



## AD HOC QUERY ON 2021.45 Seasonal requests for an on-site services

## Requested by EMN NCP Latvia on 12 July 2021

## Responses from Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Hungary, Ireland, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Slovakia, Slovenia, Spain, Sweden (22 in Total)

## Disclaimer:

The following responses have been provided primarily for the purpose of information exchange among EMN NCPs in the framework of the EMN. The contributing EMN NCPs have provided, to the best of their knowledge, information that is up-to-date, objective and reliable. Note, however, that the information provided does not necessarily represent the official policy of an EMN NCPs' Member State.

## 1. Background information

The Latvian migration authority - Office of Citizenship and Migration Affairs, which issues residence permits and personal identification documents to third-country nationals, faces a significant increase in seasonal requests for an on-site services. In order to improve the availability of on-site services for third-country nationals, please answer the questions down below. We would be very pleased, if you have an opportunity to submit your response by July 30.

# 2. Questions

**1.** Have your national migration authorities experienced an increase in seasonal demand for on-site services? *Available choices: Yes, No* 

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## 2. If so, how is the provision of on-site services ensured in the event of increased demand?

We would very much appreciate your responses by **25 August 2021**.

## 3. Responses

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		Wider Dissemination 2	
=	EMN NCP Austria	No	This EMN NCP has provided a response to the requesting EMN NCP. However, they have requested that it is not disseminated further.
	EMN NCP Belgium	Yes	<ol> <li>No The (Belgian) Immigration Office itself doesn't issue residence permits, identification documents or visa, but sends instructions to municipalities or diplomatic posts to do so.</li> <li>Not applicable</li> </ol>

<sup>&</sup>lt;sup>1</sup> If possible at time of making the request, the Requesting EMN NCP should add their response(s) to the query. Otherwise, this should be done at the time of making the compilation. <sup>2</sup> A default "Yes" is given for your response to be circulated further (e.g. to other EMN NCPs and their national network members). A "No" should be added here if you do not wish your response to be disseminated beyond other EMN NCPs. In case of "No" and wider dissemination beyond other EMN NCPs, then for the Compilation for Wider Dissemination the response should be removed and the following statement should be added in the relevant response box: "This EMN NCP has provided a response to the requesting EMN NCP. However, they have requested that it is not disseminated further."

-	EMN NCP Bulgaria	Yes	<ol> <li>Yes</li> <li>The construction of a system to book a visit for submitting documents is forthcoming.</li> </ol>
Η	EMN NCP Croatia	Yes	<ol> <li>Yes</li> <li>There has been the continuous increase in the number of applications for work permits since 2017, but seasonal peaks occur during summer and autumn for seasonal employment (tourism and agriculture). In accordance with safety measures in order to prevent spread of COVID-19, applications are handed mainly electronically, which reduces need for in-person meetings (TCN must announce their visit to Police Administration or Police Station by phone or mail).</li> <li>To alleviate seasonal increases, additional staff are hired in certain Police Administrations or Police Stations and there are organizational measures (intra-institutional transfers of public servants, the allocation of requests to Police Stations with less work-load).</li> </ol>
v	EMN NCP Cyprus	Yes	1. No 2. N/A
	EMN NCP Czech Republic	Yes	<ol> <li>Yes</li> <li>Yes, as an example can be mentioned "students ' visa" when there is twice a year a high increase of students coming to our offices.</li> </ol>

			However, we do not have any official strategy in place but our personnel take this in consideration while planning duty rosters for these periods.
	EMN NCP Estonia	Yes	<ol> <li>Yes</li> <li>Firstly, the on-site services for migration related permits need to be pre-booked. When setting up the calendar dates and times for services, the seasonal demand is taken into account. Secondly, the Police and Border Guard Board has also developed several online services and direct people to use them (e.g. nearly 80% of short-term work registrations are done via the online services). In this way, the resources are managed better.</li> </ol>
+	EMN NCP Finland	Yes	<ol> <li>Yes</li> <li>A notable seasonal trend is the increase in student residence permit applications in spring/summer. This, however, does not affect the customer service greatly, as it is an anticipated trend.</li> <li>Last summer the Finnish Immigration Service piloted a designated booking system for students (with seasonal fluctuation in mind) at the Immigration Service customer service points and a similar system has been in place for Brexit-applications.</li> <li>Main reasons for backlogs are due to resources, length of recruitment processes of new staff, or logistical changes such as moving the service point to a new address.</li> <li>Another main cause for seasonal statistical spikes is applicants submitting residence permit applications just before holiday season. Applicants often realize just before travelling to their country of origin for holidays that their application is about to expire, which results in higher numbers of applications. Therefore, seasonal increases in applications can be usually seen in springtime before summer holidays and November-December before</li> </ol>

		Christmas. For instance, July 2021 was relatively slow compared to previous years. COVID-19 made it more difficult for people to travel abroad both ways. To alleviate seasonal increases in the summer, the Finnish Immigration Service hires summer employees to substitute regular staff who are often on their annual leave during the summer period. Furthermore, digital application services are constantly being developed, as is communication about these services as well as work shift management and short-term projects aimed at boosting the processing of specific application categories. In Autumn 2020 the Immigration Service extended service point opening hours by keeping the customer service open on five Saturdays in autumn 2020 and four Saturdays in Spring 2021 (otherwise open mon-fri). During this year, customer service points have also piloted shorter service appointments for certain application categories (to free up time for more time-consuming cases) and starting from autumn 2021 the service points will have assistants helping out applicants with filling out applications. Appointment booking system is under further development. Due to some backlogs caused by COVID-19, some staff have been reassigned to receiving applications at the service points. This, however, has been a temporary measure, since customer service duties require its own training. In terms of online services, a big success has been the new policy on extended permits, where the applicant does no longer need to visit a customer service points. The new policy has been advertised widely. Of course, not all extended permits can be applied online-only; based on a pre-screening risk analysis, some applicants are still required to visit the customer service point in person with originals of all attachments.
 EMN NCP France	Yes	1. Yes 2. in France we mainly register an increase in the number of student applications at the start of the university year (Sept/Oct). Until 2019 specific measures were implemented to address this seasonal demand with dedicated reception

			<ul> <li>offices in the Prefecture or in the universities. Since 2020 all applications are filed online which provides an easier access with no risk of overcrowding.</li> <li>More generally several measures help in reducing the impact of seasonal demand.</li> <li>The current development of online services for first and renewal residence permit applications for several types of residence permits in order to avoid overcrowded prefectures. Thus the TCN will only visit once the Prefecture to collect their residence permit.</li> <li>The issuance of multi-year residence permits to avoid annual visits to the Prefectures</li> </ul>
	EMN NCP Germany	Yes	<ol> <li>Yes</li> <li>In Germany an increase of seasonal demand concerns first of all students. An increase in applications from students from third countries for a residence permit to be issued to the local immigration authority before the start of the semester is countered by issuing the national visa for entry for a longer than the usual period of 90 days. The longer period of validity of the visa extends the period in which the students can apply for the residence permit following the visa at the local immigration authorities, which should lead to a more favorable temporal distribution of the applications. In addition, the responsible authorities counter a seasonally increased workload according to their local conditions and possibilities with organizational measures, e.g. via the allocation of (additional) preliminary consultation appointments.</li> </ol>
=	EMN NCP Hungary	Yes	<ol> <li>2. As a general rule, pursuant to the applicable Hungarian legislation on aliens policing, in aliens policing procedures initiated by submitting an application, a person entitled to submit an application may do so in person, with the aliens policing authority competent to make a decision on the application. The third-country national</li> </ol>

			may also submit the application electronically after registration on the online platform for initiation of aliens policing cases (except for applications at diplomatic missions and applications for granting a residence permit submitted in Hungary, where electronic submission of applications is not possible). In the latter case, the third- country national's facial image and fingerprints must be recorded no later than 15 days after sending out a confirmation on receiving his/her application, on the occasion when (s)he appears before the authority.
	EMN NCP Ireland	Yes	<ol> <li>Yes</li> <li>Main source of seasonal demand is the Language, further and higher Education start of term times. Third country nationals in Ireland are required to register their immigration permission if they are in Ireland for longer than 90 days. They must register with the Department of Justice Immigration Service Delivery (for Dublin residents) or Garda National Immigration Bureau (GNIB) (rest of country) within 90 days of arrival. The Registration public office has extended opening hours. This answer relates to the Dublin Registration Office. Renewals of registrations are conducted online in the Dublin area. Over 85000 online renewals have been completed since the online renewal system was introduced on 20 July 2020. Negating the necessity of people attending the registrations in the Dublin area, applicants make appointments for an onsite appointment using an online system.</li> <li>Seasonal peaks in demand traditionally put pressure on the registration office. However, the introduction of the online renewal system eased the demand substantially for public facing appointments. Seasonally, Colleges, Universities and education providers along with other outside agencies are contacted in regard to estimating numbers. The registration demand could then be estimated and resources utilised accordingly</li> </ol>
=	EMN NCP Latvia	Yes	1. Yes

			2. Office of Citizneship and Migration Affairs is currently looking for a feasible solution.
	EMN NCP Lithuania	Yes	<ol> <li>Yes</li> <li>The primary mechanism for dealing with temporary increased demand is to use the institution's internal resources.</li> <li>Article 21 of the Law on Public Service allows for temporary intra-institutional transfers of public servants to perform other duties when necessary. Their consent is required, except in cases of war, state of emergency, extreme events, or extreme situations.</li> <li>In some cases, while the time for reviewing applications is fixed, the provision of services may be queued. If it is not possible to meet increased demand by redistributing internal resources or queuing the provision of services, funding for new fixed-term or permanent positions is sought.</li> </ol>
=	EMN NCP Luxembourg	Yes	1. No 2. N/A.
	EMN NCP Malta	Yes	1. No 2. N/A

EMN NCP Netherlands	Yes	<ol> <li>Yes Yes. Outside of the COVID-19 pandemic, the Desks and Expat Centres of the Immigration and Naturalisation Service (Immigratie- en Naturalisatiedienst – IND) usually experience an increase in demand during the summer months (July, August, September). This is connected to the start of the new academic year. Many international students arrive to the Netherlands at the same time during this period, and need to pick up their residence permits at the IND Desks. It should be noted however that residence permit applications are largely handled while the third-country national is still abroad, in the so-called mvv-procedure. This means that a surge in demand at IND Desks has little effect on whether applications are processed within the legal time period. In addition, it should be noted that IND Desks only handle regular residence permit applications, as asylum applications are submitted at so-called Application Centres.</li> <li>Together with educational institutions, the IND organises pick-up moments at these institutions, to prevent disruption of other services at the IND Desks. In the past year, the IND furthermore gained experience with increasing the capacity by:         - increasing opening hours (on weekdays and on Saturday)         - expanding to additional locations         - sending non-sensitive residence permits by courier         - enable applicants to submit their application in writing or digitally, instead of in person.[1] [1] Information provided by the IND on 29 July 2021.</li> </ol>
EMN NCP Poland	Yes	<ol> <li>Yes</li> <li>Poland has been dealing with a continuous increase in the number of applications for residence permits since 2014. The pandemic period did not slow down this trend. Despite the workload aimed at streamlining the process of issuing residence permits (increasing employment and infrastructure, reorganization of permit issuing points, legislative measures), we still have a problem with the prolonged waiting period for permits and an increase in the number of pending cases. This phenomenon in Poland is definitely permanent, not seasonal. Taking into</li> </ol>

			account the growing migratory pressure, the development of a mechanism to deal with this challenge is still ahead of us and at the moment we are not a source of good practices in this regard.
	EMN NCP Slovakia	Yes	<ol> <li>Yes</li> <li>At the moment the Slovak Republic registers an increase of interest for reservation of appointments at the Foreign Police Departments. The provision of services is secured in a way that an electronic booking system which enables to process a maximum set number of applicants per day is in place.</li> </ol>
ľ	EMN NCP Slovenia	Yes	<ol> <li>Yes</li> <li>Administrative units implemented safety measures in order to prevent spread of COVID-19. In accordance with implemented measures, each person has to announce its visit beforehand by phone or email. Due to safety measures, the number of daily on-site visits was consequently reduced.</li> </ol>
ŝ	EMN NCP Spain	Yes	<ol> <li>Yes         After the distortion caused by the pandemic during 2020, a general increase in requests is being observed that is higher than that which occurred before the start of the pandemic, both in online and in-person requests. However, the constant changes that are being implemented in the applications facilitating online presentation together with the restrictions on mobility and the limitation of capacity in the administrative offices have substantially increased the online presentation of those applications that were previously normally presented in person.     </li> <li>Since the beginning of the pandemic, work has been carried out on several ways aiming to improve the usability of existing applications for the public and the implementation of new system s that facilitate electronic presentation in those cases that was not possible until now.</li> </ol>

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			We are working on the prevention of errors, with a greater use of data in the processing of requests that allows us to automate and personalize processes in order to reduce the administrative burden and improve response times. This also includes improvements to the information offered online.
=	EMN NCP Sweden	Yes	<ol> <li>Yes</li> <li>In Sweden, seasonal peaks occur mainly as regards applications for residence permits for study purposes and, to some degree, permits for work reasons, such as seasonal employment. These seasonal peaks normally follow similar patterns each year in terms of when they occur, which means that the Swedish Migration Agency can anticipate them and mobilise the necessary resources and staff accordingly. In addition, many applications are handed in electronically, which reduces paper work and the need for in-person meetings between Agency staff and applicants.</li> </ol>

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