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The End of National Models? Integration Courses and Citizenship Trajectories in Europe

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Several European countries have recently introduced, or are planning to introduce, citizenship trajectories (voluntary or obligatory inclusion programmes for recent immigrants) or citizen integration tests (tests one should pass to be able to acquire permanent residence or state citizenship). Authors such as Joppke claim that 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. The empirical fact of diffusion of civic integration policies throughout Europe cannot be denied. This paper claims that there is, however, still sufficient distinctiveness between immigrant integration policies in order to continue and use an analytical framework that distinguishes national models.

In the 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 refused to take part in these programmes risked penalties. Ten years later the Dutch citizenship trajectory scheme has toughened to a considerable degree. The programme 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 programme, demanding a considerable amount of acculturation, is currently the strictest in all of Europe. The Netherlands, known and praised in the 1980s and 1990s for its multicultural model, thus seems to have shifted to a more assimilationist position (Entzinger and Fermin 2007).

Since the Dutch have toughened their civic integration programme, several European nation-states and regions seem to have followed suit. The neighbouring Belgian region of Flanders basically copy-pasted the original Dutch citizenship trajectories (*inburgeringstrajecten*) at the start of the new millennium. When Germany introduced *Integrationskurse*, the Dutch programme (partly) served as a model. Since the end of the 1990s, integration courses and citizenship trajectories appear to be emerging 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 (on language and knowledge about life in the UK) in order to qualify for British citizenship. Estonia insists that its sizeable russophone minority must first pass an Estonian language and citizenship test before being entitled to Estonian nationality. Poland, Hungary and Spain are contemplating special integration programmes 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 programmes. The Scandinavian countries Denmark, Sweden and Finland have programmes whose 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, it seems. In a well-written and witty article Joppke (2007) claims that 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 do not propose to throw out the baby with the bath water. In contrast to Joppke, we think that national models, as those proposed by Koopmans et al. (2005), still make sense, albeit that traditional typologies 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.

1. Citizenship Trajectories and Citizenship Tests in Europe

No less than nine European Union 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 programmes without involving strictly guided coordination at European 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 into particular immigrant integration programmes. 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

Where there has been diffusion of “best practices” in the field of immigrant integration programmes 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, however, to believe that integration courses are good practice. Instead of wanting to reinvent the wheel, they increasingly look at what is happening across their borders. Instruments such as the Handbook on integration for policy-makers and practitioners (Niessen and Schibel 2004) facilitate cross-national comparison. On this matter the following appears 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. [All countries of immigration are, sooner or later, confronted with the same difficulties. Why not be inspired by the good ideas and good practices of our neighbours – they often have them – and by what works for them? Why not profit from their experience, and possibly even from their failures, to avoid “bad” good ideas? Each country has its traditions and its model of integration, so it is not simply a matter of mechanically reproducing or copying what works elsewhere in a different context.] (Délégation de l'Assemblée Nationale 2006: 12).

We briefly present each of the programmes for immigrant integration of third-country nationals (TCNs) in these countries. In our overview we do not include 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 be considered to be immigrant TCNs).

1.1. The Netherlands

In 1998 the Netherlands introduced the *Wet inburgering nieuwkomers* (WIN), a scheme of so-called citizenship trajectories (Entzinger and Fermin 2007). Newly

¹See European Council press release, 19 November 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).

arriving adult non-EU immigrants were obliged to take 600 hours of language courses and courses on “societal orientation”. These courses were financed by central government and the municipalities. If a newcomer did not participate, that person was sanctioned. The aim was to assure rapid independence.

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 onwards.² The obligation to participate was modified into an obligation to pass a final test. 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 permanent residence. To pass 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 immigrant 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 immigrants of non-EU origin, 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 programme, people under the new WI programme now have to pay for the courses and tests themselves – albeit that some municipalities will pay the fees for applicants.

A new citizenship test was also introduced for people wanting to come to the Netherlands (for example in the framework of family formation or family reunification) and who needed a residence permit. This new regulation, introduced by the *Wet Inburgering Buitenland*, has been in effect since mid-March 2006. EU nationals, holders of a working permit, temporary students and nationals of a number of non-EU countries (United States, Canada, Australia, New Zealand, Norway, Switzerland, etc.) are exempt from 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 of being granted a residence permit. Candidates can prepare for the test after having acquired course material (€63.90) through Dutch bookstores (via the internet).³ 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.

1.2. 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

² <http://www.hoemoetikinburgeren.nl>

³ Information on the educational package is available on the Netherlands Civic Integration Examination Abroad website (<http://www.naarnederland.nl>).

Decree on Civic Inclusion (*Inburgering*) is to actively promote a certain degree of language and cultural assimilation. This scheme, 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 outwith 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 €5,000. 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 some point actual tests will be 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, in the future be limited to individuals sufficiently mastering the Dutch language or participating in a citizenship trajectory scheme. The Flemish preoccupation with mastery of the Dutch language has to be understood in the light of the ongoing linguistic struggle in federal Belgium between Flemish and francophones.

The Flemish Government sees no 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 nevertheless keeps 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).

1.3. Germany

Since 2005 a new *Zuwanderungsgesetz* is in place in Germany (Michalowski 2004; Carrera 2006; Joppke 2007). Newcomers can take 300 (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 in the integration programme, while permanent residence requires passing an exam. The programme 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 per cent. Non-compliance could lead to non-renewal of a short-term residence permit

or refusal of a long-term residence permit (but a number of exceptions are 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 minimal knowledge of German a condition for family reunification.

Table 1: Overview of Characteristics of Civic Integration Policies

	AU	DE	DK	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	No	Yes	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 free (or minimal cost)	No	No	Yes	(Yes)	Yes	Yes	No	Yes	(No)
Noncompliance fined	Yes	No	(No)	No	Yes	No	(Yes)	No	No
Noncompliance impact on social benefits	No	Yes	Yes	Yes	(No)	No	Yes	Yes	No
Renewal of short-term residence permit depends on participation	Yes	(Yes)	No	No	No	(Yes)	Yes	No	No
Long-term residence permit depends on participation	Yes	Yes	Yes	No	No	Yes	Yes	No	Yes
Test at end of course	No	(No)	Yes	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 naturalisation	No	(Yes)	(Yes)	No	No	No	Yes	No	Yes
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Note: AU = Austria, DK = Denmark, DE = Germany, FI = Finland, FL = Flanders, FR = France, NL = Netherlands, SW = Sweden, UK = United Kingdom. A response is in parentheses when the answer is not straightforward due to special provisions (or transitional measures).

1.4. Austria

Austria introduced integration contracts (*Integrationsvereinbarungen*) in 2003 (Michalowski 2004; ICMPD 2005). The programme is obligatory for non-EU newcomers who arrived in the country after 1998. Highly skilled professionals staying for less than two years in Austria and people who can prove sufficient knowledge of German (in a test) are exempt. The signing of an integration contract is a prerequisite for entitlement to a residence permit (or its renewal). The integration programme 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 the 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 programme or financial fines. Failure to participate within three years leads to non-renewal of the residence permit and even threat of expulsion.

1.5. Denmark

Denmark has had an integration programme since 1986 focused 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 an 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 six months (30 hours a week). The entire programme is meant to be completed in a period of three years and can go up to 2,000 hours of language education. At end of the entire education programme, the newcomers should pass a standardised exam. Active participation in the programme is obligatory for all target groups of the Integration Act. Since July 2003, an adapted programme has been compulsory for all asylum seekers. Non-compliance leads to a reduction of social benefits (up to 30 per cent), which are in fact granted in the form of an “integration allowance”⁴. Furthermore, completion of the introduction programme is a condition for receiving a permanent residence permit. Passing a language test and a test on

⁴ In the original plans this integration allowance was meant to be considerably lower than the corresponding welfare benefits that Danes receive, but this idea was dropped after criticism on its discriminatory nature.

Danish culture and history has been part of the requirements for obtaining Danish citizenship since the end of 2005.

Because of the Danish opt-out 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 seven years of residence for obtaining a permanent residence permit. Furthermore, it has imposed a controversial age limit of 24 years for marriages with third-country nationals, while the European directive on the right to family reunification allows an age limit of only 21. Denmark also imposes a bank deposit (of about €7,400) before family reunification is possible. The country has announced it will, as the Netherlands has done, introduce an integration test as a precondition for family reunification in the future.

1.6. Finland

Finland introduced an 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 programme.⁵ Newcomers are expected to learn Finnish (or Swedish) and acquire basic information on Finnish society. The individualised programme lasts about 18 weeks and is part of a wider “integration plan”. It is obligatory for unemployed newcomers or newcomers on other social benefit 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 unemployment benefit, but they do have the right to receive an “integration allowance” in return for participation in the integration programme. Ingrians – a Finnish-speaking minority in Russia – have to prove knowledge of the Finnish language, by passing a test, to make use of their right to migration to Finland.

1.7. Sweden

Sweden has a long tradition of organising language courses for immigrants, dating back to the 1970s. Its current integration programme, offering both language courses and courses on Swedish society, is only compulsory for social benefit applicants. It is open to all types of immigrants, not only to newcomers and is paid for by the state. Municipalities are responsible for offering integration courses, which on average entail 525 hours of study, 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.

⁵ http://www.mol.fi/mol/en/04_migration/index.jsp

1.8. France

In 1998 the socialist government launched the *Plate-forme d'accueil*, a programme meant to help newcomers to understand 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 people had further specific needs. If required, 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 programme of *Contrats d'accueil et de l'intégration*, which has been in vogue throughout France since 2005. The programme involves 200 to 500 hours of French language classes and six hours of lessons on the practicalities 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 an integration programme. 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 in the Netherlands and as announced in Denmark and Germany) and that it should formalise the criterion of knowledge of French for naturalisation through a test.

1.9. United Kingdom

In the UK, the Nationality, Immigration and Asylum Act 2002 explicitly introduced a test for 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 “indefinite leave to remain”) equally have to pass the test (effectively implemented since 2 April 2007). If applicants do not have sufficient knowledge of English, they should attend English for Speakers of Other Languages (ESOL) and citizenship classes. Some categories can get free tuition, but in principle applicants have to pay for the classes, also for the test itself. Home Office explanatory documents stress that 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 emphasise this point, reference is made to the particular position of the Welsh and Scottish in the UK:

⁶ In practice, this boils down to a test of English. The ESOL Entry 3 level should be attained. This level corresponds broadly to the ability to hold “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 may be found at the UK Home Office website (<http://www.lifeintheuktest.gov.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, nor for smaller communities such 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. Scotland, for example, 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 to 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.

2. Comparative Assessment of Integration Programmes

We now look into the convergence and divergence of the above-mentioned civic integration policies that we briefly discussed. Table 1 gives an overview of the extent to which the different national policies share a number of characteristic traits. We discuss a number of convergent and divergent traits of these integration programmes,⁸ focusing on the following questions:

Is there a form of mandatory participation to integration courses for new non-EU migrants?

Do the integration courses entail language training (2a), vocational training or orientation (2b) and knowledge on history and culture (2c)?

1. Is participation to integration courses free (or not very costly)?
2. Is there a fine in case of non-compliance?

⁸ When the answer relating to a particular question does not easily fit into the forced choice format, we have put the “yes” or “no” answer in parentheses, to indicate that the correct response is rather more complex.

3. Is there a cut in social benefits in case of non-compliance?
4. Is entitlement to a residence permit conditional on participation to an integration course?
5. Is there a test at the end of the citizenship trajectory?
6. Is passing a citizenship or integration test a precondition for permanent residence status?
7. Is passing a test a prerequisite for naturalisation?

An interesting similarity in all countries is that official discourse always denies 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. With the exception of the UK, all the countries mentioned 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 programme. While at first most integration programmes were free (or almost free), a number have started asking a fee from 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 programmes 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 in 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 programmes and often sanctions are 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 where newcomers are concerned. This goal is still the central emphasis of integration programmes in the 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 in integration programmes to entitlement to social benefits, but equally to attach consequences on the level of residence permit. 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 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 a link is also established between participation in integration courses on the one hand and entitlement to (permanent) residence on the other. 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 stress is equally placed on knowledge of the history and culture of the receiving society.

A third general goal that 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 that the aim is assimilation, while Germany seems to find itself in an intermediate position.

Some of the above-mentioned countries have only just recently launched their new integration programmes and might well modify them in future years, after evaluation (and depending on partisan positions of the ruling political majorities). It is thus too early to try and pin them down in a clear-cut typology. But there does seem to be a number of divergent tendencies in the underlying philosophies being articulated in the different integration schemes. There is, for example, quite a difference between an integration programme “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 naturalisation. 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 also mean that all integration programmes are basically the same? We think not. Furthermore, does the presence of integration courses in countries such as the UK, the Netherlands and Sweden – in the past traditionally seen as multicultural societies – and in a country such as France, the assimilation-oriented state par excellence, mean that national models are dead? Once again, our answer is negative.

3. The End of Multiculturalism?

In *Toward Assimilation and Citizenship*, editors Joppke and Morawska (2003) claim that the rise of civic integration programmes 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 the present authors has claimed in the past that the introduction of citizenship trajectories (and citizenship tests) should not necessarily 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 criticised Joppke 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 has clear-cut consecutive periods of political consensus concerning integration policy but, on the contrary, experiences 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 and 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, speak of a paradigm change towards an assimilationist model (albeit with some elements left over from the multicultural scheme). So here we have to admit that recent history has proved Joppke and Morawska right in 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 with 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 and left-wing parties to reposition themselves on this issue throughout Europe and the increasing impact of benchmarking exercises at EU level. At the same time, we claim that this does not automatically lead to the inevitable end of multiculturalism (or other models for immigrant integration).

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). However, this definition of multiculturalism is too crude. 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” (see Vermeulen and Slijper 2003; Jacobs 2004a). 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. It cannot be denied that, especially in the Netherlands, the classic multicultural model has been under substantial strain during the post-Fortuyn and post-Van Gogh period. We readily admit that in some areas former multicultural policies have been downgraded or even withdrawn. Entzinger and 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, subsidising 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 film-maker Theo Van Gogh by a Muslim extremist in November 2004, the Dutch Government has re-emphasised institutionalised dialogue with ethnic minority associations.⁹

The neighbouring Belgian region of 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 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

⁹ For example through the Breed Initiatief Maatschappelijke Binding (BIMB), launched in January 2005.

stone, so there is no guarantee that Flanders will keep on embracing a multicultural model indefinitely (see Jacobs 2004a). But, for the time being, it cannot be claimed that 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.

4. Bringing Back National Models

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 Garbaya, 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” (Garbaya 2005: 211). While the city level has been far from neglected (Penninx et al. 2004; Garbaya 2005), most authors primarily focus on the impact of institutions at the national level. Koopmans et al. (2005), for example, 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 and Tillie 2004; Penninx et al. 2004; Laurence and Vaisse 2006). As we have seen, Joppke (2007) questions their relevance in claiming that it no longer makes sense to think in terms of national models now that we are confronted with convergence in civic integration policies.

We conclude that 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 example, policy with regard to newcomers) to be noted. Some countries, such as the Netherlands, have indeed witnessed a paradigm shift or have, as Germany, made significant policy changes in particular domains such as naturalisation 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 take the issues of state/religion relations and 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 and Saharso 2004; Kastoryano 2006; Boussetta and Jacobs 2006). In all countries that have recently introduced integration programmes and citizenship trajectories, dominant discourses, legislation and policy practices with regard to the wearing of the headscarf have remained fairly stable. In France the headscarf is banned in public schools for pupils and teachers alike. In some German Länder it is prohibited for teachers but allowed for pupils. In the Netherlands and the UK, wearing the headscarf is generally allowed for both pupils and teachers in schools. In Flanders,

schools take a pragmatic view of the headscarf and in general allow it for pupils. In francophone Belgium, however, the French discourse and related institutional ban is being copied. Nothing has changed in this respect since the convergent trend in the development of integration courses.

Another domain in which national institutional traditions and dominant political discourses attest to 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 international 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 avoid producing such data. Schematically, two traditions relating to “ethnic statistics” can be distinguished in Europe. In France and most southern European countries, the dominant statistical categorisations merely distinguish individuals on the basis of their nationality. This 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, for example, has a system of self-identification of ethnicity, as is 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, whereas 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 such as access to citizenship or the significance of national identity, for example, 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 and Statham 1999) or philosophies of integration (Favell 1998), and trying to assess their impact, becomes pointless.

It is true that some of the “crude” classifications of the 1980s and 1990s, for example 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 anti-discrimination policies and more organic diffusion of integration programmes 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 al. 2005), the European Civic Citizenship and Inclusion Index (Geddes and Niessen 2005) and the NATAC project (Bauböck et al. 2006) may be cited as of particular importance in constructing new analytical classifications. For the moment, this exercise has still to be done by the scientific community. We hope that this paper has successfully argued that the diffusion of integration courses and citizenship trajectories throughout Europe should not be interpreted as the sign that such endeavours have become futile. Although 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 indistinct.

5. Conclusion and Debate

Interestingly, a certain convergence may be noted in current 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 anti-discrimination policy but, apart from that, have rather limited impact – practically none – 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 EU-guided 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- and 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, in contrast to Joppke (2007), that national models such 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 discourse) across nation-states to analytically distinguish national integration models. Existing typologies might not be sufficiently adequate but this does not mean that we should now think all integration policies are basically the same. In order to reclassify countries according to their integration policies, empirical projects such as the European Civic Citizenship and Inclusion Index, the MERCI project or the NATAC project may be cited as of particular importance in constructing new analytical classifications (or, indeed, if this were 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 whether the glass is half full or half empty.

Note

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