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**Representing the unrepresented?
Operation and representativeness of the immigrant consultative
bodies at local level in Greece**

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Abstract: This paper examines the participation and representation of immigrants in local public life in Greece. This research is the first attempt to evaluate the operation and representativeness of the Immigrant Consultative Bodies at Local Level (ICBLLs) of the municipalities of Greece. An important finding is that there is significant delay in activating the institution in conjunction with an increased degradation of its operation. In many cases, municipal authorities do not embrace the institution with the necessary trust and do not pursue its operation. In the majority of the researched municipalities (74%) not all immigrant populations in their jurisdiction are represented in the ICBLLs. Moreover, it is crucial to note that of the immigrants who participated in the process of the formation and further operation of the ICBLLs, the majority (56%) were not elected representatives of immigrant communities. There are severe problems of representation and participation of immigrants in their community associations which raise doubts as to the actual and official representation by those acting as immigrant representatives. The need to establish common criteria for representation of individual groups is regarded as being of great importance.

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1. INTRODUCTION

This paper (Fouskas, 2013b)¹ examines the participation and representation of immigrants in local public life in Greece. The research (Fouskas, 2013b) is the first attempt to evaluate the operation of immigrant consultative bodies at local level of the municipalities of Greece. Integration policies are best implemented in local communities. As mentioned in the European Union's (EU) Agendas for Integration, in fact, integration takes place locally, as part of everyday life where everyone has his role (European Commission, 2005, 2011). To make the integration successful, one must include the host society in creating opportunities for full participation of legal third country nationals (Council of Europe, 1999a, 1999b, 2001, 2003). The involvement of local communities in joint action is important. This policy process at local level is characterized by the pushing of ideas from the bottom up and completes the integration initiatives of the central government. With Article 78, Law 3852/2010 (Government Gazette of the Hellenic Republic, 2010) the Greek Government recommends the foundation and operation of Immigrant Consultative Bodies at Local Level [(ICBLLs)/or Immigrant Integration Councils (IICs)/Local Immigration Councils/(LICs) or Migrant Integration Councils/(MICs)] within the Greek municipalities, an initiative that aims to contribute significantly to promoting the integration of legal third country nationals.

However, little research has been conducted concerning the ICBLL institution in Greece. The project by the National Centre of Social Research (NCSR/EKKE)/Bee Group/PRAKSIS/KEMOP/Efxini Poli (2011; Linardis, 2012) aimed to inform local communities of the enhanced role of local authorities in the access of legally residing third-country nationals through ICBLL institutionalization. Within its frames a web research was conducted with emailed questionnaires with three queries to the municipalities about ICBLs. Fouskas's (2011a; 2011b) reports focus on the activation of the local institutions and local communities to support active participation of third country nationals in local decision-making centers and social web, to support and retain social cohesion. Emphasis is given to the ICBLs conversion to a functional useful foundation which would contribute to immigrant

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socialization and connection with the local community via developing the methodological framework for IC BLL establishment and operation as well as introducing the Best Practices of other European countries for the efficient function of IC BLL. In her study Pradan (2013), in order to identify the particular aspects of the institution of IC BLL, conducted a field research in the Municipalities of the Attica Region which included: the statistical evaluation of the overall population, including the foreign population, in the 66 Municipalities of the Region and correlations between population data and the establishment of IC BLL were examined. A questionnaire was distributed to the presidents of the relevant IC BLLs of the 33 Municipalities of the Region that have already established the IC BLL and personal interviews were conducted in the Municipality of Athens which was selected as best practice.

IC BLL is a municipal consultative body, providing a forum between the Greek elected representatives and legal third country nationals. IC BLL is a tool for participation and representation of all legal foreign residents at local level (Council of Europe, 1992; Fouskas, 2011b). In order for IC BLL to function properly, it must be in constant communication with the local elected representatives and the foreign residents. It is indisputably a simple and flexible tool that can be adapted to the specific situation of each municipality or town. It must not be perceived as an effort to offer pseudo voting rights (Pavlopoulos, 2010; Fouskas, 2011a, 2011b) or pseudo representative elections and is in no case connected to political rights, granted or not, to foreign residents in order to benefit by ruthlessly seeking electoral clientele. IC BLLs can serve as a starting point for the establishment of local democracy on a daily basis action. They offer a true chance to all legal foreign and indigenous residents to political participation and to increase their effectiveness for political action, especially in cities and municipalities (Gropas and Triandafyllidou, 2005; 2012). Their consulting role with the right to initiate a procedure and respond to a request is the core of the way IC BLLs function. Placed in an institutional position, IC BLLs pave the way for dialogue (Afouxenidis, Sarris and Tsakiridi, 2012; Golubeva, 2012; Sarris, 2012) between elected representatives and legal immigrant citizens and they encourage immediate local participation (Anderson, 1979; Tomasi, 1981; Jones-Correa, 1998; Meli and Enwereuzor, 2003; Jacobs and Tillie, 2004) of all citizens for the better operation of the municipality and the local society.

2. METHODOLOGY

The aim of the research (Fouskas, 2013b)² (April-July 2012) was to examine the operation of the IC BLLs since their implementation. Therefore, a semi-structured questionnaire was designed in the framework of research in order to assess the functioning of IC BLL in the Municipalities of Greece. The anonymous questionnaire included mainly multiple answer questions and Likert scales. Twenty-seven (N=27) questionnaires were distributed and completed (representative/non-statistical sample) by an equal number of representative-members of the IC BLL from the following municipalities in Greece: Aghios Dimitrios, Athens, Egaleo, Maroussi, Argos-Mycenae, Volos, Galatsi, Didimoticho, Dionysos, Doxato, Evrotas, Zografou, Heraklion/Crete, Thessaloniki, Ioannina, Kastoria, Kavala, Kordelio-Evosmos, Korydallos, Milos, Nea Smyrni, Patras, Piraeus, Rethymno, Trikala, Haidari and Halandri.

3. DEMOGRAPHIC AND SOCIAL CHARACTERISTICS OF THE IC BLL REPRESENTATIVES

Regarding the respondents' gender, 44%-[12] were male and 56%-[15] female. As to age, the highest percentage, 48%-[13] were 40-50 years old, 26%-[7] were 30-40 years old, 19%-[5] were 50-60 years old and 7%-[2] were under 30 years old. Concerning the educational level, 37%-[10] had received tertiary education while 33%-[9] had secondary education qualification. 26%-[7] had a graduate degree and 4%-[1] had received only compulsory education. As regards their employment, the majority of respondents, 22%-[6] were public or municipal servants. 18%-[5] were involved in the educational system (*e.g.*, teachers, foreign language teachers, *etc.*). 2%-[2] worked as lawyers and 2%-[2] as social workers. Of the remaining 9 respondents, 1% had various occupations (agriculturist, businessman, electrician, medical doctor, private sector employee, retired banking employee, hygienist, sales employee, tax consultant). 11%-[3] had other professions. Moreover, regarding respondents' status in their municipality, 52%-[14] were city counselors, 26%-[7]

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were deputy mayors, while 15%-[4] were municipal employees. Finally, 7%-[2] had other positions. Relating to the position held within the IC BLL the majority of the respondents, 56%-[15], is president of their respective IC BLL, 19%-[5] are members, while 7%-[2] are vice presidents. Finally, 11%-[3] hold various positions in IC BLL and 7%-[2] are alternate members.

For the majority, 52%-[14], the reason for participating in IC BLL is directly related to their position and duties as leaders and members of the City Council on issues of immigration and integration. 26%-[7] are interested in civic participation while 15%-[4] stated other reasons for their participation (*e.g.*, interest in immigration issues in the country and the municipality). Finally, 4%-[1] participated as a result of their academic or research experience in immigration issues, while 3%-[1] participated as activists or NGO members dealing with immigrants. It must be mentioned that the participation in IC BLLs is honorary and unpaid. Of the IC BLL members who were also City Councilors and NGO representatives, 37%-[10] were chosen based on their engagement with immigration issues, 19%-[5] because they had already been elected in the City Council and were responsible for immigration issues, 22%-[6] based on other criteria. Finally, 22%-[6] did not specify. Concerning IC BLL alternate members, 37%-[10] are immigrant community representatives, 22%-[6] members of NGOs, activists for immigrant issues, 15%-[4] have another related activity (*e.g.*, city council members, local community association representatives, *etc.*), 11%-[3] are Greek citizens and 11%-[3] are third country nationals. Finally, 4%-[1] are academics and researchers on immigration issues. Regarding participation of women in IC BLL of municipalities, in 10 cases, 2/IC BLL-(37%), in 6 cases, 4/IC BLL-(22%), in 3 cases, 5/IC BLL-(11%). Also, in 3 cases, 3/IC BLL-(11%), 2 cases, 6/IC BLL-(7%). In 2 cases, 1/IC BLL-(8%). Finally, in 1 case, 9/IC BLL-(4%).

PART ONE

4. EVALUATION OF IC BLL OPERATION

The vast majority of municipalities researched³, 96%-[26], have established an IC BLL within their jurisdiction. Only in 4%-[1] has an IC BLL not been created, but are expected to do so soon. Concerning IC BLL operation duration, 37%-[10] have been operating for more than 12 months, while 22%-[6] more than 6 months. Also, 11%-[3] established the IC BLL 12 months ago while 11%-[3] 6 months ago, 8%-[2] less than 12 months ago, 4%-[1] less than 6 months ago and 7%-[2] duration was not specified. Relating to number of IC BLL members per municipality, (regular-alternate-associate), this varies between 7 and 26: 11/Aghios Dimitrios, 26/Athens, 9/Egaleo, 11/Maroussi, 7/Argos-Mycenae, 11/Volos, 11/Galatsi, 9/Didimoticho, 9/Dionysos, 7/Doxato, 9/Eurotas, 13/Zografou, 13/Heraklion/Crete, 12/Thessaloniki, 9/Ioannina, 11/Kavala, 7/Kastoria, 9/Kordelio-Evosmos, 11/Korydallos, 9/Milos, 7/Nea Smyrni, 16/Patras, 8/Piraeus, 7/Rethymno, 9/Trikala, 9/Haidari, 9/Halandri. Moreover, in most cases, 78%-[21], it was found that there is a regulation for the function of the IC BLL, while for 22%-[6] it has not yet been approved. Moreover, it was observed that in 63%-[17] there is no annual action plan of the IC BLL, whereas only in 37%-[10] there is. By late April 2013 only 221/325 of all Greek Municipalities had established their IC BLL. Regarding the equipment provided to the IC BLLs by each municipality, 78%-[21] were supplied although as stated there are deficiencies, 15%-[4] has not received any equipment from the municipality for the IC BLLs' work. Finally, 7%-[2] did not specify whether they had received equipment to facilitate operations.

Regarding the means of communicating IC BLL's actions, in the multiple choice questionnaire combined responses of the 27 municipalities, 21%-[15] of them usually inform the persons involved and the local community via email, 21%-[15] through the local media and 20%-[14] by phone. Also, 16%-[11] publishes their actions by posting on the bulletin board of the municipality, 11%-[8] through posters, while 7%-[5] in other ways, *e.g.*, through the municipality's website. Finally, 4%-[3] did not specify. Concerning the open hours of the IC BLLs, 41%-[11] operate on a daily basis, 22%-[6] only during its meetings, 11%-[3] in other situations, *e.g.*, when a relevant issue for the municipality occurs and 26%-[7] did not specify. As regards IICs' resources, 63%-[17] do not receive any funds from the municipality, only 22%-[6] reported that the IIC is supported by the municipality, while 15%-[4] did not

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specify. Regarding the frequency of IC BLLs' meetings in each municipality, for 41%-[11] meetings are held monthly, 22%-[6] arrange meetings once every three months, in 18%-[5] of cases the IC BLL meets on other occasions, *e.g.*, in exceptional cases, when necessary or once every 2 or 6 months. In a single case, 4%-[1] the IC BLL met more frequently than monthly, *i.e.*, twice a month. Finally, in 15%-[4] it was not possible to determine the frequency of meetings of the IC BLL.

Moreover, 96%-[26] held IC BLLs meeting proceedings. Only 4%-[1] did not clarify whether proceedings are kept. With regard to the existing networking and cooperation between IC BLLs, in the multiple choice questionnaire combined responses of 27 municipalities, 18%-[8] collaborates with the Hellenic Ministry of Interior, 16%-[7] with the Region and 16%-[7] with NGOs. Only 14%-[6] collaborates with the IC BLL of other municipalities, 9%-[4] cooperates with political parties, 7%-[3] do not join forces with anyone, while another 7%-[3] cooperates with other agencies, *e.g.*, Vocational Training Centers (VTCs), academic institutions, professional associations, *etc.* 2%-[1] are in collaboration with institutions from abroad and finally, 11%-[5] did not specify. Concerning the significance of IC BLL, the vast majority of respondents 70%-[19] identified it as necessary. However, it is particularly remarkable for further research that 26%-[7] saw the institution as forced upon them as its establishment was mandatory under Article 78 of Law 3852/2010. Also, 4%-[1] could not evaluate the institution positively or negatively. On a scale 1 to 10 (worst to best) of all 27 municipalities/IC BLLs: Regarding the evaluation of the IC BLLs operation so far, 37%-[15/27] graded it with 5/10. Concerning the adequacy of City Counselors who are IC BLL members 18%-[5/27] gave an average grade. As regards the suitability of NGO representatives who are IC BLL members, 52%-[14/27] graded them with 5/10. About the suitability of immigrant representatives who are IC BLL members, 26%-[7/27] graded them with 7/10. Concerning immigrant participation in the political life of the municipality, for the majority, 89%-[24], the immigrant residents of municipalities should participate, only 7%-[2] opposed immigrant participation, while 4%-[1] did not specify whether immigrants should be involved in local level politics or not.

Relating to actions promoted by IC BLLs, in the multiple choice questionnaire combined responses, 19%-[13/27] believed the IC BLLs promoted immigrant participation in local public life, 19%, [13/27] that the IC BLLs dealt with combating

all forms of racism and xenophobia, 18%-[12/27] that the IC BLLs helped towards the improvement and harmonization of relations between natives and immigrants, 16%-[11/27] that IICs made proposals on local policies (*e.g.*, education, healthcare, work, housing), 11%-[7/27] established the IC BLL as the only adequate body regarding immigrant issues, 8%-[5/27] filed for requests, *e.g.*, exemption of immigrants from the fee for social security contributions for obtaining residence permit. Finally, 9%-[6/27] did not specify the actions taken by IC BLLs. Moreover, in the multiple choice questionnaire combined responses, 18%-[13/27] of the IC BLLs promoted the organization of Greek language courses, 16%-[11] helped organize cultural events, 7%-[5/27] helped organize intercultural mediation services, 4%-[3/27] facilitated the right to freedom of religious expression, 23%-[16/27] encouraged dialogue between institutions on migration issues, 6%-[4/27] helped in the distribution of multilingual information guides (regarding immigrant labor, social, political and legal rights), 7%-[5/27] functioned as a permanent service that assists foreigners (regardless of legal status), 11%-[8/27] encouraged participation in municipal elections and voter registration in the municipality. Finally, 8%-[6/27] did not specify any actions since the IC BLLs establishment. Concerning issues regarding immigrant integration in Greek society, in the multiple choice questionnaire combined responses in all 27 municipalities/IC BLL, matters of work and employment (41%-[11/27]), action against undeclared work (56%-[15/27]), access to health services and education (57%-[16/27]) and action against violence, racism and xenophobia (52%-[14/27]) are considered by the IC BLL representatives as extremely important. On the contrary, the coexistence of cultures (religion, customs and traditions), integration policies in general and entrepreneurship were generally considered of moderate importance.

PART TWO

5. REPRESENTATION AND PARTICIPATION OF IMMIGRANT POPULATIONS WITHIN THE IC BLL

As regards the total of immigrant nationalities participating in IC BLL per municipality, the diversity of immigrant populations that coexist in Greece and within

ICBLLs is obvious. The main immigrant groups involved in ICBL are from: Albania-(29%/24), Sudan, Moldova, Georgia, Lebanon *etc.*-(22%/18), Pakistan-(13%/11), Ukraine-(9%/7), Egypt-(7%/6), Syria-(6%/5), Nigeria-(4%/3), Afghanistan-(4%/3), India-(2%/2), Bangladesh-(2%/2), Poland-(1%/1) and the Philippines-(1%/1). In all ICBL of the municipalities that responded, there are no immigrant city councils members. Based on the questionnaires, an important finding of the research (Fouskas, 2013b)⁴ is the fact that in the majority of municipalities 74%-[20] not all immigrant populations in their jurisdiction are represented in the ICBL, something seen in only 26%-[7]. Concerning knowledge of number of legal immigrants in the municipality, 52%-[14] did not know the true number, while 48%-[13] did. This finding relates to the recording of problems of immigrant populations in Greece. For the majority, 59%-[16] the number of immigrants with voting rights at local level within the municipality was unknown. In contrast, only 41%-[11] knew or kept records at local level within their geographical boundaries. An essential problem is the extent to which there is a record of immigrant associations and communities in each municipality, which is directly related to the representation of all immigrants in the ICBL of each municipality/region. The majority of municipalities 44%-[12] do not keep a record of immigrant associations and communities, 37%-[10] do, while 19%-[5] claim there are none within their limits. The fact that no records are kept, highlights the problem of communication between local authorities and immigrant communities but also of the effective representation and participation of immigrants in collective institutions (Fouskas, 2011a, 2011b, 2012a).

At ICBLs establishment in most municipalities 81%-[22], immigrant associations were invited, while for 19%-[5] there was no participation in the process either because there were no associations and immigrant organisations in the municipality, or because there was no response. It is crucial to note that immigrants who participated in the process of the formation and further operation of the ICBL were not all elected representatives of immigrant communities. In their majority, 56%-[15] were not elected immigrant representatives and only 44%-[12] were. However, there are severe problems of representation and participation of immigrants in their associations which raises doubts as to the actual and official representation by

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those acting as immigrant representatives (Fouskas, 2012a, 2012b, 2013a). The aforementioned observation is related to the inability of municipalities to verify the representativeness of immigrant representatives. Regarding this verification, 47%-[13] of representatives had not been elected, 19%-[5] of municipalities simply asked if immigrants were elected members of associations, and in just 15%-[4] the municipality authorities asked for the official results of the last elections of each immigrant community. For 15%-[4] respondents did not know how the representativeness of immigrants' representatives was verified, while 4%-[1] asked for the association statute and election records.

Regarding the representativeness of immigrant representative ICBLL members, 19%-[5] were selected based on the fact that they had already been elected to the immigrant association/community, 15%-[4] after general elections of every community within the municipality limits, 11%-[3] proposed representatives on a consensus basis from each association/community, 11%-[3] were chosen immigrant representatives by the municipality by a majority and 11%-[3] combined the above procedures. 29%-[8] chose another way of selecting immigrant representatives for ICBLL, such as their placement by their immigrant association Board, or with other criteria of the municipality, or pressure on the behalf of City Counselors towards immigrants *etc.* Finally, 4%-[1] did not specify how the immigrant representatives-members of ICBLL were selected.

Concerning the way in which immigrant representatives ICBLL members were selected, when there was an immigrant association in the municipality area, in 11%-[3] the municipality conducted elections, in 36%-[10] the municipality selected members from contacts with immigrants without elections, in 15%-[4] immigrant representatives had already been elected, in 4%-[1] after general elections of every community. None of the municipalities designated a common acceptance representative by each community association, or appointed an immigrant representative from the municipality by a majority, or not yet established an ICBLL. 4%-[1] chose another way of selecting immigrant representatives for ICBLL, while 30%-[6] did not specify how they were selected. As regards how immigrant representative ICBLL members were selected where there was no immigrant association in the municipality area, in 7%-[2] of cases the Municipality conducted elections for the immigrant residents, in 38%-[10] the municipality chose members

from contacts with immigrants without elections, in 11%-[3] Immigrants conducted their own elections. In 7%-[2] of cases another way was followed and in 37%-[10] the means of selection was not specified. All municipalities followed some sort of election process, and all had set up IC BLLs.

Regarding immigrant participation during the process of electing representatives for the IC BLL, 40%-[11] reported that the municipality informed immigrant citizen residents, 26%-[7] reported that the municipality informed the chairmen/representatives of immigrant associations, 4%-[1] reported that immigrants were informed on their own, 4%-[1] through other means, *e.g.*, being informed by members of IC BLLs. Finally, 26%-[7] did not specify how they ensured the widest possible participation of immigrants in the process of electing representatives for the IC BLL. From the responses received it was not evident how each municipality ensured the transparency of the electoral process for the IC BLLs. 70%-[19] did not explain how this process was verified. Only in 11%-[3] of cases did a representative of the municipality contribute to the organization of the elections. 7%-[2] of municipalities did not take any action and immigrants conducted the elections for IC BLLs representatives themselves. In 4%-[1] municipal representatives were present during the procedure, in 4%-[1] representatives of the embassy or consulate of the immigrants' country were present. Finally, 4%-[1] followed other procedures of choosing their representative, *e.g.*, randomly.

PART THREE

6. CONCLUSION

The research (Fouskas, 2013b)⁵ highlights the key points concerning the operation and the representativeness of immigrant consultative bodies at local level of municipalities in Greece and contributes to the relative international bibliography. Through the research (Fouskas, 2013b), concerning the operation of the IC BLLs, the following are established: The lethargic intervention of the institution in the life of

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local communities is usually justified due to lack of resources; an independent and autonomous budget in municipal financial plans would overcome difficulties and practical weaknesses. However, lack of resources is not sufficient to justify the limited activity by some IC BLLs in Greece, as informative and motivational actions can be realised without extra funding. A significant number of successful activities have been implemented under the current institutional framework with extremely limited financial means, a consequence of the ongoing economic crisis. The difficulties regarding the administrative and scientific support of the interventions planned by IC BLLs are sometimes dealt with whilst municipalities do not have the capacity to exclusively appoint specialised personnel for the IC BLL's needs. The IC BLLs staffing with permanent full-time personnel could provide a solution to this problem, but is unfeasible at this economic juncture. The existence of permanent specialized staff and the necessary administrative structures would ensure institutional memory and viability, strengthening the institution and releasing its function from clientele relations or personal aspirations of IC BLLs participants. Although seemingly minor issues, IC BLLs operating and meetings hours emerged as a point of friction in the institution's function. The work object of immigrant populations affects the ability of a significant part of them to participate and ultimately excludes them (Fouskas, 2012a, 2012b, 2013a; Psimmenos, 2013). Therefore, an adjustment of the operating framework is required. Regarding the immigrant community representativeness in IC BLLs there are enormous weaknesses. The need to establish common criteria for representation of individual groups is imperative, which should not, however, lead to the conclusion that there should be common procedures. Apart from practical unfeasibility, the aim is to implement efficient processes tailored to local cases and the individual characteristics of immigrant communities. An important finding is that there is significant delay in activating the institution, in conjunction with an increased degradation of its operation. In many cases, municipal authorities do not embrace the institution with the necessary trust and do not pursue its operation, which negatively affects the perceptions that immigrants themselves shape about this. The need to establish constant communication bridges with local immigrant communities and associations, to transfer paradigms, practices and solutions at local level between IC BLLs, is of great importance and gravity.

The present economic crisis has urgently put forward the need to establish local policies for social integration of vulnerable groups, especially immigrants (Pavlopoulos, 2009; Fouskas and Tsevrenis, 2014). In this context, the ICBLL's advisory and consulting role will be vital in the local policies (Skamnakis, 2006; Sakellaropoulos, 2006, 2011; Angelaki, 2011) if it is operated with adequate staffing, expertise and the will to contribute, and provided there is true immigrant representation. If ICBLL is formed as above it could contribute decisively in crucial sectors for the social integration of immigrants, *e.g.*, formal labour market integration (Athanasίου, 2013), combating undeclared work, actions against racism and xenophobia (Syrigos, 2011: 244), fostering of trust in their communities, organization and coordination of immigrants in their associations, revival of immigrants' interest to care and participate in local matters, removal of barriers that prevent harmonious co-existence, *etc.* ICBLL contribution should take place in the frame of deep knowledge of the local area and the particularities of its native and legal (Maganas, 2003; Papatheodorou, 2007) immigrant population.

The ICBLL may face limitations (Martiniello, 1999; Caneva and Ambrosini, 2013) in two main areas: its representativeness and its advisory role. Some immigrant communities are not represented despite all efforts. It is important to mention that the main goal of ICBLLs is to increase the participation of foreigners in local public life. The creation and the operation of an ICBLL must be supported by genuine political will on behalf of the City Council. The initiative for the foundation of an ICBLL can be taken by the members of Municipal Councils in cooperation with the foreign residents and their associations. In some countries, national or regional legislation may promote the foundation of such bodies or even make it mandatory. Moreover, ICBLLs can draw from several resources in order to function: human resources, administrative, economic and communicational tools. In some cases, despite the presence of an ICBLL, local elected representatives do not consult it or do so only after already deciding on matters. Hence, in order to optimise the usefulness of ICBLL, their role as a consultative body must be placed on an institutional basis, with certain rights and obligations of its members and its associates.

It is, therefore, essential it be officially recognised, *on the one hand* that the ICBLL acts as a consulting body on its own initiative and with the responsibility to respond to requests and *on the other hand*, that it is the duty of the City Council to

consult with the ICBLL. The ICBLL must be provided with all the necessary resources that will allow it to function in a sustainable way. ICBLL develops different types of activities. Apart from their consulting role, with regard to the expression of views on a municipal level and recommendations on subjects of special interest, the ICBLL should also deploy other local political, social and cultural activities with the involvement of the immigrant communities. The ICBLLs must give priority to local political activities and limit their involvement with other types of activities, such as associations, that can be fulfilled by other actors. ICBLL members are its actual protagonists. They are chosen with criteria such as their citizenship and their role in the body (*e.g.*, represent a community, the City Council *etc.*). Given the fact that the main target of the ICBLLs is the local level participation of foreigners, they should develop different formulas in order to give a voice to all legal foreign residents. It is recommended that the selection criteria for an ICBLL participant and his membership be based on grass root elections. Also, a structure founded on equal representation and balance between genders must be promoted, along with training of members.

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