



**PICUM**

Annual  
Report 2025



# Who we are

PICUM, the Platform for International Cooperation on Undocumented Migrants, was founded in 2001 as an initiative of grassroots organisations, and today is a network of 155 member organisations working with undocumented migrants in 34 countries.

With over two decades of experience and expertise, PICUM promotes recognition of the human rights of undocumented people and people with insecure residence status and provides an essential link between local realities and the debates taking place at within institutions of the United Nations, the Council of Europe, and the European Union.

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# Message from the Director

By Michele LeVoy

In 2025, migration remained at the forefront of political debates across Europe, with an increasing focus on enforcement, deterrence and externalisation.

In particular, the proposed Return Regulation reflects a clear political priority to accelerate deportations, expand immigration detention and increase pressure on people to leave. Cooperation with third countries on migration control – starting with the Italy-Albania deal – continued to deepen, raising ongoing concerns about accountability and human rights. Some EU countries (e.g. Denmark and Italy) have spearheaded calls to cut back on protections enshrined in the European Convention on Human Rights to facilitate deportations.

Across Europe, undocumented people continue to face sanctions, administrative penalties and exclusion simply for their presence, while those providing humanitarian assistance – including civil society organisations, volunteers, private citizens and even local authorities – are at risk of being targeted under anti-smuggling frameworks. The ongoing revision of the Facilitation Directive, which largely stalled in the European Parliament, is yet to meaningfully address the criminalisation of solidarity. In Greece and in The Netherlands, parliaments have been pushing forward proposals to criminalise people simply based on their administrative situation.

New EU funding frameworks are expected to escalate border control measures, with the European Commission proposing to triple its budget and spend € 81 billion in the areas of asylum, migration and integration – including € 11.9 billion for Frontex, an agency that has been accused of complicity in human rights abuses multiple times.

These developments are unfolding alongside persistent and, in some cases, widening gaps in access to fundamental rights. In several countries, restrictions on access to healthcare, housing and social services for undocumented migrants remain in place or are being further tightened. Undocumented victims of crime continue to face significant barriers in accessing protection and justice, often due to fears of immigration enforcement. The Victims' Rights Directive, revised in 2025, failed to ensure safe reporting mechanisms for undocumented victims of crime, leaving many without effective protection.

At the same time, labour market dynamics continue to expose the contradictions at the heart of European migration policies. Labour shortages across key sectors such as care, agriculture, construction and hospitality are driving demand for migrant workers.



While some governments are exploring or expanding labour migration pathways, these remain limited in scope and often tied to restrictive conditions that enable workers' dependency on employers and their vulnerability to exploitation. Undocumented migrant workers continue to face unsafe working conditions, wage theft and barriers to accessing justice, while the risk of immigration enforcement discourages many from reporting abuse.

Digitalisation is also increasingly shaping migration governance and access to rights. The expansion of data-sharing systems, digital identity tools and automated decision-making processes is raising new concerns about privacy, discrimination and exclusion.

Civil society organisations working on migration and social inclusion report increasing pressure, including administrative burdens, funding constraints and, in some cases, direct hostility. In the European Parliament, centre-right and far-right forces set up a Scrutiny Working Group to inspect EU funds to NGOs in a clear attempt to delegitimise European civil society.

At the same time, it's important to recognise that positive change, solidarity and resistance happen throughout Europe.

In Spain, a targeted regularisation programme for people affected by floods in the Valencia region provided over 21,000 undocumented people with residence permits. A new broad programme announced

at the start of 2026 could regularise hundreds of thousands more people. In the Netherlands, the government launched a regularisation scheme for Surinamese nationals living in The Netherlands who had lost their Dutch nationality after Suriname's independence. In both countries, the measures were the result of a long-standing campaign by civil society and undocumented people themselves.

In Switzerland, a parliamentary motion opened the way for undocumented survivors of gender-based violence to report abuse without fear of immigration enforcement, addressing a long-standing protection gap.

Courts across Europe also played a crucial role in upholding fundamental rights. Landmark rulings challenged unlawful practices, from pushbacks at borders in Greece to the criminalisation of people seeking asylum in Denmark.

These developments, alongside the continued protection afforded to people fleeing the war in Ukraine, demonstrate that a fairer and more humane migration policy is possible – and sometimes even a reality. As Europe moves forward, the choices made on migration will have far-reaching consequences for social cohesion, equality and fundamental rights. Ensuring that policies are grounded in dignity, fairness and respect for human rights remains essential – for undocumented people and for European societies as a whole.

*Midele Lelay*

# Message from the Chair

By Jan Knockaert

In a year marked by uncertainty and growing pressures on civil society, we remained focused on strengthening our foundations and preparing for the future.

We kicked off 2025 with the adoption and publication of our Strategic Plan for 2026–2030. This new plan sets out a clear and ambitious pathway for the years ahead, grounded in collective resistance, solidarity and meaningful participation. It builds on shared learning and an extensive process of consultation and co-creation with our members and partners. As such, it is both a response to the challenges we face today and a commitment to shaping a more just and inclusive future together.

The strategic directions outlined in the plan also guided the renewal of our partnership with the European Commission. In early 2025, we signed a new framework partnership agreement with the Directorate-General for Employment, Social Affairs and Inclusion, continuing a collaboration that has been in place since 2011. This core funding enables us to pursue essential work on anti-poverty and social inclusion, labour migration and fair working conditions, access to healthcare and social services, among other areas. It provides a crucial foundation for advancing our mission and supporting our members' work across Europe.

At the same time, a significant part of our activities - particularly those addressing the shrinking space for civil society and the protection of individuals defending the rights of undocumented people - relies on complementary funding streams and project-based support. As a Board, we have closely followed our fundraising efforts throughout the year and are deeply grateful for the continued trust and commitment of our partners, including private foundations. In a context of increasing uncertainty around funding, both at EU and national levels, ensuring financial sustainability remains a key priority and we will continue working towards a more stable and diversified funding base to support our long-term impact.

We also remain committed to supporting our members in strengthening their own sustainability and capacity, so that together we can advance social justice and uphold the rights of undocumented migrants in Europe and beyond. A priority for us is to ensure that we are able to provide tailored capacity-building supports for members to strengthen their national level engagement and achieve impact at the local level while contributing to the EU wide efforts for change.



A handwritten signature in blue ink, appearing to be 'Jan Knockaert'.

## Vision

PICUM seeks a world where all people are guaranteed their human rights regardless of migration or residence status, and where human mobility is recognised as a normal reality.

## Mission

Grounded in principles and values of social justice, anti-racism and equality, PICUM is committed to ensuring that undocumented migrants have a dignified standard of living and rights.

## Working Principles

Bringing together a broad range of experience and expertise, PICUM generates and coordinates evidence-gathering and advocacy for a humane and informed response to undocumented migrants' realities and provides a platform to engage policy makers and the public in the full realisation of their rights.

## In 2025



23

Reports and publications



18

Open letters and joint statements



32

Meetings for PICUM members

## What We Do

- Monitoring and Reporting
- Capacity Building
- Advocacy
- Awareness Raising
- Global Action on Migrants' Rights

Migration policies are increasingly restrictive, imposing structural violence through detention, deportation and limited access to regular migration pathways and secure residence permits. Undocumented people and those who support them face growing threats from punitive enforcement, the instrumentalisation of essential services, and the criminalisation of solidarity. Together, these measures entrench exclusion, insecurity, and widespread rights violations.

PICUM works to counter these harmful developments and to uphold rights, ensure accountability, and build fair migration systems.



Read more about 'Resistance and Remedy' and our other objectives in our strategic plan, which outlines our direction for the next five years.

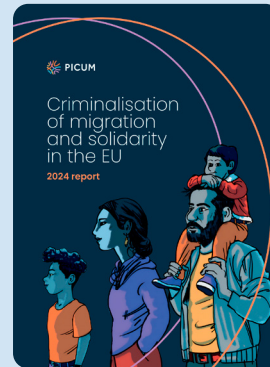


**Resistance  
and Remedy**

# Criminalisation of migration and solidarity

Criminal law, sanctions and enforcement-based policies are often used against migrants and those who help them. In 2025, we continued to play a leading role in documenting and challenging the criminalisation of migration and solidarity across Europe. We published our annual report on the criminalisation of migration and solidarity in the EU, providing updated data, case studies and legal analysis on the ways in which individuals and organisations are targeted for supporting (undocumented) migrants. The report highlights trends such as the misuse of anti-smuggling legislation, increased surveillance and administrative restrictions on civil society organisations. Press outreach about this report included an online press briefing and a press release featuring quotes and perspectives from members and other actors on the ground; such work resulted in over 70 media reports and continues to be a key reference point for understanding developments in this area among journalists, policymakers and civil society actors.

We used the findings of the report to engage directly in EU policy debates, particularly around the revision of the Facilitation Directive and broader counter-smuggling initiatives. We submitted detailed input to consultations, held meetings with European



Commission officials and Members of the European Parliament, and contributed to discussions at UN level, including with human rights mechanisms addressing the protection of human rights defenders.

We also challenged the European Commission's lawmaking process on the Facilitation Directive before the European Ombudsman, arguing that it failed to uphold its own standards on transparency and fundamental rights analysis. As a result, the Ombudsman found the Commission committed [maladministration](#) and urged it to put in place procedures to ensure urgent proposals still meet EU standards for transparent, evidence-based, and inclusive lawmaking.

# Digital technologies

In 2025, our work on the impact of digital technologies on migrants' rights responded to increasing digitalisation in both labour market regulation and migration governance. We published a policy briefing on the digitalisation of labour inspection data systems, analysing how to embed data protection safeguards so digitalisation can support labour inspectors' work without compromising migrant workers' rights or reinforcing risks of immigration enforcement.

In parallel, we monitored developments in the digitalisation of migration administration, including the expansion of online application systems for residence permits, digital identity tools and automated decision-making processes. Through consultations with our members and exchanges with external experts, we identified practical challenges such as digital exclusion, limited access to technology, language barriers and the risk of errors in automated systems.

We also engaged in broader policy discussions on digitalisation, contributing to debates on artificial intelligence, data governance and fundamental rights. With the [Protect Not Surveil coalition](#) we [highlighted](#) how the EU's new Return Regulation proposal would expand the digital surveillance infrastructure by facilitating the sharing of personal data and information for migration enforcement purposes, including with third countries, strengthening the technological management of detention centres in and outside the EU, as well as expanding control over people in an irregular situation and on people helping them.



Data protection and the firewall

Digital technology use  
by labour authorities and  
migrant workers' rights



# Immigration enforcement (Detention and Deportation)

In 2025, we significantly scaled up our advocacy in response to the European Commission's proposal for a new Return Regulation, which is set to escalate immigration detention and deportations across Europe. We helped to coordinate a broad civil society coalition of more than 100 organisations from across Europe, bringing together migration, social, human rights and humanitarian actors to develop a common response. A [joint statement](#) rejecting the enforcement-oriented approach in the Commission's proposal was signed by over 250 organisations. Through this work, we helped ensure a strong and coordinated civil society voice in debates on the future of EU deportation policies.

We engaged extensively with policymakers throughout the year – including several high-level events at the national and global level - and contributed to public consultations and policy discussions at the EU level, providing detailed analysis of the proposed Regulation and its potential impact on fundamental rights, access to services and social inclusion.

In parallel, we carried out targeted communications and media work to raise awareness of human rights risks in the proposed reforms. We held an online press briefing with Amnesty International, Equinox and the International Rescue Committee ahead of

► *Discussion on immigration enforcement with PICUM members during the May 2025 General Assembly*



the proposal's release, and further briefed journalists about the Council's position that was adopted in December 2025 and which endorsed home raids to catch undocumented people. This work resulted in over 300 media reports across international and European news outlets and contributed to increasing scrutiny of enforcement-focused approaches.

Alongside our response to the Return Regulation, we continued to promote alternatives to detention and rights-based approaches to migration governance. Through our research, publications and advocacy, we highlighted community-based models and policies that prioritise case management, access to services and respect for fundamental rights.

▼ *PICUM, Spanish member CEPAIM and International Detention Coalition met with Santiago Yerga, Government of Spain, at the Global Forum on Migration and Development in Riohacha, Colombia, September 2025*

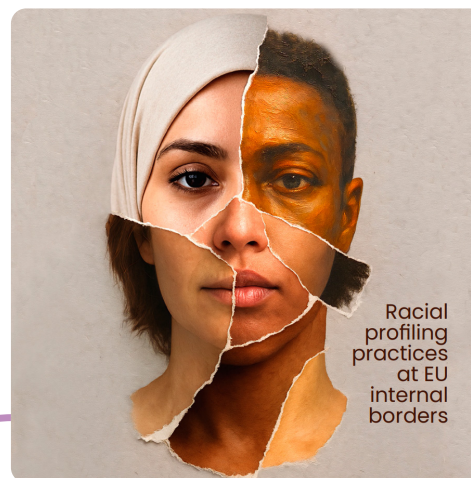


# Racism and immigration control

Across Europe, policing and immigration enforcement are increasingly interconnected, disproportionately harming people coming to Europe and communities of colour in Europe.

In 2025, we engaged with United Nations human rights bodies, contributing to the development of a [joint general comment](#) from the UN Committees on Migrant Workers and for the Elimination of Racial Discrimination to address states' obligations to combat xenophobia and its impact on migrants' rights. We also participated in EU-level civil society coalitions working on the next EU Anti-Racism Strategy (2026–2030), contributing recommendations and engaging in advocacy with policymakers.

We co-produced a booklet with the European Network Against Racism featuring testimonies and illustrations documenting experiences of racial profiling in border areas and transport hubs. We disseminated these materials through communications, events and advocacy activities, raising awareness among policymakers and the public. We also participated in discussions and exchanges on discrimination and migration policies, contributing to a stronger understanding of how immigration control can reinforce structural racism.





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The millions of undocumented people who live and work in Europe are part of society – they develop relationships, build connections and contribute to the life of the community in many different ways. But because of their residence status, undocumented people experience various forms of exclusion. They also face additional barriers when residence status intersects with other forms of discrimination due to their gender, disability, racial or ethnic origin, religion or belief, age, and/or sexual orientation.

PICUM's work on belonging and inclusion aims to ensure undocumented migrants' access to well-funded services, social inclusion and anti-poverty policies, and to uphold their social and labour rights. We also promote solutions to address irregular migration status, such as well-designed regularisation measures, regular migration pathways and access to secure permits.



Read more about 'Resistance and Remedy' and our other objectives in our strategic plan, which outlines our direction for the next five years.

The image features a solid purple background. In the center, there are three overlapping circles. One circle is orange, one is light blue, and one is yellow. They overlap in a way that creates a central white space. The text 'Belonging and Inclusion' is centered within this white space.

**Belonging  
and Inclusion**

# Anti-poverty, social inclusion and housing

Addressing poverty, homelessness and social exclusion affecting undocumented migrants remained a core priority for us in 2025, cutting across our engagement in EU social policy, housing and funding debates. To strengthen the evidence base, PICUM and FEANTSA published a comprehensive report analysing access to housing and homelessness among undocumented migrants across Europe. Based on contributions from 45 member organisations working at local and national level, "[Housing and homelessness of undocumented migrants across Europe: patterns, barriers, and ways forward](#)" provides detailed insight into barriers to emergency accommodation, shelters, social housing and private rental markets. It highlights how legal restrictions, lack of access to income support, administrative requirements and discrimination combine to exclude undocumented migrants - including children, families and young people - from safe and adequate housing.

2025 was an important year for social policies, as much preparatory work was being done by the European Commission ahead of the first-ever EU Anti-Poverty Strategy, a new European Pillar of Social Rights Action Plan and the next Multiannual Financial Framework. In order to make sure that these policies hit their mark by benefitting everyone in need, regardless of their residence status, we urged the EU to [prioritise inclusive, needs-based social policies](#).

We met with policy makers in the Commission, facilitated the participation of a formerly undocumented person with lived experience of poverty in an exchange with the Commissioner Social Rights and Skills, Quality Jobs and Preparedness Roxana Minzatu, and raised the issue of homelessness and housing precarity, specifically, in the European Parliament.

To strengthen our call, we joined the Ad-Hoc Coalition on the EU Anti-Poverty Strategy, led by EAPN, and continued coordinating messages calling for inclusive social policies and investment in services as part of Social Platform and the Alliance for Investing in Children. Through this work, we aim to bring the experiences of undocumented migrants into broader debates and ensuring their inclusion in policy responses to poverty and housing exclusion across Europe.



# Children, families and youth

Children, families and young people continue to be affected by EU and national policies but are too often invisible to decision makers and those who implement policies. PICUM's work consists of highlighting how children, families and young people are affected by a range of policies, what works well and what could be improved.

With preparations continuing in 2025 for the implementation of the new EU Migration and Asylum Pact (to come into force in June 2026), we discussed child-specific aspects in detail with our members in dedicated calls, and raised critical issues with child rights ombudspersons from across Europe at the joint event held by the European Network of Ombudspersons on Children and the European Migration Network Okaju Spring Seminar in Luxemburg, and local and regional governments member of the Conference of Peripheral Maritime Regions as they are facing unique challenges.

In parallel, we engaged with EU institutions, children's rights organisations and networks working on child and youth policy to ensure that undocumented children are included in broader debates on child protection, education and social inclusion. Key coalitions for PICUM continue to be the EU Alliance for Investing in Children and the Child Rights Action Group through which we have consistently called for [a Europe that protects every child](#).

For thousands of migrant children and young people in Europe, turning 18 means transitioning into an uncertain future, with too few resources to navigate this phase of their life, especially if they're undocumented. In 2025, we focussed on disseminating good practices and developing resources to improve policies. At the beginning of the year, we dedicated a webinar to [Spain's legal reforms supporting young migrants](#), presenting a concrete example of how changes to residence permit rules and administrative procedures improve outcomes for young people. We also translated existing resources into more languages so more people can use them.



In collaboration with the Council of Europe's Youth Department and its Division on Migration and Refugees, Voices of Young Refugees Europe, Voicify and Youth Social Rights Network we co-organised a two-day seminar on transition into adulthood for the second year in a row. The seminar brought together young people with lived experience, civil society organisations and policymakers to provide a platform for young people to share their experiences and recommendations. These were used to inform the Council of Europe's future work on transition into adulthood as well as our own advocacy.

To improve policies and inform policy makers, we worked with a consultant to dive into the reasons why best interests assessments and best interests of the child procedures should take into account

what happens to the child in (young) adulthood. The findings, based on desk research, interviews and an expert roundtable in November, will be published in 2026 and, highlights the need for more consistent and rights-based approaches to decision-making affecting children in migration.

In parallel, we analysed care and aftercare systems in several European countries, focusing on how the availability or absence of support influences access to housing, education, employment and secure residence status.

We also supported dedicated awareness raising campaigns by members in Belgium, Ukraine and Israel, each calling for secure statuses for children and young people turning 18.



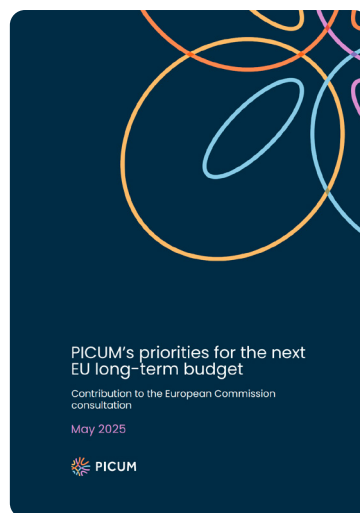
▲ *PICUM worked with the Council of Europe for the second year in a row to bring together 31 young people for a seminar on transition into adulthood*

# EU funding

In 2025, we actively engaged in shaping EU funding frameworks to ensure that they support inclusive policies and services for undocumented migrants. We contributed to discussions on the upcoming EU budget (Multiannual Financial Framework 2028–2034), including through participation in European Commission consultations and meetings with EU officials. We advocated for increased investment in social inclusion, poverty reduction and access to essential services, emphasising the importance of ensuring that funding mechanisms are accessible to organisations working with undocumented migrants.

We also played an active role in civil society coalitions such as Social Platform, EUForSocialFunds and the Alliance for Investing in Children and contributed to joint positions on key initiatives such as the European Child Guarantee and the EU Anti-Poverty Strategy.

In parallel, we supported our members by providing information, analysis and guidance on EU funding programmes, helping them engage in national-level discussions and access funding opportunities. We also participated in events and exchanges on EU funding and social policy, contributing to broader discussions on how to ensure that funding instruments reach organisations providing essential services to people in vulnerable situations.



# Gender equality

Advancing gender equality and protecting the rights of undocumented migrant women remained a key focus of our work. In 2025, we engaged in EU-level policy processes, including consultations on the upcoming Gender Equality Strategy 2026–2030 and discussions on the revision of the Victims' Rights Directive. We highlighted gaps in existing legal frameworks, including the lack of safe reporting provisions for undocumented victims. We also collaborated with partners working on

gender equality and migrant rights to strengthen joint advocacy efforts, including as a co-founder and board member of the [Women in Migration Network \(WIMN\)](#). Through this work, we contributed to increasing recognition of the intersection between migration status, gender-based violence and access to justice.



▲ Michele LeVoy (PICUM), Antonia Avalos Torres (Mujeres Supervivientes) and Sofie Prick (Red Cross Sweden) during PICUM's webinar on gender-based violence

# Health

For many, being undocumented means having little or no access to health care and living and working in conditions that lead to poorer health.

In 2025, we highlighted community-based health-care initiatives across Europe. We supported and participated in the Nordic Gathering of organisations providing care to undocumented migrants, facilitating exchanges on service provision, advocacy strategies and challenges faced by healthcare providers. Through these exchanges, we supported knowledge-sharing and collaboration among organisations.

We also explored the implications of the proposed EU deportation law ('EU Return Regulation') from the perspective of healthcare and other services. Together with Médecins du Monde International Network, we co-organised an online workshop examining how the proposal could lead to obligations for public workers and service providers to report undocumented people. We also published a joint analysis of the regulation from a right-to-health perspective, exploring how enforcement measures can deter people from seeking care and create challenges for healthcare providers.



▲ *PICUM members' event in the European Parliament on health and detention, October 2025*



# Justice and policing

In addition to being at risk of being targeted by law enforcement for immigration control, being undocumented often means being at greater risk of coercion and abuse, and having fewer options for support, protection, and safety.

We published a policy briefing on access to justice for undocumented women survivors of gender-based violence, setting out detailed recommendations to ensure safe reporting, access to shelters and support services, and residence status protections.

We organised a public webinar and an expert roundtable bringing together policymakers, service providers, legal experts and civil society organisations to discuss challenges and good practices. These events facilitated exchange of experiences and helped identify practical solutions to barriers faced by undocumented survivors.



We also expanded long-term cooperation with pro-bono law firms to research on legal frameworks requiring public authorities to report undocumented migrants to immigration enforcement bodies. We further engaged in broader discussions on policing practices, discrimination and access to justice and contributed to ongoing debates on the need for clear separation between public services and immigration enforcement and for policies that ensure access to justice for all.



# Regularisation and residence permits

Promoting regularisation as a pathway to rights, stability and social inclusion is a cornerstone of our work, underpinning our broader advocacy on migration governance, labour markets and access to services. A key milestone in this work was the publication of a major research paper analysing five decades of studies on regularisation measures, "[The impact of regularisation measures on people, institutions and wider society](#)". The study showcases the positive impacts of regularisation on individuals, communities and societies, including improved access to employment, better working conditions for all, increased tax contributions and strengthened social cohesion.

We complemented this research with our ongoing monitoring and analysis of regularisation policies and debates across Europe. Throughout the year, we tracked developments in several countries, including reforms in France and Spain, and discussed these with our members in the Taskforce on Regularisations.

We supported our members in their work on regularisation: we supported members in Spain to develop information sessions for those who want to regularise

and presented promising regularisation practices at member events in Belgium, Spain and the UK. In parallel, we helped bridge the gap between civil society and academia by inviting researchers from two research consortia where PICUM is a partner (MirreM and FAiR) to present their findings to our members and shared our analysis on regularisation at both the IMISCOE Spring and annual conferences and the ERA Annual Conference on European Immigration Law. We continued examining pathways to secure residence



The impact of regularisation  
measures on people, institutions  
and wider society

Evidence from research from across the world



for people displaced from Ukraine as they transition out of temporary protection, contributing to emerging discussions on longer-term solutions for them. In addition to publishing a case study on Czechia, we held a high-level policy discussion in October exploring the central question: “After Temporary Protection: Staying in the EU, Returning to Ukraine.” The conference, which was co-organized by PICUM, the European Policy Centre, the International Rescue Committee EU and EGMONT - Royal Institute for International Relations, brought together leading representatives

of the European Commission, member state and the Ukrainian governments as well as EU and Ukrainian civil society and diaspora. At the event, Special Envoy for Ukrainians in the EU, Ms Ylva Johansson, discussed ways forward and announced her return and reconstruction programme in her keynote speech.

Through 2025, we facilitated knowledge-sharing, highlighted good practices and explored how regularisation can be used as a tool to address irregularity in a sustainable and rights-based way.

▼ *PICUM Taskforce meeting with members on regularisation*



# Work

Being a migrant worker in Europe often means not being paid the minimum wage, working in extremely poor conditions, and being exposed to harm. Undocumented workers who try to stand up for their rights often risk detention and deportation.

In 2025, we carried out extensive research on occupational safety and health for undocumented migrant workers in Europe. The report provides detailed evidence on workplace risks, including exposure to hazardous conditions, lack of protective equipment, unsafe environments and barriers to reporting accidents or abuse. Drawing on input from our members and partners across Europe, it highlights structural gaps in labour protection systems and the

ways in which migration status exacerbates vulnerability to exploitation.

We complemented this work with a country case study on labour migration pathways and regularisation policies in Spain, examining how recent reforms have affected access to regular status, employment and labour protections. The case study provides concrete lessons on how labour migration schemes, including bilateral schemes such as the GECCO agreement between Spain and Morocco, and regularisation measures can be designed to better protect workers' rights and reduce precarity. We used both publications as key advocacy tools in our engagement with EU policymakers and stakeholders.



Occupational Safety and Health of Undocumented Migrant Workers in Europe



▲ *PICUM and members' meeting with Commissioner for Migration Magnus Brunner on labor exploitation of migrant workers, October 2025*

Throughout the year, we were actively involved in a range of EU policy processes related to labour migration and working conditions. We facilitated a meeting of several of our members with the Commissioner for Migration, Magnus Brunner, to discuss potential EU action to address exploitation of undocumented workers. We engaged in the process for the Implementation report of the Employers' Sanctions Directive, providing evidence on realities for undocumented workers and their access to complaints mechanisms. We contributed to discussions on the European Semester, where we highlighted the need to address labour market segmentation and ensure decent working conditions for all workers, regardless

of status, and to consultations on the Quality Jobs Roadmap and on the use of artificial intelligence in the workplace.

With further engaged with labour authorities, including the European Labour Authority, to advocate for complaint mechanisms that allow undocumented workers to report exploitation without risking immigration enforcement. In particular, we were invited as a speaker at the European Labour Authority's workshop on the posting of migrant workers, launching their study on protection mechanisms for posted third-country nationals.

▼ *PICUM Taskforce meeting with members on effective complaints mechanisms*



In 2025, we rounded off the two-year subgrants provided to six PICUM members for their work to promote migrant workers' rights in Spain, Netherlands, Greece, Ireland, Czechia and Belgium (five others received smaller and shorter grants under the same programme supported by Robert Bosch Stiftung for

activities that mostly ended in 2024). We provided additional targeted supports to two members in Spain. We organised a workshop for these members to share successes, challenges and learnings from their projects with other PICUM members advancing migrant workers' rights in their daily work.

▼ *PICUM spoke at an event organized by Spanish member Asociación Rumiñahui on labor exploitation and remedies*



There is an increasing trend towards limiting the space for civil society to address and advocate for the human rights of migrants. Hostile narratives and disinformation on migration and human rights are becoming prevalent in political discourses and public opinion. PICUM and its members believe that strengthening the network and empowering undocumented people can contribute to a more informed debate.

PICUM fosters resilience and participation of members by supporting and lifting up informed, lived experiences and calls for change and increasing the participation of undocumented people across PICUM's work.



Read more about 'Resilience and Participation' and our other objectives in our strategic plan, which outlines our direction for the next five years.



**Resilience  
and Participation**



72,000

Website visitors



800+

Followers on Bluesky



23,000+

Subscribers to the newsletter



33,000+

Followers on LinkedIn



430

Media appearances



13,200

Followers on X



11

Blogs and press releases



5,000+

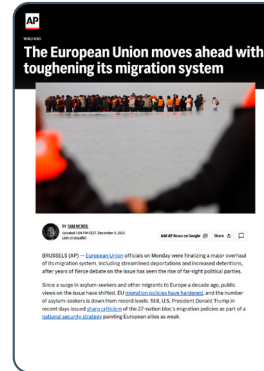
Followers on Instagram

# Communications

## Media relations

In 2025, we further strengthened our relationships with journalists and expanded media coverage of issues affecting undocumented people. Our media relations work resulted in more than 430 pieces of coverage and over 100 media requests, reflecting a growing recognition of our expertise among journalists covering migration and EU affairs. Coverage included international press agencies, Brussels-based outlets, national newspapers, radio programmes and podcasts.

Our press work and most of the resulting coverage throughout the year focused particularly on the growing criminalisation of undocumented people and of those acting in solidarity, as well as on new proposed EU rules on deportations. In particular, we devoted several press releases and two online press briefings on the revision of the Facilitation Directive and the proposed Return Regulation. These communications provided journalists with context and analysis of the legislative proposals, as well as quotes, background information and resources to support informed reporting.



We also provided analysis of the political agreement on the revision of the Victims' Rights Directive, which ultimately failed to include provisions ensuring safe reporting for undocumented victims.

Our analysis and perspectives on EU migration policies were regularly featured in key Brussels-based outlets such as Agence Europe, Brussels Times, EU Observer, Euractiv and Euronews. National coverage was particularly strong in Belgium, France, Italy and Spain, including in major newspapers such as Corriere della Sera, El País, Le Monde and Le Soir. Reporting by international press agencies AP and AFP ensured broader visibility around key policy moments, particularly in relation to the proposed EU Return Regulation.

## Social Media

In 2025, we continued to grow our online communities and strengthen the reach of our digital communications. Our LinkedIn community expanded to over 33,000 followers (up from 25,000 in 2024), while our Instagram audience grew to around 5,000 followers. After suspending posting on X in 2024, we launched a page on Bluesky, which currently counts over 800 followers.

Throughout the year, we shared regular updates and analysis on key migration policy developments and the realities faced by undocumented migrants across Europe. Our LinkedIn posts reached close to 600,000 accounts and generated over one million total impressions, while our Instagram content reached around 85,000 accounts and generated approximately 400,000 impressions.

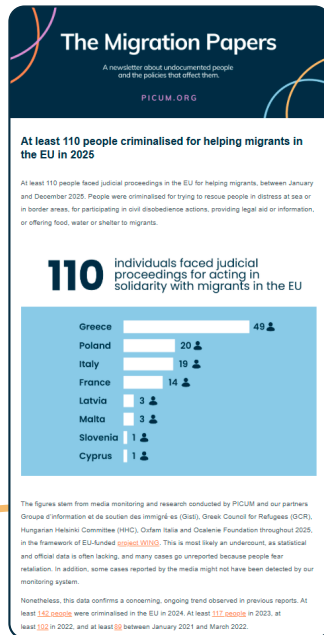


On Instagram, we partnered with ice-cream company Ben and Jerry's to activate content creators in France, Germany and The Netherlands around the criminalisation of solidarity. With each post, we invited people to email their national MEPs to ask that they protect solidarity from criminalisation in the new EU Facilitation Directive.

## Newsletter and website

Our newsletter The Migration Papers remained an important channel for sharing our research, policy analysis and migration updates with policymakers, civil society organisations, journalists and researchers. In 2025, we published 12 editions of the newsletter, including a special edition on migrant smuggling and on stories of resistance and hope which we released around International Migrants' Day.

Thanks to this work, the readership expanded to more than 22,000 subscribers across email and LinkedIn. Our website also continued to attract a broad audience, with around 72,000 visitors over the course of the year.



## Public events

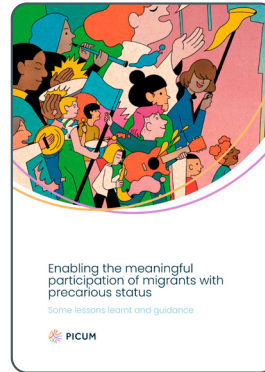
Public events were another important part of our communications work. In 2025, ahead of our General Assembly in Ghent, Belgium, we organised a screening of the award-winning film L'histoire de Souleymane followed by a discussion on the experiences of undocumented migrants in Europe. These activities helped engage wider audiences and create spaces for dialogue on inclusive migration policies and the realities faced by undocumented communities.



# Participation

When working to advance migrants' rights, safe and meaningful participation of those affected is essential when rooted in trust, safety, and shared purpose. Involving people with lived experience not only strengthens the authenticity and impact of such work, but also supports community leadership, collective empowerment, and more effective narratives.

As a broad network including grassroots movements and associations, we have been working to make this a reality since PICUM's foundation in 2001. Our new Strategic Plan 2026-2030 places meaningful participation of people with lived experience at the heart of all areas of work – from advocacy and research to communications and governance. As part of this commitment, we published guidance on how to make



participation safe and meaningful, and we launched a Task Force on Meaningful Participation, including members of affected communities, to drive PICUM's participation agenda.

We have also been promoting Participatory Action Research (PAR), an approach that recognises the agency of migrants as active research actors and seeks to link evidence to action.

▼ *Taskforce meeting on meaningful participation*



# Researching irregular migration

In 2025, PICUM was a partner in four research consortia on irregular migration funded by the Horizon Europe programme.

The **MirreM** project (Measuring Irregular Migration) focused on methods to estimate numbers of flows and stocks and related policies across 20 countries. In 2025, we led the Working Group on Regularisation and produced a Handbook on Regularisation to help guide policymakers in promoting, designing and implementing regularisation policies that are fair and effective. The project ended in September 2025.

The **DignityFIRM** project studies the working and living conditions of migrant workers in food-related labour sectors such as agriculture or delivery riders, in seven countries. In this project, we conducted participatory action research (PAR) in partnership with local organisations in the Netherlands, Spain and Poland. PAR is an approach that recognises the agency of migrants as active research actors and seeks to link evidence to action. In 2025, we produced a cross-country report that seeks to identify the structural elements that shape migrant workers' precariousness in the PAR findings, while also highlighting the specific national and local dynamics that influence how exploitation, agency, and resistance unfold. We also published a summary of the actions carried out based on the PAR.



▲ *PICUM team at the final conference of the MirreM project*



▲ *Workshop with DignityFIRM partners in Spain*

As part of the **FAiR** project (Finding Agreement in Return), PICUM contributed to the production of *Unseen Lives*, a booklet gathering testimonies, stories and photos of people who have lived undocumented in Europe and have been detained or returned to their countries of origin. Some of the testimonies come from loved ones, and doctors and lawyers who work inside and against Europe's immigration detention system. Under the **MORE** project (Motivations, experiences, and consequences of return and readmission policy), we organised a series of webinars to highlight the project's findings on the perceptions and experiences of judges, doctors and border guards on return policy, as well as on the experiences of migrants at risk of detention or deportation.

We are also part of the Advisory Board of **PRIME** (Protecting Irregular Migrants in Europe), which analyses the conditions of and politics around undocumented migrants. As a civil society partner, we participate in these projects to ensure research is informed by the lived experience of undocumented people as well as by the latest policy developments in this area, and to promote evidence-based migration policy making.

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▲ *PICUM and FAiR project partners launching the “Unseen Lives” booklet at the European Parliament*

# Membership

PICUM has 155 member organisations in 34 countries, primarily in Europe. Our members uphold the human rights of undocumented migrants by providing essential services, and leading campaigns, actions and advocacy. Our membership includes grassroots, national level, migrant community organisations, service providers, trade unions and others engaged in a variety of activities from information and advice, mediation, legal aid, research, policy analysis, and advocacy.

## New members in 2025

In 2025, the following ten organisations joined PICUM:

- The Shelter Students Refuge (Cyprus)
- Human Rights Legal Project (Greece)
- Defence for Children International ODV (Italy)
- Sienos Grupe (Lithuania)
- Vluchtelingen in de Knel (Netherlands)
- Here to Support (Netherlands)
- Migration Consortium (Poland)
- Asylum Protection Center (Serbia)
- Movimiento de Mujeres Migrantes de Extremadura (Spain)
- Aculco - Asociación Sociocultural u de Cooperación (Spain)



## **ALBANIA**

- Initiative ARSIS
- 

## **AUSTRIA**

- Austrian Red Cross
  - Diakonie Oesterreich
  - Drop-in Center for Undocumented Migrants / UNDOK-Anlaufstelle zur gewerkschaftlichen Unterstützung undokumentiert Arbeitender
- 

## **BELGIUM**

- ADC Memorial
- Atlas
- Bureau d'Accueil et de Défense des Jeunes asbl
- CIRE - Coordination et Initiatives pour Réfugiés et Etrangers
- CSC Brussels-Hal Vilvoorde - Confédération des Syndicats Chrétiens
- European AIDS Treatment Group
- FAIRWORK Belgium
- JRS Belgium
- Maison du Peuple d'Europe
- Medimmigrant
- Le Monde des Possibles asbl
- Move Coalition
- ORBIT -Thuis in de Wereld van diversiteit en migratie
- Point d'Appui Liege
- Samahan-Filipino Migrant Workers Union in Belgium
- SIEMPRE
- Support in Belgium and Overseas
- United Protestant Church in Belgium
- UTSOPI

- Vluchtelingen Onthaalgroep Sint-Niklaas (VLOS)
  - Vluchtelingenwerk Vlaanderen
- 

## **BULGARIA**

- Center for Legal Aid – Voice in Bulgaria
- 

## **CROATIA**

- Coalition for Work with Psychotrauma and Peace
- 

## **CYPRUS**

- CyRC
  - Generation for Change
  - KISA - Action for Equality, Support, Antiracism
  - The Shelter Students Refuge
- 

## **CZECHIA**

- Association for Integration and Migration
  - Consortium of Migrants Assisting Organisations in the Czech Republic
  - La Strada Czech Republic
- 

## **DENMARK**

- Red Cross Health Clinic for Undocumented Migrants
- Refugees Welcome

## **FINLAND**

- Evangelical Lutheran Church of Finland
  - Physicians for Social Responsibility
  - Refugee Advice Centre
  - Turun Valconauha
- 

## **FRANCE**

- GISTI- Groupe d'Information et de Soutien des Immigrés
  - RESF - Réseau éducation sans frontières
  - STRASS
- 

## **GERMANY**

- Agisra e.V. / Arbeitsgemeinschaft gegen internationale sexuelle und rassistische Ausbeutung
- Arbeit und Leben
- Ban Ying
- Flüchtlingsrat Niedersachsen e.V.
- Jugendliche ohne Grenzen
- KOK e.V. German NGO network against trafficking in human beings
- Maisha e.V. African Women in Germany
- Medibüro Kiel e.V.
- MediNetz Bremen
- MediNetz-Koblenz e.V.
- Medinetz Mainz e.V.
- MedinetZ Ulm e.V.
- MediNetz Würzburg e.V.

## **GREECE**

- ARSIS - Association for the Social Support of Youth
  - Community Rights in Greece
  - Generation 2.0 RED (Generation 2.0 for Rights, Equality and Diversity)
  - Greek Council for Refugees
  - Human Rights Legal Project
  - Solidarity Now
- 

## **HUNGARY**

- Menedék - Hungarian Association for Migrants
- 

## **IRELAND**

- Immigrant Council of Ireland
  - Migrant Rights Center Ireland
  - Nasc - Irish Immigrant Support Centre
- 

## **ISRAEL**

- HIAS Israel
  - Hotline for Refugees and Migrants
  - Kav LaOved
- 

## **ITALY**

- ASGI - Associazione Studi Giuridici Immigrazione
- Defence for Children International ODV
- NAGA-Associazione Volontaria di Assistenza Socio-Sanitaria
- SIMM - Società Italiana Medicina delle Migrazioni

## LUXEMBOURG

- ASTI - Association de Soutien aux Travailleurs Immigres asbl
- 

## MALTA

- Aditus
  - Jesuit Refugee Service Malta
- 

## MOROCCO

- Organisation Démocratique des Travailleurs Immigres au Maroc (ODT)
- 

## NETHERLANDS

- Dokters van de Wereld
  - Here to Support
  - La Strada International
  - Pauluskerk Vluchtelingenwerk
  - Stichting ASKV Amsterdams Solidariteits Komitee Vluchtelingen
  - Stichting FairWork
  - Stichting LOS
  - Stichting PHAROS
  - Stichting Ros
  - Stichting STIL Utrecht
  - Vluchtelingen in de Knel
- 

## NIGERIA

- Centre for Youth Integrated Development
- 

## NORTH MACEDONIA

- LEGIS
- 

## NORWAY

- Church City Mission in Oslo

- The Norwegian Centre against Racism
- 

## POLAND

- Association for Legal Intervention (Stowarzyszenie Interwencji Prawnej)
  - Fundacja Ocalenie
  - Migration Consortium
- 

## PORTUGAL

- Associação de Promotores de Saúde, Ambiente e Desenvolvimento Socio-Cultural - PROSAUDESC
  - JRS - Jesuit Refugee Service Portugal (Serviço Jesuíta aos Refugiados)
  - APAV - Portuguese Association for Victim Support
- 

## SERBIA

- Asylum Protection Center
- 

## SLOVAKIA

- Centre Mokosha
  - Human Rights League
- 

## SPAIN

- Accem
- Aculco - Asociación Sociocultural y de Cooperación
- AESCO - América, España, Solidaridad y Cooperación
- Asociación Red de Mujeres Latinoamericanas y del Caribe
- APAV- Asociación en Prevención y Asistencia de la Violencia

- Asociación POR TI MUJER
- Asociación Rumiñahui
- Asociación Salud y Familia
- Convive Fundación Cepaim
- ENWAD - European Network of Women of African Descent
- Federación Red Acoge
- Federación Sur Acoge
- Fundación Salud por Derecho
- Justicia y Paz, Comisión General de España
- Malen Etxea
- Movimiento de Mujeres Migrantes de Extremadura
- MPDL - Movimiento por la Paz
- Mujeres Supervivientes
- Red de Apoyo a la mujer inmigrante víctima de violencia de género (Red Aminvi)
- SJME - Servicio Jesuita a Migrantes España
- SOS RACISMO GIPUZKOA

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#### **SWEDEN**

- Afghan Association
- Caritas Sverige
- Swedish Red Cross
- Rosengrenska
- Trade Union Center for Undocumented Migrants

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#### **SWITZERLAND**

- Association Promotion Droits Humains
- Berner Berantungsstelle für Sans-papiers
- CCSI - Centre de Contact Suisses-Immigres
- Collectif de soutien aux Sans-papiers de Geneve
- FIZ Fachstelle Frauenhandel und Frauenmigration
- ProCoRe

- Sans-Papiers Anlaufstelle Zürich
- SIT - Syndicat interprofessionnel des travailleurs et travailleuses
- Solidaritätsnetz Sans-Papiers Bern

#### **TOGO**

- MARS

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#### **UKRAINE**

- Right to Protection

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#### **UNITED KINGDOM**

- Anti-Slavery International
- Coram Children's Legal Centre
- Focus on Labour Exploitation
- HMSC - Haringey Migrant Support Centre
- Latin American Women's Rights Service
- Maternity Action
- Migrants Rights Network
- Migrant Voice
- OAID - Oxford Against Immigration Detention
- The Detention Forum

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#### **EUROPEAN AND INTERNATIONAL ORGANISATIONS**

- ESWA - European Sex Workers Alliance
- European AIDS Treatment Group
- European Federation of the Community of Sant'Egidio
- Jesuit Refugee Service - Europe
- MdM - Médecins du Monde International Network
- Quaker Council for European Affairs
- Sante Mentale & Exclusion Sociale (SMES-Europa aisbl)

# Membership Spaces

PICUM coordinates a number of different groups to exchange and cooperate with members, and in some cases, with partner organisations (non-members).

## Member Groups

These are spaces for informal communication and exchange among members, and between members and the Secretariat, on broad thematic issues, including access to justice, support and protection; labor rights and labor migration; social inclusion; migration policies; and participation.



▲ Member group meeting on detention

## Task Forces

These are spaces for members to co-develop an advocacy agenda and related activities around a specific objective, such as complaints mechanisms, regularisations, meaningful participation, and the Temporary Protection Directive.



▲ PICUM's tailored support to members in 2025 included the NGO MARS in its advocacy for access to health care for undocumented migrants in Togo.

## Groups Involving Members and External Partners

These are spaces to co-develop an advocacy agenda and related activities around a specific objective, which are open to non-member partner organisations. Our advocacy groups have looked at the criminalisation of solidarity and on best interest of the child procedures. We also continued running a stakeholder group on migrant domestic and care work.

► *Taskforce meeting on meaningful participation*



# Governance

PICUM has a four-layer governance structure consisting of a General Assembly, Board, Management Committee and Secretariat.

The **General Assembly** (GA) consists of all PICUM members, who meet annually to vote on important issues concerning PICUM's operations and future planning.

Reporting to the GA, the **Board** supports the steering of PICUM's mission, goals, and objectives. The Board brings diverse thematic, geographical, and organisational expertise to PICUM's leadership, and ensures the network maintains a relevant, strategic, and effective approach.

PICUM's Management Committee consists of four Board members that meet in regular intervals to provide support and guidance to the PICUM Secretariat. The **Management Committee** reports to the Board.

PICUM's **Secretariat** develops and carries out activities in line with PICUM's work plan and the strategic objectives of the organisation. The Secretariat coordinates members in information exchange, dissemination of good practices and strategic networking.



PICUM Board

## Executive Committee (Board)



**Jan Knockaert**  
(Chair)  
FAIRWORK  
Belgium



**Teresa De Gasperis**  
ACCEM  
Spain



**Magda Faltová**  
Association for  
Integration and  
Migration  
Czech Republic



**András Kováts**  
Menedék  
Hungarian  
Association for  
Migrants  
Hungary



**Lucy Polo Castillo**  
Por Ti Mujer  
Spain



**Nazek Ramadan**  
Migrant Voice  
United Kingdom



**Rubén Romero Masegosa**  
Fundación  
CEPAIM  
Spain



**Moussa Sangaré**  
Greek Forum of  
Refugees  
Greece



**Adam Weiss**  
Expert member  
Belgium



**Matti Wirehag**  
Rosengrenska  
Stiftelsen  
Sweden

## Staff



**Michele LeVoy**  
Director



**Anaïs Faure**  
Deputy Director



**Paul Geeraerts**  
Financial Director



**Amaru Mestas**  
Finance  
and Human  
Resources Officer



**Lilana Keith**  
Senior Advocacy  
Officer – Labour  
Rights and  
Labour Migration



**Louise Bonneau**  
Advocacy Officer –  
Justice, Health, and  
Racial Equality



**Silvia Carta**  
Advocacy Officer -  
Migration  
Enforcement Policies



**Laetitia  
Van der Vennet**  
Senior Advocacy  
Officer – Children,  
Families  
and Youth &  
Regularisation



**Chiara Catelli**  
Advocacy and  
Project Officer



**Gianluca Cesaro**  
Senior  
Communications  
Officer



**Chloë Bouvier**  
Multimedia  
Officer



▲ *PICUM staff during their annual team activity*

PICUM is grateful to former staff for their commitment and for their many contributions to PICUM's work, some over many years: Irene Subiri, Marta Gionco, Imanol Legarda, Liliana Almeida, Lian Moya Martinez, Garyfallia Mylona and Rahul Chawla.



**Marta Gionco**



**Imanol Legarda**



**Irene Subiri**



**Liliana Almeida**



**Lian Martínez  
Moya**



**Garyfallia  
Mylona**



**Rahul Chawla**

## PICUM Trainees

Trainees provide crucial support to PICUM's daily work while gaining hands-on experience with operating a transnational NGO network, supporting member organisations, and promoting policy change. We would like to thank Sara Aalto-Setälä, Mafalda Azvedo, Samia Bakkal, Hasna Belachqr, Jalal Hdidi, Isadora Pinheiro e Silva for their contributions in 2025.

▼ *PICUM advocacy trainees Samia Bakkal (left) and Hasna Belachqr (centre) and events and communications trainee Jalal Hdidi (right)*



## PICUM Volunteers

PICUM is grateful to its many volunteers for their help with translating and proofreading publications and other documents as well as compiling news on criminalisation of solidarity cases:

Helena Bahr, Valentine Bellet, Eloïse Bui, Claudia Castel Gallart, Nandi Chinoy Jones, Lucia Ciolino, Sandra Costa, Olga Efraimidou, Mwanki Engels, Danaja Fabic, Matilde Felgueiras, Silvia Ganassi, Cala Anne Gibson Juncosa, Shiva Heitmann, Ariane Huici Diaz, Anya Sarah Itse, Anne Jainta, Milena Jakičević, Ellen Judson, Alma Kirchhoff, Aristeidis Kouroukerezis,

Sarah Le Guillou, Molly Leeson, Marion Leprich, Irena Marinko, Zainab Mbarki, Ines Mesbah, Shachi Mokashi, Charles Murata, Gelatius Mwendwa Mwangangi, Dayo Olanyan, Maria Claudia Pastena, Marina Pérez de la Fuente, Mathilde Perrin, Stella Petridou, Letizia Santhià, Defi Satriyani, Hannah Schütt, Annie Silva, Akanksha Singh, Alessandra Kimberlin Soto Ruiz, Alexia Stamiri, Asli Tamay, Jeanne Tesson, Cyntia Tonello, Alice Vigne, Laura von Hammerstein, Anouk Weyne, Maite Zahran, Bianca Zickert.

# Financial Report

January - December 2025

## INCOME

<b>EUROPEAN COMMISSION</b>		<b>1,002,296.00</b>
DG Employment, Social Affairs and Inclusion: "Easi: Framework Partnership For Operating Grants - Aim Up"	778,664.00	
<b>European Research Executive Agency:</b>		
"Measuring Irregular Migration and related Policies - MirreM"	94,220.00	
"Dignity for Irregular Migrants in EU Farm2Fork Labour Markets - DIGNITY FIRM"	61,029.00	
"Finding Agreement in Return - FAIR"	17,499.00	
"Motivations, Experiences and Consequences of Returns and Readmissions Policy: Revealing and Developping Effective Alternatives - MORE"	48,040.00	
<b>European Education and Culture Executive Agency (EACEA)</b>		
"EmpoWerLING Actors in Civic Space Protection - WING"	2,844.00	
<b>PRIVATE DONORS</b>		<b>909,985.00</b>
Robert Bosch Stiftung	261,961.00	
Open Society wFoundation	151,000.00	
Adessium	128,666.00	
European Artificial Intelligence Fund - Network European Foundations	55,642.00	
European Programme for Integration and Migration (EPIM) - Network European Foundations (NEF)	44,479.00	
Porticus	268,237.00	
<b>MEMBERSHIP FEES</b>		<b>39,930.00</b>
<b>EXPERT FEES AND OTHER SOURCES</b>		<b>12,264.00</b>
<b>TOTAL INCOME</b>		<b>1,964,475.00</b>

## EXPENDITURE

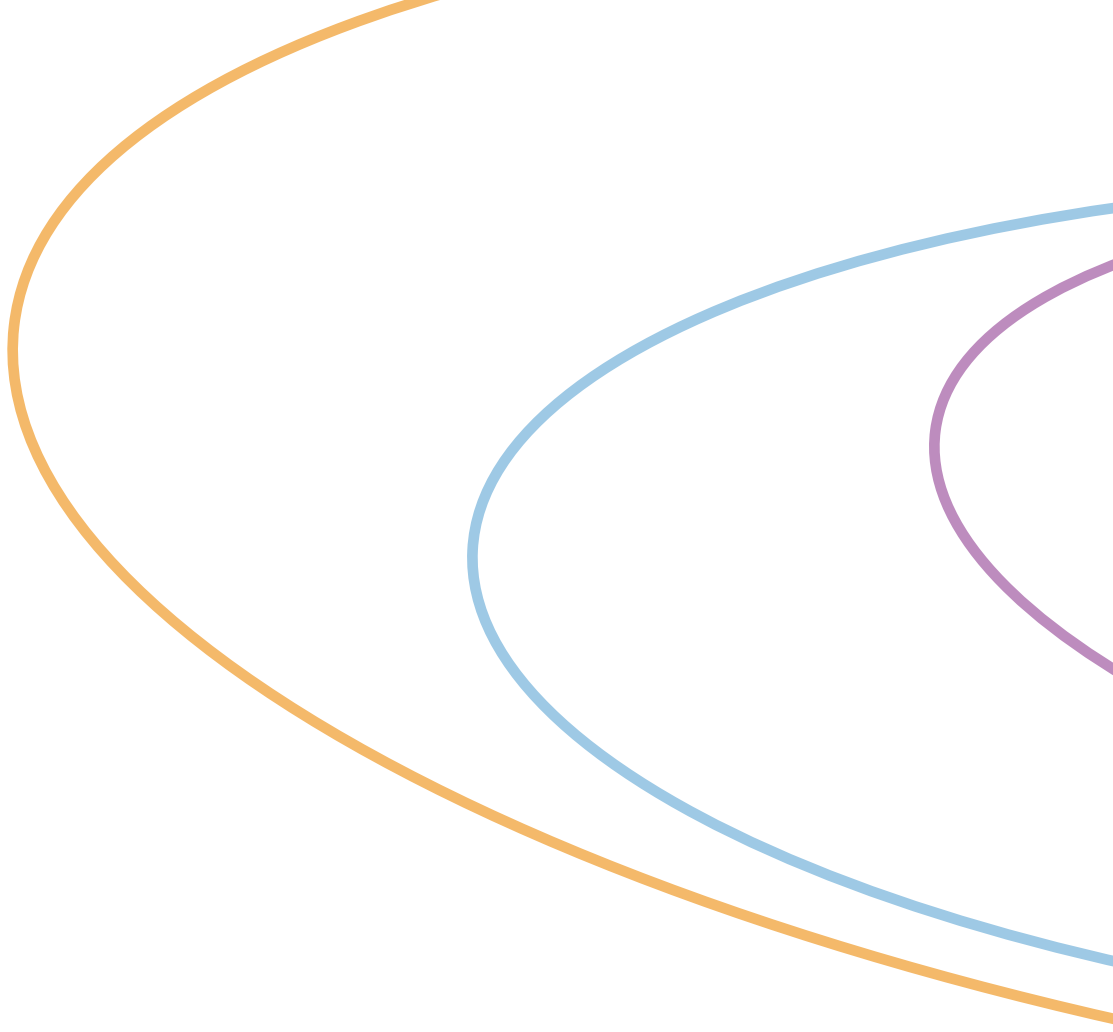
<b>STAFF</b>	<b>1,391,998.00</b>
<b>ACTIVITIES</b> <i>(Including travel, organization of confer- ences and meetings, publications)</i>	<b>409,329.00</b>
<b>FACILITIES AND ADMINISTRATION</b>	<b>145,148.00</b>
<b>TOTAL EXPENDITURE</b>	<b>1,946,475.00</b>

In addition to the support provided by PICUM members, we wish to thank the following foundations and institutional donors for their financial support:



Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or European Union Programme for Employment and Social Innovation "EaSI" (2021-2027). Neither the European Union nor the granting authority can be held responsible for them

Supported by a grant from the Foundation Open Society Institute in cooperation with the Open Society Initiative for Europe of the Open Society Foundations.



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**PICUM**