rights by contacting Claudia Peroni at the Department of Sociology, Trinity College Dublin, or the Trinity College Data Protection Officer (contact details above).

⁸ Article 9(2) (j))

⁹ (Article 6(1)(e))

Please note that these rights relate to data which could identify you (personal data). If your data has been anonymized, we will not be able to access or delete it, as we will have no way of being able to link the data to you.