

Chapter 5

Frankfurt



Frankfurt, as a global city and financial metropolis with diverse working opportunities, is a magnet for migrants. Around 30% of official residents do not have German citizenship and more than 50% have a ‘migration history’. The city is therefore considered ‘super diverse’ (Stadt Frankfurt am Main, 2022a; Schneider, 2020). In 2020, people from 177 countries lived there. Around two-thirds of the city’s officially registered population without German citizenship comes from Europe, around half from within the EU. Some 20% of the migrant population are from an Asian country, and around 8.5% are nationals of an African state (Stadt Frankfurt am Main, 2022c: 2). In 2015, around 80% of the official population with foreign citizenship had a long-term right of residence—either because of overarching EU freedom of movement regulations or because they held a settlement permit (AmkA, 2017: 49).

5.1 Precarious Migrants Diverse in Background, Length of Stay and Living Conditions

Based on the literature and the interviews we conducted, we can conclude, that most precarious migrants are “overstayers” following expiry of a tourist or study visa or separation from a spouse prior to completing the required two-year period for independent residence (Krieger et al., 2006: 74).¹ They are highly diverse in age, employment background and length of residence. Despite the precarious living conditions these migrants face, they remain in Frankfurt because they have little hope for a better future elsewhere. A 2006 study on the life situation of people living ‘illegally’ in the city, found that “for people without status (as for migrants in

¹In the EU, “overstayers” form the largest group of migrants residing without authorisation (Hinterberger, 2020).

general) there are obviously many ‘good reasons’ to stay”. There is the great potential for jobs both in the lower sector of the labour market, which is characterised by strong competition and low wages, and in the private (domestic) sector. The danger of detection is also lower than in smaller cities due to the high number of migrants; and finally there are numerous support structures such as ethnic communities, family networks and activist groups that “offer some degree of social support in everyday life” (Krieger et al., 2006: 74 (translated)).

Among precarious migrants are people with professional backgrounds from other European countries who have only been in Frankfurt for a short time and are looking for work. Others have no access to health insurance in Germany due to informal employment situations or because residing without authorisation. The composition in terms of gender and country of origin varies greatly depending on the services of the respective institutions.² In the years preceding our research, many sectors had seen an increase in the proportion of EU citizens. According to various interviewees, they come mainly from Bulgaria, Romania and Poland, but also from Spain, Croatia and Italy. Nevertheless, the proportion of people without residence status among all migrants with precarious status in Frankfurt remains high, especially among users of care facilities. These come from various African countries and the Philippines. In addition, there are third-country nationals with refugee protection status in another European member state who are also excluded from social benefits.

While irregular migrants are not entitled to work, many do so informally on construction sites, in the cleaning industry, in the hospitality sector or private households. People who work in construction and the cleaning industry in particular can fall ill due to precarious working conditions, as the staff of a counselling centre for EU migrants emphasised (F10).³ Others work in restaurants or are employed informally in private households as cleaners or caregivers. Some are in sex work. Overall, these residents are exposed to a wide range of different precarious living situations and challenges.

²While young women make up a large share of patients in the health sector (Schade et al., 2015: 472), services in the field of homelessness are predominantly requested by men (e.g. WESER 5, 2021: 9) The Multinational Information and Contact Point for EU Citizens (MIA) reports a relatively balanced proportion of women and men for 2020 (MIA, 2021: 2). Especially in counselling centres that also advise sex workers, there is a comparatively higher proportion of Trans people.

³Several interviewees reported that they had lost their jobs during the COVID-19 pandemic (F26, F27, F28). Many people who were otherwise able to survive on their own were therefore dependent on food donations (F7).

5.2 Large Municipal Authority with Responsibilities in the Social Sector

Frankfurt is an independent municipality (“Kreisfreie Stadt”) in the Land of Hesse. The highest political decision-making body of the city is the City Council (“Stadtverordnetenversammlung”). It is composed of 93 members (city councillors) who serve in an honorary capacity and are elected in municipal elections for a period of 5 years. The government coalition following the March 2021 election, consisting of SPD (Social Democrats), The Greens, FDP (Liberal Democrats) and Volt, provided the full-time department heads and members of the Municipal Administration (“Magistrat”). This Council replaced the previous coalition of SPD, CDU (Christian Democrats) and The Greens.

As an administrative and executive body, the Municipal Administration prepares and implements resolutions of the City Council and makes decisions on current administrative matters. In the legislative period 2021–2026, it consists of the Lord Mayor (SPD), Mayor (The Greens), City Treasurer (The Greens) and 9 other full-time and 14 honorary city councillors. The municipal offices and enterprises—like the Local Health Authority or the Youth and Social Welfare Office—are subordinate to the Municipal Administration and support it in the fulfilment of its duties (Stadt Frankfurt am Main, 2022b). The Council employs around 14,000 people in more than 60 offices, companies and departments that belong to the city administration.⁴ This does not include all of the organisations which work closely with the Council, however, such as the Frankfurter Verein für Soziale Heimstätten (Frankfurt Association for Social Homes), which employs around 850 people.⁵

As a municipality, in accordance with the principle of local self-government enshrined in the German Basic Law (“Grundgesetz”, GG), Frankfurt has the competence to “regulate all local affairs on their own responsibility within the limits prescribed by the laws” (§28 II 1 GG). This includes “tasks that are rooted in the local community or have a specific reference to the local community and can be handled by this local community on its own responsibility and independently” (Bundesverfassungsgericht cited in Heuser, 2017). The municipality also acts as a sub-state administrative authority for the execution of “tasks in the sectors of internal administration and general state tasks, social affairs, health care, economic development, transport and public institutions”, while subject to the supervision and instruction of the Federal State of Hessen (Bogumil & Jann, 2009: 103ff).

⁴ See <https://frankfurt.de/service-und-rathaus/verwaltung/jobs-und-karriere>

⁵ See <https://www.frankfurter-verein.de/>

5.3 Cosmopolitan Self-image and Policy Focus on Integration

Frankfurt sees itself as a “diverse and cosmopolitan metropolis with people from a wide range of cultures and ways of life” (Stadt Frankfurt am Main, 2022d). This self-image as a “global city” is also related to its role as an international financial metropolis (Stadt Frankfurt am Main Integrationsdezernat, 2011: 13). To take the diversity of its population into account and to promote equality and social participation, the Office for Multicultural Affairs (“Amt für multikulturelle Angelegenheiten”, AmkA) was founded in 1989. It is attached to the former Department for Integration, established in 2000, which since 2021 is called Department for Diversity, Anti-Discrimination and Social Cohesion. In the commemorative publication for AmkA’s 20th anniversary in 2009, Dr. Eskandari-Grünberg, then head of the Department for Integration, emphasised: “The fact that today we in Frankfurt quite naturally see ourselves as an ‘international civic city’ [...] is also a result of the work honoured in this commemorative publication” (AmkA, 2009: 9 (translated)).

With the integration and diversity concept adopted in 2010, the city aimed to “ensure that people of different origins, religions and world views as well as different biographies and circumstances in life have equal opportunities to participate in public life” (Stadt Frankfurt am Main Integrationsdezernat, 2011: 58). Facilitating social participation for all would be a “cross-sectional task for the whole city” (ibid.: 16), which could only be implemented through close cooperation between the various municipal offices, other institutions, and the entire population (ibid.: 16–18). The concept also refers to the state’s obligation “to prevent foreigners from being forced into illegality both by avoiding regulatory gaps and by avoiding overly restrictive regulations” (ibid.: 78). Moreover, it would be “no less a public task to mitigate social problems arising from illegality and to ensure the adherence to human rights” (ibid.). In addition to the expansion of medical services, efforts should therefore be taken in coordination with state and federal authorities to “find viable solutions to questions of residence rights and work permits” (ibid.). This is because: “the legal equality of persons with German and foreign citizenship constitutes [...] an essential prerequisite for comprehensive participation and equal rights” (AmkA, 2017: 50).

5.3.1 Critics Argue Inclusivity Has Limits

An anthology on Frankfurt by academics and civil society actors makes clear, however, that the extent to which the city meets its goal of being a “city for everyone” is disputed by civil society (cf. Betz et al., 2021: 13ff). Due to the growing presence of EU citizens without entitlement to benefits, in particular, and the impoverishment associated with this that is apparent on Frankfurt’s streets, the

situation of migrants with precarious status has begun to be more openly discussed. An external report with the title “Needs Assessment on the Situation of Homeless EU Citizens” (Riedner & Haj Ahmad, 2020) commissioned by AmkA also led to controversial discussions.

Despite the city’s inclusive self-image, there is no comprehensively inclusive approach towards migrants with precarious status. While we shall show that there are examples of inclusivity in the area of basic health care and access to primary schools, there are also high access barriers, for example in the area of housing. Overall, inclusive and exclusive responses can be identified, some of which mitigate and some of which co-produce the precarious living conditions associated with a precarious residence status and the concomitant lack of entitlements to social benefits.

While some of the services aimed at migrants or more broadly at people in need of assistance are explicitly offered by municipal institutions in Frankfurt, regardless of their status and/or entitlement to social benefits, the majority of support services are provided by non-municipal organisations. For people seeking support, this has the advantage that—unlike most government agencies—the corresponding organisations are not subject to the reporting obligation under §87 of the Residence Act. Nevertheless, the reporting obligation restricts access to some basic social rights, as will become clear below. Some of these NGO services receive financial support from the City of Frankfurt or from other public bodies (European, federal or state (“Land”)) while others are financed by the providers’ own funds and private donations. Often there are mixed forms of funding.

5.4 Regular Health System Largely Excludes Those Without Insurance

Within the German insurance-based system, access to health insurance is closely connected to regular employment or to entitlement to unemployment or social welfare benefits. Migrants with precarious status mostly do not have access to either. A wish to avoid contact with official institutions is a further deterrence; while those who have held insurance, such as EU citizens, sometimes drop out due to bureaucratic barriers, structural gaps and social inequality. These barriers are particularly high for people who have little command of the German language. Nor can they generally opt for private insurance because of the cost. Migrants with precarious status in Germany are thus mostly uninsured and hence do not have access to the regular health system.

Although Germany has ratified various international agreements that provide for a right to health regardless of residence status (e.g. §12 International Covenant on Economic, Social and Cultural Rights), people without residence status and people without health insurance are only eligible for medical treatment in exceptional cases, such as emergency care, or benefits under the Asylum Seekers’ Benefits Act. Other exceptions hold for diseases of public health importance like Tuberculosis or

COVID-19. In order to counteract this exclusion and provide access to health care for precarious migrants, various municipal and civil society actors in Frankfurt offer complementary free and confidential services.

5.4.1 Municipal Clinic Targets Unmet Needs

Unique to the city of Frankfurt is the ‘humanitarian consultation hours’, recognised internationally as a best-practice model (cf. Spencer & Delvino, 2019: 51). This is carried out by staff of the local Health Authority in cooperation with an NGO, Maisha—the Association for African women in Germany. Twice a week there is a general medical consultation, and once a week a paediatric and gynaecological consultation, for migrants who are not insured, including those with an irregular status. The treatment is free of charge and confidential. In addition to medical treatment, social counselling by Maisha makes up an essential part of the service. The cooperation began in 2001 after the NGO reached out to the Frankfurt Women’s Department and then to the local Health Authority, drawing attention to problems that women from African countries faced in accessing health care. That prompted the setting up of a service originally known as the “Africa consultation hours”. In response to the EU’s eastward expansion and the diversification of patients, the service was expanded in 2009. The municipal budget includes funds for basic care treatment costs. Medicines, vaccines, diagnostics and therapy are financed by the Youth and Social Welfare Office on a lump-sum basis. Premises and staff⁶ are provided by the local Health Authority (F1).

In support of their work, the employees of the Health Authority refer to §7 I of the Hessen Law on the Public Health Service (HGöGD). It states that the task of health offices is to inform and advise the population on how to promote health, avoid hazards and prevent diseases. This applies “in particular to socially disadvantaged or particularly vulnerable or endangered people who do not have sufficient access to health care; for this group of people, the health offices can provide outpatient treatment on a case-by-case basis” (§7 I 3 HGöGD). Accordingly, (and in contrast to the role of UK local authority public health departments) the Health Authority’s staff consider the provision of health care to people without health insurance as a task for a municipal public health service. While the humanitarian consultation hours were quite marginal in the early days, they now enjoy broad support within the local Health Authority as well as across the municipality as a whole (F1 & F3).

Surveys by the local Health Authority show that the demand for free treatment at the humanitarian consultation hours more than doubled between 2008 and 2013. Many of the patients come more than once (Schade et al., 2015: 466). Between 2015 and 2019, the number of patients attending the humanitarian hours and the children’s consultation, which has been running since 2015, stabilised at around 650 per year,

⁶There are (at the time of writing) two medical officers, two medical assistants and one coordinator.

with approximately 1700 consultations.⁷ In addition, there is the gynaecological consultation that has been held since 2018, which is accessed by women without health insurance, often in the case of pregnancy⁸ (271 patients with 658 consultations in 2019). In cases where adequate treatment cannot be provided, attempts are made to refer patients to medical specialists who are willing to cooperate with the service or to other low-threshold outpatient clinics that provide free services for migrants and people without health insurance. However, finding sustainable solutions for the patient is often a challenge, especially when inpatient treatment is required. In that case it often happens that no solution can be found for the patient.

5.4.2 NGO Health Services Endeavour to Fill Gaps in Provision

There are many other facilities in Frankfurt that are committed to the goal of “health for all” (cf. ESA, 2021) and offer health services for people without health insurance regardless of their status. These include the Elisabeth Streetwork health centre (“Elisabeth-Straßenambulanz”, ESA), Malteser Medicine for People without Health Insurance as well as a student polyclinic. These offers are only partially funded by the city council. To varying degrees, the facilities are dependent on donations from civil society.⁹ They differ from each other in terms of their (original) target groups, and in terms of the services they can offer.

ESA, a facility run by Caritas, has been providing medical care for homeless people and others without health insurance for over 25 years. Around half of its patients are homeless and uninsured. Two thirds of its service is covered by municipal funds and the rest by Caritas—that is, by donations. Every morning there is a general medical consultation. In addition, there are dental and psychiatric consultations twice a week and a women’s consultation once a week. People in precarious situations under residence and social welfare law make up most of the patients. For their access to health care, language plays a central role, as one interviewed staff member summed up:

⁷Due to the pandemic, the numbers declined somewhat in 2020 and 2021. Most likely, this can be attributed to various reasons, including the limited office hours of the humanitarian consultation hours and the connotation of the local health authority as a control institution that prescribes quarantine, as well as the fact that especially people in irregular residence could rely less on the protection of anonymity on the sometimes hardly frequented shopping street in which the clinic is located.

⁸Between 2008 and 2013, 14.1% of diagnoses at the humanitarian consultation hours were pregnancies (Schade et al., 2015: 469).

⁹The associated workload and financial insecurity were described as a problem by several interviewees (F9; F10; F11).

We want to understand because we believe that professional medical treatment really requires understanding, a mutual understanding. That's why we try, if we notice that German is not understood, [...] to work with translation. This means that we, our team, is equipped to be genuinely multilingual. New hires to the team were also recruited with language skills. Medical training alone wouldn't have been enough in this case. (F4)

Malteser Medicine for People without Health Insurance (“Malteser Medizin für Menschen ohne Krankenversicherung”) offers a weekly consultation in the medical centre of the Markus Hospital in Frankfurt. Medicines and, to a limited extent, outpatient and inpatient operations are funded by donations. The majority of patients are people in precarious residence situations, many of them employed but without access to health insurance. They are examined and treated and then referred on if necessary. Thanks to cooperation with a laboratory and an X-ray practice, free diagnostic examinations are possible. For follow-up treatments, there is also a network of around 80 medical specialists who provide treatments either free of charge or on a donation basis. In addition, Malteser has access to lawyers who provide pro bono counselling for patients who may be able to gain regular access to the health system. Fundraising and the maintenance of these networks continuously requires a high level of coordination, provided on a voluntary basis.

The Student Polyclinic (StuPoli), founded in 2014, is a teaching project of the Goethe University. There is particularly close cooperation between the StuPoli and the humanitarian consultation hours—the StuPoli consultation hour taking place twice weekly in its premises. The examination and treatment are carried out by medical students supervised by a doctor. Every year, around 40 students (so-called “juniors”) enrol in this elective course. Some of them subsequently become part of a volunteer pool of seniors, which is comprised of about 30 people and works alongside them. The organisational tasks are carried out by senior students, some of whom are employed as student assistants at Goethe University for the teaching project, and some of whom also work for StuPoli on a voluntary basis. The services include ultrasound and laboratory examinations as well as electrocardiograms (ECGs), which are also regularly carried out for patients at the nearby Caritas clinic to which we have referred, ESA.

Also worthy of mention is the outpatient childbirth programme. In order to provide a risk-free delivery, the Health Authority and several Frankfurt clinics agreed in 2007 that the latter would carry out outpatient births for patients of the humanitarian consultation hours for 700€. This ensures that women can register at a clinic and give birth there without having their data passed on to the foreigners' authority.¹⁰ As various interview partners informed us, the fee is either paid by patients in instalments or financed by NGOs (F1; F3; F11). While the outpatient childbirth programme is generally regarded as positive, it is not possible to ensure sufficient follow-up care for women and new-born children. In addition, there are problems if complications arise during the birth and an inpatient stay becomes

¹⁰The fear of deportation is nevertheless present for women during childbirth. An interview partner who frequently attends births told of a woman who, while in labour, repeatedly asked the medical staff not to call the police.

necessary, since this is not covered by the agreements and results in high additional costs.

5.4.3 High Reliance on Municipal-NGO Cooperation and Personal Commitment

The services offered by NGOs and the Health Authority are thus explicitly open to all people without health insurance, regardless of their status.¹¹ Confidential treatment—to the extent that they can provide the service needed—is guaranteed by all providers. They take strict care to collect as little personal data as possible and not to pass it on to public authorities. Low-threshold access is understood as “the foundation” (F1). All facilities explicitly offer open consultation hours: it is not necessary to make an appointment. Some facilities also pay special attention to the reduction of language barriers through multilingual staff or the use of interpretation if no one in the facility has the necessary language skills (F3; F4). Over the years, a good division of labour has developed between the Health Authority and the NGOs. All participants in the study emphasised the positive non-hierarchical collaboration, which is based less on formalised meetings and more on informal exchange. There is a lot of everyday communication. Patients are referred and transferred to the most appropriate facility.

The high level of (voluntary) commitment of the people working in this field and the close cooperation between them make it possible to provide basic care for people without health insurance in Frankfurt, regardless of their residence status. However, further cooperation with individual specialists and hospitals is also crucial to this. In the first 2 years of the Covid-19 pandemic, this network again played a central role in providing health care to people without health insurance, regardless of their residence status. The existing structures were used to provide care in case of infections and vaccinations against COVID-19, which in turn was managed by the additional, largely voluntary commitment of the staff. Overall, the services only had to be slightly reduced¹² and have been fully available again since the beginning of 2022.

¹¹ESA only provides care for homeless people, but also regardless of their residence status.

¹²For example, the humanitarian consultation hours could not be carried out jointly by the local Health Authority and Maisha for a while and the consultation hours were somewhat reduced. In addition, Malteser, for instance, had to make do without the help of some volunteer supporters.

5.4.4 *Council Clearing House Signposts Patients to Regular Services*

A concern with such a parallel health system is that it cannot provide the same level of care and continuity of care as in the regular healthcare system. In 2021, Frankfurt set up a Clearing House to address this concern. Once a week, psychosocial counselling with a focus on health and social security issues takes place in cooperation with the Department of Social Work and Health at the Frankfurt University of Applied Sciences. The cost of the rooms and most of the personnel are covered by the local Health Authority, while the cost of the two counsellors is covered by the Youth and Social Welfare Office. The aim of the Clearing House is to advise and support people to obtain long-term health insurance coverage and thus access to the regular health care system. Counselling includes clarification of insurance coverage and support with applications as well as the determination and, if necessary, enforcement of claims, for social benefits. Translation to Spanish, English, Bulgarian and Romanian is available as well as six other languages via a fee-based telephone interpreting service. Between February 2021 and February 2022, 118 people received counselling, 39% of whom were third-country nationals, 32% non-German EU citizens and 27% German citizens (2% unknown). A total of 45% of those seeking advice who came to the Clearing House for the first time between February 2021 and March 2022 had successfully received access to health insurance (Lang & Ivanova, 2022: 15).

The actual need for counselling, however, exceeds the available staff resources. The process of obtaining insurance coverage can take a long time. As a result, it often does not come in time for the people affected to cover their acute treatment needs. At first contact, about half of the people seeking advice stated that they were in urgent need of treatment (31%) or pregnant (20%).¹³ The Clearing House is also not able to deal with some of the barriers to accessing health insurance as it cannot resolve issues relating to residence rights.

The Clearing House was set up as a pilot project that ended in November 2022. Following the expiry of the allocated funding, legal advice had to be temporarily discontinued in November 2022 but reopened in May 2023 for an initial period of 1 year. The motivation for the Clearing House was attributed to the city's participation in a city network, the City Initiative on Migrants with Irregular Status—the only example that our study found of a direct connection between a city network and a policy or practice change.¹⁴

¹³One of the staff members in charge emphasised in an interview that this is one reason why alternative support is needed, for example in the form of a treatment fund to finance urgently needed interventions (F3).

¹⁴See <https://cmise.web.ox.ac.uk/article/frankfurt-set-up-clearing-point-advice-service>

5.4.5 Multiple Barriers Remain to Accessing Healthcare

Beyond a lack of health insurance, our study revealed numerous other limitations related to health care. The comparatively good basic care in Frankfurt is, first, strongly dependent on the commitment of individual full-time and voluntary actors and their private networks. Moreover, these are parallel structures; so far, transitions into the regular system have only taken place in individual cases and have only become more systematic since the establishment of the Clearing House. Several interviewees also emphasised that, for fear of deportation, patients with precarious status often come very late to a clinic, when the illness is already far advanced. They then often have multiple illnesses that cannot be treated on an outpatient basis. The assistance system regularly reaches its limits, for example in cases of complicated, costly operations, chronic or mental illnesses, palliative care or rehabilitation therapy after operations.

Secondly, due to the insufficient or uncertain funding resulting from temporary project funding and reliance on donations, it is rarely possible to finance longer-term or cost-intensive treatments. Since entitlement to treatment only exists for emergencies, there frequently are complications with recovering fully after interventions. No accommodation is possible beyond the emergency itself, and there are hardly any adequate beds in facilities for homeless people. This problem is exacerbated by too early discharges on the part of the clinics which, especially in the case of homeless people, often leads to a vicious circle of repeated short-term hospital stays. The effect on individuals' health of their poor accommodation was exacerbated by the COVID-19 pandemic particularly for those, such as Roma, with problematic long term housing situations.

In addition, there are two central problems related to applications for reimbursement of costs at the Youth and Social Welfare Office. Firstly, people with unresolved residence status in Germany run the risk of their personal data being passed on by the staff to the foreigners' authority (see also Von Manteuffel, 2018). Medical and other staff in the health sector are subject to a medical confidentiality obligation which, according to the general administrative regulation of the Federal Government through the Residence Act, extends to public authorities (Drucksache 669/09). However, according to the Federal Medical Association, there is legal uncertainty as to whether social welfare offices are obliged to maintain the confidentiality of data received from doctors and hospitals vis-à-vis the foreigners authority (Bundesärztekammer, 2013). Mylius (2016) states in a study on the practice of local health authorities and hospitals that in 8.5% of the cases investigated, hospitals regularly inform the police when migrants in irregular residence appear for emergency treatment (ibid.: 275). However, in our study we could not determine for Frankfurt whether this data is being passed on. Of key importance is the fact that

there is no legal certainty in this regard and therefore patients cannot be confident of risk-free treatment, even in emergencies.¹⁵

Further, there are financial losses for hospitals if the Youth and Social Welfare Office rejects applications for the reimbursement of costs because the documentation on the destitution of the treated patients is not accepted, including for emergency treatment that has already been provided (F3; F21). Lack of proof of identity is one reason why applications for reimbursement of costs are often rejected. In this case, the hospitals are left with the cost of treatment. In 2019, treatment costs for inpatient treatments without reimbursement amounted to more than €1.5 million (Gesundheitsamt Frankfurt am Main, 2020). Several interviewees reported that, as a result, it has become more difficult to accommodate patients. Some patients referred by them to the central emergency room have been turned away without treatment.

5.5 Legal Restrictions and Affordability Limit Access to Accommodation

The right to housing is part of the right to an adequate standard of living, as protected by Article 11 of the International Covenant on Economic, Social and Cultural Rights. The Covenant provides that this provision shall apply regardless of nationality or residence status but does not create legally enforceable rights. However, it follows from the guarantee of human dignity under the German Basic Law that the state must ensure the conditions for a dignified existence. Corresponding entitlements are defined and specified in social welfare law (Krennerich, 2018). However, a right to housing is not explicitly provided for.

Homelessness has become an increasing problem in major cities in Germany (Sonderberichterstattung für angemessenes Wohnen, 2018). In Frankfurt, as in Cardiff, affordable housing is scarce. Especially after 2009, property prices and rents have risen rapidly. At the same time, the number of social housing units has decreased sharply;¹⁶ while the number of people entitled to a social housing unit who were registered as looking for housing increased by almost half between 2009 and 2017 to almost 24,000 (Schipper & Heeg, 2021: 54ff). According to the municipal Housing Office (Amt für Wohnungswesen, 2019: 48), 46.1% of people seeking housing in 2018 were acutely homeless. The generally strained state of Frankfurt's

¹⁵In May 2022, a Kosovar living in Germany since 1997 and staying in Frankfurt without residence status since 2017 filed a strategic complaint with the Frankfurt Administrative Court. Supported by the Society for Freedom Rights and the organisation Doctors of the World, it argues that the reporting obligation under §87 restricts his right to health. The overarching goal of the lawsuit is to have the reporting obligation reviewed by the Federal Constitutional Court (GFF, 2022).

¹⁶Since the early 1990s, the number of publicly subsidised social housing units in Frankfurt has fallen from almost 70,000 (approximately 20% of the housing stock) to 25,000 units (6.3% of the housing stock) in 2018 (Schipper & Heeg, 2021: 55).

housing market is not alleviated by its many construction projects as the flats created mainly serve as capital investments (Betz et al., 2021: 10). Therefore, there has as yet been little positive change in terms of affordable housing for lower income groups (Belina, 2021: 75).

It is only people who can prove permanent residence in Germany (§27 WoFG) or possession of a valid residence permit for at least 1 year, who are entitled to social housing. In Frankfurt, there is an additional barrier: applicants must have been registered in the city for at least 1 year (Amt für Wohnungswesen, 2019). The majority of precarious migrants are therefore excluded from applying. At the same time, the lack of (subsidised) affordable housing affects the situation in facilities providing support to the homeless and in women's shelters.

5.5.1 Poor Quality Housing and Exploitation Regularly Reported

For people with low financial means and/or language difficulties, it is particularly challenging to find adequate and affordable housing. It is not uncommon for precarious migrants in Frankfurt to live in unacceptable accommodation that is tied to informal work arrangements. Frequently, high rents are subtracted straight from their wages without any record in their salary statement. This accommodation is often of poor quality—as reported by our interviewees (F9; F10; F15) and found by various previous studies, referring in particular to the situation of Eastern European EU citizens in the city (Alicke et al., 2014; Künkel, 2018; Riedner & Haj Ahmad, 2020). The low availability of housing is exacerbated by the fact that landlords are liable to prosecution if they provide housing to people without residence status (Deutscher Caritasverband and Deutsches Rotes Kreuz, 2017: 67). Therefore, the degree of exploitation is reported to be high.

Due to the low supply of housing, widespread discrimination in the housing market, lack of social protection (cf. Künkel, 2018: 289; Riedner & Haj Ahmad, 2020: 51) and, in the case of people without a valid residence status, the permanent threat of being reported to the authorities (F7), precarious migrants may submit to particularly unacceptable conditions. Some have to share a room with other people or sleep in friends' living rooms until they have to move on to the next temporary sleeping place (F26, F27). This is difficult to organise and mentally stressful, according to one interviewee, but: “You have no other choice!” (F27). Due to these dependencies, conflicts at work or the abrupt end of employment can directly cause the loss of a place to stay. The latter regularly affects women who work informally in private households and care for older people or people with disabilities when the person dies or moves to a care facility. Even for those with regular housing, losing their job can quickly lead to a loss of their home if there is no entitlement to social benefits.

5.5.2 *Provision for Homeless People Excludes Many in Need*

Accommodation in facilities for the homeless in Frankfurt is based on two legal foundations. First, there is an entitlement to support for “persons whose special living conditions are linked to social difficulties” (Federal Social Welfare Code §67 SGB XII). However, this assistance, like almost all benefits under the Social Welfare Code, is not legally available to precarious migrants. The welfare organisations themselves have little leeway to accommodate people who are not entitled to social benefits, as they would have to bear the costs themselves.

The second legal basis for housing homeless people is the federal states’ security and public order laws. In the case of Frankfurt, this is the Hessen Law on Public Security and Order (“Hessisches Gesetz über die öffentliche Sicherheit und Ordnung”, HSOG). Significantly, it obliges municipalities, in their function as local security authorities, to prevent acute risks such as homelessness. For this purpose, they have to provide accommodation to involuntarily homeless people. The obligation under public order law applies irrespective of the nationality or residence status of the person concerned (Ruder, 2015: 56). This understanding of the law, while shared by the staff of Frankfurt’s Youth and Social Welfare Office, is nevertheless interpreted restrictively (see also Riedner & Haj Ahmad, 2020: 28; Böhm, 2021: 91).

One interviewee in the Youth and Social Welfare Office summed up the legal obligation as follows: “We have to prevent homelessness [...] whenever someone cannot help themselves. [...] If someone still has a shelter somewhere else, then I don’t have to provide for them here” (F18). This interpretation also underpins the office’s practice of offering a travel ticket to EU citizens who are not entitled to benefits, if it is assumed that they have the option of ending their homelessness somewhere else. If they could avoid being homelessness by accepting a return ticket home, the Youth and Social Welfare Office would no longer be obliged to provide accommodation.¹⁷ However, as Karl-Heinz Ruder points out in a legal opinion, rejecting this course of action does not release the municipality from its obligation to provide accommodation (Ruder, 2015: 29). These diverging legal opinions caused a public controversy on the occasion of the needs assessment of the situation of homeless EU citizens in Frankfurt (Riedner & Haj Ahmad, 2020).

Due to the legal regulations described above and their current interpretation by the Youth and Social Welfare Office, homeless EU citizens without entitlement to benefits generally only have short-term emergency access to homeless shelters. These are also occasionally used by people with irregular status, but this is “a rather marginal phenomenon” (F17). The legal basis for emergency accommodation is the public order law. It is provided in various facilities and, depending on the facility, is limited to a maximum of 10 days. People staying in an emergency shelter usually must see the Special Service 3 of the Youth and Social Welfare Office (“Besonderer

¹⁷The following note on the information page of the City of Frankfurt on emergency sleeping facilities also points in this direction: “Before using the emergency sleeping facilities, all self-help options (locally unlimited) must be exhausted” (Stadt Frankfurt am Main, 2022b).

Dienst 3 des Jugend- und Sozialamts”, BD3) within 3 days, in order to check whether they are entitled to accommodation according to the national Social Welfare Law or regional Public Order Law. If the Youth and Social Welfare Office does not cover the costs, individuals may only stay under special conditions (see section below on “Liste vital”).

5.5.3 NGOs Vital Providers of Night and Day Shelters

There are various relevant support services. The largest providers are the Frankfurter Verein Soziale Heimstätten (“Frankfurt Association Social Homes”), closely linked to the municipality, and the two denominational charities Diakonie and Caritas. Frankfurter Verein is responsible for the Ostpark emergency shelter (“Notschlafstätte Ostpark”). With 200 to 220 places, it is Frankfurt’s largest facility and contact point for homeless people and receives lump-sum funding from the municipality. This allows the staff a certain flexibility with regard to admissions when free places are available, regardless of residence status:

Of course we ask whether [the person] has an identity document. If he doesn’t have one and he is standing there freezing and we have a bed, [...] then we take him in anyway, [...] and try to sort it out afterwards, so he will be accommodated for the time being. (F12)

Frankfurter Verein is closely connected with the Youth and Social Welfare Office, the head of which is part of the association’s supervisory board (F12). People staying in the Ostpark emergency shelter usually¹⁸ have to go to that Office for an assessment of their entitlement to accommodation. At Ostpark, accommodation without having any entitlements is usually only possible for a maximum of 3 days.¹⁹

There are other emergency shelters with lump sum funding from the city where people can stay for a maximum of 10 days including the Diakonie centres WESER 5²⁰ and Haus Hannah—Wohnen für Frauen. Accommodation is offered separately according to gender and usually in two to four-bed rooms. Families are also accommodated on behalf of the City of Frankfurt by the Protestant Association for Housing Aid (“Evangelischer Verein für Wohnraumhilfe”), mainly in boarding houses or hotels. These are located throughout the city, many of them close to the

¹⁸This has been delayed somewhat due to the pandemic, as it was/is possible to come by appointment only.

¹⁹With reference to the addresses given on the identity cards, the social welfare office regularly determines that applicants could be accommodated at the place of residence where they were officially registered last. If they refuse the tickets offered to them there, homelessness is no longer considered involuntary and the municipality does not feel obliged to extend the accommodation.

²⁰Compared to 2016, the proportion of EU citizens among those using WESER 5’s emergency overnight accommodation almost doubled in 2017. Between 2018 and 2020, the proportion was around 30%; around 23% came from other third countries and 47% were of German nationality. (WESER 5, 2019: 26).

railway station.²¹ In response to the pandemic, the 10-day limit on stay was lifted between April and June 2020 and over the 2020/2021 New Year's holidays. Especially in the case of homelessness, there is also a long-term need for counselling that does not match the short-term nature of the services available: 'these [...] 10 days are not enough to somehow sort things out with the authorities', as one counsellor emphasised (SF2).

5.5.4 Eligibility Checks Deter Take Up

Staying in homeless assistance facilities for a longer period of time requires an application to the social welfare office. Beyond short-term emergency accommodation, EU citizens who have been in Germany for less than 5 years are only accommodated if they are entitled to unemployment benefit II (ALG II) as top-up recipients ("Aufstocker*in"), for example due to working in a part-time low-paid 'mini-job' or because a part-time income is too low to cover their needs. Losing one's job can ultimately lead to (renewed) homelessness, as occurred during the COVID-19 pandemic (Böhm, 2021: 95ff). As the staff of one counselling centre pointed out, the practice of checking eligibility often causes homeless EU citizens not to make use of emergency services they are entitled to, fearing that this could lead to a future revocation of their right to freedom of movement (F10). As such, the legal regulations obstruct access even to those services that the city is obliged to provide. For people residing with an irregular status, a deterrent effect can be observed similar to that in the health sector due to §87 of the Residence Act (the reporting requirement).

Overnight accommodation in the winter emergency programme is available at low thresholds to all people who acutely need a place to sleep. This seasonal offer, which aims to prevent cold-related deaths, is open between 15 November and 31 March, irrespective of status. This is an overnight-only service, between 8 pm and 8 am. One of these is the B-level of the subway station Eschenheimer Tor, which is managed by the Frankfurter Verein. If necessary, people will be provided with a sleeping mat and a sleeping bag. According to an estimate by the staff interviewed (F12), every night around 140–150 people stay at Eschenheimer Tor, 50–60% of them from Eastern or South-Eastern Europe.

During to the COVID-19 pandemic, the overnight accommodation at Eschenheimer Tor was opened all year round for the first time in 2020. For 2021 and 2022 as well, the Youth and Social Welfare Office decided to keep the seasonal emergency shelter open all year (F10; F12). The offer is supplemented by a winter café where warm drinks and pastries are served between 6 am and 10.30 am. The opening hours are extended during particularly cold periods. While an overall

²¹ As a neighbourhood where drug use is a visible part of everyday life, it was described by various interviewees as unsuitable for housing families (F9; F15).

improvement in the situation has been noted compared to the B-level of the Hauptwache,²² used until 2018 (WESER 5, 2019: 11), the winter shelter at Eschenheimer Tor still receives repeated criticism: According to an interviewee this facility is mere “protection against freezing”, which does not necessarily comply with the requirements of accommodation under public order law (F10).

The municipality has been funding additional places under the winter emergency programme in homeless assistance facilities since 2017. These include the WESER 5 daycentre, where prior to the pandemic 30 places were available as winter emergency night shelters. To maintain minimum distances, these were reduced to 20 places (15 men and 5 women) in the winters of 2020/2021 and 2021/2022.²³ The percentage of those staying who were migrants was 93% in 2019/2020 and 85% in 2020/2021 (WESER 5, 2020, 2021).

There is a further humanitarian exemption for exceptional health emergencies: if facilities encounter people for whom remaining on the street would endanger their life, they can be placed on the Liste Vital (vital list), maintained by a working group called Street (“Arbeitskreis Straße”). The working group is made up of the institutions providing assistance to the homeless as well as the municipal Youth and Social Welfare Office. For persons on this list, the Youth and Social Welfare Office covers the cost of accommodation. While of benefit to the individuals, it is argued that these individual solutions do not change the problematic accommodation situation. Moreover, staff must wait until the state of health of people who live on the street is so bad that accommodation through the vital list becomes possible (SF2).

Various actors are trying to fill the remaining gaps. These include local churches providing temporary accommodation and activist self-organised projects such as Project Shelter. The latter is an initiative founded in 2014 in which “people with and without experiences of migration and flight work together against homelessness and racism” (Project Shelter, 2021: 309). The activists organise private sleeping places for migrants who are excluded from accommodation in state-funded facilities and campaign politically for longer-term changes. They also advocate for a self-managed migrant centre where people can arrive in a calm and safe environment and organise their lives (ibid.). A similar demand is also made by the Roma support association (“Förderverein Roma”), which has been campaigning for a house for Roma people. This is conceived as an integrated housing project where residents are accommodated according to their needs and receive social counselling as well.

The COVID-19 pandemic made it even more obvious that it is not only important “to provide accommodation, but also [...] to provide adequate accommodation” (F9). Numerous interviewees emphasised, moreover, that it is difficult to find formal employment without adequate housing. Housing insecurity also has a further negative impact on access to health and education. From early 2021 until autumn 2021,

²²This overnight accommodation was initially provided by the transport company for almost two decades, with no social service provider accompanying the overnight stays (F12).

²³In winter 2019/2020, an average of 29 people per night registered for the winter places at WESER 5. Of these, 18 people actually made use of the sleeping place (WESER 5, 2020).

entitlement-free accommodation beyond immediate emergency situations was available for single men in the Henriette-Führt-Haus, run by Caritas. In response to the pandemic and the demands of the Roma support association, 20 places were created that can be assigned without having to check formal entitlements. Since Autumn 2021, these places—which are financed by the Youth and Social Welfare Office on a lump-sum basis—will no longer be filled when they become available. Interviewees noted that under the new “Magistrat” (administration) provided by the Greens, SPD, FPD and Volt they are faced with the same restrictive accommodation policy as under the previous administration—even if the coalition agreement had pointed in a different direction. The plans formulated in the coalition agreement “to offer a sleeping place for humanitarian reasons in a kind of boarding house based on the Cologne model” (Grüne, SPD, FDP, Volt, 2021: 114) and to examine the possibility of establishing a “House for Roma” based on the Berlin model (Ibid: 94) had been welcomed accordingly.

5.5.5 Lack of Accommodation Increases Vulnerability to Violence

In the case of violence, there are further accommodation options for women (see below). However, the lack of hardly any housing options available beforehand increases the likelihood of experiencing violence on the streets or in private homes. In addition, several interviewees (SF2) pointed towards incidents or announcements of taking children into custody when women are homeless—instead of accommodating them together with their children even if they are not entitled to social benefits (see also Riedner & Haj Ahmad, 2020: 39ff).

Under the Istanbul Convention,²⁴ which entered into force on 1 February 2018, Germany committed itself to preventing and combating violence against women and to providing protection for victims of domestic violence. These obligations apply to all government bodies. They explicitly include the protection of all women regardless of nationality or residence status (Art. 4). Many of the tasks associated with the Istanbul Convention are the responsibility of the Länder or are delegated by them to the municipalities. However, in Frankfurt protection against violence remains difficult for migrant women with precarious status.

Women in precarious residence situations are particularly exposed to the risk of violence due to their housing situation. This is often linked to personal dependencies and informal work arrangements. An effective prevention of violence approach is obstructed by exclusions under residence and social welfare law. Women living on the street are also more likely to be affected by violence. Yet women are only entitled

²⁴Germany signed the “Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence”, known as the Istanbul Convention for short, in 2011 and ratified it in 2017.

to appropriate accommodation when they have already become victims of violence. Moreover, they often remain in violent relationships if their residence status is not independent from their partner. Women lacking residence status equally do not dare to speak out and seek support for fear of deportation (Dinkelaker & Schwenken, 2020: 163; Atmaca & Dinkelaker, 2020: 168). The possibility of receiving protection from violence is thus “undermined by restrictive asylum and residence policies” (Dinkelaker & Schwenken, 2020: 60).

5.5.6 Shortage of Women’s Shelters Addressed by Council Unit

In Frankfurt and more widely in Hessen there is an overall shortage of places in women’s shelters. In 2018, there were 128 places in Frankfurt and 727 in Hessen as a whole (Drucksache 19/6088). According to estimates, in 2021 there was a shortage of around 800 places²⁵ throughout Hessen. With the available places, Frankfurt does fulfil the formal requirements of the Convention. Nevertheless, women asking for places have continually to be turned away (Schindler, 2021). Access to protection against violence is also hampered by the shortage of places with lump-sum funding that can cover these particular residents. In Frankfurt, most places in women’s shelters are funded through daily rates, which means that staff and material costs are apportioned to the available places. For women who are entitled to social benefits, the Job Centre or Youth and Social Welfare Office pay daily rates to the shelter (cf. Dinkelaker & Schwenken, 2020: 163). As precarious migrants are excluded from social benefits, the shelters might be left to cover the costs if they take in women who are not entitled to have their costs covered. As a result it is difficult to find places for women with precarious status who have experienced violence.

Further, due to the shortage of housing in Frankfurt, women often have to wait a long time before moving out of the shelter into their own flat. As a result, places remain occupied longer than expected. While there are some alternative accommodation options, such as the night café for women, capacity is limited. While one

²⁵The federal government has provided €30 million annually for women’s shelters, women’s counselling centres and women’s emergency centres since 2020 with the programme “Together against Violence against Women” (“Gemeinsam gegen Gewalt an Frauen”) for the implementation of the Istanbul Convention. Hessen facilities are entitled to about 2.2 million. So far, however, only about 618,000 € have been claimed. According to the Hessen Minister of Social Affairs, this is due to the “immense effort and lengthy administrative procedures” and the “complexity of the application procedure”, which poses a challenge to the organisations applying for funds. The need for improvement had been communicated to the federal government (Hessischer Landtag, 2021: 1°). In response to the COVID-19 pandemic and the increased need for protection, the State of Hessen has made an additional four million euros available in the programme “Preventing and Combating Domestic Violence” (Hessisches Ministerium für Soziales und Integration, 2022).

interviewee felt that “if there’s no room, there’s no room, but at least there you don’t have to be entitled to benefits” (F10), another emphasised that these facilities are actually not suitable for women who have just experienced violence, as they neither have appropriately trained specialist staff nor an adequate protection structure.

In 2021, the City of Frankfurt created a coordination unit with the purpose of implementing the Istanbul Convention within the Women’s Department. The administration allocated permanent funding of €50,000 for a coordinator and an assistant. Following the example of the Darmstadt model for the implementation of the Convention (Darmstadt, 2021), the tasks of the coordination unit include an assessment of the current situation to identify needs for action, and to work towards their implementation (Magistrat der Stadt Frankfurt am Main, 2020a). Implementation of the Convention is understood as a joint effort that can only succeed if all responsible departments and offices, the judiciary and police authorities as well as civil society institutions work together. It will build on existing structures such as Frankfurt’s Working Group on Violence against Women (“Arbeitskreis Gewalt gegen Frauen”), where representatives from the Youth and Social Welfare Office, the police and the judiciary and various NGOs have worked together, in some cases since the 1980s: “Structures that in other municipalities still have to be set up for the Convention already exist here.”

In parallel to the creation of the coordination unit, a number of other budget proposals were accepted (2020). The funds provided are intended to create 37 lump-sum financed places in women’s shelters for women who are not entitled to unemployment benefits (Magistrat der Stadt Frankfurt am Main, 2020b). The autonomous women’s shelter “Frauen helfen Frauen” (Women Helping Women) has been offering two lump-sum funded places for women in need out of a total of 60 places since December 2020. Frankfurter Verein has been providing an additional 20 lump-sum funded places since April 2021²⁶ (Magistrat der Stadt Frankfurt am Main, 2022). It is planned to “change the procedure completely to lump-sum funding” (Magistrat der Stadt Frankfurt am Main, 2020b). In addition, funds for language mediation were approved. However, this does not yet fully cover the current demand for places. Furthermore, the places were created in response to the COVID-19 pandemic and are thus temporary. There is still a need for more “lump sum financed places” in women’s shelters and “lump sum financed counselling” (F22).

Comprehensive and sustainable improvements in the protection against violence for migrant women with precarious status will be very difficult to realise at the municipal level alone. The Federal Republic of Germany has ratified the Istanbul Convention only with a reservation, to §59 II and III. These provisions would otherwise require deportation proceedings for victims of human trafficking or violence in partner relationships to be suspended, and that they should be granted a residence status if this is necessary on account of their personal situation or for

²⁶In contrast, a counsellor from a women’s counselling centre commented at the expert meeting organised by the AmkA on 9 June 2022 that she only knew about the two places in the autonomous women’s shelter.

legal proceedings.²⁷ Germany has not accepted that provision. Frankfurt is in dialogue with colleagues in other cities, within and beyond Hessen, with a view to advocating for a future state-wide coordination unit and a federal coordination unit that would enable a coordinated approach between all tiers of governance.

5.6 Access to School Education for All Since Reporting Requirement Lifted

Overall, there is a mixed picture regarding the right to education for precarious migrants in Frankfurt. In primary and secondary education there is comparatively good access, partially due to inclusive legal regulations at the state and federal level. Barriers nevertheless exist around access to places in daycare centres, on the one hand, and to further education on the other.

In a very significant move, following years of mobilisation by church and human rights organisations as well as the Trade Union for Education and Science (GEW), schools and educational and training institutions in Germany were exempted in 2011 from the obligation to report anyone with an irregular status to the immigration authorities. This requirement in principle applies to all public authorities (§87 I AufenthG). In December 2009, the state of Hessen had been one of the first federal states that decided not to comply with the reporting obligation and through its School Act removed that requirement from its schools. (Steffens, 2011: 238); a move that had resulted in positive changes concerning access to education for precarious migrants. Unlike before the law was changed, there have been no known problems in subsequent years (F23).

Merely abolishing the reporting obligation however does not automatically lead to the removal of all barriers in access to education, as Funck et al. found (2015) in a nationwide comparative study. The authors emphasise that the likelihood of risk-free school attendance strongly depends on whether compulsory schooling or a right of access to school for all children and adolescents, regardless of residence status, is enshrined in the respective state constitution. Enshrining the right to attend school in national law, as also recommended by the Council of Europe (Council of Europe, 2011: 8), would clearly also have a positive impact (Funck et al., 2015: 35ff). In Hessen, the right of access to school is indeed explicitly provided for children who are residing without authorisation (§46 III VOGSV). School attendance is also free

²⁷The Convention also provides that women affected by intimate partner violence should be granted an independent residence status if their own status depends on that of their partner (§59 I). According to the German Women Lawyers' Association, this article is also not sufficiently established in German law. In practice, it is being undermined by placing too high a burden of proof on the victims (DJB, 2020). The Istanbul Convention Alliance (2021: 177) states in its alternative report on the implementation of the Convention that victims of domestic violence are denied effective protection due to arbitrary treatment by immigration authorities and police.

of charge.²⁸ This means that at federal and state level, explicitly inclusive regulations irrespective of residence status are provided for. Furthermore, through its Integration and Diversity Concept 2010, the City of Frankfurt acknowledged:

the humanitarian obligation to enable refugees and children of parents without official residence status to participate in regular schooling. (Stadt Frankfurt am Main Integrationsdezernat, 2011: 68)

In addition to the law, it is crucial that relevant information is disseminated. Key to (risk-free) access is that headteachers and administrators, as well as people in precarious situations, are informed about the right to education and the suspension of the reporting obligation (Funck et al., 2015: 11ff).²⁹ Our interviewees indicated, however, that there has been no public information events or campaigns by the state education authority nor by the education trade union (GEW) in Frankfurt following the legal changes in 2011.³⁰ A senior Education Department interviewee said she assumed that the schools had been informed by the state education authority. Knowledge about the right to education and the abolition of the reporting obligation does indeed seem to be widespread among Headteachers. This most likely is also due to the fact that students in precarious residency situations are not unusual in the city and are the subject of public discourse.³¹ Overall, the schools in Frankfurt are thought to be quite “courageous and determined” to enable inclusion regardless of residence status (F25). Nevertheless, there is a continuous need to disseminate information on the right to education in order to ensure that it can be exercised.

While access to primary schools and secondary schools (up to the age of 18) was described as generally unproblematic, difficulties due to exclusion within schools were reported. Roma children, for example, tend to be transferred very quickly to schools for children with special needs (“Fördersystem”). One response to this is the “Schaworalle” daycare centre, a national pilot project that prepares Roma children for school and subsequently provides them with a school education. After the Förderverein Roma started working with children and young people in 1996, it was possible to rent suitable premises in 1999 with the help of the youth welfare office, the AmkA and the municipal education authority (Förderverein Roma e.V., 2022: 5). Next to kindergarten places, the Schaworalle also includes a school project where Roma can attend regular school up to the age of 15 and obtain a secondary school qualification (“Hauptschulabschluss”). The offer is well received.

²⁸ However, this only includes costs for tuition itself. Costs for events such as class trips or excursions must be paid privately (Deutscher Caritasverband and Deutsches Rotes Kreuz, 2017: 20).

²⁹ Following the study by Funck et al. (2015), the GEW developed a flyer to inform employees in schools and daycare centres so that they can support children and young people in irregular residence to access the right to education (GEW, 2017).

³⁰ The state education authority itself could not provide any information on this due to a lack of documentation.

³¹ Funck et al. (2015: 38) emphasise that “the public discussion of the situation of people in illegal residence may lead to more frequent identification of viable ways to enrol in school”.

5.6.1 *Barriers to Pre-school and Post-school Education*

More difficulties exist in terms of access to places in day care centres. While a 2018 decision to abolish day care fees in Hessen does facilitate access, families still must pay additional fees, for example for meals. For precarious migrants, this can be difficult to afford. In accordance with the federal education and participation package, it is possible to apply for the payment of meal costs. However, these are in turn linked to entitlement to benefits under the Social Welfare Code or the Asylum Seekers' Benefits Act (BMAS, 2022). There are also too few day-care places available in Frankfurt, as at state-wide and national level. For the kindergarten places for Roma children at the Schaworalle, too, there is a long waiting list (Förderverein Roma e.V., 2022: 7).

The most serious access barriers are in the field of further education and training. For migrants without residence status, there are virtually no opportunities to get apprenticeships or to participate in training programmes. They are explicitly excluded from German language courses and integration courses³² funded by the Federal Office for Migration and Refugees. They are also not entitled to alternative services provided by local organisations which are funded by the Frankfurt Women's Department.

In contrast, German language courses are generally open to EU citizens. Since 2013, Förderverein Roma has also been offering a vocational training project for young people between 14 and 27, as well as for adults, to members of the Roma minority. These are EU-funded projects in which participants are supported in obtaining a lower secondary school certificate and vocational orientation, and in finding employment. However, there can be difficulties continuing into an apprenticeship. Unless employed, the right to freedom of movement can be lost: "I am not allowed to stay here and go to school and study. If I want to stay here, I have to work properly" (F15). Instead of doing an apprenticeship, the interviewee started working as a cleaner.

The COVID-19 pandemic highlighted the extent to which educational success also depends on home conditions. Pupils in precarious situations had a particularly hard time during the school closures and the times of home schooling associated with them. In this respect, access to education—similar to access to health care—is closely linked to the housing situation.

³²Participation in integration courses is explicitly provided for the following groups only: "asylum seekers with good prospects of remaining ('mit guter Bleibeperspektive': Eritrea, Syria, Somalia, Afghanistan), asylum seekers with a good chance of finding employment and who entered Germany before 01.08.2019, tolerated people with a toleration permit pursuant to §60a II 3 AufenthG or holders of a residence permit pursuant to §25 V AufenthG" (BAMF, 2018).

5.7 Importance of Legal Advice and Counselling

Legal and social counselling services are indispensable for accessing social rights due to the complexity of asylum, residence and social welfare law, the complicated language of official notices and, at times, bureaucratic obstacles. This applies in particular to access to social benefits which form the basis for longer-term accommodation in facilities provided by homeless assistance services, but also with regard to access to health insurance. The city of Frankfurt supports various facilities that offer social and legal counselling for migrants. In addition, the Women's Department funds counselling services for women who have experienced violence, open to women regardless of status. Various organisations providing counselling to migrants have received Hessen state funding through a programme (WIR) through which the state government supports innovative projects "for a culture of welcome and recognition and diversity-oriented opening of municipal services" (Hessen, 2022). In Hessen, there is however no state funding programme for refugee and migration counselling centres. Almost all counselling centres for general residence law issues are financed from the welfare associations' own funds, donations or from federal government funds.

Between 2015 and 2018, three projects also received funding under the EU Fund for European Aid to the Most Deprived (FEAD). None had their funding extended, however, which became known only shortly before the planned extension. In the case of the counselling centre *Frauenrecht ist Menschenrecht* ("Womens' Rights are Human Rights"), this meant that the project social worker could no longer be employed. In the case of the newly founded Multinational Information and Contact Point for EU Citizens, Caritas and Diakonie managed to negotiate with the city to continue financing the counselling services with city funds, but with the staff members now only employed part-time.

5.7.1 *Short Term Funding Threatens Viability of Advice Provision*

This short-term decision to continue funding and the resulting uncertainty is not an isolated case. A considerable part of the funding for services aimed at precarious migrants are temporary project funds, the extension of which usually takes place only shortly before the end of the funding period. Local authority and NGO staff highlighted the problems with this. On the one hand, the financial uncertainty makes long-term planning difficult; on the other, some grants may entail a focus on certain topics that do not make sense in practice, but which have to be followed in order to comply with funding criteria. Overall, numerous interviewees indicated that there was a lack of sufficient and, above all, permanent resources to meet all needs and to improve the situation of those affected in a sustainable way (F7; F9; F10; F11). Beyond funds for specific services, this statement referred in particular to insufficient resources for legal and social counselling as well as for language mediation.

As a result of the COVID-19 pandemic and the associated restrictions, the demand for counselling increased so much in Frankfurt that not all requests could be dealt with. The demand grew mainly because authorities such as the Youth and Social Welfare Office and the Job Centre switched to telephone and email communication. Many people were unable to deal with this due to language difficulties, so they had to rely on the support of counsellors who could translate for them. This situation repeatedly gave rise to problems. It appears that case workers from public authorities such as the Job Centre—contrary to official statements—did not, for instance, accept language mediation by telephone. Privacy issues were cited as the reason for this, although this had not been a problem in relation to face-to-face appointments. More broadly, the lack of language mediation is a key barrier to accessing services for precarious migrants. Neither public authorities nor health insurance companies usually provide any option for communicating in a language other than German. Many problems could be solved more quickly “if all the offices had language mediation”, according to a counsellor who mainly advises Romanian-speaking workers on labour and social welfare law issues.

5.8 Conclusion

The study found that precarious migrants among Frankfurt’s population encounter various problems in accessing social services and thus realising basic social rights due to their precarious status and related restrictions on social welfare entitlements. Frankfurt now has a level of commitment to inclusion of precarious migrants. Nevertheless, despite inclusive approaches in the areas of health, protection against violence and education, Frankfurt has not yet adopted a comprehensively inclusive approach.

It is notable how clearly Frankfurt is held back by the explicit federal exclusions of this group from regular social welfare entitlements, and by the requirement to report those with an irregular status to the immigration authorities. The Council could, to an extent, counteract these exclusions by pursuing a more extensive interpretation of public order law in healthcare than it has done so far. On the other hand, in the absence of other measures, implicit barriers would remain, notably the fear of detection and deportation, the loss of freedom of movement or fear that children will be taken into care. Lack of coordination across the council to ensure a consistent approach, the problems associated with short term funding, and lack of capacity to address language barriers, are also clear obstacles to be addressed.

The strongest approaches to an inclusive municipal response so far are in the area of health care. The humanitarian consultation hours offered by the local health authority in cooperation with an NGO play a central role here. A more recent component is the Clearing House, but it has yet to be established as a permanent part of the local health authority. The municipal offer of basic medical care is internationally regarded as a best-practice model. The local Health Authority and the municipality consider the provision of health care to people without health

insurance as a task for the public health service. Other offices such as the Youth and Social Welfare Office support these efforts by providing financial resources—a notable example of municipal cross-departmental cooperation. For the provision of health care to people without health insurance, regardless of their residence status and social welfare entitlements, we saw that additional services offered by NGOs and medical students, partially funded by the city, are also crucial as well as the informal networks with specialists and hospitals built up over many years. It is a well-functioning division of labour with close cooperation to strengthen the municipality's capacity to achieve the goal of comprehensive access to health care for people without health insurance—but lacks some crucial capacity for paid-for, in-patient hospital care.

The responses in the area of education are mixed. In 2010, we saw that the city explicitly committed itself to providing access to regular schooling for all children, regardless of their residence status but the inclusive measures taken have not been sufficient to reduce the barriers for children with precarious status: in particular from an overall lack of places in pre-school education and from fees that must be paid. Regarding further education, there is a lack of inclusive measures, so that precarious migrants are confronted with high access barriers.

More exclusive responses were revealed with regards to accommodation. Accommodation options for precarious migrants in Frankfurt are limited. Due to the scarcity of affordable housing, wide-ranging exclusions from benefits, and restrictive procedures by the Youth and Social Welfare Office, little support can be offered in most cases. The city only funds short-term emergency accommodation for people without entitlements under the Social Welfare Code. Medium and long-term accommodation options are therefore denied to the majority of precarious migrants. A major issue is the dependency on private accommodation, and its quality. However, the main concern is that there are no adequate, low-threshold accommodation options available all though the year independent of entitlement to benefits. The COVID-19 pandemic saw the implementation, temporarily, of more inclusive measures, but some of these have now been cancelled. The coalition agreement of 2021 provides for some inclusive measures, but as of July 2022 these had not yet been implemented.

In the area of protection against violence, Frankfurt has been pursuing an increasingly inclusive approach spurred on by the need to implement the provisions in the Istanbul Convention. The creation of 37 places in women's shelters financed by the municipality on a lump sum basis, being implemented (as of 2022), will provide greater access to protection. The proposed switch to full lump-sum funding of places in shelters will further contribute to an inclusive approach. The establishment of a coordination unit linking relevant council services highlights the lack of coordination in relation to the service needs of precarious migrants more generally.

Overall, the study showed that the contribution of NGOs and activist groups, volunteers as well as individual supporters is of crucial importance in Frankfurt in overcoming the numerous challenges that people with precarious status are confronted with. In addition, there is the commitment of numerous full-time employees who support people in precarious situations beyond their formal employment duties.

Bibliography

- Alicke, T., Türk L., & Holz, G. (2014). *Neuzuwanderung in Frankfurt am Main. Vorstudie zur Situationsbeschreibung und zur strukturellen Weiterentwicklung von kommunalen Hilfen*. Retrieved March 21, 2022, from <http://d-nb.info/1074372298/34>
- Amt für multikulturelle Angelegenheiten (AmkA). (2009). *20 Jahre AmkA 1989–2009*. Retrieved July 29, 2022, from https://amka.de/sites/default/files/2018-05/20%20Jahre%20AmkA_2009.pdf
- Amt für multikulturelle Angelegenheiten (AmkA). (2017). *Frankfurter Integrations- und Diversitätsmonitoring*. Retrieved July 29, 2022, from https://amka.de/sites/default/files/2018-05/Frankfurter%20Integrations-%20und%20Diversit%C3%A4tsmonitoring_2017_0.pdf
- Amt für Wohnungswesen. (2019). *Wohnungsmarktbericht 2018*. Retrieved April 4, 2023, from <https://frankfurt.de/-/media/frankfurtde/service-und-rathaus/verwaltung/aemter-und-institutionen/amt-fuer-wohnungswesen/pdf/wohnungsmarktberichte/wohnungsmarktbericht-2018.ashx>
- Atmaca, D., & Dinkelaker, S. (2020). Ein Recht auf Schutz vor Gewalt für alle Frauen*. Interview mit dem Dachverband für Migrant*innenorganisationen DaMigra e.V. *Bürger und Staat*, 3/2020, 167–170. Retrieved July 29, 2022, from http://www.buergerimstaat.de/3_20/migration.pdf
- Belina, B. (2021). Bodenpreise und Bodenpreispolitik in Frankfurt Rhein/Main. In J. Betz, S. Keitzel, J. Schardt, S. Schipper, S. Schmitt Pacifico, & F. Wiegand (Eds.), *Frankfurt am Main – eine Stadt für alle?* (pp. 67–78). transcript Verlag.
- Betz, J., Keitzel, S., Schardt, J., Schipper, S., Schmitt Pacifico, S., & Wiegand, F. (2021). Einleitung. In J. Betz, S. Keitzel, J. Schardt, S. Schipper, S. Schmitt Pacifico, & F. Wiegand (Eds.), *Frankfurt am Main – eine Stadt für alle?* (pp. 9–20). transcript Verlag.
- Bogumil, J., & Jann, W. (2009). *Verwaltung und Verwaltungswissenschaft in Deutschland. Einführung in die Verwaltungswissenschaft, 2., völlig überarbeitete Auflage*. VS Verlag für Sozialwissenschaft.
- Böhm, B. (2021). Zermürbend, abschreckend, desintegrierend: Frankfurts Politik gegen Obdachlose. In J. Betz, S. Keitzel, J. Schardt, S. Schipper, S. Schmitt Pacifico, & F. Wiegand (Eds.), *Frankfurt am Main – eine Stadt für alle?* (pp. 89–98). transcript Verlag.
- Bundesamt für Migration und Flüchtlinge (BAMF). (2018). *Integrationskurs für Asylbewerbende und Geduldete*. Retrieved April 11, 2023, from <https://www.bamf.de/DE/Themen/Integration/ZugewanderteTeilnehmende/AsylbewerberGeduldete/asylbewerbergeduldete.html?nn=282656>
- Bundesärztekammer. (2013). *Patientinnen und Patienten ohne legalen Aufenthaltsstatus in Krankenhaus und Praxis*. Bundesärztekammer, 3. aktualisierte Auflage, 11/2013. Retrieved April 4, 2022, from <https://www.bundesaerztekammer.de/patienten/patientenrechte/patienten-ohne-legalen-aufenthaltsstatus/>
- Bundesministerium für Arbeit und Soziales (BMAS). (2022). *Bildungspaket*. Retrieved May 5, 2022, from <https://www.bmas.de/DE/Arbeit/Grundsicherung-Arbeitslosengeld-II/Bildungspaket/bildungspaket.html>
- Council of Europe. (2011). *Undocumented migrant children in an irregular situation: A real cause for concern*. Report Committee on Migration, Refugees and Population (Doc. 12718). Retrieved April 12, 2022, from <https://www.refworld.org/pdfid/4ee0c4dd2.pdf>
- Darmstadt. (2021). *Istanbul-Konvention umsetzen. Übereinkommen des Europarats zur Verhütung und Bekämpfung von Gewalt gegen Frauen und häuslicher Gewalt*. Retrieved May 11, 2022, from https://www.darmstadt.de/fileadmin/PDF-Rubriken/Gewaltschutz/Bericht_Bestandsbewertung_und_Handlungsempfehlungen_zur_IK.pdf
- Deutscher Caritasverband, & Deutsches Rotes Kreuz (Eds.). (2017). *Beratungshandbuch Aufenthaltsrechtliche Illegalität 2017*. Retrieved June 16, 2022, from https://www.asyl.net/fileadmin/user_upload/publikationen/Arbeitshilfen/2018-02-02_Beratungshandb_Aufenthaltsrechtl_Illegalitaet_2017.pdf

- Dinkelaker, S., & Schwenken, H. (2020). *Fragmentierter Schutz an der Schnittstelle von gewaltförmigen Geschlechterverhältnissen und restriktiven Asyl- und Aufenthaltspolitiken* (Bürger und Staat, 3/2020). Retrieved June 26, 2022, from https://www.buergerundstaat.de/3_20/migration.pdf
- DJB, Deutscher Juristinnenbund. (2020). *Rücknahme des Vorbehalts zu Artikel 59 der Istanbul-Konvention* (Themenpapier vom 13.02.2020). Retrieved May 11, 2022, from <https://www.djb.de/presse/pressemitteilungen/detail/st20-12>
- Evangelische Stiftung Alsterdorf (ESA) (Eds.). (2021). *Jahresbericht 2020*. Retrieved June 15, 2022, from https://www.alsterdorf.de/fileadmin/user_upload/images/ueber-uns/zahlen-und-fakten/ESA_Jahresbericht_2020.pdf
- Förderverein Roma e.V. (2022). *Kindertagesstätte Schaworalle. Jahresbericht 2021*. Retrieved May 3, 2022, from <http://www.schaworalle.de/info/Jahresbericht%202021.pdf>
- Funck, B. J., Karakaşoğlu, Y., & Vogel, D. (2015). „*Es darf nicht an Papieren scheitern*“. *Theorie und Praxis der Einschulung von papierlosen Kindern in Grundschulen*. Gewerkschaft Erziehung und Wissenschaft. Retrieved May 5, 2022, from https://www.gew.de/index.php?eID=dumpFile&t=f&f=33994&token=a7da698d477adc42f4bd2590c786bfdae01152b2&sdownload=&n=NichtAnPapierenScheitern_2015_Broschuere_web.pdf
- Gesellschaft für Freiheitsrechte (GFF). (2022). *Gesellschaft für Freiheitsrechte klagt auf Gesundheitsversorgung für Menschen ohne Papiere. Herzkranker Kläger braucht dringend medizinische Versorgung*. Retrieved May 18, 2023, from <https://freiheitsrechte.org/ueber-die-gff/presse/pressemitteilungen-der-gesellschaft-fur-freiheitsrechte/pm-gesundheitsversorgung-2>
- Gesundheitsamt Frankfurt am Main. (2020). *Unveröffentlichte Datenerhebung zu stationären Behandlungsfällen ohne Kostenträger*. Gesundheitsamt Frankfurt am Main.
- Gewerkschaft Erziehung und Wissenschaft (GEW). (2017). *Recht auf Bildung – auch ohne Papiere. Was sollten Beschäftigte in Bildungs- und Erziehungseinrichtungen beachten?* Retrieved May 5, 2022, from https://www.gew.de/index.php?eID=dumpFile&t=f&f=39890&token=fd57b397d10078be5d4d462a4792910a9d7f68da&sdownload=&n=NichtAnPapierenScheitern_2015_Flyer_web.pdf
- Grüne, SPD, FDP, Volt. (2021). *Ein neues Frankfurt gestalten. Koalitionsvertrag für Frankfurt 2021–2026*. Retrieved March 15, 2022, from <https://fdp-frankfurt.de/wp-content/uploads/sites/6/2021/06/FINAL-mit-Inhaltsverzeichnis-und-Deckblatt.pdf>
- Hessen. (2022). *Integrationsprogramm WIR*. Retrieved May 18, 2022, from <https://integrationskompass.hessen.de/vielf%C3%A4ltige-f%C3%B6rderm%C3%B6glichkeiten-im-landesprogramm-wir>
- Hessischer Landtag. (2021). *Kleine Anfrage von Christiane Böhm (DIE LINKE) vom 14.09.2021 Bundes-Förderprogramm „Gemeinsam gegen Gewalt an Frauen“ in Hessen und Antwort des Ministers für Soziales und Integration* (Drucksache 20/6376). Retrieved May 11, 2022, from <https://starweb.hessen.de/cache/DRS/20/6/06376.pdf>
- Hessisches Ministerium für Soziales und Integration. (2022). *Pressemitteilung: „One Billion Rising“ Weltweiter Aktionstag gegen Gewalt an Frauen und Mädchen*. Retrieved May 11, 2022, from <https://soziales.hessen.de/Presse/Weltweiter-Aktionstag-gegen-Gewalt-an-Frauen-und-Maedchen>
- Heuser, H. (2017). *Sanctuary cities in Deutschland: Widerstand gegen die Abschiebepolitik der Bundesregierung*. VerFBlog, 2017/3/13. Retrieved July 4, 2022, from <https://verfassungsblog.de/sanctuary-cities-in-deutschland-widerstand-gegen-die-abschiebepolitik-der-bundesregierung/>
- Hinterberger, K. F. (2020). *Regularisierungen irregulär aufhältiger Migrantinnen und Migranten. Deutschland, Österreich und Spanien im Rechtsvergleich. Schriften zum Migrationsrecht*, Band 29. <https://doi.org/10.2139/ssrn.3522591>.
- Krennerich, M. (2018). *Ein Recht auf (menschenwürdiges) Wohnen?* Retrieved May 15, 2023, from <https://www.bpb.de/shop/zeitschriften/apuz/270880/ein-recht-auf-menschenwuerdiges-wohnen/>
- Krieger, W., Ludwig, M., Schupp, P., & Will, A. (2006). *Lebenslage „illegal“. Menschen ohne Aufenthaltstitel in Frankfurt am Main*. Von Loeper.

- Künkel, J. (2018). Die städtische Produktion von „Armutsmigration“. Soziale Kämpfe um prekäres Wohnen in Frankfurt am Main. *PROKLA*, 191, 283–298. <https://doi.org/10.32387/prokla.v48i191.85>
- Lang, S. A., & Ivanova, K. (2022, March 24). *Pilotprojekt „Clearingstelle 1.0“*. Beratung für Menschen ohne Krankenversicherung am Gesundheitsamt Frankfurt am Main, Presentation, Kongress Armut und Gesundheit [Congress Poverty and Health], Berlin.
- Magistrat der Stadt Frankfurt am Main. (2020a). *Bericht zum Beschluss B623*. Retrieved May 4, 2022, from <https://frankfurt.de/-/media/frankfurtde/service-und-rathaus/verwaltung/aemter-und-institutionen/frauenreferat/pdf/istanbul-konvention/magistratsbericht-zum-beschluss-b623.ashx>
- Magistrat der Stadt Frankfurt am Main. (2020b). *Etatantrag*. Retrieved May 13, 2022, from https://www.stvv.frankfurt.de/PARLISLINK/DDW?TEXT=frauenhauspl%E4tze&TEXT_O=beinhaltet+%28ungef%E4hr%29&FORMFL_OB=DATUM&FORM_SO=Absteigend&??3
- Magistrat der Stadt Frankfurt am Main. (2022). *Bericht des Magistrats vom 25.04.2022, B 168*. Istanbul-Konvention umsetzen – Schutz bei häuslicher Gewalt bedarfsgerecht für alle Betroffenen ausbauen. Retrieved May 13, 2022, from https://www.stvv.frankfurt.de/PARLISLINK/DDW?W=DOK_NAME=%27B_168_2022%27
- Multinationale Informations- und Anlaufstelle für EU-Bürger*innen (MIA). (2021). *Sachbericht 2020*. Diakonie Frankfurt Offenbach. Retrieved March 17, 2022, from <https://www.diakonie-frankfurt-offenbach.de/wp-content/uploads/2021/07/MIA-Sachbericht-2020.pdf>
- Mylius, M. (2016). *Die Medizinische Versorgung von Menschen Ohne Papiere in Deutschland. Studien zur Praxis in Gesundheitsämtern und Krankenhäusern*. transcript Verlag.
- Project Shelter. (2021). Project shelter: Practices of solidarity between visions of liberation and boundaries of integration. In J. Betz, S. Keitzel, J. Schardt, S. Schipper, S. Schmitt Pacifico, & F. Wiegand (Eds.), *Frankfurt am Main – eine Stadt für alle?* (pp. 309–318). transcript Verlag.
- Riedner, L., & Haj Ahmad, M.-T. (2020). *Bedarfsanalyse wohnungsloser EU-Bürger*innen in Frankfurt am Main*. AmkA. Retrieved October 7, 2021, from <https://www.amka.de/bedarfsanalyse-wohnungsloser-eu-buergerinnen-frankfurt-am-main>
- Ruder, K.-H. (2015). *Grundsätze der polizei- und ordnungsrechtlichen Unterbringung von (unfreiwillig) obdachlosen Menschen unter besonderer Berücksichtigung obdachloser Unionsbürger*. Verlag der Bundesarbeitsgemeinschaft Wohnungslosenhilfe e.V.
- Schade, M., Heudorf, U., & Tiarks-Jungk, P. (2015). Die Humanitäre Sprechstunde in Frankfurt am Main: Inanspruchnahme nach Geschlecht, Alter und Herkunftsland. *Gesundheitswesen*, 77(7), 466–474.
- Schindler, H. (2021, February 9). Hessen: Schutz vor Gewalt gegen Frauen und Kinder unzureichend. *Frankfurter Rundschau*. <https://www.fr.de/rhein-main/landespolitik/hessen-schutz-vor-gewalt-gegen-frauen-und-kinder-unzureichend-90197788.html>
- Schipper, S., & Heeg, S. (2021). Der Stachel des Widerspruchs: Wohnungspolitik und Soziale Kämpfe in Frankfurt am Main. In J. Betz, S. Keitzel, J. Schardt, S. Schipper, S. Schmitt Pacifico, & F. Wiegand (Eds.), *Frankfurt am Main – eine Stadt für alle?* (pp. 53–66). transcript Verlag.
- Schneider, J. (2020). *Was heißt „Integration“ in superdiversen Nachbarschaften?* Bundeszentrale für politische Bildung. Retrieved June 1, 2022, from <https://www.bpb.de/themen/migration-integration/kurzdossiers/integrationspolitik/308203/was-heisst-integration-in-superdiversen-nachbarschaften/>
- Sonderberichterstatte(r)in für angemessenes Wohnen. (2018). *Bericht der Sonderberichterstatte(r)in für angemessenes Wohnen als Bestandteil des Rechts auf einen angemessenen Lebensstandard und auf das Recht auf Nichtdiskriminierung*. Deutsches Institut für Menschenrechte. Retrieved June 16, 2022, from [https://www.institut-fuer-menschenrechte.de/fileadmin/Redaktion/PDF/Sonstiges/Bericht_Sonderberichterstatte\(r\)in_Recht_auf_Wohnen_Recht_auf_Nichtdiskriminierung.pdf](https://www.institut-fuer-menschenrechte.de/fileadmin/Redaktion/PDF/Sonstiges/Bericht_Sonderberichterstatte(r)in_Recht_auf_Wohnen_Recht_auf_Nichtdiskriminierung.pdf)
- Spencer, S., & Delvino, N. (2019). Municipal activism on irregular migrants: The framing of inclusive approaches at the local level. *Journal of Immigrant & Refugee Studies*, 17(1), 27–43. <https://doi.org/10.1080/15562948.2018.1519867>

- Stadt Frankfurt am Main. (2022a). *Bevölkerung*. Retrieved May 16, 2022, from <https://frankfurt.de/service-und-rathaus/zahlen-daten-fakten/themen/bevoelkerung>
- Stadt Frankfurt am Main. (2022b). *Stadtpolitik*. Retrieved May 17, 2022, from <https://frankfurt.de/service-und-rathaus/stadtpolitik>
- Stadt Frankfurt am Main. (2022c). *Statistik aktuell, Ausgabe 04/2022*. Retrieved May 16, 2022, from <https://frankfurt.de/service-und-rathaus/zahlen-daten-fakten/themen/bevoelkerung>
- Stadt Frankfurt am Main. (2022d). *Vielfalt und Zusammenleben*. Retrieved May 16, 2022, from <https://frankfurt.de/themen/soziales-und-gesellschaft/vielfalt-und-integration/vielfalt-und-zusammenleben>
- Stadt Frankfurt am Main Integrationdezernat. (2011). *Diversitäts- und Intergrationskonzept*. Retrieved May 17, 2022, from <https://www.amka.de/integrations-und-diversitaetskonzept-fuer-stadt-politik-und-verwaltung-2010>
- Steffens, K. (2011). Menschenrechte und schulische Bildung im Labyrinth der deutschen Einwanderungspolitik. In G. Steffens & E. Weiß (Eds.), *Menschenrechte und Bildung. Jahrbuch für Pädagogik 2011* (pp. 271–285). Lang.
- The Istanbul Convention Alliance. (2021). <https://rm.coe.int/alternative-report-2021-german-istanbul-convention-alliance/1680a1f12b>
- Von Manteuffel, M. (2018). Papierlos und unterversorgt. Die notwendigen Verbesserungen der Gesundheitsversorgung von Menschen ohne Papiere in Deutschland. *Zeitschrift für medizinische Ethik*, 64, 33–41.
- WESER 5. (2019). *Tätigkeitsbericht 2018*. Diakonisches Werk für Frankfurt und Offenbach.
- WESER 5. (2020). *Tätigkeitsbericht 2019*. Diakonisches Werk für Frankfurt und Offenbach. Retrieved May 4, 2022, from <https://www.diakonie-frankfurt-offenbach.de/wp-content/uploads/2020/07/WESER5-Taetigkeitsbericht-2019.pdf>
- WESER 5. (2021). *Tätigkeitsbericht 2020*. Diakonisches Werk für Frankfurt und Offenbach. Retrieved May 4, 2022, from https://www.diakonie-frankfurt-offenbach.de/wp-content/uploads/2021/06/Taetigkeitsbericht_WESER5-2020.pdf

Open Access This chapter is licensed under the terms of the Creative Commons Attribution 4.0 International License (<http://creativecommons.org/licenses/by/4.0/>), which permits use, sharing, adaptation, distribution and reproduction in any medium or format, as long as you give appropriate credit to the original author(s) and the source, provide a link to the Creative Commons license and indicate if changes were made.

The images or other third party material in this chapter are included in the chapter's Creative Commons license, unless indicated otherwise in a credit line to the material. If material is not included in the chapter's Creative Commons license and your intended use is not permitted by statutory regulation or exceeds the permitted use, you will need to obtain permission directly from the copyright holder.

