

Chapter 11

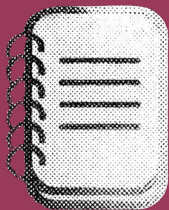
Towards the more effective use of irregular migration data

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Towards the more effective use of irregular migration data



Key points

- Irregular migration data is used to inform decisions across sectors—from service planning and public debate to policy design—but remains poorly aligned with the needs of those expected to use it. This chapter examines how different stakeholders rely on the data, and where gaps emerge.
- We introduce the data pathway to show how data on irregular migration are defined, collected, shared, and interpreted. At each stage, competing mandates, vague concepts, and inconsistent practices risk undermining coherence and usability.
- Five core challenges, such as gaps in availability, ambiguous definitions and low data literacy, limit the value of the data. Legal and institutional barriers, particularly a lack of knowledge about the implication of the GDPR, further constrain responsible sharing and can erode trust.
- Improving data use requires more than technical or methodological improvements. It calls for clearer definitions, accessible documentation, stronger privacy protections, and sustained investment in the capacity of those who collect and use the data.

How is data on irregular migration used by stakeholders?

As more data on irregular migration becomes available across different policy areas, there is a growing interest in stakeholders' data needs and use. Far from being a neutral resource, such data shapes decisions, drives public narratives, and influences outcomes across a wide range of domains, including:

- **Decision-making:** Helping policymakers weigh trade-offs and design effective responses.
- **Strategic and operational planning:** Enabling authorities and civil society to anticipate service needs and better predict migration flows
- **Identifying needs and policy gaps:** Informing policy agendas by highlighting the needs of irregular migrants.

- **Good governance and policy learning:** Enabling policy evaluation, accountability, and transparency.
- **Policy outcomes:** Shaping both individual lives and broader systems through resource allocation and programme design.
- **Fostering dialogue and innovation:** Informing public debate and driving new approaches.
- **Research:** Serving as the basis for analysis, theory testing, and evidence-building.

This chapter examines the main challenges surrounding the collection, interpretation, and use of irregular migration data. It also highlights promising practices and emerging solutions aimed at improving data use and supporting more informed policy responses.

How data on irregular migrants and migration are shaped along the data pathway

A variety of stakeholders—each with their own objectives and priorities—shape data along the ‘data pathway’. Before data can be collected, key concepts such as ‘irregular migration’ must be defined, after which the data collectors decide how to measure this quantitatively. Data are then collected, shared, accessed, interpreted, and disseminated (see Figure 11.1). Notably, this data pathway is not always a linear process; steps may be skipped or repeated.

Throughout this process, barriers can emerge that

stand in the way of the effective collection and use of irregular migration data. Obstacles that arise earlier on, for example unclear or inconsistent definitions of irregular migration or issues related to data sharing and access, create problems down the line for actors using the data.

Irregular migration data is shaped by the mandates, interests, and priorities of the varying stakeholders at each step along the data pathway.

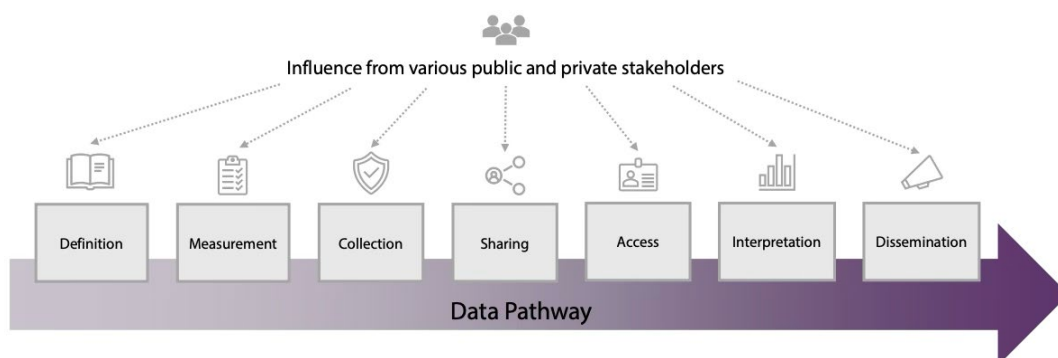


Figure 11.1: The data pathway

There are five challenges that limit the effective use of irregular migration data.

Challenge 1: Gaps in data availability

Selective and incomplete data are one of the main challenges for stakeholders seeking to use information on irregular migration. While data are predominantly available on rejected asylum claims and irregular border crossings, it lacks on other routes into irregularity (e.g., visa overstaying and being born into irregularity), secondary movements, sociodemographic characteristics, and longitudinal trends.

This is caused by:

1. A mismatch in priorities between those who collect data and those who use it. Most data on irregular migration are gathered as a byproduct of operational activities (e.g., border controls), and not to improve the broader evidence-base.
2. Practical obstacles, including irregular migrants underreporting crimes and abuse due to fear of deportation, and service providers or NGOs not registering migration status to prevent data-abuse and a chilling effect on migrants with irregular status seeking support.

Challenge 2: Data quality – ambiguous definitions and limited transparency

Even when data exists, its use is often hampered by unclear definitions and limited documentation, making it difficult to interpret or compare effectively.

- **Inconsistent definitions:** There is no universally accepted definition of irregular migration, and related terms like “undocumented” or “overstayer” are used inconsistently across contexts, reducing comparability and clarity.
- **Lack of transparency:** Critical details about how data is collected, what it measures, or how it should be interpreted are often missing or buried in annexes, preventing data users to assess quality or limitations. Inconsistent methods, outdated figures, and missing contextual details can further reduce the significance of existing datasets.

Challenge 3: Lack of data literacy

Even when data is available, it is not always used effectively. Limited data literacy among policymakers and a lack of shared language with data producers can lead to misinterpretation or mistrust. As a result, relevant data may be ignored or dismissed, reducing its potential to inform sound decision-making.

Challenge 4: Limited access – legal, technical and institutional barriers

Access to irregular migration data is often hindered by unclear legal regulations, leading some stakeholders to over- and misinterpret the guidelines set out in frameworks such as the EU General Data Protection Regulation (GDPR).

Box 11.1: GDPR and the limits of data access

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Legal uncertainty surrounding the GDPR – the main legal framework governing the collection, use, and protection of personal data in the EU – often creates barriers to the sharing and use of irregular migration data. While the GDPR is essential for safeguarding individuals’ rights, it is not always clear how its provisions apply in specific contexts. In the absence of legal clarity, many authorities and organisations adopt a precautionary approach, limiting or avoiding data sharing altogether to reduce the perceived risk of noncompliance.

At the same time, insufficient adherence to data protection principles can result in rights violations. For instance, research by the EU Agency for Fundamental Rights has found that personal data collected during labour inspections are frequently shared with immigration enforcement authorities, despite GDPR requirements that such data should be used transparently and only for clearly defined purposes. This contravenes the principle of purpose limitation, which

prohibits the use of personal data for objectives beyond those originally specified. When these boundaries are not respected, it can erode trust, deter migrants from seeking protection or services, and ultimately undermine the effectiveness of policies intended to protect vulnerable individuals.

The example of the GDPR underscores the need for clear, practical guidance on lawful data sharing, robust privacy protections, and frameworks that both facilitate responsible data use and uphold fundamental rights.

Technical barriers, such as limited interoperability between databases, and practical constraints including limited resources, staffing, and weak institutional ties between users and producers can further complicate access. In many cases, data sharing is ad-hoc and driven more by trusted relationships and political will than by established protocols or transparent collaboration.

Challenge 5: Data non-use and underuse

Even if accessible, data isn't always used to inform policymaking due to:

- **Limited awareness:** Data users, especially at local levels, may be unaware of existing data sources.
- **Perceived irrelevance:** Data may be seen as too outdated, too aggregated, and overall, not optimised for the specific needs of potential users.

- **Lack of trust:** Concerns about reliability, political influence, selective reporting, and opaque methodologies can fuel mistrust and lead to the dismissal of available data.
- **Concerns about impact and control:** Data producers may limit dissemination out of concern that information could be misused, misinterpreted, or worsen migrants' vulnerability, especially in sensitive political contexts. Without clear safeguards or control over secondary use, valuable data may remain unpublished or overlooked.

These five challenges, ranging from availability and access to trust and interpretation, can create significant barriers to the meaningful use of irregular migration data. Addressing them is essential for promoting evidence-informed policies that are more inclusive, effective, and transparent.



How to improve irregular migration data practices?

Addressing the challenges that hinder the use of irregular migration data requires targeted efforts to improve its quality, accessibility, and usability. These improvements are essential for supporting informed decisions and designing effective, targeted interventions. Several practices can be recommended:

- Harmonising definitions and measurement methodologies is crucial to enhance data compatibility across countries and systems. While multiple definitions of irregular migration will continue to serve different policy purposes, it is vital to clarify which definitions are used and why.
- Providing accessible and user-friendly data documentation can help prevent misinterpretation. Clear manuals should accompany datasets, outlining the definition of irregular migration applied, whether figures represent precise counts or estimates, potential limitations, and data quality concerns.
- Investing in capacity-building for key stakeholders involved in data collection and use is a vital step to address skill and expertise gaps. High-quality training materials, communities of practice facilitated by organisations dedicated to irregular migration can enhance data literacy. Pooled resources from Member States, research organisations and non-governmental organisations, alongside dedicated funding can encourage evidence-based policymaking.
- Strengthening data privacy safeguards is critical when enhancing data base interoperability. Linking data sources offers the potential for more comprehensive, real-time exchange of data, and responsive policy actions. However, this must be balanced with privacy protections under regulations, ensuring purpose limitation and protecting migrant rights.
- Scaling up local initiatives that can fill gaps on the profiles and circumstances of irregular migrants is essential. Local and municipal efforts offer pragmatic, frontline insights that can be expanded into national or EU-level programmes. National governments could, in turn, play a key role in creating standardized frameworks for data collection and sharing, ensuring consistency across different projects and regions.

Box 11.2: Spain's padrón system*Adèle Appriou, Jasmijn Slootjes and Ravenna Sohst*

Spain's *padrón municipal de habitantes* (municipal register of inhabitants) is a notable example of how local registration systems can support the inclusion of irregular migrants while generating valuable data for public planning and service provision.

All residents, regardless of their status, are required to register with the *padrón*, which grants them access to municipal services such as education, health care, libraries, and language courses. The main advantage for irregular migrants registering in the *padrón* system is the possibility of obtaining *arraigo social* (legal residence) if they provide proof that they have lived in Spain for at least three years.

Registration requires minimal documentation—typically an ID and proof of address—which many municipalities apply flexibly to reduce barriers for irregular migrants. For instance, Barcelona actively encourages registration even for those without a fixed address, with city officials conducting field visits to verify the residence of individuals unable to provide formal proof. Another key feature of this public formation is its separation from other policy functions (e.g., immigration enforcement), which, along with outreach by civil society actors, helps build trust and encourage participation. This initiative enables the country to gather valuable information about all residents, including their age, country of origin, nationality, gender, and family or marital status.

While the *padrón* fosters inclusion, challenges remain. Registration requirements and practices vary between municipalities, with some cities facilitating registration for irregular migrants more actively than others. Issues around data accuracy—such as residents failing to de-register when they move—have also been noted. Nevertheless, Spain's *padrón* offers valuable lessons on how local initiatives can improve data collection and service access for irregular migrants.

Conclusion

While data on irregular migration has the potential to drive more effective, transparent, and responsive policymaking, this potential remains limited by persistent gaps and structural barriers. Enhancing

the quality, accessibility, and responsible use of data is not only feasible, but necessary for fair and informed migration governance.



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