

PAPER prepared for the EUSA-conference, Montréal, 17-19 May 2007
Work in progress - contact first author for latest version before citation

The end of national models? Integration courses and citizenship trajectories in Europe.

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Abstract Several European countries have recently introduced or are planning to introduce citizenship trajectories (voluntary or obligatory inclusion programs for recent immigrants) or citizen integration tests (tests one should pass to be able and acquire permanent residence or state citizenship). Authors like Joppke claim this is an articulation of a more general shift towards the logic of assimilation (and away from a multicultural agenda) in integration policy paradigms of European States. Integration policies would even be converging in such a fashion that it would no longer make sense to think in terms of national models for immigrant integration. One cannot deny the empirical fact of diffusion of civic integration policies throughout Europe. This paper claims there is, however, still sufficient distinctiveness between immigrant integration policies in order to continue and use an analytical framework which distinguishes national models.

Introduction

Mid 1990s the Netherlands introduced citizenship trajectories for (non-EU) immigrant newcomers. New immigrants were obliged to take language lessons and a number of introductory courses on the institutions and practices of the receiving society. These courses were paid for by the state. People who refuse to take part in these programs risked penalties. Ten years onwards the Dutch citizenship trajectory scheme has toughened to a considerable degree. The program is now even meant to function as a filter for new immigration. Family formation is only possible if the incoming partner first passes a citizenship exam (including a Dutch language test) in the country of origin. Furthermore, candidate migrants have to pay for all the costs themselves. The Dutch integration program, demanding a considerable amount of acculturation, is currently the strictest one in all of Europe. The Netherlands, known and praised in the 1980s and 1990s for its multicultural model, thus seem to have shifted to a more assimilationist position (Entzinger & Fermin, 2007).

Since the Dutch have toughened their civic integration program, several European nation-states and regions have followed suit. Belgian neighbouring region Flanders basically copy pasted the original Dutch citizenship trajectories (*inburgeringstrajecten*) at the start of the new millennium. When Germany introduced *Integrationskurse*, the Dutch program (partly) served as a model. Since the end of the 1990s, integration courses and citizenship trajectories seem to be popping up all over Europe. France launched *Contrats d'accueil et de l'intégration* and Austria introduced *Integrationsvereinbarungen*, contracts which have become a necessary intermediary step towards entitlement to a long term residence permit. The UK introduced a citizenship test (a test of language and a test of knowledge about life in the UK) in order to qualify for British citizenship. Estonia insists that its sizeable Russophone minority first must pass an Estonian language and citizenship test before being entitled to

Estonian nationality. Poland, Hungary and Spain are contemplating special integration programs for newcomers. Non-EU member Switzerland is also debating the introduction of *contrats d'intégration* involving obligatory language courses and civic courses in its cantons. It would be incorrect, however, to think that it was merely the new Dutch model that triggered this wave of integration programs. Scandinavian countries Denmark, Sweden and Finland have programs which origins predate the Dutch experience.

The rapid diffusion of the idea and practice of integration courses, citizenship trajectories and citizenship tests across Europe provides mounting proof of a convergence in immigrant integration policies, so it seems. In a well written and witty article Joppke (2007) daims the diffusion of civic integration courses and tests for newcomers attests to a convergent trend in immigrant integration policies. This convergence would make traditional national model assumptions obsolete: "The notion of national models no longer makes sense, if it ever did" (Joppke 2007: 2). We propose to not throw out the baby with the bath water. Contrary to Joppke we think that national models, as those proposed by Koopmans *et al.* (2005), still make sense, albeit that traditional classifications might have to be re-examined. There is indeed some noteworthy convergence in policy towards newcomers, but there is still sufficient divergence in policies towards immigrant ethnic minorities (and related dominant political discourses) across nation-states to continue analytically distinguishing national integration models.

Citizenship trajectories and citizenship tests in Europe

No less than nine EU-countries have in recent years introduced integration courses, citizenship tests and/or citizenship trajectories as instruments in their civic integration policies for immigrants. Interestingly, EU nation states are adopting similar integration programs without this involving strictly guided coordination from the European Union level. There is no European directive on integration policy forcing member states to go in a particular direction. Since November 2004 there is, however, a European Council agreement on "common basic principles" of immigrant integration policy. These common basic principles are formulated in a rather general way and do not push member states in a clear manner to particular immigrant integration programs. One of the principles hints at the possible introduction of 'integration courses' and citizenship trajectories:

"Basic knowledge of the host society's language, history, and institutions is indispensable to integration; enabling immigrants to acquire this basic knowledge is essential to successful integration"¹

When there has been diffusion of 'best practices' in the field of immigrant integration programs within the EU this has happened organically and not because of clear-cut joint decision making, not even through the so-called '*open method of coordination*' (Caviedes, 2004). Currently quite a number of EU member states seem to believe that integration courses are good practices. Instead of wanting to reinvent the wheel, they increasingly look at what is happening across their borders. Instruments as the 'Handbook on integration for policy-makers and practitioners' (Niessen & Schibel, 2004) facilitate cross-national comparison. On this matter we can read the following in a report by the French Parliament:

« Tous les pays d'immigration sont confrontés, peu ou prou, aux mêmes difficultés. Pourquoi ne pas s'inspirer des bonnes idées, des bonnes pratiques de nos voisins – ils en ont souvent – et de ce qui marche chez eux ? Pourquoi ne pas profiter de leur expérience, et même de leurs échecs éventuels, pour éviter les « fausses bonnes idées » ? Chaque pays a ses traditions et son modèle en matière d'intégration, et il ne s'agit pas de reproduire mécaniquement ou de « singer » ce qui fonctionne ailleurs, dans un contexte différent » (Délégation de l'Assemblée Nationale, 2006 : 12).

Let us shortly present each of the programs for immigrant integration of third country nationals in these countries. We did not include in our overview Estonia, which also has a citizenship test, because the Baltic state is a particular case (in light of the large number of stateless *Russophones* who in our opinion cannot really be considered to be immigrant TCNs).

The Netherlands

In 1998 the Netherlands introduced the *Wet inburgering nieuwkomers (WIN)*, a scheme of so-called citizenship trajectories (Entzinger & Fermin, 2007). Newly arriving adult non-EU immigrants were obliged to take 600 hours of language courses and courses on 'societal orientation'. These courses were financed by the central government and the municipalities. If a newcomer did not participate, the person was sanctioned. The aim was to assure rapid independence of newcomers.

As a result of a new bill, the *Wet Inburgering (WI)*, prepared by the centre-right government Balkenende-II since 2003, the citizenship scheme has been substantially altered from January 2007 onwards². Obligation to participate was modified into an obligation to pass end tests. Those failing to pass the test after three and a half years (maximum five years for asylum seekers) are sanctioned and will not be entitled to a permanent residence title. Having passed a (more difficult) language test and a test on Dutch society has equally become a prerequisite for naturalisation. Furthermore, the scheme was broadened to include not only newcomers but equally established immigrants groups not holding Dutch citizenship (and enjoying state benefits). At first, the hard-line right-liberal Minister of Justice and Integration Rita Verdonk – nicknamed *Iron Rita* – wanted to oblige all non-EU origin immigrants, even those holding Dutch nationality, to pass the citizenship test. Due to its unconstitutional nature, this aspect of the new bill had to be abandoned by Verdonk. However, unlike in the old WIN-program, people under the new WI-program now have to pay for the courses and tests themselves – albeit that some municipalities will pay the fees for applicants.

There was also a new citizenship test introduced for people wanting to come to the Netherlands (for instance in the framework of family formation or family reunification) and who need a residence permit. This new regulation, introduced by the *Wet Inburgering Buitenland*, is in effect since mid March 2006. EU-nationals, holders of a working permit, temporary students and nationals of a number of non-EU countries (US, Canada, Australia, New-Zeeland, Norway, Switzerland, etc.) are exempt of doing the test. Prospective immigrants first have to pass an automated citizenship test (costing 350€) at the Dutch embassy in the country of origin before being (potentially) allowed to move to the Netherlands. A basic knowledge of Dutch is a condition to be granted a residence permit. Candidates can prepare for the test after having acquired course material (63,90€) through Dutch bookstores (via the internet). In the video material footage on gay marriage (and topless women sunbathing

at the beach) is shown in order to communicate the message that the Netherlands is a liberal society.

Flanders (Belgium)

Since the end of the 1990s the Flemish have been preparing and experimenting with so-called citizenship trajectories (*inburgeringstrajecten*) in which lessons on the Dutch language and lessons of introduction to Flemish/Belgian society are to be taken by certain categories of immigrant newcomers. The aim of the Flemish Decree on Civic Inclusion (*Inburgering*) is to actively promote a certain degree of language and cultural assimilation. This scheme, once again copied from the Netherlands, has become compulsory for (most) non-EU newcomers in Flanders from April 2004 onwards and optional in Brussels.

Following a modification of the original Decree in 2006, from January 2007 onwards established non-EU origin immigrants, including Belgian state citizens born outside of Belgium, have equally become target groups. For those groups who are obliged to attend citizenship courses (i.e. most non-EU newcomers and refugees) non-compliance can lead to fines ranging from 50 to 5000 €. There is, for the moment, only an obligation to participate to citizenship trajectories, not to achieve a certain knowledge level, but the new Flemish Decree does foresee that at one point in time there will be actual tests introduced. There are no consequences attached to non-compliance on the level of entitlement to residence permits or nationality acquisition, which are federal Belgian prerogatives. Access to social housing (a Flemish policy level prerogative) will, following a Flemish Decree voted in 2006, at some point in the future be limited to individuals sufficiently mastering the Dutch language or participating to a citizenship trajectory scheme. The Flemish preoccupation with mastery of the Dutch language has to be understood in light of the on-going linguistic struggle in federal Belgium between the Flemish and the Francophones.

The Flemish Government does not see a contradiction in combining a (more multicultural) targeted ethnic minorities policy with a (more assimilationist) programme for citizenship trajectories, although it has been gradually shifting the emphasis towards the idea of individual responsibility of immigrants. Albeit that this point is debatable, Flanders keeps nevertheless insisting that its civic integration policy is not aimed at "assimilation":

"We want to achieve social cohesion in which everyone's particularity and cultural identity can prosper, but in which the current values, norms and rules of our democratic state and the rule of law, remain the corner stone of Flemish society. The Flemish Government judges it to be important that *allochtonous* Flemings do not give up their cultural and religious values, but rather integrate these as added values to Flemish society. Respect of diversity is one of the fundamental values of Flemish society: just like the equality of all humans, the separation of church and state and the freedom of expression" (Flemish Government, 2004: 5).

Germany

Since 2005 a new "*Zuwanderungsgesetz*" is in place in Germany (Michalkowski 2004; Carrera 2006; Joppke 2007). Newcomers can take 300 (up to 600) hours of German language classes and 30 hours of lessons on German society (culture, history, constitution, legal system and political institutions). Entitlement to a temporary residence permit depends on participating to the integration program, while permanent residence requires passing an exam. The program is

obligatory for everyone not showing a minimal mastery of German and/or enjoying social benefits. Failure to attend can lead to a fine or a cut in social benefits of 10%. Non compliance could lead to a non-renewal of a short term residence permit or refusal of a long term residence permit (but there are a lot of exceptions foreseen). In the (near) future attendance of integration courses and passing of a language test will become a prerequisite for naturalisation. There are also plans to make a minimal knowledge of German a condition for family reunification.

Austria

Austria introduced integration contracts (*Integrationsvereinbarungen*) in 2003 (Michalkowski 2004; ICMD 2005). The program is obligatory for non-EU newcomers who arrived in the country after 1998. High-skilled professionals staying for less than two years in Austria and people who can prove sufficient knowledge of German (in a test) are exempt from the program. The signing of an integration contract is a prerequisite for entitlement to a residence permit (or its renewal). The integration program consists of language and civic education courses and is relatively limited in length (75 hours). About half of the costs are to be paid by the immigrant (or his employer). Alternatively, instead of taking the integration courses, one can pass a language certificate test (*Sprachkenntnisnachweis*). Delays in participation can lead to a halt in unemployment benefits, a shorter duration of the renewed residence permit, a lower participation by the state in the costs for attending the program or financial fines. Failure to participate within three years leads to non-renewal of the residence permit and even threat of expulsion.

Denmark

Denmark has an integration programme since 1986 focussed on refugees (Liebig, 2007). In 1999 Denmark drastically modified its approach when introducing an *Integration Act* in which it is stipulated that in order to obtain a permanent residence permit, a newcomer – except when originating from a EU-member state or a Nordic country - is obliged to participate in an introduction programme, especially when depending on social benefits (Michalowski, 2004). Newcomers who wish to participate in a language course but are not part of the target groups, can ask for a financial contribution. From 2004 onwards, language courses are provided on three different levels, with modules of about 6 months (and 30 hours a week). The entire program is meant to be completed in a period of three years and can go up to 2000 hours of language education. At end of the entire education programme, the newcomers should pass a standardised exam. Active participation to the programme is an obligation for all target groups of the Integration Act. Starting July 2003, an adapted programme is compulsory for all asylum seekers. Non compliance leads to a reduction of social benefits (up to 30%), which are in fact granted under the form of an “integration allowance”⁴. Furthermore, completion of the introduction programme is a condition for receiving a permanent residence permit. Having passed a language test and a test on Danish culture and history is part of the requirements to obtain Danish citizenship since end 2005.

Because of the Danish opt-clause with regard to the Amsterdam Treaty, Denmark is not bound to implement the European directive on the right to family reunification nor the directive on the status of long-term third-country residents. As a result, Denmark has a requirement of 7 years of residence for obtaining a permanent residence permit. Furthermore, Denmark has imposed a

controversial age limit for marriages with third-country nationals at 24 years, while the European directive on the right to family reunification only allows an age limit of 21. Denmark also imposes a bank deposit (of about 7400 €) before family reunification is possible. Denmark has announced it will, as the Netherlands have done, introduce an integration test as a precondition for family reunification in the future.

Finland

Finland introduced its Act on the Integration of Immigrants and Reception of Asylum Seekers in 1999 (Michalowski 2004). On the website of the Ministry of Labour of Finland extensive information can be found in English on their integration program⁵. Newcomers are expected to learn Finnish (or Swedish) and acquire basic information on Finnish society. The individualised program has a duration of about 18 weeks and is part of a wider 'integration plan'. It is obligatory for unemployed newcomers or newcomers on other social benefits schemes, but not for non-EU newcomers in general. Non compliance can in some cases lead to a reduction of social benefits. In fact, for the first three years of their stay in Finland, immigrants do not have the right to an unemployment benefit, but they do have the right to receive an "integration allowance" in return for participation to the integration program. Ingrians – a Finnish speaking minority in Russia – have to prove knowledge of Finnish language, by passing a test, to make use of their right to migration to Finland.

Sweden

Sweden has a long tradition of organizing language courses for immigrants, dating back to the 1970s. Its current integration programme, offering both language courses as courses on Swedish society, is only compulsory for social benefit applicants. It is open to all types of immigrants, not only to newcomers and it paid for by the state. Municipalities are responsible for offering integration courses, which on average entail 525 hours of courses, although this can vary according to the individual situation of the immigrant. Foreigners receiving social benefits can see these being reduced or withdrawn upon failure to participate in language courses, vocational training or orientation courses.

France

In 1998 the socialist government launched the "*plate-forme d'accueil*", a program meant to help newcomers get an understanding about the different institutions of the French welfare state (Joppke, 2007). A voluntary session of half a day was foreseen to explain the functioning of a set of crucial institutions, followed by an individual interview to check whether they had further specific needs. If needed, the newcomers could have their language knowledge tested and be directed to information about language courses.

In 2002 a new centre-right government decided to create an alternative program of *Contrats d'accueil et de l'intégration*, in vogue in all of France since 2005. The program entails 200 to 500 hours of French language classes and six hours of lessons on the practical ins and outs of life in France (Délégation 2006). Newcomers are not obliged to participate, but entitlement to a residence permit does depend on sufficient mastery of French or inclusion in a program for integration. Since 2006, citizenship is granted after a special ceremony but there are no citizenship tests to be taken in order to become a French national.

Interestingly, in an overview report on integration programmes of the *Délégation de l'Assemblée Nationale pour l'Union Européenne* (2006) it is suggested that France should create a language test as a precondition for family reunification (as is the case in the Netherlands and has been announced in Denmark and Germany) and that it should formalize the criterion of knowledge of French for naturalization through a test.

The United Kingdom

In the UK, the *Nationality, Immigration & Asylum Act 2002* explicitly introduced a test to residents seeking British citizenship. Applicants should show “a sufficient knowledge of English, Welsh or Scottish Gaelic”⁶ and also “a sufficient knowledge about life in the United Kingdom”⁷ by passing a test (effectively implemented since 1 November 2005). Those immigrants seeking to settle in the UK (applying for an “indefinite leave to remain”) equally have to pass the test (effectively implemented since 2 April 2007). If one does not have sufficient knowledge of English, the applicant should attend English for Speakers of Other Languages (ESOL) and citizenship classes. Some categories can get free tuition, but in principle one has to pay for the classes, just like one has to pay for the test itself. In explanatory documents of the Home Office it is stressed the tests aim at “integration”, but without this meaning “complete assimilation” (Home Office, 2004: 14). In other words, there is still room for multiculturalism and in order to emphasize this point, reference is made to the particular position of the Welsh and Scottish in the UK:

“[...] So to be British does not mean assimilation into a common culture so that original identities are lost. Assimilation to such a degree has not, after all, happened for most people in Wales and Scotland, nor historically for Irish and Jewish immigrant communities, not for smaller communities as the Poles who once fled from persecution. There is no reason why loss of a distinctive identity within a wider British identity should occur to immigrants from the new Commonwealth or from elsewhere” (Home Office, 2004: 15).

Interestingly in this respect, questions asked during the citizenship test can vary according to the region (i.e. for instance Scotland with questions on the Scottish parliament). From a substantive point of view, other than respect for the general principles of the modern democratic state, no specific content is given to the idea of *Britishness*:

“To be British seems us to mean that we respect the laws, the elected parliamentary and democratic political structures, traditional values of mutual tolerance, respect for equal rights and mutual concern; and that we give our allegiance to the state (as commonly symbolised in the Crown) in return for its protection. To be British is to respect those over-arching specific institutions, values, beliefs and traditions that bind us all, the different nations and cultures together in peace and in a legal order.” (Home Office, 2004: 15).

Any democratic nation state will basically uphold these general principles linked to the rule of law. More typically – although not exclusive - British elements are the reference to the multinational character of the UK and the idea of allegiance to the Crown.

Table 1. Overview of characteristics of civic integration policies

	AU	DK	DE	FI	FL	FR	NL	SW	UK
Mandatory for (most) non-EU newcomers	YES	YES	YES	NO	YES	NO	YES	NO	NO
Language training	YES	YES	YES	YES	YES	YES	YES	YES	YES
Vocational training or orientation	NO	YES	NO	YES	YES	YES	YES	YES	NO
Civic orientation	YES	YES	YES	YES	YES	YES	YES	YES	YES
History and culture	NO	YES	YES	NO	NO	NO	YES	NO	(YES)
Courses are for free (or at minimal cost)	NO	YES	NO	(YES)	YES	YES	NO	YES	(NO)
Non compliance fined	YES	(NO)	NO	NO	YES	NO	(YES)	NO	NO
Non compliance impact on social benefits	NO	YES	YES	YES	(NO)	NO	YES	YES	NO
Renewal of short term residence permit depends on participation	YES	NO	(YES)	NO	NO	(YES)	YES	NO	NO
Long term residence permit depends on participation	YES	YES	YES	NO	NO	YES	YES	NO	YES
Test at the end of course	NO	YES	(NO)	NO	(NO)	NO	YES	NO	(YES)
Test for long term residence permit	NO	YES	YES	NO	NO	NO	YES	NO	YES
Test precondition for immigration	NO	(NO)	(NO)	NO	NO	NO	YES	NO	NO
Test for naturalization	NO	(YES)	(YES)	NO	NO	NO	YES	NO	YES

Explanatory note for table 1 AU=Austria, DK=Denmark, EE=Estonia, DE=Germany, FI=Finland, FL=Flanders, FR= France, NL=Netherlands, SW=Sweden, UK=United Kingdom. A response is put between brackets when the answer is not straightforward due to special provisions (or transitional measures).

Comparative assessment of integration programmes

Let us now look into the convergence and divergence of all the aforementioned civic integration policies which we briefly discussed. Table 1 gives an overview to what extent the different national policies share a number of characteristic traits. We want to discuss a number of convergent and divergent traits of these integration programmes⁸ by focussing on the following questions:

- (1) Is there a form of mandatory participation to integration courses for new non-EU migrants?
- (2) Do the integration courses entail language training (2a), vocational training or orientation (2b) and knowledge on history and culture (2c)?
- (3) Is participation to integration courses free (or not very costly)?
- (4) Is there a fine in case of non-compliance?
- (5) Is there a cut in social benefits in case of non-compliance?
- (6) Is entitlement to a residence permit conditional on participation to an integration course?
- (7) Is there a test at the end of the citizenship trajectory?
- (8) Is the passing of a citizenship or integration test a pre-condition for permanent residence status?
- (9) Is the passing of a test a prerequisite for naturalization?

An interesting first resemblance in all countries is that in official discourse it is always denied that the integration courses and citizenship tests are aimed at assimilation. But let us focus on the actual traits and not on the political rhetoric. Except for the UK, all countries offer integration courses to newcomers. These courses typically entail language lessons and some kind of civic introduction. In a number of countries vocational training and professional orientation are equally part of the program. While at first, most integration programmes were for free (or nearly free), a number have started asking a fee to participants. Last but not least, one of the most important points of divergence is the voluntary or obligatory nature of the schemes and the consequences of non-compliance.

Analytically a number of general goals of the integration programs can be distinguished which are combined in several ways in the different countries and are, hence, not necessarily overlapping. One aim of integration courses is to stimulate socio-economic inclusion and facilitate independence of immigrants. Language courses and vocational training are offered in order to enhance the chances of immigrants on the labour market and limit their dependence on social benefits. In most countries people who are dependent on state social benefits are explicitly targeted to make use of these inclusion programs and often there are sanctions foreseen in case of non compliance. This is not necessarily a typical trait of immigrant integration policy. In most cases it is an extension of workfare and activation logics which are more universally present in welfare state arrangements (and equally have an impact on national citizens). They are, however, given a clearer emphasis and visibility when newcomers are concerned. This goal is still the central emphasis of integration programs in Scandinavian countries Sweden and Finland and in the Belgian region of Flanders. They were equally the main focus point of the first citizenship trajectories of Denmark and the Netherlands, but these countries have moved on.

Some states, indeed, go one step further in not only linking participation to integration programs to the entitlement to social benefits, but to equally attach consequences on the level of residence permits. Denmark and especially the Netherlands have adopted the most radical position in this respect. They are

using the integration courses (and attached integration tests) as an additional means of immigration policy. The Netherlands use the citizenship test for newcomers as an outright and explicit selection criterion for non-EU newcomers, while the Danes have not hidden that their objective is to create obstacles for new immigrants. The position of the French, Germans and Austrians is less radical, but there is also a link established between participation to integration courses on the one hand and entitlement to (permanent) residence on the other hand. Joppke (2007) correctly points out that the obligatory and repressive dimension of civic integration here has to be understood as a response to the fact that immigration to Europe is basically of a non-selective nature (in contrast to the policies of the classic immigrant nations such as Canada, Australia and New Zealand). In the French, UK and Austrian cases the *raison d'être* of the link with residence entitlement is comparable to the link with social benefits: the aim is to discipline newcomers and diminish their dependency on the state welfare system. In the Danish, Dutch and German cases, however, there seems to be an additional goal of acculturation articulated in the content of the integration courses, when there is equally a stress put on knowledgeability of the history and culture of the receiving society.

A third general goal which can analytically be distinguished is the functionality of citizenship trajectories or citizenship tests as prerequisites for nationality acquisition. A certain degree of linguistic assimilation is formally demanded and tested in the UK (and might at one point be introduced in France). Linguistic assimilation *plus* acculturation is the goal in the Netherlands and seems to be the direction Denmark and Germany wish to follow in naturalisation procedures. In the Dutch and Danish cases there is an explicit assimilationist dimension. In the UK case it is officially denied the aim is assimilation, while Germany seems to find itself in an intermediate position.

Some of the aforementioned countries have only just recently launched their new integration programs and might well modify them the upcoming years after evaluation (and depending on partisan position taking of ruling political majorities). It is, hence, too early to try and pin them down in a clear cut typology. But there do seem to be a number of divergent tendencies in the underlying philosophies being articulated in the different integration schemes. There is, in our opinion, for instance quite a difference between an integration program 'just' being imposed in the light of a socio-economic activation philosophy (Sweden, Finland) or (also) aiming at other goals such as linguistic assimilation and acculturation as preconditions for residence rights and naturalization. Joppke claims that the shared feature of civic integration is "that liberal goals are pursued with illiberal means, making it an instance of repressive liberalism", which would be "gaining strength under contemporary globalisation" (Joppke, 2007: 1 & 2). That is certainly an interesting point but does it equally mean that all integration programs are basically the same? We think not. Furthermore, does the presence of integration courses in countries as the UK, the Netherlands and Sweden – in the past traditionally seen as multicultural countries – and in a country like France – the assimilation oriented state *par excellence* –, mean that national models are dead? Once again, our answer is negative.

The End of Multiculturalism ?

In the book *Toward Assimilation and Citizenship* editors Joppke and Morawska (2003) claim the rise of civic integration programs is an articulation of a more general shift towards the logic of assimilation and away from a multicultural agenda in integration policy paradigms of European states. One of us has

claimed in the past that the introduction of citizenship trajectories (and citizenship tests) is not necessarily to be interpreted as a radical step away from multicultural policies towards assimilation policies, referring to empirical evidence available on the introduction of such schemes in Flanders (Jacobs, 2004a). Accordingly, it was argued that the assertion made by Joppke and Morawska that there is an overall decline of official multiculturalism in Europe, and that the introduction of citizenship tests attests to this development, seems to be rather premature.

Jacobs in particular criticized Joppke's and Morawska's interpretation of policy changes in the Dutch case. It was argued that one should take into account that the Netherlands no longer have clear cut consecutive periods of political consensus concerning integration policy but, on the contrary, experience a continuous struggle between integration discourses of competing political factions (Jacobs, 2004b). In other words, integration policy has become much more incoherent and is no longer a clear reflection of one overarching policy paradigm, but much more the reflection of party political power relationships and ad hoc policy compromises. Change is more rapid because the salience of the topic of immigrant integration has increased both for the left as for the right. As a result, Jacobs claimed it is too early to state that the assimilationist policy paradigm has ultimately won the battle in the Netherlands.

As we have seen, the Dutch policy has, however, in the meanwhile undergone such a radical modification that one can, today, indeed speak of a paradigm change towards an assimilationist model (albeit with still some elements left over of the multicultural scheme). So here we have to admit that recent history has proved Joppke and Morawska right for the Dutch case. Furthermore, recent policy developments in Flanders have downplayed the multicultural aspects and have upgraded the assimilationist elements of Flemish integration policy, compared to the situation three years ago (Jacobs, 2004a).

Does this mean the end of multiculturalism in Europe and a new phase of policy convergence towards assimilation? Not necessarily. We acknowledge that the rapid diffusion of civic integration policies reflects the increasing salience of the political topic of immigrant integration, related efforts of both right wing as left wing parties to reposition themselves on this issue throughout Europe and the increasing impact of benchmarking exercises on the EU-level. At the same time we claim this does not automatically lead to the inevitable end of multiculturalism (or other models for immigrant integration).

Joppke and Morawska (2003) make a distinction between "de facto multiculturalism" and "official multiculturalism". The former would be required by the logic of liberal states, the latter implies a deliberate and explicit recognition and protection of immigrants as distinct ethnic groups. Accommodation of religious differences, they consider, epitomises the inevitable trend towards de facto multiculturalism in liberal states. Official multiculturalism goes beyond de facto multiculturalism, they note, in "engaging the state in the recognition and protection of immigrants as distinct ethnic groups" (2003, 10). This distinction does not necessarily make the assessment easier of whether a country (still) has a multicultural policy or not. Indeed, recognition of distinct ethnic groups can be undertaken to different degrees and might simultaneously take place in some fields but not in others. Furthermore, it could be argued that de facto multiculturalism is of far more importance than official multiculturalism if the latter is merely limited to rhetoric. We could, of course, embark on a long debate on what precisely is to be understood by "multiculturalism", the difference between "de facto multiculturalism" and "official multiculturalism" and whether "multiculturalism" is an appropriate concept altogether (see Vermeulen and Slijper 2003). We prefer not to go into this discussion – is the glass half full or

half empty? - in depth, but inevitably a number of decisions on terminology and definition have to be made in order to be able to judge to what extent a particular policy towards ethnic minorities should be regarded to (still) be "multicultural".

Vermeulen and Slijper (2003) stress that the ideology of multiculturalism has the rejection of homogenisation and assimilation as its central tenet. If we take this general designation as the main point of reference, then integration courses and citizenship trajectories are clearly not multicultural. Their explicit objective is to achieve a certain degree of homogenisation, civic acculturation and (linguistic) assimilation (for a variety of reasons).

Vermeulen & Slijper, however, equally claim that the ideology of multiculturalism has three central characteristics: (a) the recognition of ethnic and cultural diversity; (b) the objective of social equality for ethnically differentiated groups; and (c) the objective of social cohesion which is best assured – according to multiculturalists – through recognition of ethnic and cultural differences. Some multiculturalists want to preserve cultural diversity at all costs – even if it hinders equality and cohesion – other multiculturalists applaud cultural diversity in combination with open intercultural communication and reject artificial and enforced preservation of cultural differences (Vermeulen and Slijper 2003). As far as we are concerned, we would label the former perspective as "segregationist" and only the latter as "multicultural".

For the purposes of this paper, we wish to consider the official recognition and endorsement of ethnic and cultural diversity as the central characterising element of policy that could be designated as being "multicultural". Formulated in a less abstract manner, this has a number of policy-making implications: (a) the notion of ethnicity and/or ethno-cultural minorities is used to start with; (b) it is seen to be acceptable and necessary that specific policy is developed for such ethnic minorities; (c) ethnic minorities are allowed to maintain and develop their cultural specificities; (d) host institutions are sensitive to this cultural diversity and – to the extent that this is feasible – modify their procedures and practices in accordance; and (e) ethnic minority groups are allowed and stimulated to organise themselves on an ethnic basis – amongst other things for interest representation.

We do not deny that this multicultural policy framework has been under constant attack and criticism the last couple of years in the Netherlands. One simply cannot deny that especially in the Netherlands, the classic multicultural model has been under substantial strain during the post-Fortuyn and post-Van Gogh period. We gladly admit that in quite some areas former multicultural policies have been downgraded or even withdrawn. Entzinger & Fermin (2007) have in this regard pointed to the abolition in 2004 of education schemes in languages of immigrant groups (*Onderwijs in Allochtone Levende Talen*) and the increasingly critical attitude Dutch policy makers have taken towards Islamic schools. Furthermore, subsidizing of ethnic minority associations has become much more conditional, in stressing the importance of integration effects and intercultural contacts. At the same time, however, in the period following the murder of cineaste Theo Van Gogh by a Muslim fanatic in November 2004, the Dutch government has reemphasized institutionalised dialogue with ethnic minority associations⁹.

Neighbouring Belgian region Flanders has introduced Dutch-inspired assimilationist citizenship trajectories for newcomers, but has at the same time still held on to a multicultural policy framework for long(er) established immigrants. In some aspects it was even strengthened. Striking developments in Belgium are the preparations for state subsidising of mosques (payment of imams, costs of buildings) from 2005 onwards – as is also done for churches

and synagogues – and the granting of holidays on religious festivities for Jews and Muslims in the Flemish education system. Consultation with immigrant organisation representatives was furthermore intensified in Flanders in several policy domains. Of course, policies are not set in stone, so there is no guarantee that Flanders will keep on embracing a multicultural model indefinitely (see Jacobs, 2004a). But for the time being, one cannot claim multiculturalism is completely dead in the low countries. Yes, it is in a deep coma in the Netherlands, but in Flanders it still seems to remain alive and kicking.

Bringing National Models Back in

Institutional approaches to ethnic minority politics, also known as the 'political opportunities structure' perspective, are quite popular in the literature on political participation of immigrants. According to Garbaye a historical institutionalist approach shows "hot institutions function as past political situations frozen in time which may define the possibilities and modalities of later developments" (Garbaye, 2005: 211). While the city level has been far from neglected (Penninx & alii, 2004; Garbaye, 2005), most authors primarily focus on the impact of institutions at the national level. Koopmans, Statham, Giugni & Passy (2005), for instance, show how national institutional frameworks and dominant discourses on ethnic minorities influence the forms of collective mobilisation by immigrant groups. Inspired by Brubaker (1992), several authors have started to talk about 'national models' and have interpreted them as being rooted to an important extent in long-standing national cultural understandings and legal frameworks of national identity, citizenship, and church-state relations (see Favell 1998; Koopmans and Statham 1999; Fennema & Tillie 2004; Penninx et alii 2004; Laurence & Vaisse 2006). As we have seen, Joppke (2007) questions their relevance in claiming it no longer makes sense to think in terms of national models now that we are confronted with convergence in civic integration policies.

According to us, distinct national policy traditions and related dominant discourses with regard to immigrant integration have not disappeared, although there are indeed some striking new convergences in particular domains (for instance policy with regard to newcomers) to be noted. Some countries, as the Netherlands, have indeed witnessed a paradigm shift or have, as Germany, made significant policy changes in particular domains as naturalization policy. In quite a number of fields, dominant discourses have, however, remained intact in several countries and existing institutional arrangements still tend to lead to path dependency in policy choices.

Let us first take the issue of state-religion relations and the issue of space for public expression of a religious belief as an example. As is well known, the Islamic headscarf has been a subject of public controversy across Europe (Verhaar & Soharso, 2004; Kastoryano, 2006; Bousetta & Jacobs, 2006). In all countries which have in recent times been introducing integration programs and citizenship trajectories, dominant discourses, legislation and policy practices with regard to the wearing of the headscarf have remained fairly stable. As is well known, in France the headscarf is banned for pupils and teachers in public schools alike. In some German *Länder* it is prohibited for teachers but allowed for pupils. In the Netherlands and the United Kingdom, wearing of the headscarf is generally allowed for both pupils and teachers in schools. In Flanders, schools take a pragmatic view on the headscarf and in general allow it for pupils. In Francophone Belgium, however, the French

discourse and related institutional ban is being mimicked. Nothing has changed here since the convergent trend in the development of integration courses.

Another domain in which national institutional traditions and dominant political discourses attest to quite some cross-national divergence (and national stability), is the field of demography and statistics. The sensitive issue of counting and classifying inhabitants of foreign origin or ethnic background is tackled quite differently across European nation-states. Anyone wanting to perform internationally comparative research on immigrants or ethnic minorities in Europe is unavoidably confronted with the most diverse types of national statistical data. Several countries traditionally even shun from producing such data. Schematically one can distinguish two traditions related to 'ethnic statistics' in Europe. In France and most southern European countries, the dominant statistical categorizations merely distinguish individuals on the basis of their nationality. It basically boils down to a limitation to two categories: the national and the foreigner. Often an additional distinction is made among the foreign population between those coming from other EU-member states and those who do not. In contrast, most northern European countries have been producing data on the ethnic and/or foreign origin of their populations in a more detailed manner. The UK has for instance a system of self-identification of ethnicity, as is equally the case in the Baltic States. The Nordic countries and the Netherlands keep track of their 'immigrant population' by counting the number of persons who have parents (or grandparents) born abroad (and by distinguishing them according to country or region of origin). Interestingly, Belgium is caught somewhere in between these two traditions (Jacobs and Rea 2005).

Partly related to traditions in (not) producing ethnic statistics, there are different traditions in stimulating public acknowledgement and political visibility of ethnic (or ethnicised) identities. In some countries immigrant associations have been financed by the state *because* they are immigrant associations and are seen to be legitimate political actors, while other countries consider ethnic and communitarian political identities as something to be avoided. Positive discrimination and affirmative action is applauded in some countries and seen as unacceptable in others. Policy convergence in the field of newcomers' integration (and anti-discrimination law) has in some cases – notably France – perhaps stimulated debate on the issue of targeted policies, but most countries – with the exception of the Netherlands - have not seen radical modifications in their policies towards settled ethnic minority groups.

Obviously, policies are not set in stone. Discourses which at one point in time were dominant in a particular country, can lose appeal. Issues like the access to citizenship or the significance of national identity, for instance, can become partisan symbols in political and ideological struggles between political parties. As a result, policies can be modified. One clear example, particularly stressed by Joppke (2007) is Germany, which overhauled its nationality legislation in 2000 and introduced a form of *jus soli* for immigrant children born in Germany. Joppke also has a point when referring to increased emphasis in linguistic and cultural assimilation of newcomers in many European countries, including the Netherlands and the UK, which traditionally had been relatively forthcoming towards cultural differences. Belgium recently adopted a liberal nationality legislation and granted local voting rights to non-nationals, while this still seemed an impossible political step in the late 1990s (Jacobs, 1999). The empirical fact that a number of countries have changed (some aspects of) long standing policies, however, does not mean that the analytical approach of distinguishing *political opportunity structures* (Koopmans & Statham, 1999) or

philosophies of integration (Favell, 1998), and trying to assess their impact, becomes pointless.

What is true, is that some of the “crude” classifications of the 1980s and 1990s, for instance a very general distinction between a multicultural model and an assimilationist model, are no longer necessarily valid in the new millennium. In a number of countries, integration policies seem to have lost some of their internal coherence, making it more difficult to pinpoint them as clear national models in line with typical philosophies of integration. Furthermore, EU-led convergence in antidiscrimination policies and more organic diffusion of integration programs across Europe has indeed made EU member states more similar. We need to re-evaluate our typologies making use of both theoretical and empirical insights. In order to reclassify countries, empirical projects as the *MERCI*-project (Koopmans et alii, 2005), the *European Civic Citizenship and Inclusion Index* (Geddes & Niessen, 2005) and the *NATAC*-project (Bauböck et alii, 2006) are to be cited as being of particular importance in constructing new analytical classifications. For the moment, this exercise is still to be done by the scientific community. We hope this paper has been able to argue that the diffusion of integration courses and citizenship trajectories throughout Europe should not be interpreted as the sign that such endeavours have become futile. Integration policies of EU member states might be converging to a certain extent with regard to incorporation of newcomers, this does not mean that all policies towards ethnic minority groups and immigrants have become indistinctive.

Conclusion and debate

It cannot be ruled out that at one point in the future, immigrant integration policies of EU member states will be indistinguishable. For the time being this is, however, clearly not the case. Interestingly there is currently a certain convergence to be noticed in policies towards newcomers throughout Western Europe. This is not the result of explicit and deliberate EU policy steering. The European Institutions have played a crucial role in setting the standards for antidiscrimination policy but, apart from that, have rather limited – if not to say practically no - impact on integration policies. Recent convergence of integration policies for newcomers is the result of organic diffusion of policy schemes and visions from one country to another, without guided EU interference (and not even through the open method of coordination). The diffusion of civic integration policies, in our opinion, reflects the increasing salience of the political topic of immigrant integration and efforts of both right wing as left wing parties to reposition themselves on this issue throughout Europe, but without this leading automatically to the end of multiculturalism (or other models for immigrant integration). We claim contrary to Joppke (2007) that national models, as those proposed by Koopmans *et al.* (2005), still make sense. There is indeed some convergence in policy towards newcomers, but there is still sufficient divergence in integration policies (and related dominant political discourses) across nation-states to analytically distinguish national integration models. Existing typologies might not be sufficiently adequate but this does not mean we should now think all integration policies are basically the same. In order to reclassify countries according to their integration policies, empirical projects as the *European Civic Citizenship and Inclusion Index*, the *MERCI*-project or the *NATAC*-project are to be cited as being of particular importance in constructing new analytical classifications (or, indeed, if this would be the case, in concluding that analytical distinctions have become superfluous in the light of overwhelming convergence). Without such fine-grained empirical analysis, potentially leading

to new classifications of national models, debates about convergence or divergence of integration policies will remain discussions of the type whether the glass is half full or half empty.

Notes

- 1 See the press release of the European Council of 19/11/2004: [http://ue.eu.int/ueDocs/cms_Data/docs/pressData/en/jha/82745.pdf]. Other relevant documents on the issue are the Commission's first response to the Basic Common Principles of the Council (COM/2005/0389 final), the Second Annual Report on Migration and Integration (SEC/2006/892) and the European Parliament Resolution on Integration of Immigrants (P6_TA(2006)0318).
- 2 <http://www.hoemoetikinburgeren.nl>
- 3 Information about the educational package is available on the following website: <http://www.naarnederland.nl>
- 4 In the original plans this integration allowance was meant to be considerably lower than the corresponding welfare benefits Danes receive, but this idea was dropped after criticism on its discriminatory nature.
- 5 http://www.mol.fi/mol/en/04_migration/index.jsp
- 6 In practice, it boils down to a test of English. The ESOL Entry 3 level should be attained. This level corresponds broadly to the ability of holding "a conversation on an unexpected topic, that is workable, though not perfect, English" (Home Office, 2004: 11).
- 7 Further information on the contents of the test, can be found at the following website of the UK Home Office: <http://www.lifeintheuktest.gov.uk>
- 8 When the answer related to a particular question does not easily fit into the forced choice format, we have put the 'yes' or 'no' answer between brackets, to indicated the correct response is a bit more complicated.
- 9 For instance through the *Breed Initiatief Maatschappelijke Binding* (BIMB), launched in January 2005.

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