Country-Specific or Convergent? A Typology of Immigrant Policies in Western Europe[1]

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This article raises the question as to whether European immigrant policies are shaped by country-specific traditions of nation-state building or whether, on the contrary, they are converging toward the same policy goals. On the basis of four case studies of 30 years of policy development (United Kingdom, France, Germany, and the Netherlands), the authors develop a broad typology of immigrant policies in Western Europe. This typology shows that in the shadow of the debate on different "integration models", Western European countries have implemented a whole range of similar immigrant policies. However, in policy fields touching the core of historically established notions of how state and society should relate to each other—notably the struggle against discrimination and the opening of public institutions to immigrants—significant differences persist.

Cet article soulève la question de savoir si les politiques d'immigration européennes sont façonnées par les particularismes qui accompagnent l'édification de l'État-nation ou si, au contraire, elles convergent vers des objectifs politiques semblables. À partir de quatre études de cas couvrant 30 années d'élaboration politique (Grande-Bretagne, France, Allemagne et Pays-Bas), les auteurs ont élaboré une vaste typologie des politiques d'immigration de l'Europe occidentale. Cette typologie démontre que dans l'ombre du débat sur les différents modèles d'intégration, ces pays ont en fait appliqué des séries de politiques d'immigration semblables. Toutefois, des différences notables persistent, à savoir dans les domaines politiques liés au noyau de notions historiquement enracinées—la relation de la société à l'État—notamment la lutte contre la discrimination et l'ouverture des institutions publiques aux immigrants.

Introduction

A glance at recent comparative studies of European immigrant policies reveals a striking paradox: although a highly diverse group of authors observe country-specific features of these policies, an equal number

observe a broad tendency toward convergence in the responses of European countries to immigration. Representatives of the first group explain that variables such as institutional heritage (Lapeyronnie, 1992), the historical outcome of the class struggle (Bovenkerk, Miles, & Verbunt, 1990), the political culture of civil society (Schiffauer, 1997), or the interaction between migrant groups and the host society (Kastoryano, 1997) are responsible for differences among immigrant policies in European countries. The most powerful arguments in favour of referring primarily to the national framework in order to understand immigrant policies are probably made by Schnapper (1992) and Brubaker (1992, 1995): the former suggests that these policies must be interpreted as "one dimension of nation-building" (p. 17); the latter focuses primarily on nationality laws, arguing that the social inclusion or exclusion of migrants is determined by a country's cultural and political history. Starting from the same assumption other authors have identified the main variables responsible for national differences and used these to develop country-specific typologies (e.g., Castles, 1995).

Exponents of the second thesis argue that policy responses to immigration in European countries have been converging over the last two decades. The initial use in 1984 of the term *convergence* is attributed to the Organisation for Economic Co-Operation and Development (OECD) Continuous Reporting System on Migration (known under its French acronym SOPEMI, Miller, 1990). A year later Hammar (1985) observed the same tendency, suggesting that despite national differences, European immigrant policies had been drawing closer since the economic crisis of 1973-1974. Two authors recently supported this thesis, albeit from different perspectives. Soysal (1993) on the one hand insists on the growing importance of a "post-national model" for understanding the inclusion of migrants in European societies. She maintains that the rights and legal status of migrants no longer derive from national legislation, but are determined by universalistic rules that are formalized and legitimized by a whole set of transnational normative structures and codes, as well as international legal instruments. In her view, the process of European unification is bound to increase pressure on member states to promote further convergence in the field of immigrant policies. Freeman (1995a, 1995b), on the other hand, argues that the inherent principles of liberal democracies inevitably lead to a liberalization of immigration and immigrant policies. In his view, country-specific policy differences must be ascribed to temporal variations in the history of immigration rather than to diverging political cultures. In the long run, the "unfolding

of the internal logic of the core values of liberal democracy" are likely to yield identical policy results (1995b, p. 909).

How can the contradiction between these two strands of immigrant policy analysis be resolved? Is it, as Joppke (1998) suggests, a matter of the researcher's ideological stance if he or she highlights the country-specific as opposed to the convergence perspective? Or are we confused between the concept of convergence and that of parallel development—the latter implying that individual countries go through identical stages in developing their immigration policies without necessarily reaching the same point (Vermeulen, 1997). Without denying the possible role played by these two factors, the contradicting conclusions may well be explained by the different aspects of immigrant policies they examine. Whereas some analyses highlight the politics of citizenship and nationhood, others compare civil and social rights granted to migrants or anti-discrimination legislation. Because modern governments comprise relatively independent policy sectors with often divergent principles of operation (Muller, 1990), it is not surprising that cross-national comparisons of different domains of immigrant policy produce different results.

Thus, in order to add precision to the comparative endeavor and to assess the issue of convergence versus specificity, we must first describe the manifold forms that immigrant policy has taken in different countries. This allows us to define a general typology of such policies. This typological framework can then be used to compare precisely and empirically the evolution of immigrant policies in different domains and in different countries. The typology also provides a basis for explaining the observed differences and similarities (Sartori, 1970; Grawitz, 1990).

Our analysis includes the United Kingdom, France, Germany, and the Netherlands. We chose these four countries for two reasons: first, they are the major countries in Western Europe to attract immigration following World War II. Second, in the literature they are often represented as "ideal types" of different modes of migrant inclusion (Brubaker, 1992; Castles, 1995; Favell, 1997, 1998; Kastoryano, 1997; Schiffauer, 1997; Schnapper, 1992). Our argument challenges this conventional notion.

We first describe the evolution of immigrant policies in the UK, France, Germany, and the Netherlands during the last 40 years. Although our treatment of the four case studies is necessarily schematic, highlighting solely the main developments, the studies nevertheless allow us to identify five general types of programs and policies that address migrants. On the basis of this typology we can then undertake a more accurate comparative reading of current trends in European immigrant policies.

One preliminary observation needs to be made: in most cases migrants and their children are, like all residents, subject to the institutions and policies prevalent in the host society. Hammar (1985) calls these general actions "indirect immigrant policies" because they "are intended to affect all members of the community, including immigrants" (pp. 265-266). If we measure the impact of state action on the position of migrants in the society, it is to be assumed that these general policies would have a stronger impact, albeit differentially, than what is currently labelled "integration policy for migrants." Our concern is not to gauge the impact of policies, but rather to distinguish the different forms they take. Thus we are interested in how immigration has become an issue on the political agenda and how the authorities have tackled it: in what terms have problems arising from the presence of migrants been identified, and what policies have been applied? Although immigration became an issue in the 1960s, most programmes concerning migrants were developed only after the international oil crisis of 1973-1974 and the ensuing unemployment crisis that affected vast sectors of first- and second-generation migrants. These programmes were not necessarily designed specifically for migrants in the sense of Hammar's (1985) "direct immigrant policies" understood as "government measures in which the instruments used and the programs developed are intended specifically for immigrants" (pp. 265-266). Some were specific only in the sense that they tried to bring migrants under mainstream laws (Doomernik, 1998). Often they were also general in the sense that they proposed to tackle the problems encountered by migrants as problems shared by all residents. Nevertheless, even when formulated in this manner they must be regarded as a response to immigration, which brings them into the scope of our analysis.

Immigrant Policies in Four European Countries

The United Kingdom
Unlike most other European countries, the inclusion of migrants in the UK has never been a legal issue: because most immigrants arrived after Word War II from the Commonwealth and were therefore already British citizens, the challenge rather consisted in giving their citizenship cultural and symbolic meaning (Crowley, 1995). Immigration became an item on the political agenda in the late 1950s because of a wave of racist violence against migrants. In 1962 the Conservative government

responded by restricting admission of newcomers from the Common-wealth. When the Labour Party came into power in 1964, it tightened the admission rules even further. Yet in 1965 it enacted the Race Relations Act (RRA) to implement a policy against racial discrimination that included the establishment of the Race Relations Board (RRB), a so-called QUANGO (Quasi-Autonomous Non-Governmental Organization) entrusted with the task of mediating between victims of racial discrimination and discriminating individuals or agencies (Layton-Henry, 1992; Solomos, 1993). Also in 1965 the National Committee for Common-wealth Immigration (NCCI) was established to advise and to subsidize the so-called Voluntary Liaison Committees, which were community-based organizations that aided immigrants faced with social problems. Some observers criticized these decisions because they "aimed at insti-tutionalizing a situation of *stable underrepresentation* [in the sense of not being included in the competitive establishment] for the black and Third World populations" (Katznelson, 1976, p. 197).

At the end of the 1960s, with the arrival of Indians from East Africa, the debate over immigration became highly politicized. The notorious xenophobic speech made by Enoch Powell, who predicted "rivers of blood" as a result of uncontrolled immigration put pressure on the Labour government. Prime Minister Harold Wilson defended the government's immigration policy, but promised both to reinforce measures against racial discrimination and to tackle the social problems of the inner ci-ties. It should be noted that these problems were perceived as the fun-damental reason why part of the population supported Powell's ideas. In 1967 the RRB and the NCCI published a report showing considerable evidence of discrimination against Black minorities in housing and on the labour market, two areas excluded from the RRA of 1964 (Layton-Henry, 1992). The second Race Relations Act (1968) was therefore ex-tended to these two areas and to education. The RRB was authorized to make enquiries and to bring charges of fraud against a discriminating agency or person even in the absence of an individual complaint (Crowley, 1990). The third change in the new Act concerned the establishment of the Community Relations Commission (CRC), which became the na-tional body that subsidized local associations, now called Community Relations Councils (CRCs).

Another initiative was the Urban Programme (UP). Although not a direct response to the problems encountered by ethnic minorities, but rather to those of disadvantaged inner cities in general, its establish-ment nevertheless clearly manifested the authorities' fear that Black

immigration might trigger racial conflict in certain neighbourhoods. Inner cities, therefore, became eligible for municipal aid allotted on the basis of two main indicators: the percentage of migrant children in the school system and the presence of large families. The Conservative government elected in 1970 continued the Urban Programme, which was increasingly judged ineffective, however, and there was much controversy over its underlying purpose, namely, that the neighbourhoods in question experienced "pathological deprivation." In 1977 the Urban Programme was therefore transformed into the Enhanced Urban Programme and destined to rely more strongly on private funding. The establishment of Inner City Partnership Areas in 1978 marked the definite metamorphosis of a social policy on migrants into a general policy of urban renewal (Parkinson, 1994, p. 52-53).

The new Labour government elected in 1974 once again reformed the RRA of 1968. A number of studies published between 1972 and 1975 had confirmed the prevalence of a high level of discrimination in British society, and existing legislation was judged ineffective (Layton-Henry, 1992). The revised Race Relations Act of 1976 brought about three important changes: first, the RRB and the CRC were merged to form the Commission for Racial Equality (CRE), which pursued the following objectives: (a) to contribute to the elimination of racial discrimination; (b) to promote equality and good community relations; (c) to monitor the enforcement of the Act (Section 43 of the RRA). Moreover, the concept of indirect discrimination, defined as the objective outcome of an action that was not intentionally discriminating (Banton, 1988), was adopted. Finally, the CRE was declared competent to prosecute acts of discrimination and to pronounce Non-Discriminatory Notices, which had the validity of legal sentences. It was also authorized to provide financial assistance to individuals for court action and to subsidize organizations committed to the aims of Section 43 of the RRA (Crowley, 1990). However, positive discrimination in the sense of "affirmative action" in the United States was prohibited by the new Act. At the same time, the CRCs changed their name to Councils for Racial Equality (CREs). Together with the Committees for Community Relations and the Race Relations Units, they were entrusted with the task of avoiding ethnic conflict through mediation at the local level (Messina, 1987; Vertovec, 1996a).

During the early years of the Thatcher Conservative government, which came to power in 1979, new initiatives in the field of immigration achieved only a tightening of the nationality law: the British Nationality

Act of 1981 excluded, with certain exceptions, British Overseas Citizens from free settlement in the UK. However, following riots in several British cities in 1980-1981, the issue of an immigrant policy once more appeared on the political agenda. Although these disturbances involved White as well as Black youths, they were labelled "race riots" in the media (Keith, 1990). Lord Scarman, Minister of Home Affairs, commissioned a report on how to prevent such turmoil in the future. This report, made public in 1981, had two policy effects. First, its recommendation to adopt a policy to counter social and economic exclusion in the inner cities and, specifically, to remedy the marginalization of Black people led to a reinforcement of already existing programmes designed for poor neighbourhoods (Layton-Henry, 1992). Second, the report's criticism of the police, considered to be partly responsible for the riots, led to a discussion on how to combat discriminating practices in police forces. Under the heading of *Community Policing*, several reforms were undertaken, one of which involved the recruitment of higher numbers of police officers from ethnic minorities to ensure that the police forces were shown to represent all sectors of society.

After making these decisions in the early 1980s, the Conservative government dispensed with new immigrant policy initiatives. However, a second wave of urban riots in 1985 led to a reinforcement of law and order, while urban renewal policies were geared toward satisfying the interests of local entrepreneurs rather than coping with the problems of underprivileged groups (Le Galès & Parkinson, 1994). New initiatives were taken, therefore, mostly by Labour-governed municipalities at the local level and concerned three main areas: promoting equal-opportunity employment for minorities in the public sector, using the instrument of ethnic monitoring; adapting local administration and its services to the needs of ethnic minorities; and intensifying the struggle against racism (Joly, 1992). Many municipalities also introduced anti-racist education in the school systems.

In Bradford and Birmingham, for example, structures for multicultural consultation were established during the 1980s, which have been characterized by some observers as "negotiating institutions through which the minorities have a part in determining the future of their society of settlement and can work towards equality" (Rex & Samad, 1996, p. 29). The system of consultation between Muslim organizations and the local authorities of Leicester has also been described as a successful example of institutionalized multiculturalism (Vertovec, 1996a).

On the national level, however, no innovation has taken place during the last decade. In 1985 the report *Education for All*, or the Swann Report, recommended the integration of anti-racist and multicultural curricula—a recommendation not followed in the Education Reform Act of 1988, which introduced a national syllabus (Layton-Henry, 1992). Despite its restrictive policy toward disadvantaged groups in general, the Conservative governments neither limited the activities of the CRE nor abandoned community policing. Yet neither did they give in to CRE demands for strengthening these policies. And the Labour government now in power seems to prefer to leave things as they are: so far, no important new initiatives have been taken in the field of immigrant policy.

France

In France the first policies directed toward migrants concerned housing. The scarcity of decent dwellings after World War II (more pronounced in France than elsewhere in Europe; Bachmann & Le Guennec, 1996) compelled many migrants to live in hostels, run-down apartments in downtown areas, and slums (*bidonvilles*). In the late 1950s, the government established two institutions to deal with this situation: the *Société nationale de construction de logements pour les travailleurs algériens* (SONACOTRAL) entrusted with building migrant hostels, and the *Fonds d'action sociale pour les travailleurs immigrés* (FAS) responsible for funding social and cultural activities for migrants, but after 1964 also increasingly committed to improving housing conditions for migrants (Ballain & Jacquier, 1989). The activities of these two institutions were largely inadequate, however, and *bidonvilles* continued to mushroom around major cities like Paris, Lyon, and Marseilles, with 80% of their inhabitants being aliens (Lallaoui, 1993). The first official response to halt this trend was a law enacted in 1964, which allowed the authorities to expropriate the areas covered by *bidonvilles*. In 1970 the death of four workers from Mali in a shack that had caught fire provoked a general outcry, and the government began to increase the budget for expropriation and rehousing. Nevertheless, migrants—if they were not simply expelled—were not directed to housing estates, but to specific transitory housing, so-called *cités de transit*, supposedly to re-educate them for life in social housing to be provided at a later date.

The 1970s saw other specific responses to the problems of migrants, especially in the area of housing, notably with the establishment of the *Commission nationale pour le logement des immigrés* (CNLI), which was meant to fund social housing for migrants only. During the same period, a

number of initiatives were taken in the education system to create opportunities for migrant children (Costa-Lascoux, 1989). In the second half of the 1970s, however, the government started to adopt a return policy for migrants as a way to combat high unemployment rates following the international oil crisis, but this initiative failed because of heavy political opposition (Weil, 1991).

With the victory of the Left in the presidential and legislative elections of 1981, the new goal of immigrant policy became the realization of equal legal status for immigrants. In this respect three decisions can be regarded as carrying the highest symbolic weight: granting the right to set up associations, issuing 10-year residency permits acknowledging the possibility that immigrants might settle in France, and the regularization of the status of 130,000 illegal residents (Weil, 1991). While this policy was being implemented, the "hot summer" of 1981 again changed the political configuration of the issue when the Socialist government was faced with urban riot that involved many youths from migrant families.

In response to these events the authorities opted for a new approach that placed immigrant policy within the broader framework of the State's "spatial management of exclusion" (Gaudin, 1993, p. 4). The policy of urban social development (DSQ—*Développement social des quartiers*), which grew in importance during the 1980s, targeted neighbourhoods that were said to experience social problems (*quartiers en difficulté*) and provided them with additional resources. The same rationale was applied in the field of education by allotting special subsidies to school districts—called *Zones d'éducation prioritaire* (ZEP)—where priority needs were identified on the basis of several social indicators, including the percentage of migrant children. Although policies comparable to DSQ and ZEP existed in the 1970s (Bachmann & Le Guennec, 1996) the new focus on "a model of positive discrimination based on a geographical definition of its priority targets" became prevalent only in the early 1980s (Damamme & Jobert, 1995).

Although neighbourhoods that benefit from DSQ programmes often have a high percentage of immigrant residents, the policy of urban social development does not target them explicitly. The immigration issue is only part of a larger urban policy (*politique de la ville*) reinforced in 1991 through new legislation entitled *Loi d'orientation de la ville* (LOV), also called the "anti-ghetto law." Its purpose is to combat the spread of poor ethnic neighbourhoods by applying a dispersal policy in social housing, the purpose of which is to ensure that the residents of large

housing estates represent a variety of social categories (Toubon, 1992). In this context immigrants appear only as members of the underclass. The "ethnic management" of social housing is nevertheless an open secret (Simon, 1998).

In the 1990s a new perception of migrants has come into force: "integration within the Republic" (*intégration républicaine*) is now the dominant slogan in the political discourse on immigration. Two developments are responsible for this. The first concerns the attempt made in the 1980s by the extreme Right to racialize the immigration issue; indeed, the *Front National* succeeded in putting immigration on the political agenda as an issue of culture and ethnicity (Taguieff, 1991). The second important development is the rise of Islam in the wake of the settlement process of Muslim migrants in France, a phenomenon that has become an object of much media attention (Battegay, 1992). The fear that Muslims could form a community potentially hostile to mainstream society began to trouble public opinion and the political establishment. This caused heated debate over the meaning of French citizenship. The more profound reasons of this debate must nevertheless be sought in general developments such as the challenge of the process of European unification to the French political system (Favell, 1997).

In response, the government—whether Right- or Left-wing—adopted a political discourse grounded in the principle of equal rights and duties for all citizens (implicitly including also alien residents). This turnabout relied heavily on the idea of a "French integration model" that recognized equal rights only to individuals while denying groups any special rights or status (Haut Conseil, 1993; Schnapper, 1991). The discourse in question also purported to·address the increasingly problematic issue of social exclusion, an issue that had become a matter of such urgency that specific policies for the sole benefit of migrants no longer seemed to be politically feasible. Although the mainstream political forces thus managed to reach a relative consensus on the question of integration, the citizenship issue became highly politicized: In 1993 the Right-wing government abolished automatic acquisition of French citizenship for children born in France, but in 1997 the Left-wing government reinstated it.

The latest initiative in the field of immigrant policy has been the establishment of an observer agency for racial discrimination in the autumn of 1999. This agency has no autonomy, however, and may only report discrimination to the authorities.

French centralism and republicanism explain why local authorities have never played a role in establishing local immigrant policies comparable to those in municipalities in the three other countries under study. The capital, Paris, for example, has never implemented a specific policy with regard to migrants (Weil, 1995). Following the *décentralisation* movement during the 1980s, the services of the FAS were regionalized, but the local authorities were not involved in the new structures (Frybes, 1992). A recent study on municipal immigrant policies describes them as uncertain and symbolic (Gaxie, 1999).

Germany

In Germany, as in France, the first problems relating to immigration arose in the area of housing. Starting in the 1960s, the media regularly reported on the dismal housing conditions experienced by migrant workers (the so-called *Gastarbeiter*, guest workers), who came mostly from southern European countries and Turkey. However, no official policy was adopted to remedy this situation. It was only in the early 1970s that immigrants became a policy issue. Before the international economic crisis of 1973-1974, the authorities had noted the declining role of migrant workers in the economy. Following the end of recruitment (*Anwerbestopp*) of 1973 the government adopted a policy of consolidation (*Konsolidierungspolitik*) aimed at introducing more restrictive admission rules for immigrants' family members (Herbert, 1986). Moreover, the concentration of migrants in poverty-stricken neighbourhoods in several major cities led to a general fear of seeing ghettoes develop. In 1974 the Federal Minister for Work and Social Affairs, therefore, introduced the so-called *Zuzugssperren* (settlement ban): persons who were not nationals of European Community countries could not settle in areas where the percentage of aliens exceeded 12% (Franz, 1976). This policy was abandoned in the Federal Republic in 1977 but continued in Berlin until 1990.

The policy of consolidation did not yield the results hoped for by the authorities. As a result of family reunification, the number of migrants in Germany increased steadily during the 1970s. The idea that immigrants required "integration" became increasingly prevalent in the political discourse as well as in the social sciences. *Integration* was defined in various ways, however, depending on the social actors involved. In public administration, integration was defined solely with regard to the labour market, whereas solidarity movements and the churches considered it as a question of equality of rights and opportunities. Finally, in

mainstream political discourse integration was seen as the capacity of migrants to adapt to the German way of life (Treibel, 1990). In the late 1970s a series of official reports that proposed integration measures were issued, but none had any impact on government decisions (Meier-Braun, 1988). The policy adopted by the coalition of Christian-Democrats (CDU/CSU) and Liberals (FDP) that came into power in 1982 took quite a different turn. In 1983 it was decided to offer financial incentives to encourage immigrants to return to their home countries. This programme was largely symbolic, however, and did little to reduce the number of migrants living in Germany (Meier-Braun, 1988). Another attempt to limit immigration was made by the Minister of the Interior, who tightened the rules governing family reunification. Because the German government laid more stress on immigration control than on immigrant policies, some scholars claim that the 1980s were a "lost decade" in matters of integration (Bade, 1993). This view, however, fails to take into account several initiatives taken at the local level during the 1980s. Thus the *Länder* (territories) adopted integration programmes with regard to education and the labour market, and several municipalities established consultative bodies and other mechanisms to promote the participation of migrants in the public sphere (Esser & Korte, 1985). The view in question also underestimates the function of the *Ausländerbeauftragter*, or Commissioner for Alien Residents, established in 1978 and since then responsible for co-ordinating the different administrative levels involved in programmes concerning migrants and for informing public opinion.

In the late 1980s the debate about the treatment of migrants underwent significant changes. The discourse on immigration became increasingly dominated by the idea that Germany was turning into a multicultural society. This concept was first used by the Left to criticize the idea of integration, which was considered to have—like assimilation—authoritarian and paternalistic overtones. But as it spread to mainstream political discourse, the definition of the new concept became increasingly indistinct (Treibel, 1990). Furthermore, the multiculturalism debate had almost no impact on concrete policies. Only certain cities used it as a guideline for special programmes; for example, Frankfurt established an Office for Multicultural Affairs (*Amt für multikulturelle Angelegenheiten*—AMKA) in 1989. This Office took several initiatives to improve relations between immigrants and Germans through policies that promoted information and dialogue; it thus launched campaigns against racism and established a consultative body for migrants. It also lobbied in favour of migrants' interests in the municipal administration

(Leggewie, 1993). Berlin offers another example of this type of policy (Vertovec, 1996b).

In the early 1990s the issue of migrant integration again changed focus. The electoral success of small xenophobic parties in the *Land* of Hessen and in Berlin put pressure on the federal government to clarify how they proposed to cope with the presence of large migrant communities. Their response was a new Law on Aliens (*Ausländergesetz*) enacted in 1990, which enshrined the principle of equal rights for migrants and their free access to the welfare state. It also reformed the rules of settlement and family reunification. However, critics pointed out that the law still failed to acknowledge that Germany had become an immigration country. With the rise of racist violence against migrants during the 1990s, the authorities came under pressure once more. Because they considered racism primarily as the outcome of the growing number of refugees, they opted for restricting the admission of asylum seekers. After extensive negotiations with the opposition, a compromise in the form of a package deal (*Asylkompromiss*) was made in 1993: the possibility of seeking asylum in Germany was severely restricted, but naturalization was facilitated.

Indeed, until then the German nationality law dating back to 1913 was almost exclusively grounded in the principle of *ius sanguinis*, meaning that German citizenship could only be acquired through blood ties. Other European countries, most prominently France, on the other hand, apply *ius soli*, meaning that they grant citizenship to alien children born on national soil (Brubaker, 1992). The law of 1990 took the edge off previous restrictions by stipulating "facilitated naturalization" for migrant youths aged 16 to 23 on the condition they had lived for at least eight years in Germany and had completed at least six years in the German school system. Dual citizenship was still impossible, however. This issue was raised by the coalition of the Social Democrats and the Green Party that came into power in 1998. They proposed to revise the law to allow migrants living in Germany to acquire dual citizenship. With the politicization of the issue by the Christian Democrats, the government felt compelled to seek a compromise: although children of aliens born in Germany now automatically acquire German citizenship, they must decide on their 23rd birthday whether to keep it or to revert to the nationality of their parents. More important, however, the new law has introduced *ius soli* in Germany.

The Netherlands

After World War II the Netherlands experienced an influx of two groups of immigrants from Indonesia after that country gained independence in 1949. The first were *Indische Nederlanders* of mixed Dutch and Indonesian ancestry, who were perceived as repatriates and as such the beneficiaries of special programmes in the areas of housing (e.g., quotas in social housing) and employment to facilitate their rapid integration into Dutch society (Van Amersfoort, 1982). The second group were the Moluccans, former members of the Dutch colonial army, who fled persecution by the new power structure. Unlike the *Indische Nederlanders*, the Moluccans were regarded as temporary residents and therefore became the object of a segregationist policy: they were housed in isolated camps and depended entirely on social assistance (*Wetenschappelijke Raad voor het Regeringsbeleid* (WWR), 1979). During the 1970s three problems appeared on the political agenda, which caused the presence of migrants to become a general policy issue.

First, increased immigration from Surinam gave rise to a debate about more restrictive admission rules. After Surinam's independence in 1975 and the ensuing reduction of immigration from that country, the attention of politicians shifted to the social effects of the large number of Surinamese already living in the Netherlands. The authorities were troubled by the concentration of Surinamese in certain neighbourhoods of major cities (especially The Hague) as well as unemployment and the increasing social exclusion of Surinamese youth, leading to the formation of an ethnic underclass (Van Amersfoort, 1982). Moreover, popular xenophobia targeting workers from Mediterranean countries was on the rise, occasionally breaking into open violence as in the Rotterdam suburbs of Afrikaanderwijk in 1972 and Schiedam in 1976. In a country that takes pride in its history of tolerance, such events were severely condemned. When the *Nederlandse Volksunie* (NVU), an extreme Right-wing party, was founded, the issue became politicized. Although the party had only modest success with the voters, xenophobia was now considered a serious threat to Dutch society (Rath, 1991). Finally, and most important, are the terrorist activities of young Moluccans, which began in the mid-1960s and continued through the 1970s. A number of hijackings in which several people died deeply shocked Dutch public opinion (Bartels, 1986). Although the young Moluccans claimed that they were fighting for the recognition of an autonomous Moluccan Republic within the Indonesian State, the violence they perpetrated had a deeper cause, namely, the contradiction between their being long-time residents in

the Netherlands, if still living segregated from the Dutch, and their unrealistic hope of eventual return to their homeland. In the 1970s their frustration culminated in open revolt (Dalstra, 1983).

All these developments explain why in the late 1970s decision-makers became convinced that something had to be done about the Moluccans in particular and migrants in general. This growing awareness led to the development of a minorities policy (*Minderhedenbeleid*) in the early 1980s. The White Paper (*Minderhedennota*) issued in 1983 by the government offered two policy options: providing assistance to autonomous organizations of migrant groups and promoting the individual integration of immigrants. The second objective was accorded more weight than the first. Nonetheless, the idea that the inclusion of immigrants in Dutch society involved their collective empowerment (*emancipatie*) became a crucial component of Dutch immigrant policy and was linked to the historical experience of integrating the Catholic minority into the Dutch nation-state (Penninx, 1988). In practice, this policy led to the identification of target groups. Immigrants with a different cultural background and low social status were officially designed as ethnic minorities, the main groups being Turks, Moroccans, immigrants from the Mediterranean Basin, Moluccans, Surinamese, and West Indians. With regard to these groups the *Minderhedennota* recommended a policy aimed at three objectives: to assist their collective empowerment, to create programmes to make up for their social disadvantage, and to combat racial discrimination.

Implementation of this policy started in the mid-1980s. To reach the first objective the legal standing of immigrants was improved, for example, by allowing them access to the civil service, by relaxing the naturalization rules and—certainly the most symbolic decision—by granting local voting rights to migrants who had lived in the country legally for five years (Groenendijk, 1987). Empowering immigrant communities also involved subsidizing their associations and establishing consultative immigrants' councils. Although these councils do not have genuine decision-making powers, they are regarded as a tool that allows ethnic minorities to voice their specific concerns (Penninx, 1984). The second objective—the reduction of social disadvantage—was reached through integration programmes in the areas of employment, housing, and education. Finally, the third objective—combating racial discrimination—was realized by establishing the *Landelijk Bureau Racismebestrijding* (National Office for the Struggle Against Racism) to assist victims of discrimination in defending their rights (Böcker, 1991).

At the end of the 1980s this policy, which had initially been supported by the political parties and public opinion alike, came under heavy scrutiny, mainly because of the mounting unemployment rate of immigrants. In 1986-1987 this rate was 27% for the Surinamese, 42% for the Moroccans, and 44% for the Turks, that is, twice or three times higher than for the Dutch (13%). Many politicians concluded that the minorities policy had failed: they criticized it as being too weak and failing to encourage migrants to make efforts on their own (Penninx & Groenendijk, 1989). This criticism led to a new report issued in 1989 under the title *Allochthonenbeleid* (Policy Regarding Aliens). In order to prevent the emergence of an ethnic underclass, the report recommended the continuation of the minorities policy, but also urged the government to centre efforts on programmes designed to improve education and integration into the labour market, with a special focus on incentives to learn the Dutch language (WWR, 1990).

The Dutch government endorsed these recommendations by boosting education programmes and vocational training. It also decided to establish special programmes for *Nieuwkomers* (newcomers). Recent developments indicate that the focus of immigrant policy has shifted from applying the principle of equality of opportunity and collective empowerment to integrating migrants into the labour market (Fermin, 1997). To achieve this goal a policy of ethnic monitoring was launched in 1994 to supplement the relevant education programmes: companies with more than 35 employees are required to reveal the ethnic composition of their staff, as well as their future hiring strategy. In recent years a growing connection between immigration and the issue of urban development is apparent, with immigrant policies being linked to urban renewal programmes (Kruyt & Niessen, 1996).

The *Minderhedennota* of 1983 encouraged municipalities to establish their own immigrant policy. Many big cities, for example, Amsterdam and Rotterdam, but also several smaller local communities produced their own *Minderhedennota*. During the 1990s their activities became even more important, but concentrated mostly on programs of information and mediation, as in the case of Amsterdam (Tillie & Wolff, 1998; Wolff, Tillie,Tijn A Ton, 1998).

Five Types of Immigrant Policy

Our overview of immigrant policies in the UK, France, Germany, and the Netherlands shows both differences and similarities in how these

countries have responded to the presence of migrants. Five broad policy types can be distinguished.

Policies to Guarantee Equality Under the Law

The first types of policies guarantee equality under law. These are based on the idea that the inclusion of immigrants requires abolishing all legal barriers to their full participation in society. Aimed at granting migrants equal legal opportunities, they can be distinguished according to the different categories of rights they involve (Marshall, 1950). The first category comprises civil rights, for example, the right of free speech, the right to belong to a trade union, and the right to establish an association. The second category includes social rights such as free access to social insurance, unemployment benefits, and public assistance. The third category is made up of political rights: the right to participate in or stand for local elections and to apply for citizenship. Although naturalization can be viewed as the last step toward full legal equality, there still remains the question of religious and cultural rights (Bauböck, 1996). In practice, two different issues are at stake here, namely, whether those of a non-Christian faith should enjoy religious freedom on equal terms with Christian denominations in European societies, or whether religious minorities should be granted special rights.

Our analysis shows that during the last three decades settled migrants and their children have been accorded most civil and social rights in all four countries. There are still differences with regard to legislation regulating family reunification, but because this issue is closely linked to admission policies we do not analyse it further.

The most important differences between the four countries can be found in the area of political and religious rights. The Netherlands is the only country to have introduced local voting rights for resident aliens. In Germany and France similarly oriented political initiatives have been launched, but without success. Since the European Union decided to grant local voting rights to Union citizens in all member states, thus fostering a "Europe of citizens," these differences have been somewhat reduced.

Regarding access to citizenship, the UK is the only country that has restricted an earlier more liberal policy, as is evidenced by the British Nationality Act of 1981. The Netherlands and Germany have relaxed their nationality laws, whereas France has traditionally had liberal provisions in this area. The two French reforms of 1993 and 1997 nevertheless show that the overall trend toward more liberal access to citizen-

ship cannot be taken for granted and that under certain circumstances it may well be reversed.

There are also differences in how countries of our comparison treat adherents of non-Christian religions, especially Muslims. The reasons for these differences lie in the historically diverse relations between church and state, for these also influence how the non-Christian religions are accommodated. The heterogeneity of the Muslim community represents an important obstacle to the integration of Islam in Germany (Heine 1997) and in France (Cesari, 1997), where many of the rights claimed by Muslims and other religious minorities depend on their formal recognition as a religious community, a process that requires the official recognition of representatives of the community. The Dutch regulations, based on a long institutional tradition of accommodating religious differences, are more flexible. They offer better opportunities for religious organizations to develop activities (Doomernik, 1995) and they are not as strict with regard to the issue of representiveness (Rath, Penninx, Groenendijk, & Meyer, 1999). In the UK, Muslims first addressed their claims to local authorities and only in recent years have turned to the national level. Whereas local authorities were responsive to Muslims' demands, "the central government has repeatedly shown itself to be inflexible and dismissive" (Rath et al., 1999, p. 230).

It seems, however, that in most cases the unequal treatment of Islam does not result from legal provisions, but rather from discriminating practices of administrative and political authorities, although these are in breach of the principle of religious freedom guaranteed by the constitutions of European countries (Dwyer & Meyer, 1995). Another similarity is that none of the states analysed has granted collective rights to migrants on the basis of their cultural identity such as is provided for non-immigrant cultural and linguistic minorities in some countries.

Policies Against Racial Discrimination

Policies against racial discrimination are based on the idea that discrimination is a crucial impediment to the inclusion of immigrants and a threat to the peaceful coexistence of all those living in a given country. Antidiscrimination policies may address direct or indirect discrimination; the first is defined as the result of the subjective intention of a discriminating person or group; the second is gauged according to the objective outcome of an action that is not intentionally discriminating (Banton, 1988).

With its three *Race Relations Acts* and its *Commission for Racial Equality* (CRE), the UK has gone the farthest in developing such a policy. The Netherlands has an institution comparable to the CRE, the National Bureau for the Struggle against Racism (*Landelijke Bureau Racismebetrijding*). In both countries the efficiency of these institutions is nevertheless open to question. It should be noted, however, that critics do not demand that these institutions be abolished, but rather that they be strengthened. As to French anti-racism legislation, it has served to prosecute publishers of racist publications and utterances, but is little use in combating discrimination in employment and housing and has seldom been invoked to that effect. Finally, the German Fundamental Law contains provisions criminalizing racism, but unlike the UK and the Netherlands, Germany has no policy of actively prosecuting discriminatory practices (Doomernik, 1999).

Policies Against Social Disadvantage
Policies that aim to redress social disadvantage seek to enhance equal opportunities for migrants through compensation programmes. Focusing on the areas of education, housing, and employment (Van Amersfoort, 1982), they give expression to the idea that de jure equality does not guarantee de facto equality for individuals in everyday life. Although such policies concern in principle the population at large, they often target specific groups of beneficiaries. Such groups are defined in three ways. The first consists of using socioeconomic indicators. In this case beneficiaries of compensation programmes are, for example, persons with a low income and little education or families with many children. Because these policies benefit not only migrants but all underprivileged groups in society, one may speak of a global social policy. Another way of defining target groups is by employing criteria such as national origin or ethnicity, which results in a migrant-specific policy. Finally, there are spatially defined programmes that target problem areas or neighbourhoods, which consequently benefit all those who live there.

All four countries apply migrant-specific policies in the area of education. Special programmes are established to help migrant children overcome language barriers and to enable them to follow the standard syllabus. Most of these special programmes are considered to be transitional arrangements. Long-term special measures are increasingly criticized as stigmatizing. With regard to the labour market, Germany and the Netherlands have developed special programmes for migrant youths, whereas measures to facilitate integration into the labour market in France

and in the UK benefit young people in general. Over a long period France and the Netherlands had special housing programmes for migrants: the former through the construction of hostels and funding of social housing reserved for migrants, the latter—in the 1950s and once again in the 1970s—through a quota policy governing allocation of social housing in favour of *Indische Nederlanders* and, subsequently, Surinamese and West Indians. Both countries have now changed their policy: France has made housing initially reserved for migrants accessible to all underprivileged groups, and the Netherlands has started to implement a policy directed against discrimination in housing.

A spatially defined immigrant policy was established for the first time in the UK, namely, the *Urban Programme* of the 1960s and 1970s, which was subsequently abandoned by the Thatcher government. Since the early 1980s France has followed a similar policy—*politique de la ville*—of allocating resources to neighbourhoods facing social problems (many of which also have an above-average share of migrant residents). In the Netherlands also, inclusion of migrants is increasingly viewed as a problem characteristic of major cities, which should therefore be addressed in the context of an urban development policy. Finally, in Germany several large municipalities have recently become active in the field of immigrant policy.

Affirmative action as understood in the US, that is, as a policy of ethnic quotas applied by universities or public administration, for example, does not exist in Western Europe; so far such a policy has not received the support of strong interest groups.

Policies of Information and Dialogue

Policies of information and dialogue are grounded in the assumption that in many instances problems and tensions between migrants and the majority population exist because of insufficient communication between the two groups. Hence it is considered important to have information programmes including both sides involved to combat stereotypes and to foster dialogue and mutual understanding. Four strategies can be distinguished in this regard. The first consists in providing financial support to migrant associations, as these help migrants cope with their new environment. The second strategy involves subsidizing socio-cultural activities such as information campaigns and multicultural events, in the hope that these will facilitate contact between migrants and the majority population. The third strategy consists in setting up consultative bodies, for example, ethnic councils or "foreigner parliaments"

through which representatives of ethnic minorities can voice their concerns to the authorities. The establishment of advisory bodies forms the fourth strategy; such bodies are generally composed of "experts" who are called upon to acquaint the political and administrative authorities with the specific difficulties encountered by migrants.

All four countries considered here have applied policies of this type. In all four, institutions have been created to support migrant associations and sociocultural activities through public funding; the most important of these are the Commission for Racial Equality in the UK and the *Fonds d'action sociale* in France. The German *Ausländerbeauftragte* fulfils the same function. In the Netherlands the state as well as the major cities subsidize migrant organizations. The *Councils for Racial Equality* in the UK play an important role as consultative bodies at the local level. In the Netherlands such bodies exist as well, both locally and nationally. In Germany the municipalities and larger cities were the first to take initiatives in this regard by setting up "parliaments for alien residents." In France such local policies of mediation play a much less important role than in the other three countries.

Finally, the most important advisory bodies can be found in Germany—the *Ausländerbeaftragte*, which intervened repeatedly during the 1980s in the controversy over immigrant policies—and in France with the *Haut Conseil de l'intégration* founded in 1990, which to date has restricted itself to publishing annual recommendations, some of which have proven to be quite influential (most notably in discussion of the citizenship issue).

Making Public Institutions Accessible to Migrants

Policies aimed at opening public institutions (e.g., local administration, police) to migrants and members of ethnic minorities are based on the idea that everyone living in a given country must acknowledge the legitimacy of the State and its agencies. This means that public institutions must view themselves as being part of the society as a whole and therefore reflect its cultural and ethnic plurality. Only then can minorities believe that they are being properly represented and so acknowledge the legitimacy of these institutions. The composition of the public sector should, therefore, mirror the ethnic composition of the society as a whole.

In the UK ethnic monitoring in public administration (especially at the local level) and the police (community policing) plays a significant role. The same applies in the Netherlands where ethnic monitoring has

also been increasingly promoted in the private sector, especially in large companies. No policy of this kind is applied in France or Germany.

Conclusion: Trends in Western European Immigrant Policies

Our analysis shows that each of the countries considered applies a specific mix of the five policy types we identify. In principle, these are not antagonistic; nonetheless, each nation-state prefers some types over others. A clear trend is shown in all four countries to improve inclusion of immigrants and their children through a policy of realizing equality under the law. Moreover, respect has grown for the civil and social rights and, to some extent, the political rights of migrants over recent decades. Another general trend worth mentioning is the importance given to programmes and policies that allow migrants to gain better access to the labour market, as their economic participation has declined since the mid-1970s. The convergence to be noted in this particular field can be explained by the common perception that the—generally high—unemployment rates affecting migrants represent a financial burden for the state and may well lead to other problems like social exclusion, segregation, and urban violence, all of which increasingly threaten to disrupt the social fabric.

A third important point are migrant-specific compensation policies in the field of education and vocational training. These programmes are considered to be transitional arrangements designed to further the inclusion of immigrants and their children into mainstream institutions; special long-term measures for migrants are generally controversial, however. This is also true for housing. In this regard critics stress two aspects: special arrangements for migrants may lead to isolation and ghettoization and have a stigmatizing effect; moreover, special measures are politically problematic because they are likely to trigger a backlash among the majority population, especially in situations where a large part of the majority itself is threatened by social exclusion.

A fourth point of convergence is the link established between immigrant and urban policies. The difficulties faced by immigrants are increasingly regarded as problems inherent in urbanization. For this reason the authorities prefer to address them within the broader framework of urban renewal and regeneration policies. Consequently, one notes a common trend towards spatially defined compensation policies.

Finally, another common trend can be observed with regard to policies of information and dialogue. In all four countries such policies, which comprise a variety of programmes including the funding of associations, the organization of intercultural events, and the establishment of advisory bodies, are considered to contribute significantly to ensuring the peaceful coexistence of all members of society.

Beyond these trends that indicate converging immigrant policies, areas where national differences remain relevant are shown. For example, policies to combat racial discrimination or to make public institutions accessible to migrants are of crucial importance in the UK and have also gained significance more recently in the Netherlands. Conversely, similar measures do not exist in France and Germany; both seem to be unwilling to countenance such policies.

The answer to our initial question must therefore be differentiated. Undoubtedly European immigrant policies converge in certain areas. But country-specific features persist in how European countries deal with the presence of migrants; and there is little indication that changes are about to occur in this regard.

How can we explain the simultaneous convergence and persistence of national peculiarities? Only a few hints and a hypothesis, to be tested by future research, are offered here. First, we should acknowledge that the self-representation of politics in political discourse is not necessarily mirrored by effective political practice. Although public political debate usually centres on issues about a specific experience of nation-building and thus touches the cornerstones of collective identity, political reforms can proceed in other domains without causing much political noise. In the end the specific immigrant policy mix that emerges in a country may at least in part contradict the concept of integration that dominates public discourse. On a theoretical level our hypothesis implies that neo-institutionalist approaches that emphasize continuity may well serve to analyse certain policy domains linked to the central principles of state-society relations, whereas for other domains a traditional view of the policy process as a problem-solving mechanism might be more adequate.

To be more explicit, our study shows that, in the shadow of the debate on different integration models, notably in France and Germany, Western European countries have implemented a whole range of similar immigrant policies that respond to three different, yet interrelated, developments that affect the four countries in roughly similar ways. First, liberal democracies have legal, normative, and political difficulties in

permanently excluding parts of their resident population or in tolerating systematic violation of the principle of equal treatment. If this is to be explained by an emerging transnational regime of norms and rules, as Soysal (1994) proposes, or by the "unfolding of the internal logic of the core values of liberal democracy," as Freeman (1995b, p. 909) suggests, is still a matter of discussion (Joppke, 1998).

Second, high unemployment rates, especially of immigrants and their descendants—a phenomenon observed in all four countries as a consequence of similar admission policies in the postwar period—led to similar attempts to (re-)integrate migrants into the labour market and the school system. Third, because the impact of socioeconomic exclusion in terms of segregation and urban unrest is mostly felt in large cities, immigrant policy has in the last decade increasingly become defined as an urban issue.

Thus similar sets of problems have produced comparable responses, in part also through mutual borrowing and learning. How, then, should we explain the remaining differences between the four countries? According to our hypothesis, struggling against discrimination and opening public institutions to immigrants, the two major policy domains where differences persist, both touch the core of historically established notions of how state and society should relate to each other. Such an intimate connection is not seen in those domains of policy-making where we see convergence. State- and nation-building gave rise to a centralist and republicanist tradition in France, an ethnocultural understanding of the relation between state and society in Germany, the notion that the state is supported by culturally defined social segments with equal rights in the Netherlands, and the idea that the state should enforce a set of rules that guarantee "fair competition" between different interest groups in the UK (Schiffauer, 1997).

Anti-discrimination legislation and preferential treatment of immigrants in public employment must be perceived as a break with republicanism in France, because they introduce cultural or racial categories into the legal and administrative system, thus dividing a state held together by the everyday plebiscite of its citizens. In Germany the state is supposed to protect the interest of the national group it represents—and not that of immigrant minorities or other peoples who do not truly "belong" to the national family. By contrast, the state in the Netherlands is called upon to guarantee equal status to the different cultural segments in the state's administration and in the society at large. According to the liberal model of society-state relations in the UK, the state should provide an even playing field on which different groups compete.

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