

Developing capacities together: European CSO-University networks for global learning on migration, security and sustainable development in an interdependent world - InterCap

Policy Coherence and Impact Measurement for Sustainable Development

Focus on Policies Impacting Migrants in Malta

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Table of Contents

Acronyms	3
Introduction.....	5
Methodology	6
Findings and Analysis.....	7
State of Play of PCSD in Malta	7
Reporting and Measurement of the Impact of Policies on SDG Targets	11
Involvement of CSOs in Implementing and Promoting Sustainable Development.....	15
Impact of Policies and Practices (regarding relevant SDGs) on Migrants in Malta	17
Conclusions and Recommendations	25
Annex: List of Interviewed and Consulted Stakeholders.....	27

Acronyms

AMIF	Asylum, Migration and Integration Fund
CDP	Committee for Development Policy (UN)
CLW	Community Liaison Worker
CSO	Civil Society Organisation
DG	Director General
ESDN	European Sustainable Development Network
GFG	Guardian of Future Generations (Malta)
HLPF	High-Level Political Forum
LNOB	Leave No One Behind
MCESD	Malta Council for Economic and Social Development
MEDE	Ministry for Education and Employment
MSDEC	Ministry for Sustainable Development, the Environment and Climate Change (Malta)
MEUSAC	Malta-EU Steering and Action Committee
MFEA	Ministry for Foreign and European Affairs (Malta)
MFTP	Ministry for Foreign Affairs and Trade Promotion (Malta)
MHSE	Ministry for Home Affairs, National Security and Law Enforcement
MJEG	Ministry of Justice, Equality and Governance
MLU	Migrant Learners' Unit
NAO	National Audit Office (Malta)
NGO	Non-governmental organisation
ODA	Official Development Assistance
OECD	Organisation for Economic Co-operation and Development
OPM	Office of the Prime Minister
PC(S)D	Policy Coherence for (Sustainable) Development
SD	Sustainable Development
SDD	Sustainable Development Directorate (Malta)
SDG	Sustainable Development Goal
SDN	Sustainable Development Network (Malta)
SDV	Sustainable Development Vision (Malta)
SKOP	<i>Solidarjeta' u Koperazzjoni</i>
TCN	Third Country National
UN	United Nations
VNR	Voluntary National Review

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Introduction

The main notions underlying the Sustainable Development Goals (SDGs) laid out in the Agenda 2030¹ include: leaving no one behind; ensuring equity and dignity for all; and achieving prosperity within Earth's safe and restored operating space. The Goals therefore comprise elements of economic development, social inclusion and sustainable environmental management, and the idea that these interconnected components cannot be tackled separately.²In view of this, there is an evident need of policy coherence for sustainable development (PCSD), including at country level. In what follows, this study explores this concept from different aspects with regard to the state of play in Malta.

The present study aims to – as listed in the objectives hereunder – explore the recent developments in policy coherence for development in Malta, as well as the measurement of the impact of policies, and the effect of policies and ensuing practices on migrants (Third Country Nationals – TCNs).

Objectives

- 1) To assess the state of play of PCSD with regard to the SDGs implemented in Malta, focusing on the progress made since 2018;³
- 2) To investigate the ways in which Malta is reporting on and measuring the impact of policies on SDG targets;
- 3) To explore the involvement of civil society in implementing and promoting sustainable development; and
- 4) To explore the impact of policies and practices regarding the most pertinent SDGs (1, 4, 8, 10) on migrants in Malta.

¹ Sustainable Development Goals Knowledge Platform. n.d. *Transforming our world: the 200 Agenda for Sustainable Development*. Available: <https://sustainabledevelopment.un.org/post2015/transformingourworld>. Accessed on 2 September 2020.

² Miola, A., Borchardt, S., Neher, F. and Buscaglia, D. (European Commission).2019. *Interlinkages and policy coherence for the Sustainable Development Goals implementation. An operational method to identify trade-offs and co-benefits in a systematic way*. Available: <https://ec.europa.eu/jrc/en/publication/interlinkages-and-policy-coherence-sustainable-development-goals-implementation-operational-method>

³ Other studies and reports published prior to 2018 (referred to in the course of this report) cover the state of play of PCSD in Malta.

Methodology

The study was conducted through a combination of desk research and interviews. Secondary information and data was collected through a review and evaluation of relevant policies, legislation and other legal documents as well as pertinent reports issued by government, parastatal organisations and civil society organisations (CSOs) to international organisations (e.g. to the EU), and key research studies. The second part of the study comprised the collection of primary data and information through interviews and consultations with key stakeholders (see Annex) with whom discussions and semi-structured interviews were held, either via email, phone or video call.

The two stages of data collection were iterative in nature, with desk research informing the interviews and vice-versa. Semi-structured interviews were the method of choice for interviews since, while this type of interview follows a ‘plan’ with proposed themes, it also leaves room for the interviewees to elaborate on their answers.⁴ Following transcription, the analysis of the interviews was carried out.

Ethical considerations were taken into account in that each participant was informed of their right to remain anonymous and to refuse to answer any questions posed. Data protection was ensured in that interview recordings and transcripts were kept on a password-encrypted laptop to which only the researcher has access. Upon publication of the research, recordings and transcripts were erased. The research report was also validated with interviewed stakeholders before being finalised.

⁴ Willis, K. 2006. ‘Interviewing’, in Desai, V. and Potter, R. (ed.) *Doing Development Research*. London: SAGE Publications.

Findings and Analysis

State of Play of PCSD in Malta

According to the European Sustainable Development Network (ESDN), Malta is adopting a ‘whole-of-government’ approach in implementing the 2030 Agenda for SD, meaning every Ministry has a role in implementing the SDGs.⁵ The **Sustainable Development Act of 2012⁶ mandates the Office of the Prime Minister (OPM) to compile an annual report delineating the policies and measures implemented by the government to mainstream SD across all areas.** Annual SD reports – to which the National Statistics Office⁷ also contributes with relevant data⁸ – are available for 2015 to 2018 and are published on the newly launched Sustainable Development Directorate (SDD) website.⁹ The annual SD report covering the year 2018¹⁰ opens with a statement from the **Minister responsible for Sustainable Development, Social Dialogue and the Implementation of the Electoral Manifesto, who asserts that sustainable development (SD) has been mainstreamed in the government’s operations and policy formulation.** The Minister also states that Malta is “one of the few countries having a specific Sustainable Development Governance model in place” (p. 4).

The **Sustainable Development Act establishes measures to mainstream SD across policy areas, including coordination mechanisms among different ministries and government agencies:**¹¹ the Act states that every Ministry shall have a **Sustainable Development Coordinator** (the Permanent Secretaries) and a **Sustainable Development Focal Point** (the director responsible for policy development / head of agency) in every government department, agency or entity. The Focal Points are responsible to assist the Sustainable Development Coordinator in developing the Ministry’s position on SD. In practice, however, according to an SDD representative,¹² the Permanent Secretary for each Ministry is responsible for the appointment of the Focal Point at Ministerial level, with one appointed figure covering all agencies, departments and entity within that particular Ministry. The function of the Focal Point – who is the person responsible for the policy implementation for that Ministry – is to mainstream sustainable development across their Ministry. Meanwhile, the SDD (made up of the Director and two other persons) is working to enable different ministries to work together and mainstream sustainable development principles in the development of plans, policies and

⁵ European Sustainable Development Network. 2020. *Single Country Profile: Malta*. May, 20. Available: <https://www.sdnetwork.eu/?k=country%20profiles&s=single%20country%20profile&country=Malta>

⁶ Laws of Malta. 2012. Chapter 521. *Sustainable Development Act*. Available: <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=11917&l=1#:~:text=To%20mainstream%20sustainable%20development%20across.by%20Act%20I%20of%202019>

⁷ <https://nso.gov.mt>

⁸ National Statistics Office, Malta. 2019. *Annual Report 2018*. Available: https://nso.gov.mt/en/nso/About_NSO/Pages/Annual-Reports.aspx

⁹ <https://sustainabledevelopment.gov.mt>

¹⁰ Office of the Prime Minister. 2019. *Sustainable Development Annual Report 2018*. Provided by George Said, Sustainable Development Directorate.

¹¹ InterCap. 2019. *First Annual Policy & State-of-the Art Paper for Policy Coherence for Development (PCD)*. Available: <https://developtogether.eu/en/resources/category/4-reports-and-papers>

¹² SDD Representative. 2020. Interview with author.

strategies. In addition, Ministries are also being encouraged to develop their annual budget measures based on such principles. Such work is being coordinated by the SD Focal Points which are supported by the Sustainable Development Directorate. However, the SDD representative confirms, there is a need for more training and awareness of sustainable development. Even further, Focal Points often do not possess knowledge of data collection methods, thus rendering SD mainstreaming and policy coherence more challenging. According to the SDD, SD needs to be further promoted and implemented, including in public procurement.¹³

The **lack of cohesion between policies** such as those related to education and health, and sustainability, is also underscored by the 2017 issue of the Social Watch Report for Malta.¹⁴ The then Ministry for Foreign Affairs and Trade Promotion¹⁵ (MFTP) – in its replies to an EU-wide questionnaire (launched by the European Commission in 2018) on PCD¹⁶ - mentions that a **PCD Taskforce (consisting of individuals from different Ministries)** was set up in 2014. However, there seems to be **no readily available information on this taskforce’s role**, nor does the MFTP elaborate on its political commitment to PCD.¹⁷ The existence and role of this taskforce remains obscure as no clear elaboration is forthcoming from interviews carried out with the relevant stakeholders.

Meanwhile, the same Sustainable Development Act sets up two bodies – the **Guardian of Future Generations**¹⁸ (GFG) and the **Sustainable Development Network (SDN)** – which are composed of members who have expertise in the three pillars of sustainable development (economy, environment, social sector). These entities are together responsible for coordinating and implementing Malta’s SD. The SDN and GFG also aim to foster national dialogue to promote innovative solutions for sustainable development.¹⁹

The GFG²⁰ is made up of a chairperson appointed by the Prime Minister and three members appointed by the Minister for Sustainable Development, the Environment and Climate Change (which has now become the

¹³ SDD Representative. 2020. Interview with author.

¹⁴ Grech, W. (Social Watch). 2017. *Malta. Implementation of the 2030 Agenda: Are “partners” delivering?* Available: <http://www.socialwatch.org/node/17788>

¹⁵ This has since become the Ministry of Foreign and European Affairs: <https://foreignandeu.gov.mt/en/Pages/Home.aspx>

¹⁶ European Commission. 2018. *Joint EU questionnaire to Member States. Part II – Information on Policy Coherence for Development. PCD Questionnaire for EU Member States.* Available: https://ec.europa.eu/international-partnerships/policy-coherence-development_en

¹⁷ Kopin. 2018. *1st Annual Paper – State of Affairs on PCD, Malta.* Available: <https://developtogether.eu/en/resources/category/4-reports-and-papers>

¹⁸ <https://www.gov.mt/en/Government/Government%20of%20Malta/Ministries%20and%20Entities/Officially%20Appointed%20Bodies/Pages/Boards/Guardian-of-Future-Generations.aspx>

¹⁹ Università ta’ Malta (Newspoint). 2020. *UM academics to lend expertise on Sustainable Development Network.* June, 5. Available: https://www.um.edu.mt/newspoint/news/2020/06/um-academics-sdn?utm_source=update&utm_campaign=update&utm_medium=email&utm_con%20E%2080%A6; European Sustainable Development Network.

2020. *Single Country Profile: Malta.* May, 20. Available: <https://www.sd-network.eu/?k=country%20profiles&s=single%20country%20profile&country=Malta>

²⁰ Numerous attempts to hold an interview with the GFG Chair did not yield results.

Minister for the Environment, Climate Change and Planning). The three members consist of a person having experience in the Voluntary Organisations sector, one with experience in commerce and economy, and one with experience in social and community affairs. The latter two are appointed following consultations with the Malta Council for Economic and Social Development²¹ (MCESD). **The role of the GFG is to facilitate collaboration between all stakeholders in achieving a balance between socio-economic development and environmental management.**²² However there seems to be no readily available information or reports on the work that the GFG has carried out since its establishment.

The **SDN brings together non-governmental organisations (NGOs), government and private sector to work together towards sustainable solutions.** It is made up of a chairperson appointed by the Prime Minister; a deputy chairperson appointed by the Minister for Sustainable Development, Environment and Climate Change; the Sustainable Development Coordinators (the Permanent Secretaries of the Ministries responsible for the economy, the environment and social wellbeing) responsible for economic, social and environmental issues; an NGO representative having experience in environmental matters; a person with experience in commerce and economy; and a person with experience of social and community affairs. The latter three are appointed by the same Minister, with the latter two being appointed following consultations with the MCESD.²³ However, these appointments were initially not backed by the necessary resources to do the work. As the SDD representative confirms, **previous SDN members** – who, like those of the GFG, work on a voluntary basis – **resigned due to lack of resources.** The current SDN – **appointed in June 2020** and only having met twice at the time of writing, partly due to the COVID-19 crisis – has now applied for resources which will be allocated through the forthcoming Budget measures.²⁴ Furthermore, the SDN has been granted access to the SDD resources if needs be.²⁵

The SDN is responsible for promoting SD through **a bottom-up approach.**²⁶ The current SDN chairperson²⁷ confirms that the network is **holding meetings with stakeholders such as MCESD and the Malta Developers Association**²⁸ in order to promote sustainable development: the SDN is mainly focused on promoting SD principles with the private sector (commercial or otherwise), since within the public sector there

²¹ <https://mcesd.org.mt>

²² Sustainable Development Goals Knowledge Platform. 2018. *Malta. Voluntary National Review 2018.* Available: <https://sustainabledevelopment.un.org/index.php?page=view&type=30022&nr=969&menu=3170>

²³ Laws of Malta. 2012. *Chapter 521. Sustainable Development Act.* Available: <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=11917&l=1#:~:text=To%20mainstream%20sustainable%20development%20across,by%20Act%20I%20of%202019.>

²⁴ SDD Representative. 2020. Interview with author.

²⁵ Zammit, M. 2020. Email Exchange with author.

²⁶ SDD Representative. 2020. Interview with author.

²⁷ The make-up of the current SDN can be found here: <https://newsbook.com.mt/en/new-board-appointments-to-safeguard-sustainable-development>

²⁸ <https://mda.com.mt>

already exist, as noted earlier, persons designated to oversee the implementation of SD. The idea behind meeting with such entities as the MCESD is that these entities will then promote SD principles with their members.²⁹

The SDN's mandate was widened through the Sustainable Development Act's amendment in 2019,³⁰ which enables it to **set up sub-committees promoting sustainable development**. These economic, social and environmental sub-committees would comprise social partners, actors and those with a specific interest in SD, who may feed into the SDN's deliberations and link with the representative in charge of their area of interest on the SDN and vice versa. However, **these sub-committees have not yet been set up at the time of writing, partly also due to budget and time constraints.**³¹

Furthermore, the SDN, together with the GFG, are to establish a platform of information exchange to promote innovative solutions for SD.³² In July 2020, this work has not yet started and, as the SDN chairperson confirms, the network still needs to look into this matter.³³

In 2018, the then Ministry for Sustainable Development, the Environment and Climate Change³⁴ (MSDEC) launched the national **Sustainable Development Vision for 2050 (SDV 2050)**,³⁵ which aligns with – and goes beyond – the Agenda 2030, while also taking into account developments at an EU and international level.³⁶ The SDV reiterates the government's commitment to mainstreaming the principles of sustainable development within its policies, plans and programmes, in order to ensure coherence and that all government entities are working towards the same goal. It might be argued that indirect allusions to coherence are made in such instances as the part of the Vision dealing with education making reference to the need to link the education system to the needs of the labour market. Nonetheless, such links also might indicate that, rather than policy coherence, the education system is being made to conform to the country's labour market. Beyond such links, no other reference to coherence is made throughout the document, nor does it propose ways through

²⁹ Zammit, M. 2020. Email Exchange and Interview with author.

³⁰ Laws of Malta. 2019. *Act No. 1 of 2019. AN ACT to amend the Sustainable Development Act, Cap. 521*. Available: <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lp&itemid=29475&l=1>

³¹ Zammit, M. 2020. Email Exchange and Interview with author.

³² Università ta' Malta (Newspoint). 2020. *UM academics to lend expertise on Sustainable Development Network*. June, 5. Available: https://www.um.edu.mt/newspoint/news/2020/06/um-academics-sdn?utm_source=update&utm_campaign=update&utm_medium=email&utm_con%20%80%A6

³³ Zammit, M. 2020. Email Exchange with author.

³⁴ This has since become the Ministry for the Environment, Climate Change and Planning.

³⁵ Ministry for the Environment, Sustainable Development and Climate Change. 2018. *Malta's Sustainable Development Vision for 2050*. Available: https://meae.gov.mt/en/Public_Consultations/MSDEC/Documents/Malta%27s%20Sustainable%20Development%20Vision%20for%202050.pdf

³⁶ European Sustainable Development Network. 2020. *Single Country Profile: Malta*. May, 20. Available: <https://www.sdnetwork.eu/?k=country%20profiles&s=single%20country%20profile&country=Malta>

which to achieve or monitor said coherence. However, the SDD representative confirms that such content will be contained in the Strategy that is to follow the Vision (see subsequent section).³⁷

Reporting and Measurement of the Impact of Policies on SDG Targets

The ESDN profile on Malta states that **new policies**– and revisions of existing policies – **will reflect the country’s commitment with regard to SDGs**. The first step towards this is mapping existing national policies against the SDGs.³⁸ The SDD representative notes that this exercise currently consists of mapping which policies and strategies exist in the different ministries, but does not yet include mapping against the SDGs. The SDD is exploring the ways in which these policies can fit with the SDGs and how this can become integrated towards policy coherence. At the time of writing, this exercise is still ongoing.³⁹

Meanwhile, in September 2019, the Prime Minister announced **Malta’s commitment to align its budget measures with the SDGs, starting from Budget 2020**.⁴⁰ In the Budget 2020 document, however, under the heading ‘sustainable development’, one only finds measures related to the environment (including climate change, waste management, water management, construction and energy). While other measures outlined in the same document evidently also work towards achievement of the SDGs – such as reducing poverty, reducing precarious employment, investing in health and combating human trafficking⁴¹ - there is no reference to sustainable development or to coherence among these areas, highlighting once again the lack of structural policy coherence targeting the SDGs discussed in the previous section, as well as the persisting idea that SD relates mainly to the environment.⁴² Nonetheless, the ESDN website states that “the **SD Proofing of the national budget process improves overall policy coherence, which reinforces the very nature of the SDGs as being overarching and intertwined**.”⁴³ During the High-Level Political Forum (HLPF) on Sustainable Development Side Event on PCSD, taking place online on the 15th of July 2020, the Director of the SDD states that the alignment of the Budget process with the SDGs demonstrates that Malta “can improve the overall policy coherence” and that the cross-cutting element of the SDGs creates the opportunity “to think... not just on a... single ministerial level, but to try and link... other ministries together so that we can achieve coherence

³⁷ SDD Representative. 2020. Email Exchange with author.

³⁸ European Sustainable Development Network. 2020. *Single Country Profile: Malta*. May, 20. Available: <https://www.sd-network.eu/?k=country%20profiles&s=single%20country%20profile&country=Malta>

³⁹ SDD Representative. 2020. Interview with author.

⁴⁰ European Sustainable Development Network. 2020. *Single Country Profile: Malta*. May, 20. Available: <https://www.sd-network.eu/?k=country%20profiles&s=single%20country%20profile&country=Malta>

⁴¹ Ministry for Finance. 2019. *Budget Speech 2020 Malta. Inkomplu Nikbru Flimkien*. Available: <https://mfin.gov.mt/en/The-Budget/Pages/The-Budget-2020-GD-9691.aspx>

⁴² The SDD Representative states that the SDG alignment was carried out after the Budget was presented, hence the lack of reference to SDGs in the mentioned document (SDD Representative. 2020. Email exchange with author.)

⁴³ European Sustainable Development Network. 2020. *Single Country Profile: Malta*. May, 20. Available: <https://www.sd-network.eu/?k=country%20profiles&s=single%20country%20profile&country=Malta>

and also achieve... better planning for the Budget process.” The SDD Director further states that the aim is for the Budget to avoid conflict between resource allocations, as well as to ensure that it is in line with international commitments, such as the European Green Deal⁴⁴ and the European Semester.⁴⁵ He goes on to explain that **linking the Budget measures with the SDGs gives more accountability and transparency, where Ministry officials are obliged to plan how to better allocate funding across projects and initiatives.** Aligning the Budget process also makes it more comparable to other countries, allowing Malta to rate itself compared to them, with regard to its achievements towards the SDGs. The SDD Director also notes that a **matrix has been developed, which shows the country’s progress towards the achievement of the sustainable development principles across its workings.** The tool can assess the government’s yearly performance.⁴⁶

Furthermore, the same ESDN website states that **one of the aims of the SDG alignment (which is conducted annually) is to “establish milestones in Action Plans, through which Ministries will be expected to contribute towards mainstreaming sustainable development practices whilst also addressing SDGs Indicators.”** The implementation of one SDG (SDG 1) is currently being audited in Malta, by the National Audit Office (NAO). The audit aims to: identify the efforts undertaken by the government to address poverty in 2018; assess the comprehensiveness, effectiveness and inclusiveness of these efforts; and determine the progress achieved so far in addressing poverty. The audit considers various aspects, including the governance structure in place for the implementation of the SDGs as well as for policies related to poverty; the monitoring and data collection systems measuring poverty; the views of various stakeholders (including NGOs and academics) regarding the governments’ efforts in this regard; as well as available data on current poverty levels.⁴⁷

Beyond SDG 1, **the Maltese government does not appear to be measuring the impact of its policies on SDG targets.** In its 2019 report,⁴⁸ the InterCap Consortium reports that while “there is political commitment to PCD at the rhetoric level, there seem to be no mechanisms that assess the impact of Malta’s policies on sustainable development.” When asked how Malta measures the impact of its policies and practices on SDG

⁴⁴ https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en

⁴⁵ https://ec.europa.eu/info/business-economy-euro/economic-and-fiscal-policy-coordination/eu-economic-governance-monitoring-prevention-correction/european-semester_en

⁴⁶ Said, G. 2020. *Strategies and plans for sustainable development* [HLPF Side Event 2020: High-Level Political Forum on Sustainable Development. An Interregional Dialogue: Governance and policy coherence for accelerating action on the SDGs in the post-COVID-19 era]. Available: <http://www.oecd.org/gov/pcsd/hlpfsideevent2020.htm>

⁴⁷ NAO Representatives. 2020. Email exchange with author.

⁴⁸ InterCap. 2019. *First Annual Policy & State-of-the Art Paper for Policy Coherence for Development (PCD)*. Available: <https://developtogether.eu/en/resources/category/4-reports-and-papers>

targets, all stakeholders questioned on this - as well as the Malta SD report for 2018⁴⁹ – refer to the UN SDG Index⁵⁰ and the Eurostat SDG Indicator,⁵¹ with no specific reference to how Malta measures its achievements.

Furthermore, while in its report for the Voluntary National Review (VNR) of 2018,⁵² the then Maltese Minister for Foreign Affairs and Trade Promotion states that the country has already met, and sometimes even exceeded, a number of SDG targets, Kopin's⁵³ and SKOP's⁵⁴ response to Malta's VNR⁵⁵ argues that the **targets covered by the MFTP report are not directly relevant to the SDGs**. In response to queries regarding the process undertaken by the government in reporting for the VNR and how this links to measuring progress on the SDGs, the Ministry for Foreign and European Affairs⁵⁶ (MFEA) confirms that its sole role for the VNR report was to collate information from the different Ministries.⁵⁷

Indeed, existing evaluations of policies and strategies do not seem to attempt to measure their impact against SDG targets, as evidenced by the first implementation and evaluation report⁵⁸ for the National Strategic Policy for Poverty Reduction & Social Inclusion.⁵⁹ The lack of reference to the SDGs could be ascribed to the period covered by the report (2014-2016), when the Agenda 2030 had just been adopted (in September 2015). It remains to be seen whether the next report, due in November 2020, which will cover the period ranging from 2017 to 2019,⁶⁰ will take into consideration Malta's progress towards SDG 1. Nonetheless, even more recent documents, such as the National Reform Programme of 2020⁶¹ do not make any reference to the SDGs.

Meanwhile, ad hoc Interministerial Committees are set up in order to deal with high level tasks from the relevant Ministry. Such Committees are made up of senior management (permanent secretaries, Director Generals (DGs) and directors).⁶² One such Interministerial Committee is the one which monitors the Poverty

⁴⁹ Office of the Prime Minister. 2019. *Sustainable Development Annual Report 2018*. Provided by George Said, Sustainable Development Directorate.

⁵⁰ Sustainable Development Solutions Network. 2020. *Sustainable Development Report*. Available: <https://www.sdindex.org>

⁵¹ Eurostat. n.d. *SDG Indicators: Goal by Goal*. Available: <https://ec.europa.eu/eurostat/web/sdi/indicators>

⁵² Sustainable Development Goals Knowledge Platform. 2018. *Malta. Voluntary National Review 2018*. Available: <https://sustainabledevelopment.un.org/index.php?page=view&type=30022&nr=969&menu=3170>

⁵³ <http://kopin.org>

⁵⁴ <http://skopmalta.org>

⁵⁵ Grech, W. (Social Watch). 2017. *Malta. Implementation of the 2030 Agenda: Are "partners" delivering?* Available: <http://www.socialwatch.org/node/17788>

⁵⁶ <https://foreignandeu.gov.mt/>

⁵⁷ MFEA Representatives. July 2020. Email exchange and Phone Call with author.

⁵⁸ Ministry for the Family, Children's Rights and Social Solidarity. *Implementation & Evaluation Report 2014-2016. National Strategic Policy for Poverty Reduction & Social Inclusion Malta 2014-2024*. Available: <https://family.gov.mt/en/Documents/Poverty%20Booklet.pdf>

⁵⁹ Ministry for the Family and Social Solidarity. *National Strategic Policy for Poverty Reduction & For Social Inclusion Malta 2014-2024*. Available: <https://family.gov.mt/en/Documents/Poverty%20Strategy%202014%20English%20Version.pdf>

⁶⁰ NAO Representatives. 2020. Email exchange with author.

⁶¹ Ministry for Finance and Financial Services. 2020. *Malta National Reform Programme*. Available: <https://mfin.gov.mt/en/Library/Pages/National-Reform-Programme.aspx>

⁶² SDD Representative. 2020. Interview with author.

Reduction Strategy⁶³ and involves the Ministry for the Family, Children’s Rights and Social Solidarity⁶⁴ (MFCS), Ministry for Education and Employment⁶⁵ (MEDE), the Ministry for Health⁶⁶ and the Ministry for the National Heritage, the Art and Local Government.⁶⁷ However, as the NGO Kopin emphasises, there is a need for the establishment of monitoring mechanisms in Malta which would monitor and measure the impact of policies in line with Malta’s commitment to PCD (see previous section). It notes that in its replies to the 2018 EC questionnaire on PCD,⁶⁸ **Malta demonstrates the absence of mechanisms assessing the impact of its policies on sustainable development.**⁶⁹ The same VNR response by Kopin and SKOP (the platform for Maltese development non-governmental organisations) highlights how Malta’s lack of policy scrutiny and implementation analysis is mainly due to a lack of transparency.

Meanwhile, the **SDV 2050** is to be followed by a national **Strategy and Action Plan** to assist in its implementation. These two documents, the SDD representative⁷⁰ confirms, are – at the time of writing – in the process of being developed, and will cover impact measurement. The SDD representative states that the Strategy and Action Plan – which aim to be launched in 2021 – are being developed in conjunction with the SD Focal Points as well as with the Organisation for Economic Cooperation and Development (OECD),⁷¹ in order to involve external experts in developing the Strategy. The SDD has also applied for – and received funding from – the European Commission (through the Structural Reform Support)⁷² to sustain the development of these two documents. At the time of writing, the SDD, together with the mentioned entities, are reflecting on the various building blocks (related to the economy, environment, social affairs and good governance, among others) and how they need to work together in order to achieve the goals of the Strategy (and Action Plan). The SDD is also encouraging government entities to aim to think beyond the five-year electoral cycle in order to implement SD. However, according to the SDD representative, certain aspects of SD principles (such as discrimination) cannot be measured since they are “vague” concepts.

⁶³ NAO Representatives. 2020. Email exchange with author.

⁶⁴ <https://family.gov.mt>

⁶⁵ <https://education.gov.mt>

⁶⁶ <https://deputyprimeminister.gov.mt>

⁶⁷ <https://culture.gov.mt>

⁶⁸ European Commission. 2018. *Joint EU questionnaire to Member States. Part II – Information on Policy Coherence for Development. PCD Questionnaire for EU Member States*. Available: https://ec.europa.eu/international-partnerships/policy-coherence-development_en

⁶⁹ Kopin. 2018. *1st Annual Paper – State of Affairs on PCD, Malta*. Available: <https://developtogether.eu/en/resources/category/4-reports-and-papers>

⁷⁰ SDD Representative. 2020. Interview with author.

⁷¹ <https://www.oecd.org>

⁷² https://ec.europa.eu/info/departments/structural-reform-support_en

Involvement of CSOs in Implementing and Promoting Sustainable Development

As per the Sustainable Development Act of 2012,⁷³ **one of the roles of the GFG is to develop audits of various areas / sectors contributing towards SD and engage NGOs in SD advocacy.** The Act was then revised in 2019⁷⁴ **in a bid to further increase the participation of CSOs and other social actors in mainstreaming sustainable development.** However, Kopin argues that there is a **lack of consultation** with regard to PCSD and monitoring of progress on the achievement of the SDGs in and by Malta.⁷⁵

The European Sustainable Development Network website,⁷⁶ which (at the time of writing) was last updated in May 2020, states that the Maltese government acknowledges that sustainable development needs to be achieved through consensus from various sectors, including CSOs and the private sector, and reiterates that:

In drafting of key development documents, the Maltese Government ensures that the process is open and inclusive as possible, and that the vision of the future of Malta reflects the vision of its citizens. This was safeguarded through public and sectoral consultations as well as through existing national stakeholder engagement mechanisms.

However, **no links to the consultation process** are apparent. Furthermore, **SKOP was not approached or informed by the government about the VNR report** mentioned above, despite the government claiming the existence of a “comprehensive process of consultation” “engaging all stakeholders.”⁷⁷ Thus, **calls have been made by civil society for an inter-agency forum to include CSOs;** however, these calls have, to date, remained unanswered.⁷⁸

Meanwhile, the Maltese government continues to reiterate its acknowledgment of the role of NGOs in SD, including through the setting up, in 2017, of a fund for voluntary and non-governmental organisations which are involved in economic, social and environmental areas and thus contribute towards the achievement of the SDGs. The first call for proposals was issued in November 2017⁷⁹ and the best three projects (out of seventeen

⁷³ Laws of Malta. 2012. *Chapter 521. Sustainable Development Act.* Available: <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=11917&l=1#:~:text=To%20mainstream%20sustainable%20development%20across,by%20Act%20I%20of%202019>

⁷⁴ Laws of Malta. 2019. *Act No. 1 of 2019. AN ACT to amend the Sustainable Development Act, Cap. 521.* Available: <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lp&itemid=29475&l=1>

⁷⁵ Kopin. 2018. *1st Annual Paper – State of Affairs on PCD, Malta.* Available: <https://developotogether.eu/en/resources/category/4-reports-and-papers>

⁷⁶ European Sustainable Development Network. 2020. *Single Country Profile: Malta.* May, 20. Available: <https://www.sd-network.eu/?k=country%20profiles&s=single%20country%20profile&country=Malta>

⁷⁷ Sustainable Development Goals Knowledge Platform. 2018. *Malta. Voluntary National Review 2018.* Available: <https://sustainabledevelopment.un.org/index.php?page=view&type=30022&nr=969&menu=3170>

⁷⁸ Grech, W. 2020. Email exchange with author.

⁷⁹ European Sustainable Development Network. 2020. *Single Country Profile: Malta.* May, 20. Available: <https://www.sd-network.eu/?k=country%20profiles&s=single%20country%20profile&country=Malta>

submitted) addressing the three pillars of SD, were selected.⁸⁰ No other calls have been made since. According to the SDD representative,⁸¹ the project proposals submitted in response to this call were of poor quality, indicating that NGOs lack understanding of the SD concept. Thus, the SDD representative maintains, NGOs are not ready for sustainable development: they need to change their approach and do the necessary groundwork to understand the meaning of SD and mainstream its three pillars.

The SDD representative⁸² further maintains that NGOs were invited for consultation on the SDV 2050, for which very few attended. Nonetheless, the 2018 SD report⁸³ states that during the development of the Vision, the SDD worked in collaboration with the Malta-EU Steering and Action Committee (MEUSAC) to hold a series of consultation sessions. One of the sessions, held in October 2018, targeted environmental NGOs (although one representative from Kopin/SKOP also attended), but no such session with NGOs working on social affairs (such as migration and equality) seems to have been held. The SDD representative⁸⁴ confirms that the participation of NGOs for the consultation on the Strategy and Action Plan was larger than the one held for the Vision, and valuable insights emerged from the sessions conducted in 2019.⁸⁵ Meanwhile, the SDD representative affirms that the previous SD strategy (covering the period from 2007 to 2016)⁸⁶ was developed with greater consultation with NGOs. However, the previous strategy did not have an action plan backed up by a financial framework, thus making it harder to measure its implementation.

Meanwhile, the ESDN website⁸⁷ states that SD “calls for consensus from diverse sectors of the Maltese society, including civil society and the private sector.” When asked to elaborate on this, however, the SDD representative focuses solely on the private sector (rather than the involvement of CSOs), and such initiatives as the Sustainable Enterprise Award⁸⁸ and the fact that those private companies which are branded, generally follow SD principles (unlike smaller informal ones).

⁸⁰ Office of the Prime Minister. 2019. *Sustainable Development Annual Report 2018*. Provided by George Said, Sustainable Development Directorate.

⁸¹ SDD Representative. 2020. Interview with author.

⁸² SDD Representative. 2020. Interview with author.

⁸³ Office of the Prime Minister. 2019. *Sustainable Development Annual Report 2018*. Provided by George Said, Sustainable Development Directorate.

⁸⁴ SDD Representative. 2020. Interview with author.

⁸⁵ More information on the consultation sessions can be found on the SDD website: <https://sustainabledevelopment.gov.mt/mt/Pages/National-Strategy/Vision-2050.aspx>

⁸⁶ National Commission for Sustainable Development. 2006. *A Sustainable Development Strategy for the Maltese Islands*. Available: <http://sdgtoolkit.org/tool/a-sustainable-development-strategy-for-the-maltese-islands-2007-2016>

⁸⁷ European Sustainable Development Network. 2020. *Single Country Profile: Malta*. May, 20. Available: <https://www.sd-network.eu/?k=country%20profiles&s=single%20country%20profile&country=Malta>

⁸⁸ <https://economy.gov.mt/en/Awards/Awards%202019/Pages/Sustainable-Enterprise-Award-2019.aspx>

Impact of Policies and Practices (regarding relevant SDGs) on Migrants in Malta

Having briefly explored the state of play of PCSD and impact measurement of policies regarding SDGs, this section now zooms in on the impact of the same policies and practices on migrants in Malta, with regard to the most pertinent SDGs: 1 (no poverty), 4 (quality education), 8 (decent work and economic growth) and 10 (reduced inequalities).

Policy

The need for policy coherence also emerges strongly with regard to migrants (whether they are refugees, asylum seekers, or simply TCNs residing in Malta): without coherence across policies relating to poverty reduction, education, employment, health, equality and non-discrimination, *de facto* equality for migrants remains part of the theoretical realm. One way in which policy coherence can start to be achieved is through the Strategy and Action Plan to follow the SDV 2050. So far, the SDV 2050 mentions asylum seekers and immigrants as one of the groups at risk of poverty. Nonetheless, the measures to be taken to **reduce poverty** do not seem to include migrant integration, nor is there any reference to the Migrant Integration Strategy.⁸⁹ The Budget 2020 document,⁹⁰ however, states that work on an Academy of Integration – which will offer services to those who are required to follow an integration programme – is underway. No further information on this Academy is available at the time of writing.

Meanwhile, the 2018 VNR report⁹¹ makes allusion to the Migrant Integration Strategy, however the only initiative the report mentions in this area is the setting up of an Integration Unit⁹² (within the Human Rights Directorate) which “imparts information, receives integration requests, and follows migrants’ progress on their integration in Malta.” The only other aspect specifically mentioned with regard to **migrant integration** is with regard to “labour market needs” (p. 68). There is no mention of curbing racism⁹³, educating the public (two factors which are essential for migrant integration), or facilitating migrant integration in other aspects of life. Such deficiencies confirm the observations made by the United Nations (UN) Committee for Development

⁸⁹ Ministry for European Affairs and Equality. 2017. *Integration = Belonging. Migrant Integration Strategy & Action Plan. Vision 2020*. Available: <https://meae.gov.mt/en/Documents/migrant%20integration-EN.pdf>

⁹⁰ Ministry for Finance. 2019. *Budget Speech 2020 Malta. Inkomplu Nikbru Flimkien*. Available: <https://mfin.gov.mt/en/The-Budget/Pages/The-Budget-2020-GD-9691.aspx>

⁹¹ Sustainable Development Goals Knowledge Platform. 2018. *Malta. Voluntary National Review 2018*. Available: <https://sustainabledevelopment.un.org/index.php?page=view&type=30022&nr=969&menu=3170>

⁹² This has now become the Intercultural and Anti-Racism Unit: <https://humanrights.gov.mt/en/Pages/Intercultural%20and%20Anti-Racism%20Unit/About-the-Intercultural-and-Anti-Racism-Unit.aspx>

⁹³ According to the Head of the Intercultural and Anti-Racism Unit, a Public Consultation - in preparation for a National Action Plan against Racism and Xenophobia (NAPRAX) – is expected to be launched in the second week of October 2020 by the Parliamentary Secretary for Equality and Reforms. The Working Group, headed by Mr Tortell, is diverse and includes representatives of civil society (Tortell, A. 2020. Interview with author.)

Policy (CDP)⁹⁴ that very few of the 2018 (and 2017) VNRs demonstrate adequate strategies aimed at implementing the Leave No One Behind (LNOB) objective:

While most countries acknowledge the principle of leaving no one behind, VNRs often remain vague on how to implement it in practice. Moreover, limited reflection is given in the VNRs to the risks that groups may be ‘pushed behind’ by misguided development policies.

The CDP communiqué further states that most countries link LNOB to social protection only and do not include it in strategies related to other areas of utmost importance such as macroeconomy, technology and the productive sector. The Head of the Intercultural and Anti-Racism Unit confirms that, regarding migrant integration in Malta, the policy framework covers mainly introductory integration programmes. Furthermore, the Head argues – and as the Integration Strategy and Action plan makes clear – for integration policy to be effective, it should be mainstreamed throughout all sectors. In this regard, the role of the Unit is to support and encourage stakeholders (both governmental and otherwise) to have integration policies in place for their services.⁹⁵

Additionally, TCN’s **integration processes are not measured**. The Head of the Intercultural and Anti-Racism Unit⁹⁶ confirms that this is due to the novelty of services being provided. He refers to the “I Belong” Courses⁹⁷ on language and cultural orientation, Stage 2 of which is required by TCNs wanting to apply for long-term residence status in Malta.⁹⁸ To date, there is no cohort who has finished Stage 2 (the first ever graduation for this course took place in July 2020) and applied for long-term residence (with an outcome). Thus the usefulness of such courses for migrants’ integration – and whether the ensuing certification is an indicator of integration (for example in education and employment) – has not, at the time of writing, been measured or assessed. While research on migrants’ progress regarding integration is planned for the coming years, the Head argues that reviewing the Unit’s operations against SDG targets relating to migration issues is difficult in view of the fact that the Agenda 2030 does not make sufficient reference to migrant integration.

Similarly, the SDV 2050 does not explicitly refer to migrants’ needs (for example, with regard to education and employment) within the measures set out to achieve the vision of sustainable development it proposes with regard to the various areas of life. An example of this are the aspirations the SDV lays out with regard to

⁹⁴ United Nations Committee for Development Policy. 2020. *Communique on further improving the voluntary national review process*. Available: <https://www.un.org/development/desa/dpad/voluntary-national-reviews.html>

⁹⁵ Tortell, A. 2020. Interview with author.

⁹⁶ Tortell, A. 2020. Interview with author.

⁹⁷ <https://humanrights.gov.mt/en/Pages/Intercultural%20and%20Anti-Racism%20Unit/I-Belong-Courses.aspx>

⁹⁸ Laws of Malta. 2006. *Subsidiary Legislation 217.05. Status of Long-Term Residents (Third Country Nationals) Regulations*. Available: <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=9560&l=1>

education, which include “encouraging lower-educated people and other vulnerable and marginalised groups to participate in education and learning” (p.43).⁹⁹ While this could be read as implicitly including migrants, without taking into consideration the specific needs of migrant learners, migrants can neither be fully integrated, nor can Malta’s education-related goals be achieved. Similarly, migrant-specific needs also need to be taken into account by general education-related policies, strategies and action plans in order for them to be able to exercise education-related rights. For this reason, such needs need to be mainstreamed in such education policies as the Respect for All Framework¹⁰⁰ – launched by the MEDE in 2014 – which is the basis for other policies such as the Managing Behaviour in Schools Policy, Addressing Bullying Behaviour in Schools Policy, and Addressing Attendance in Schools Policy. The Managing Behaviour in Schools Policy,¹⁰¹ for example, argues for the need for parents’ understanding of the way in which home values and parental attitudes affect students’ behaviour and learning. While this, and other insights delineated in the policy, are useful, the policy misses the opportunity to expand on such aspects as, for instance, the fact that while cultural norms at home may differ than those in school, education staff need to be attuned to this and trained in understanding the same cultural norms and their effect on students’ behaviour.¹⁰² Positively, the Addressing Bullying Behaviour in Schools Policy¹⁰³ mentions migrant groups as one of the vulnerable groups who tend to be susceptible to bullying and also defines racial and religious discrimination.

Similarly, the steps to be taken towards achieving a fair and inclusive market laid out in the SDV 2050 – while mentioning the promotion of “increased inclusion of marginalised and underrepresented groups in the labour market” (p. 42) – do not delve into detail with regard to migrant workers, who are often discriminated against in the **labour market**.¹⁰⁴ As the Malta Migrants Association – in its input to the consultation on the Migrant Integration Strategy – argues, migrants arriving irregularly are often employed illegally, which is the only way employers are willing to employ them, and which most are obliged to accept in order to survive. Other employers force migrants to apply for a work permit themselves as self-employed persons, forcing them into precarious employment. The situation is further compounded by the fact that law enforcement in this respect is

⁹⁹ The SDD Representative (2020. Email exchange with author) states that such content will feature in the ensuing Strategy and Action Plan.

¹⁰⁰ Ministry for Education and Employment. 2014. *Respect for All Framework*. Available: <https://education.gov.mt/en/resources/Pages/Education-for-All.aspx>

¹⁰¹ Ministry for Education and Employment. 2015. *Managing Behaviour in Schools Policy*. Available: <https://education.gov.mt/en/resources/Pages/Education-for-All.aspx>

¹⁰² It is worthwhile noting that some degrees at the University of Malta, do offer multiculturalism and inclusion education to current and prospective educators, including the Master in Access to Education in Culturally Responsive Education: <https://www.um.edu.mt/courses/overview/PMAEDCREPET3-2019-0-O#:~:text=The%20Master%20in%20Access%20to,in%20industry%20and%20other%20services.>

¹⁰³ Ministry for Education and Employment. 2014. *Addressing Bullying Behaviour in Schools Policy*. Available: <https://education.gov.mt/en/resources/News/Pages/News%20items/Addressing-Bullying-Behaviour-in-Schools-Policy-Launched.aspx>

¹⁰⁴ The SDD Representative (2020. Email exchange with author) states that such content will feature in the ensuing Strategy and Action Plan.

very weak, enabling employers to act with impunity.¹⁰⁵ And while the National Employment Policy¹⁰⁶ mentions initiatives to train and educate migrants in order to combat their possible exploitation (such as being employed through the black market and being paid a pittance), it does not make any reference to the need to curb illegal employment or prohibit employers from discriminating against migrants. Meanwhile, the Employment and Training Services Act¹⁰⁷ empowers the employment government agency Jobsplus¹⁰⁸ to inspect workplaces in order to ensure employers are abiding by the provisions set out in the Act. Jobsplus comprises a Law Compliance Unit¹⁰⁹ which takes action (in collaboration with other entities including the Department of Industrial and Employment Relations (DIER)¹¹⁰ and the Police Force)¹¹¹ against abuses related to work. However, policy impact relating to migrant workers is not measured or monitored.¹¹² Furthermore, Jobsplus provides the opportunity to report situations of undeclared work through their website.¹¹³ However, while, positively, the person reporting can remain anonymous, such reporting methods work under the assumption that all TCNs, refugees or asylum seekers have access to the internet, are literate, know English or Maltese and are aware of their rights, as well as of the existence of the website itself. Partly rectifying this situation, claimants may also submit claims anonymously via Jobsplus' Freephone number¹¹⁴

Based on consultations with stakeholders involved in working on policy related to migration, therefore, it appears that, overall, neither are SDG targets mentioned in action plans and policies nor is their implementation measured against SDG targets. For example, the National Action Plan on Human Trafficking 2020-2023¹¹⁵ does not refer to the Agenda 2030. As representatives from Policy Development Section¹¹⁶ of the Ministry for Home Affairs, National Security and Law Enforcement¹¹⁷ (MHSE) argue, however, the Action Plan indirectly targets work towards achieving the SDG targets related to human trafficking (such as 5.2 and 8.7). Such work includes training to related entities such as *Aġenzija Appogg*¹¹⁸ and the Malta Police Force on human trafficking as well as awareness raising campaigns. Nonetheless, no evaluation or impact measurement is

¹⁰⁵ Malta Migrants Association. 2015. *Public Consultation: Mind D Gap – Together we can make a difference. National Migrant Integration Strategy 2015-2020. Input Submission.* Available: https://meae.gov.mt/en/Public_Consultations/MSDC/Documents/2015%20-%20Integration/11.Malta%20Migrants%20Association.pdf

¹⁰⁶ Ministry for Education and Employment. 2014. *The National Employment Policy.* Available: <https://jobsplus.gov.mt/resources/publication-statistics-mt-mt-en-gb/policies>

¹⁰⁷ Laws of Malta. 2019. *Chapter 594. Employment and Training Services Act.* Available: <https://legislation.mt/eli/cap/594/eng/pdf>

¹⁰⁸ <https://jobsplus.gov.mt>

¹⁰⁹ <https://jobsplus.gov.mt/forms/compliance-unit-efforts>

¹¹⁰ <https://dier.gov.mt/en>

¹¹¹ <https://pulizija.gov.mt>

¹¹² Cini, N. 2020. Email exchange with author.

¹¹³ <https://jobsplus.gov.mt/forms>

¹¹⁴ Jobsplus. 2020. *Report Abuse.* Available: <https://jobsplus.gov.mt/forms>

¹¹⁵ Ministry for Home Affairs, National Security and Law Enforcement. n.d. *National Action Plan on Human Trafficking – January 2020~December 2023.* Available: <https://homeaffairs.gov.mt/en/MHAS-Information/Pages/Human-Trafficking.aspx>

¹¹⁶ MHSE Representatives. 2020. Interview with author.

¹¹⁷ <https://homeaffairs.gov.mt>

¹¹⁸ <https://fsws.gov.mt/en/appogg>

carried out with regard to the Action Plan, except for reports¹¹⁹ on the implementation of the Plan as well as the existence of data regarding the number of arraignments and investigations made by the police regarding forced labour, sexual exploitation, domestic servitude and labour exploitation.¹²⁰ As MHSE representatives argue, while they receive a budget from the Ministry for Finance¹²¹ in order to implement the Action Plan, evaluations would involve further costs, and thus the government prefers to allocate such funding to the provision of services and rights to victims.

Practice

Notwithstanding the need for effective policies and the measurement of their impact, practice is often different than what is enshrined in the law. The SDV 2050 states that one of Malta's objectives for 2050 is that "everyone will feel welcomed and proud of their identity and heritage", continuing to argue that race, colour and ethnic origin, among other characteristics, are "not a social status that determines the level of rights one can enjoy". This ideal vision of Malta jars with the practices on the ground in recent years, which bring to light the need, once again, for monitoring mechanisms. Examples include **public discourse** such as the statement by the Minister for the Economy, Investment and Small Businesses in March 2020 with regard to foreign workers in Malta, when he stated that all foreign workers who (due to the COVID-19 pandemic) are dismissed from their jobs should be returned to their country.¹²² While the Minister later apologised for this statement,¹²³ this oft-cited phrase (by public and politicians alike – the latter include the ex-chairman of the Guardian of Future Generations who, in 2019, argued that Muslims are taking over Malta and insisted migrants should be stopped from entering the country¹²⁴) is driving migrants away from Malta,¹²⁵ and the reasons for xenophobic comments are not solely related to crises.

While a Hate Crime and Speech Unit¹²⁶ within the MHSE was inaugurated in October 2019, this is targeted at supporting victims of **hate speech**, rather than prosecuting perpetrators. Despite the barrage of online hate speech targeted towards migrants since (and previous to) its inauguration, the Unit had only received a total of 32 reports until May 2020.¹²⁷ This paltry number does not reflect the actual instances of online hate speech

¹¹⁹ These reports can be found here: <https://homeaffairs.gov.mt/en/MHAS-Information/Pages/Human-Trafficking.aspx>

¹²⁰ MHSE Representatives. 2020. Interview with author.

¹²¹ <https://mfin.gov.mt>

¹²² Malta News Agency. 2020. *Schembri "All Dismissed Foreign Workers Should Leave Malta"*. March, 17. Available: <http://www.maltanewsagency.com/2020/03/schembri-all-dismissed-foreign-workers-should-leave-malta/>

¹²³ Times of Malta. 2020. *Economy Minister apologises after foreign workers speech. 'My choice of words was unfortunate.'* March, 18. Available: <https://timesofmalta.com/articles/view/economy-minister-apologises-to-foreign-workers-after-deportation.779108>

¹²⁴ Times of Malta. 2019. *Maurice Mizzi's anti-Muslim tirade sparks calls for dismissal.* May, 26. Available: <https://timesofmalta.com/articles/view/guardian-for-future-generations-launches-anti-muslim-tirade.710971>

¹²⁵ Times of Malta. 2020. *'Go back to your country': How coronavirus xenophobia is driving foreigners away.* June, 25. Available: <https://timesofmalta.com/articles/view/coronavirus-xenophobia-is-driving-some-foreigners-away.800772>

¹²⁶ <https://stophate.gov.mt>

¹²⁷ The Shift News. 2020. *Hate Speech Unit receives 32 reports in seven months.* May, 26. Available: <https://theshiftnews.com/2020/05/26/hate-speech-unit-receives-32-reports-in-seven-months>

targeted towards TCNs, including – but not limited to – violent and illegal speech on social media following the riot at the Open Centre in Hal Far in October 2019¹²⁸ and a video posted on social media (which went viral also owing to online news agencies) in July 2020 by a young man threatening to kill all black people in Malta.¹²⁹ In view of such instances, the need for enforcement of legislation, backed by education, is evident.

As the above-mentioned UNCDP communiqué on VNRs¹³⁰ states, most ‘developed’ countries consider those ‘furthest behind’ as people who are in less developed countries, rather than in their own countries; and confirms that minorities such as racial, ethnic and religious groups receive less attention than other disadvantaged groups such as women, youth and persons with disabilities. Unfortunately, SDG 10 is referred to by the CDP as the “orphan goal”, being the Goal which receives the least attention in the VNRs. In the 2020 UN SDG report,¹³¹ the SDG trends for Malta show that information for Goal 10 is unavailable. Indeed, at the time of writing, no information on the measures taken to achieve SDG 10.C (reducing remittances costs) was available to the Ministry for Foreign and European Affairs (MFEA).

Relatedly, and supporting the confirmation that Ministries do not generally review their operations with regard to SDG targets, when asked if they review their operations with regard to SDG 4.B (expanding the number of scholarships available to developing countries) and SDG 17.16 (enhancing global partnership for SD, particularly in developing countries) the MFEA details various scholarships and training courses provided by the Government of Malta to Arab and African nationals (some of whom went on to work in the humanitarian sector), with no details regarding impact measurement.¹³² Furthermore, MFEA representatives state that the Ministry’s ODA call for proposals¹³³ enables Malta to mobilise the expertise and capacity of NGOs in a range of sectors to accomplish Malta’s development objectives; and that the Ministry relies on reporting from NGOs to assess SDG achievement, through results and impact made by the projects.¹³⁴

On a positive note, the Migrant Learners’ Unit¹³⁵ (MLU) provides induction (Maltese and English language courses) to TCN students (and foreign European students alike) in order to enable them to access mainstream

¹²⁸ Times of Malta. 2019. *Riot exposes Malta’s hate speech problem. At least a fifth of comments under one news report threatened death or violence.* Available: <https://timesofmalta.com/articles/view/riot-exposes-maltas-hate-speech-problem.743829>

¹²⁹ Malta Today. 2020. *No assault on his parents: the racist Facebook video camouflaged by ‘emotion’. A 35-year-old contractor’s outburst on Facebook went viral but it seems the alleged violent assault did not even happen as claimed originally.* August, 2. Available: <https://www.maltatoday.com/mt/news/national/103945/no-assault-on-his-parents-the-racist-facebook-video-camouflaged-by-emotion>

¹³⁰ United Nations Committee for Development Policy. 2020. *Communique on further improving the voluntary national review process.* Available: <https://www.un.org/development/desa/dpad/voluntary-national-reviews.html>

¹³¹ Sachs, J., Schmidt-Traub, G., Kroll, C., Lafortune, G., Fuller, G., Woelm, F. 2020. *The Sustainable Development Goals and COVID-19. Sustainable Development Report 2020.* Cambridge: Cambridge University Press.

¹³² Aquilina, N. 2020. Email exchange with author.

¹³³ The 2019 ODA call for proposals can be found here: <http://maltacvs.org/wp-content/uploads/2019/01/ODA-Guidelines-2019.pdf>

¹³⁴ Aquilina, L. 2020. Email exchange with author.

¹³⁵ <https://migrantlearnersunit.gov.mt>

schooling. It also provides support through clubs after school hours as well as through a social worker who liaises with the psychosocial teams in schools. Community Liaison Workers (CLWs) – employed by the MLU through Asylum, Migration and Integration Fund¹³⁶ (AMIF) funds – serve as a bridge between (mainly state) schools and family in order to ensure communication between both parties with the ultimate aim of student integration. As an Education Officer at the MLU notes, vast progress has been made in this area since the employment of the CLWs in 2018, including in enriching the school experience for the child as well as for the school itself. Regrettably, these actions and their resulting impact are not formally measured and are reported usually as part of the AMIF requirements or the Unit’s formal reports. Mainstream reports are then developed by the colleges¹³⁷ on actions relating to mainstream education policies and frameworks. Additionally, while the MLU does not work on migrant-related SDGs directly, they liaise with the Education Officer responsible for the SDGs within the MEDE.¹³⁸

Meanwhile, in 2017, Jobsplus – which also works in collaboration with the Intercultural and Anti-Racism Unit – launched a **project for migrants**, funded by AMIF, **which offers guidance and job brokerage services to asylum seekers and migrants** with a protection status.¹³⁹ However, this project does not target employers in training and raising awareness on migrant discrimination (although the project will include a publication targeting employers, highlighting various services and information on current misconceptions. Regarding employers, Jobsplus also has a specific unit that outreaches amongst employers and the Job Brokerage Office (see below). During the instances where employers indicate their frustration on the single permit process, the Jobsplus team makes them aware that there are other migrants already in Malta who possess an employment licence in their own name and thus, should the employer employ them, they would avoid the burden of the permit process.)¹⁴⁰

Furthermore, according to the Jobsplus Annual report of 2019,¹⁴¹ less than half of the scheduled migrants to attend guidance meetings turned up. The Department Manager at the Employment Services Division of the same agency explains that while a pilot study – assessing the service required to offer the best support possible – was carried out, together with setting up a working group of relevant entities and NGOs where such issues can be discussed, the turnout of migrants is still lower than that of other client groups. Jobsplus believes that this is mainly due to “differences in culture when it comes to commitment and work ethic and in some cases is

¹³⁶ https://ec.europa.eu/home-affairs/financing/fundings/migration-asylum-borders/asylum-migration-integration-fund_en

¹³⁷ <https://education.gov.mt/en/education/Pages/Colleges/Colleges.aspx>

¹³⁸ Farrugia Buhagiar, J. 2020. Interview with author.

¹³⁹ Jobsplus. 2020. *Annual Report 2019*. Available: <https://jobsplus.gov.mt/resources/publication-statistics-mt-mt-en-gb/publications/annual-reports>

¹⁴⁰ Cini, N. 2020. Email exchange with author.

¹⁴¹ Jobsplus. 2020. *Annual Report 2019*. Available: <https://jobsplus.gov.mt/resources/publication-statistics-mt-mt-en-gb/publications/annual-reports>

brought about due to hurdles in communication.” In view of this, the agency has sought different approaches to communicate with migrant jobseekers, including sending translated letters. This had limited results due to the possible perception of having committed a transgression when receiving a formal letter from a parastatal entity. Thus Jobsplus opted for an outreach phone call with migrant jobseekers, setting up an appointment in the short-term, and then following it up with an SMS or an email. This approach has yielded better results in terms of attendance. However, no formal evaluation of the project has been carried out at the time of writing.¹⁴²

The same Job Brokerage Office receives requests for short-term placements of migrants¹⁴³ under a scheme with the aim of it acting as a stepping stone to actual employment with the same employer and also with other employers. Actual vacancies are dealt with by a separate department within Jobsplus and are advertised amongst all of the agency’s client groups without distinction.¹⁴⁴ Meanwhile, besides general Jobsplus courses¹⁴⁵ which migrants can apply for – specific tailor-made courses for migrants are organised, under the AMIF project, in basic English and Maltese language for employment, which are available to eligible migrants (of working age or who have successfully completed secondary education) who are either refugees, asylum seekers or been given a protection status in Malta.¹⁴⁶

¹⁴² Cini, N. 2020. Email exchange with author.

¹⁴³ Jobsplus. 2020. *Annual Report 2019*. Available: <https://jobsplus.gov.mt/resources/publication-statistics-mt-mt-en-gb/publications/annual-reports>

¹⁴⁴ Cini, N. 2020. Email exchange with author.

¹⁴⁵ <https://jobsplus.gov.mt/courses>

¹⁴⁶ Cini, N. 2020. Email exchange with author.

Conclusions and Recommendations

As the preceding discussion demonstrates, Malta faces a long road ahead in order to achieve policy coherence for sustainable development. While efforts to mainstream policies and achieve coherence are being implemented by such entities as the Sustainable Development Directorate and the Sustainable Development Network, such endeavours are still in their infancy and require the necessary human and financial resources as well as the backing of political will and initiative to be able to do their work.

Relatedly, there is a need to move away from the idea that sustainable development relates only to the environment and related matters, an idea which seems to be rooted in the country's mentality. This is shown by several entities, ranging from the media – for example, the online media company Newsbook,¹⁴⁷ when reporting on the new SDN and GFG appointments, reports it in the context of unsustainable construction¹⁴⁸ – to the government. The SDD, for example, was, since its inception and up until December 2019, part of the then Ministry for the Environment, Sustainable Development and Climate Change¹⁴⁹ (the name of the Ministry also demonstrating the leaning of SD towards environment-related matters). While the Directorate has now moved to the OPM, which is hopefully a move which will enable further policy coherence and mainstreaming of SD in all sectors, such erroneous thinking still affects the implementation of SD today. The Sustainable Development Act, for instance, establishes that the SDN has to include an NGO representative from the environment sector, but does not enforce the inclusion of NGO representatives from other sectors such as the social sector.

PCSD faces also other stumbling blocks in Malta, including the lack of impact measurement of policies (and practices) as well as lack of reporting and evaluation on policy and project implementation. The absence of monitoring mechanisms and a clear picture of Malta's progress towards the SDGs render policy coherence as well as the achievement of SD more challenging. While some initiatives – such as the NAO audit of progress towards SDG 1 – are commendable, such exercises need to be systematic and implemented on a regular basis for all SDGs.

Furthermore, it is to be hoped that Malta's Sustainable Development Strategy and Action Plan will include concrete impact measurement for the measures it lays out, as well as ensure that they are developed in regular consultation with the relevant stakeholders, including CSOs, for each different aspect of sustainable development. It is important that these vital documents do not simply pay lip service to policy coherence but ensure that there is indeed coherence between policies covering each area.

¹⁴⁷ <https://newsbook.com.mt>

¹⁴⁸ Newsbook. 2020. *New board appointments to safeguard sustainable development*. May, 31. Available: <https://newsbook.com.mt/en/new-board-appointments-to-safeguard-sustainable-development>

¹⁴⁹ Office of the Prime Minister. 2019. *Sustainable Development Annual Report 2018*. Provided by George Said, Sustainable Development Directorate.

Finally, as the UNCDP communiqué on VNRs¹⁵⁰ recommends, stronger and broader strategies are needed to achieve inclusive development, together with “honest reflection on trade-offs and groups that could be “pushed behind”. This is particularly relevant to Malta, where TCNs, especially asylum-seekers and refugees, are often the subjects of rampant discrimination, injustice and racism. Policy coherence as well as formal evaluation of migrant integration, inclusion and quality of life are of utmost importance not only for the full implementation of the Agenda 2030 but also to ensure the full upholding of rights for those often left behind.

¹⁵⁰ United Nations Committee for Development Policy. 2020. *Communique on further improving the voluntary national review process*. Available: <https://www.un.org/development/desa/dpad/voluntary-national-reviews.html>

Annex: List of Interviewed and Consulted Stakeholders

No.	Name	Position	Organisation	Date of Interview / Consultation(2020)	Interview / Consultation Method
1	Representative	/	Sustainable Development Directorate (OPM)	July 21 – August 25	Interview through Video Call and Email Exchange
2	Mr Marvin Zammit	Chairperson	Sustainable Development Network	July 16-21	Email Exchange and Phone Call
3	Mr Neville Aquilina & Ms Leonie Aquilina	Director General & Director	Global Issues, International Development and Economic Affairs (MFEA)	August 6-28	Email Exchange
4	Representatives	/	Ministry for Foreign and European Affairs	July 24 – August 10	Email Exchange and Phone Call
5	Representatives	/	Policy Development Section (MHSE)	August 17	Interview through Video Call
6	Representatives	/	National Audit Office	July 28 – August 10	Email Exchange
7	Mr Alexander Tortell	Head	Intercultural and Anti-Racism Unit (Human Rights Directorate, MJEG)	August 13	Interview through Video Call
8	Ms Jane Farrugia Buhagiar	Education Officer	Migrant Learners' Unit (MEDE)	August 20	Interview through Video Call
9	Ms Nicola Cini	Department Manager	Employment Services Division (Jobsplus)	August 3 - 27	Email Exchange
10	Mr William Grech	Representative	SKOP	August 4-10	Email Exchange