Education policies and the dilemmas concerning migrant students in the Northern European welfare states

The case of mother-tongue instruction

Enemark, Nanna Ramsing; Li, Jin Hui; Buchardt, Mette

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Balancing Dilemmas in Northern Europe

Edited by

Christian Albrekt Larsen

Professor of Comparative Welfare State Studies, Department of Politics and Society, University of Aalborg, Denmark

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Contributors

Karen Nielsen Breidahl is Associate Professor at the Department of Politics and Society, Aalborg University, Denmark. She is specialized in the study of comparative welfare state research and the fields of integration and migration studies. She has been involved in major research projects, beginning with her PhD project, publishing a comparative, historical study of the development of integration policies within the Scandinavian welfare states. More recently, her major projects have focused on how the welfare state and its institutions influence migrants' socio-cultural incorporation patterns and their attitudes toward the welfare state. Currently she leads a comparative research project on asylum seekers' socio-cultural integration patterns and building of trust. These studies, utilizing both qualitative and quantitative methods, have contributed new theoretical and empirical insights and have been published in recognized international scholarly journals.

Mette Buchardt is a Professor and Head of Centre for Education Policy Research (CfU), Department of Culture & Learning, Aalborg University, Denmark. She holds a PhD in Curriculum History and Sociology with a dissertation on migration, schooling and identity politics from the University of Copenhagen, where she has also been an assistant professor, and has been a postdoc at the historical studies departments at the University of Stockholm and the University of Jyväskylä. Buchardt's research comprises the interdisciplinary field of education policy history and welfare state history, including the crafting of welfare nation states across Europe and the role of migration. She has been affiliated with Nordwel, Nordic Centre of Excellence: The Nordic Welfare State – Historical Foundations and Future Challenges, and has been a visiting scholar and visiting professor at Northern European Studies, Humboldt University; Department of Curriculum and Instruction, University of Wisconsin, Madison; and at the Department of Historical, Philosophical and Religious Studies, Umeå University, among others. Buchardt has published extensively on the history of migration, schooling and the European welfare states, for example, *Schooling the Muslim Family: The Danish School System, Foreign Workers, and their Children from the 1970s to the Early 1990s* (Routledge 2018); *Families, Values, and the Transfer of Knowledge in Northern Societies, 1500–2000*, U. Aatsinki, J. Annola and M. Kaarninen (eds) (Routledge 2019).

Anna Diop-Christensen (ADC) is an Assistant Professor in Sociology at the Department of Sociology and Social Work at Aalborg University, Denmark. She holds a PhD in Political Science from Aalborg and an international MSc in Social Policy Analysis, University of Leuven. Before joining Aalborg University, ADC was previously employed as an Assistant Professor at the Metropolitan University College in Copenhagen and as a Researcher at the Luxembourg Institute of Socio-Economic Research (LISER). ADC's research focuses on migrations flows, labour and educational outcomes of immigrants, neighbourhood dynamics and immigrant integration. ADC is a member of the SocMap Research group at the Department of Sociology and Social Work and is also affiliated with the Center for Displacement, Migration and Integration (MIX) and the Centre for Comparative Welfare States (CCWS).

Lanciné E.N. Diop (LEND) is Assistant Professor at the Department of Politics and Society with a main affiliation to the Centre for Comparative Welfare States (CCWS) and the Center for Displacement, Migration and Integration (MIX). LEND's research primarily focuses on the areas of modelling asylum seeker flows, migration flows and their consequences for integration. His current research aims at investigating contact between migrants and natives in the workplace and its consequences for integration (this project is called MN-Contact and is led by Prof. Christian Albrekt Larsen and funded by DFF). Furthermore, LEND is involved in the Horizon2020 project, FUME (Future Migration Scenarios for Europe), which aims at gaining a deeper understanding of migration by revisiting the patterns, motivation and modalities of migration from the perspective both of sending countries and receiving countries. LEND has also previously been employed as a postdoc at the Department of Politics and Society (AAU). Before joining Aalborg University, LEND worked as a Researcher during his PhD at the Luxembourg Institute of Socio-Economic Research (LISER). His educational background is multidisciplinary, as he holds a PhD in Human, Economic and Regional Geography (University of Paris 10), an MSc in Land Management, Urban and Regional Studies from the University of Strasbourg, France, a Master's in Global Development (University of Copenhagen), and a Bachelor's in Sociology (University Cheikh Anta Diop, Dakar, Senegal).

Nanna Ramsing Enemark is a PhD fellow in Education Policy Research and Migration Studies at the Centre for Education Policy Research (CfU), Department of Culture and Learning, Aalborg University, Denmark. She holds an MA in Learning and Innovative Change and a BA in Politics and Administration from Aalborg University. Her research interests include the welfare state, migrant education, international education, migrant and education policy and comparative education.

Troels Fage Hedegaard is an Associate Professor in Political Science at the Department of Politics and Society, Aalborg University, Denmark. His PhD dissertation "The Dynamics of Stability" described how policy feedback processes help to reproduce support for the Nordic welfare model. His later work has focused on how migrants perceive the Northern European welfare states and how inhabitants of Norther European welfare states perceive migrants.

Kristian Kriegbaum Jensen is Associate Professor in the Department of Politics and Society, Aalborg University, Denmark and head of the Center for Displacement, Migration and Integration (MIX). He holds a PhD in Political Science from Aarhus University. His research is on the dynamics of immigration politics and how the national integration context shapes identity, attitudes and behaviour among both immigrants and majority populations. His published work addresses concerns relating to party politics, policy effects, national models, nationhood and the ethics of immigration. Currently, he is Co-PI on the projects "When Do Children of Immigrants Thrive?" and "Outside Citizenship" which, respectively, address the effect of schooling practices and citizenship requirements on the social and political integration of immigrants and their children.

Christian Albrekt Larsen (CAL) has specialized in the question of how to build social coherent societies in open economies and multicultural settings. The academic work of CAL demonstrates that the institutional structure behind the "Nordic model" still provides a promising answer to this fundamental question of social science. Internationally CAL is best known for his work on how institutions, especially universal welfare schemes, enhance public support for anti-poverty policies and social trust. In 2006 CAL published *The Institutional Logic of Welfare Attitudes: How Welfare Regimes Influence Public Support* (Ashgate 2006), which has been highly influential in the field of comparative opinion research. The book was followed by *The Rise & Fall of Social Cohesion: The Construction and De-construction of Social Trust in the US, UK, Sweden and Denmark* (Oxford University Press 2013), which theorizes why social trust declines in some post-industrial societies while it increases in others. In the national Danish context CAL has contributed with two books about long-term unemployment (2003, 2009, co-authored), two books about national identity and attitudes to migrants (2008, 2016), a book about the politics of welfare reforms (2004, co-authored) and a book about universalism (2015, co-authored). The issue of migration and assimilation into Northern European host countries is prominent in CAL's current project portfolio. CAL has received a Danish Sapere Aude II research leader elite grant (2012–2015) and a Fulbright grant (2015–2016). CAL was a member of the Danish National Research Council for Social Science (2015–2021).

Jin Hui Li is an Associate Professor at the Centre for Education Policy Research (CfU), Department of Culture and Learning, Aalborg University, Denmark. She holds a PhD in Sociology of Education and History of Education Policy from Aalborg University, and has been a Fulbright research fellow at the Department of Curriculum and Instruction, University of Wisconsin, Madison, USA. Her areas of research are history of education, sociology of education and comparative welfare state studies and she specializes in the relationship between education, migration and state–citizen relations within welfare states.

Tore Vincents Olsen is Associate Professor in Political Theory at the Department of Political Science, Aarhus University, Denmark. His research interests include multiculturalism, citizenship, education, recognition, toleration, compromise, populism, democracy, constitutionalism and the political theory of the European Union. He has published articles in journals such as *Acta Politica*, *International Theory*, *Nations and Nationalism*, *Ethnic and Racial Studies*, *Comparative Education*, and *Journal of European Public Policy*.

Emma Ek Österberg is an Associate Professor in Public Administration at the School of Public Administration, University of Gothenburg, Sweden. Her research revolves around issues of governance, organizing and auditing, particularly within the field of welfare politics. Her studies include state as well as local authorities and have in recent years come to focus on collaborative and market-based arrangements. Currently she is involved in two research projects on integration policy, more specifically on how policies and practices for labour market integration take shape and develop in local arenas and the role of local authorities. Within these projects Ek Österberg explores tools for implementing national integration policy as well as novel initiatives built up from below.

Rasmus Lind Ravn (RLR) is a postdoctoral researcher at the Centre for Labour Market Research, Department of Politics and Society, Aalborg University, Denmark. He specializes in the investigation of active labour market policies for disadvantaged groups, and currently researches labour market integration of refugees. RLR also carries out evaluations using quasi-experimental methods and designs, and does research in evaluation methodology. Methodologically, he uses a wide range of quantitative and qualitative data and methods – often in combination.

Trine Lund Thomsen (TLT) is Associate Professor in Migration Studies at the Department of Culture and Learning, Aalborg University, Denmark. In her research TLT has been particularly engaged within the area of migration and integration processes, under the heading of inclusion and exclusion mechanisms. Her focus is mainly on globalization and social transformation, migra-

tion regimes and immigration management (policy), migration process and life course, integration of refugees, East–West migration, high and low skilled labour migration, labour market inclusion, diversity management, integration processes and identity formation, intersectionality and biographical narrative methods.

Preface

The journey analogy is hackneyed. However, it is an analogy that seems to capture the feelings of most scholars finalizing a book. Ahead of a book is always a sailing out phase. In our case, it was an internal grant at Aalborg University which asked researchers from different faculties to cooperate across disciplines on major contemporary challenges. We labelled the project "Global flows of migrants and their impact on North European welfare states" (FLOW). The initiative was part of a strategy labelled "Knowledge for the World", in Danish "Viden for Verden". Then, in 2018, immigration from low-income countries was the most salient political issue in Europe. The backdrop was the so-called refugee crisis in 2015 and, for Northern Europe, the inflow of Eastern European workers following the EU expansion in 2004 and 2008.

Situated in Denmark, the inflow of immigrants has been a salient issue since the mid-1990s, when there was a distinct anti-immigration party in Parliament, the Danish People's Party. The refugee crisis was just the latest element in what seems to be an endless discussion between those fearing and those accepting an increased inflow of migrants from low-income countries. However, the pictures were different. The fear was reinforced by images of people from Syria and Eritrea walking along Danish highways; although the majority had stopped in Germany and the rest were heading for Sweden, this created an impact on the Danish public. At the same time, the broad recognition of a future climate crisis entered the debate. The fear of hordes of climate migrants was compounded by estimates of future heatwaves in Africa. At our opening conference, dark-red areas on slides from my good colleague Carsten Keßler became imprinted on my mind. The acceptance was underpinned by a picture of a drowned three-year-old boy found on the Turkish shore near Bodrum. Alan and his brother did not make it to Greece. The acceptance might also become reinforced by the fact that it is our overconsumption that in the future will push people across the Mediterranean.

It was in this intellectual and political climate that the authors of this book were given resources to study the interplay between the global flows of migrants and Northern European welfare states. It was a group of political scientists, sociologists, geographers and historians that sailed off. We were not united on a common ship with a single captain. We were individual researchers sailing out in optimistic dinghies heading in a somewhat similar direction. Guided by the same research question. I think of this book as the stories we

told each other when we returned to harbour, edited by a Danish social scientist trained within comparative welfare state studies.

One of the first things we discovered was that many others have sailed the academic oceans related to migration, to such an extent that we simply cannot do all of them justice in this book. Thus, our story is one of many. Limited by our outlooks, our resources, and our blind spots. In any case, my good colleagues made me wiser on one of the most complex issues of our times. I am grateful to everyone who joined this academic journey, especially the post-doc researchers, who have done most of the hard work. I hope their experiences will be helpful to their future careers.

The final editing of the book took place in Malta. This is a reminder of differences in perspectives. In my perspective, the surrounding blue ocean was optimal for recreational swimming. The sun was optimal for vitamin D. The Maltese holiday resort was optimal for editing. In another perspective, the Mediterranean is a graveyard. Rising temperatures in areas of Africa make farming impossible. And Maltese accommodation equals imprisonment in detention centres below basic humanitarian standards. It is easy to criticize the latter from a distance. From a Maltese perspective, it is a matter of rescue vessels being rejected at Italian harbours and a reluctance to engage in any type of burden-sharing from the other EU member states. At the same time, Maltese society is highly dependent on inflows of tourists, migrant workers and millionaires. A paradoxical micro-cosmos of the dilemmas of our times.

Christian Albrekt Larsen, editor
22 November 2021
Mellieha Holiday Centre, Malta

1. Migration and Northern European welfare states

Christian Albrekt Larsen

The question of how to combine a welfare state with increased levels of migration has become both politically and academically salient in Europe. The background is the fact that Northern European countries in particular changed from being net senders of migrants in the nineteenth century to net receivers at the end of the twentieth century. At the same time, Northern European countries have developed comprehensive welfare states, which protect most residents against the risk of unemployment, sickness, disability and old age. This is supplemented with a public service sector, which provides healthcare and education plus child- and elderly-care; especially so in Scandinavia. Thus, politicians, the public and academics of Northern Europe are embedded in a historical time and space, where a net inflow of migrants and a (fairly) generous welfare state co-exist. Therefore, it is quite reasonable that they have started to ask whether this is a happy or unhappy marriage. Or in more academic terms, whether it is a stable or unstable equilibrium. The underlying logic is a widespread consensus that Northern European countries have come a long way in establishing some of the most human and civilized societies in the world. This creates a strong preference for the status quo among the privileged members. However, it also raises the more academic question of how to build just societies in a more globalized world.

The more specific question of the book is how the Netherlands, Germany, Denmark and Sweden have addressed the dilemmas related to having a fairly generous welfare state and at the same time experiencing increased levels of immigration from low-income countries outside the European Union. Initially, such migrants were welcomed as temporary guestworkers in the booming economies of the 1960s. As guestworker programmes came to a halt in the mid-1970s, the inflow from low-income countries outside the European Union has primarily been driven by humanitarian concerns and family unifications. The latest example is the inflow of asylum seekers around 2015, which was labelled the "refugee-crisis". The migrants from low-income countries outside the European Union tend to fare worse on the (contemporary) labour markets than do natives and they tend to be more culturally distinct than groups from

neighbouring EU countries. The previous literature has sometimes described this as rich Western countries being caught in a progressive dilemma (Goodhart, 2004). The argument goes that one can have relatively open borders and a modest welfare state, as was the case during the inflow of migrants to the US in the nineteenth century, or one can have relatively closed borders and a generous welfare state, as was the case in Northern European welfare states during the nineteenth and twentieth centuries (Kalm and Lindvall, 2019). But it might be difficult, for a number of reasons that we shall evaluate throughout the book, to have both (Freeman, 1986). This is labelled a progressive dilemma, as it often is "progressive" political forces that advocate both for generous welfare states and relatively easy entry criteria.

The argument about a "hard" progressive dilemma has most forcefully been advocated by American based economists (e.g. Freeman, 1986; Alesina and Glaeser, 2004). The first pillar of the argument is about economic (un)sustainability, because having a generous welfare system will be a "magnet" for migrants from poor countries with low human capital (Borjas, 1999), whereas migrants with more human capital will be attracted by lower tax rates in countries with less generous welfare benefits. This magnet effect is believed to increase as (non-integrated) diasporas reduce the cost of entering a new state, that is, everything else being equal, migration is likely to accelerate (Collier, 2013). The second pillar of the argument is that the sense of mutual belonging and solidarity, needed to build and uphold a generous welfare state, will erode as the population becomes more ethnically diverse (Goodhart, 2004; Miller, 1993). The latter argument comes in a sociological version, which emphasize new "us vs. them" divides. In a Northern European context, the divide between "Muslims" and "natives" has become the most salient. The argument also comes in a political science version, which emphasizes that (1) perceptions of free-riders (Rothstein, 2005) are detrimental for residents' willingness to pay tax and politically support a generous welfare state and (2) right-wing political forces will be inclined to play this "race-card" in order to win elections (Alesina and Glaeser, 2004).

This book contributes to this standing debate, primarily by providing an insight into how the four Northern European states, through various public policies, have responded to increased levels of migration. The book is based on the underlying assumption that states are not simply passive entities caught in a progressive dilemma (see Ruhs, 2013 for a similar argument on the design of labour migration programmes). On the contrary, Northern European states have political elites, civil servants and a public, which actively try to mitigate and overcome problems and challenges. The book starts with an analysis of the relationship between public policies and the flow of asylum seekers into EU15 countries in the period from 2008 to 2015 (Chapter 2). Here it is shown that destination-country policies matter, but in a different way than imagined in the

initial formulation of a progressive dilemma. It is not generous social assistance that attracts asylum seekers. It is humanitarian standards of acknowledging claims for refugee status and the possibility for family unification that matter the most. Thereafter the book describes how these four states have received asylum seekers in the period from 2015 to 2020 (Chapter 3) and sought to integrate admitted applicants in the labour market (Chapter 4). Thereafter the book turns to how the four countries "discovered" the children of the guest-workers of the 1960s and how they have subsequently handled non-native children in primary and secondary school systems (Chapter 5). Focusing on the central dilemmas of teaching in the mother tongue, the chapter reveals how the countries still underpin the distinctions between native children speaking the national language and "the others", while the countries at the same time are gradually adapting to the reality of being net-immigration countries. This is followed by an analysis of how young adults of immigrant descent remember their primary and secondary school experiences in two of the most similar countries, Sweden and Denmark, with two of the most different integration philosophies in the school context (Chapter 6). Based on original survey data, the chapter shows an absence of impact of integration philosophies, which is in line with a body of previous literature in the field. The book then moves on to the issue of naturalization policy in the four countries (Chapter 7). Updating existing indexes to 2021, the chapter finds that the known positions of the four countries (see below) are still reflected in public policies. However, Germany in particular has moved towards more inclusive policies, which seems to be a stable position, while Denmark has a trajectory towards ever more exclusive policies. These chapters will show that the four states were not simply faced with a single progressive dilemma. On the contrary, the political elites, civil servants and the public faced – and continue to face – several dilemmas (in the plural). Chapters 8 and 9 are more forward-looking. Chapter 8 describes a contemporary public consensus about what kind of migrants to welcome and what kind of migrants to exclude. A consensus that both cuts across the four countries and segments within the four countries. In our point of view, future migrant-selection policies are likely to be shaped by this public consensus. To put it simply, the mandate of the people is to install policies that attract the (perceived) best migrants and deflect (the perceived) worst migrants. Finally, Chapter 9 revisits the idea of Northern European welfare states being caught in a progressive dilemma.

A NORTHERN EUROPEAN PERSPECTIVE

This book is a contribution to the emerging field in the intersection between European migration studies and welfare studies (see Breidahl et al., 2022 for an overview; Sainsbury, 2006). It is fair to say that much of the standard

knowledge within migration studies is based on the case of migration into the US. This is partly caused by the US being the destination country per se, still holding the largest stock of migrants in the world, and partly caused by American intellectual dominance in many academic fields. However, the US is not just any case of a Western country, for example defined as a country with a market economy and democracy. From the point of view of comparative welfare state scholars, the US together with other classic settler-societies such as Canada, Australia and New Zealand are cases of a liberal welfare state regime with a particular set of state, market and family institutions. In contrast, European countries are often described as cases of respectively social democratic welfare regimes, in Scandinavia, and conservative regimes, in continental Europe, with different sets of state, market and family configurations (Esping-Andersen, 1990; 2000). The contemporary concern is exactly that these institutional settings might be more difficult to combine with migration than were the American institutional settings.

The empirical focus of the book, as already mentioned, is Denmark and Sweden (representing a social-democratic welfare regime) and Germany and the Netherlands (respectively representing a conservative and a mixed social democratic and conservative welfare regime). Despite different institutional structures, the four countries share a large number of commonalities. Thus, overall the book is based on a most-similar design. In such a research design, policy differences are somewhat puzzling. Why do similar countries, facing similar problems, develop different policies? It is also a design in which variations in policies might be perceived as small natural experiences that potentially bring academics a bit closer to causality. At least, is it well-known that (perceived) policy experiences from similar neighbouring countries often enter into the national political process.

Just to mention a few of the commonalities: the four countries share the same geographical location, which means that fairly similar immigrant groups arrive. They are stable states with thriving market economies, a low level of corruption, well-functioning democracies, and they have until recently had a relatively low level of migration (see below and Chapter 2 for inflow of asylum applicants). Thriving economics matters as the classic "pull" factor (see below), a low level of corruption matters as the fundamental precondition for efficiency governance, and democracy matters as a channel for the will of the (host) people (see Chapter 8). Except for Sweden, they are NATO members and all four are deeply embedded in the European Union. The Netherlands and Germany were among the founding members of the EU in 1952, while Denmark and Sweden joined in 1973 and 1995 respectively. A unique feature of the four countries we study is that the European integration process fundamentally alters the state boundaries. In 1985 (west) Germany, the Netherlands, Belgium, France and Luxembourg signed the Schengen agree-

ment about a gradual removal of all internal border controls. A supplement was added in 1990, which meant a complete abolition of border controls and a common visa policy. The agreement was signed by all EU members of 1997 except the UK and Ireland. At the same time, the Maastricht Treaty installed an EU citizenship, which (reinforced) the right of all EU citizens to reside and work in other member states. The EU treaties also guarantee (at least in principle) that EU workers have the same rights to social benefits and services as "natives". Thereby Denmark, Sweden, the Netherlands and Germany have an institutional set-up that does not enable these states to control the intra-EU flow of migrants. Or at least, the flow will be managed in a multilevel set-up where both the EU and the new and old member nation-states will have a say.

The rules for the inflow from non-EU countries into the four countries, which is the primary focus of this book, is still a national issue. However, inter-governmental EU agreements are still important. Especially for asylum seekers, the four countries have all signed the Dublin agreement, which enables the countries to push migrants back to the first EU-arrival country. This system in practice failed during the "refugee crisis" of 2015 and is currently being renegotiated between EU countries (so far with little success). More "successful" is the common EU effort to establish a hard border with Northern Africa and Turkey in the wake of the "refugee crisis". These international deals are supplemented by a new European border agency, whose budget increased from as little as 6 million euros in 2005 to 460 million euros in 2020 (to this should be added substantial increased national budgets to border control). However, the inflow of migrants from non-EU countries is still the domain of the nation-states.

CONCEPTUAL FRAMEWORK OF THE BOOK

All intellectual endeavours are dependent on concepts. Figure 1.1 establishes a conceptual framework by distinguishing between two dimensions and four ideal types. First, the stock of migrants, and secondly, the integration of residents of the state. Around the mid-1980s, one could classify Denmark, Sweden, the Netherlands and Germany as "integrated low-inflow states" in the upper-left quadrant. The share of residents born in other states, living within the state boundaries of Denmark, Sweden, the Netherlands and Germany (foreign-born), was below 5 per cent of the population. The countries had experimented with guestworker programmes in the booming economies of the 1960s and early 1970s but they had largely been abandoned after the recessions of the mid-1970s. Thus, the inflow of workers from other states was limited and the (unexpectedly) settled guestworkers had not yet created a sizeable second generation. The inflow of asylum seekers from other states was also limited due to the relatively stable international bipolar system of the

cold war, though West Germany had a small steady stream of East German refugees entering the state. Germany also had a sizeable group of so-called "Aussiedler", who lived in Eastern Europe and Russia and had a right to enter Germany. However, again the cold war largely prevented them from doing so. The colonial link of the Dutch empire had largely been abolished, apart from the Lesser Antilles in the Caribbean. The colonial link of the smaller Danish empire had also been abolished, except for the small population respectively in Greenland and the Faroe Islands. Finally, Sweden had a small distinct Sámi-minority living in the very north of the country. Thus, the mid-1980s could serve as a benchmark for the latest experience of being "low-inflow states". At the same time, the mid-1980s could be seen as a peak for the integration of the residents of the four states.

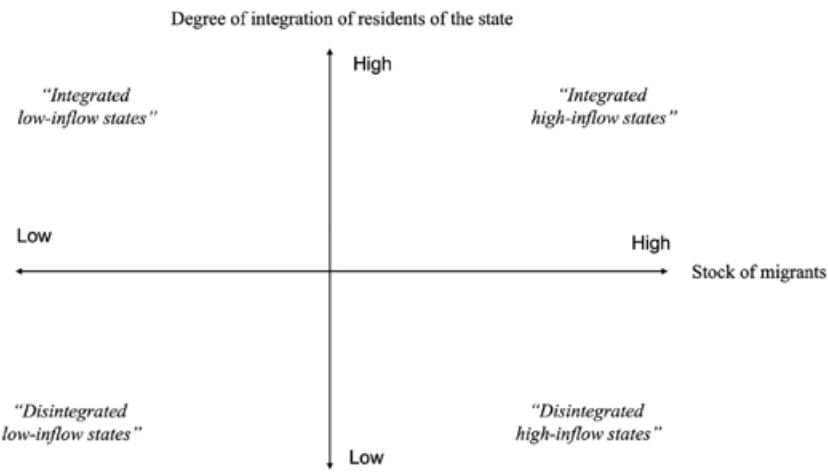


Figure 1.1 *Conceptual destination-country ideal types based on the combination of stock of migrants and degree of integration of residents of the state*

How to define and measure the level of integration among the residents of a state is a tricky business, which is at the core of the discipline of sociology (which often use the term "society" though the imagined boundary often is the state). Since the emergence of the nation-state ideology of the nineteenth century, the idea that each state had a nation, and that each nation should have a state, it is clearly described how institutions such as primary and secondary schools (language and national history training), the military (national service) and state-run mass media (public service channels) constantly seek to integrate the residents of the state (Anderson, 1989; Tilly, 1994; Buchardt et al., 2013).

The establishment of democracy in Denmark, the Netherlands, Germany and Sweden is part of the same nation-state building process, turning residents into democratic citizens with a say in how to run the state. Even the German experience with Nazism could be interpreted as an (extremely unsuccessful) nation-building process.

The establishment of rights for the residents of a given state is a fundamental part of this integration process. Using the terminology of Marshall, the process of giving the residents civil and political rights was followed by the establishment of social rights, primarily as a way to counteract the potential disintegration caused by the class conflicts associated with the establishment of capitalist national economies (Marshall, 1963). The construction of the modern welfare state started in Northern European countries around the late nineteenth century and early twentieth century. In this period all four states developed systems that protected all or large segments of the residents in the case of sickness, old age, unemployment and disability. These protection systems were further developed in the twentieth century and experienced what Esping-Andersen labelled as their "golden age" from the mid-1950s until the early 1980s. In combination with the industrial production structures and unionized labour markets, the result was fairly equal income distributions. The Gini-coefficient of disposable household income in 1987 was 0.21 in Sweden, 0.24 in the Netherlands, 0.25 in Germany and 0.26 in Denmark, which is historically low for advanced capitalist economies (Luxembourg Income Study, 2019). Thus, if one uses income distribution as a rough structural indicator of the degree of integration of the residents of the state, the four countries were indeed integrated by the mid-1980s.

Survey research on representative samples of the states' residents was not common in the mid-1980s, which makes it difficult to use subjective indicators of integration. An exception is the European Values Study from 1981, which asked, for example: "to which of these geographical groups would you say you belong first of all?". The most common answer was that the residents felt that they belonged to the town. However, there were still 37 per cent in Denmark, 32 per cent in the Netherlands, 24 per cent in (West) Germany and 22 per cent in Sweden who responded: "the country as a whole" as their first choice. Furthermore, "the country as a whole" was the most common second choice, whereas feelings of belonging to the world, the continent or the region were rare. The 1981 survey also asked: "How proud are you to be a Swede [Dane, German, Dutch]?". Seventy-seven per cent were "very proud" or "quite proud" of being a Dane. The same share was 73 per cent in Sweden, 66 per cent in the Netherlands and 67 per cent in (West) Germany. Finally, the survey asked (which has become a very popular indicator of social integration or cohesion; see below): "Generally speaking, would you say that most people can be trusted or that you can't be too careful in dealing with people?". Respectively

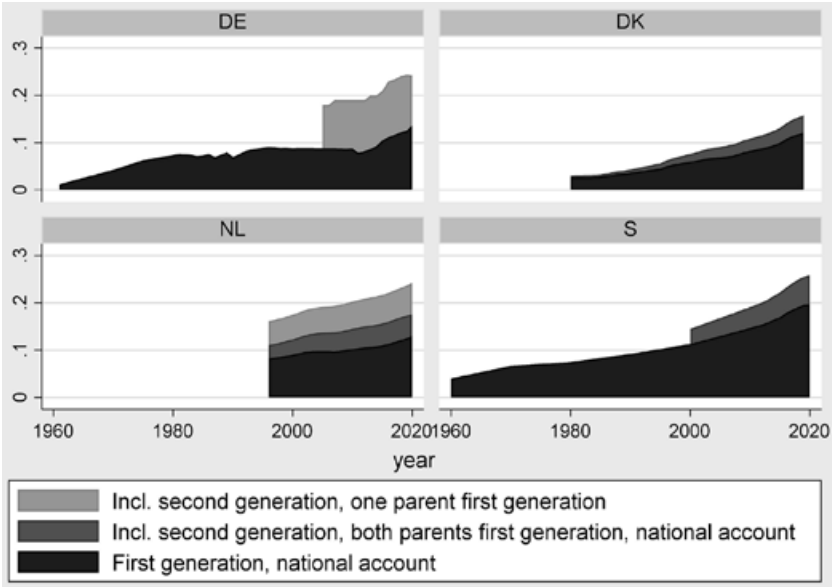
57 per cent of Swedes, 51 per cent of Danes, 44 per cent of Dutch and 31 per cent of (West) Germans answered that most people can be trusted. Thus, in terms of belonging, pride and trust, all four countries also seemed "integrated" by more subjective indicators; especially Sweden and Denmark.

The ideal types of Figure 1.1 are not only an academic tool. In contemporary Northern European public, political and academic debates, the "integrated low-inflow state" of the mid-1980s is often used as a benchmark for evaluating a (potential) shift to different societal models. Hollifield (2004) for example uses the term "Emerging Migration State". In Northern Europe migration is often imagined both to cause a horizontal movement to the right in Figure 1.1, increasing the stock of migrants, and a vertical downward movement, lowering the level of integration. Thus, the fear among "progressives" is to end up with a society close to the ideal-type of a "disintegrated high-inflow state" (the lower right quadrant), which is the prediction of the strong believers in the existence of a hard progressive dilemma. One logical response to this fear is to reduce the inflow and stock of immigrants, thereby stopping the horizontal movement to the right, in order to return to the "integrated low-inflow-state" of the past (largely meaning the 1980s). Another logical response to this fear of "progressives" is to intensify the mechanisms that integrate residents of states, thereby stopping the downward vertical movement, and approaching the more futuristic ideal-type of an "integrated-high-inflow state". Finally, there is also the dystopic prediction that even if Northern European states put a stop to immigration, maintaining the contemporary moderate stock of migrants (see below), they will, due to ethnic disputes, be on a path that turns them into "disintegrated low-inflow-states" often associated with sub-Saharan countries. The latter scenario is fuelled by the idea of an unsolvable clash between "Muslim" minorities and "natives".

THE INCREASED LEVEL OF MIGRATION

There is no doubt that Northern European countries have experienced increased inflows and stocks of migrants. However, it is standard knowledge that social developments and potential problems need to be described and constructed before they can be understood and reacted to. The national statistical bureaux are pivotal in this task. Their categorizations and descriptions of trends are fundamental for discussions on the horizontal movement to the right in Figure 1.1. Using the national definitions, Figure 1.2 displays the changes in the share of foreigners in the total population, with the y-axis scale set from 0 to 30 per cent.

The statistical unit of the states of Sweden and Germany provides the longest time series on the scope of immigration (first-generation). In Sweden in 1960, the foreign-born made up 4 per cent of the population. This had



Source: Own calculations based on national statistical accounts.

Figure 1.2 *Development in the share of migrants (first-generation) and descendants (second-generation) of the total population in Northern Europe*

increased to 19.7 per cent in 2018. From 2000, Statistics Sweden also provides the number of residents with both parents being foreign-born. This group made up 3.2 per cent of the Swedish population in 2000, which increased to 6.2 per cent in 2020. Thus, added together, first and second generation made up 25.9 per cent of the Swedish population. Statistics Sweden does not provide data on the share of second generation with only one parent being foreign-born. If one parent is Swedish, the child is calculated (or constructed) as Swedish. In Germany, the statistic is based on an aggregation of regional registers of "foreigners", which is more complex than foreign born. A German citizen born abroad would not be counted as "foreign". By national account, the "foreigners" made up 1.2 per cent of the (West) German population in 1961. This has increased to 13.7 in 2020 (in both the former West and East Germany). Since 2005, the German population statistics also include an account of the number of citizens of foreign descent, calculated as two or just one parent being classified as foreigners. This group made up 9.8 per cent of the German population in 2005, which increased to 10.6 per cent in 2020. Combined with the first generation foreigners, those with migration experience made up 24.3

per cent of the German population in 2020. Thus, this was a smaller share than that found in Sweden, where the second generation with one Swedish parent was not counted as the second generation.

In Denmark, statistics are available from 1980. By 1980, migrants (defined as foreign-born with neither parent both being born in Denmark and holding Danish citizenship) made up 2.7 per cent of the population. This has increased to 12 per cent in 2019. Their descendants (defined as born to two "migrants") made up 0.4 per cent of the population, which had increased to 3.7 per cent by 2019. Thus, the aggregated share in 1980 was 3.1 per cent, which increased to 15.8 per cent in 2019. Finally, the Dutch statistics on foreigners only date back to 1996. By 1996 the foreign-born made up 8.3 per cent, which by 2020 had increased to 13.0 per cent. Those with two foreign-born parents made up 2.8 per cent in 1996. This has increased to 6.5 per cent in 2020. Added together, this results in an increase from 11.1 per cent in 1996 to 17.5 per cent in 2020, which can largely be compared with the 24.9 per cent in Sweden and the 15.8 per cent in Denmark. Finally, the Dutch Statistics Bureau also counts those with one foreign-born parent. This share increased from 7.8 per cent in 1996 to 11.3 per cent in 2020. With all three groups added together, the share increased from 16.1 per cent in 1996 to 24.2 per cent in 2020, which seems to be equivalent to the situation in Germany.

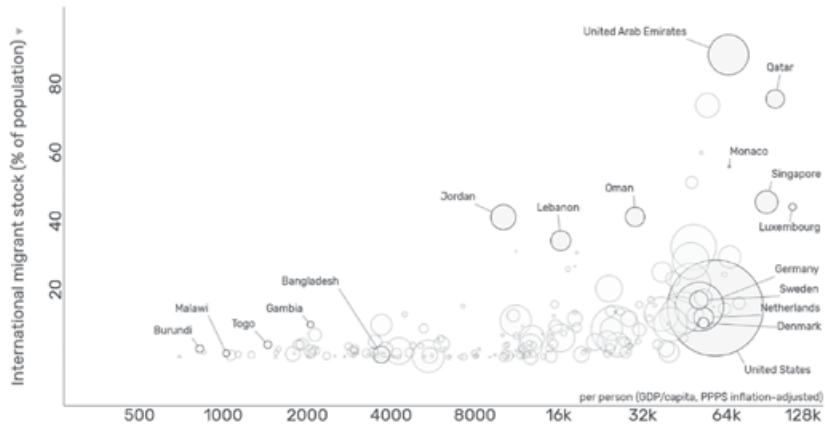
The national statistics demonstrate that all four states have experienced that immigrants and their descendants make up a larger share of the population, that is, a movement from left to right in Figure 1.1. The availability of statistics also demonstrates that migration has been identified as an issue that the states are seeking to understand. Over time the national statistics on migration have also become more sophisticated than the categories used for historical trends. The categorization is often broken down by country of birth or country of citizenship and sometimes a categorization close to "low-income" countries has been adopted. Statistics Denmark, for example, uses a standard classification of "non-Western immigrants", largely describing the migration from low-income countries described in the progressive dilemma. The common European statistics bureau, Eurostat, prefers the less controversial term "non-EU countries" but has experimented with a categorization based on the "human development of the country of previous residence". In any case, the more detailed statistics indicate that the increases illustrated in Figure 1.2 both cover a larger inflow of humans from low-income countries outside Europe as well as increased mobility between Eastern and Western EU member states. However, it is especially the inflow of asylum seekers, described in the next chapter, which caught the public and political attention.

ECONOMIC DEVELOPMENT AND THE STOCK OF MIGRANTS

The gradual increase in first and second-generation in combination with sudden inflows of asylum seekers such as in 2015 might generate the impression that the Northern European states have already come close to the ideal-type of a high-inflow state. However, it is important to take the larger context into account. First, the level of inflow of migrants found in Northern Europe is still moderate by international standards, and secondly, it is a general pattern that economic development and migration go together. From a Marxist perspective, migration is a matter of developed core countries exploiting the surplus labour of the undeveloped countries of the periphery (Wallerstein, 1979). From a neoliberal perspective, migration is a matter of individuals seeking better living conditions (the supply), and employers searching for labour (the demand) (Brettell and Hollifield, 2014). Thus, the Northern European experience is not extreme or particularly unique.

Figure 1.3 shows the level of economic development of states calculated as GDP per person (in fixed 2011 prices, adjusted for purchasing power, using a logarithmic scale). The countries covered in this book are located to the right. The worth of the production per person in Denmark, the Netherlands, Germany and Sweden was respectively 45 000, 45 500, 46 400 and 43 800 USD (2015). In comparison, the figure was around 2000 US dollars in the Gambia (see x-axis). The y-axis indicates the share that the foreign-born make up of the full population of the state, as provided by UN population division (estimates are used in cases where national statistics on birthplace is missing). Our four countries are not among those with the largest share of foreign-born. In contrast, the extreme case of "openness" is the United Arab Emirates, where migrants made up 88 per cent of the population in 2015. Thus, the book studies rich states, but not extremely rich states, with a low to medium-high share of migrants.

The size of the bubbles indicates the absolute stock of foreign-born in the state. The largest stock of foreign-born is still found in the US, at around 47 million, but they only make up 15 per cent of the population. Thus, this historical ideal type "high-inflow state" is in relative terms no longer so open. It might once have been the country of migrants but it has turned into a more common country with a salient distinction between the immigrant and the "natives" (Alba and Foner, 2015). With 7.8 million foreign-born making up 21.8 per cent of the population, Canada is a clearer example of a Western "high-inflow" state. However, the Gulf states are among the clearest examples of a contemporary "high-inflow state". In the United Arab Emirates, there were around 8 million foreign-born in 2015. In absolute numbers in 2015,



Source: Retrieved from www.gapminder.org (6 January 2022).

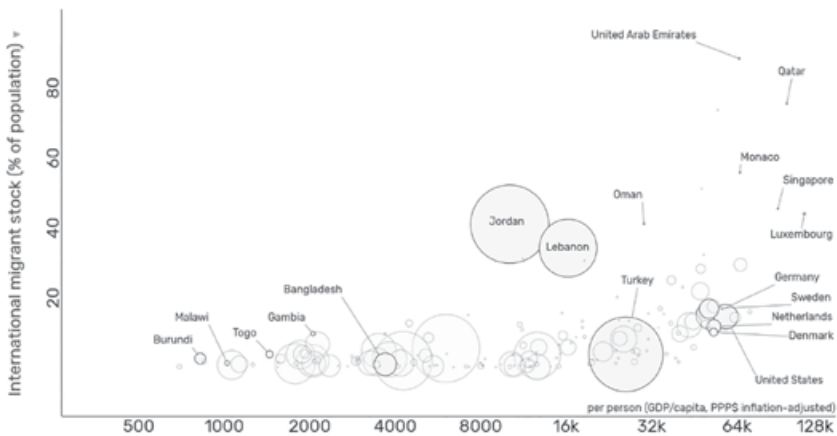
Figure 1.3 *Economic development (x-axis, log), the share of international stock migrants (y-axis) in relation to population, and international migrant stock (size of bubble), 2015*

the stock of foreign-born was around 0.6 million in Denmark, 1.6 million in Sweden, 2.0 million in the Netherlands and 12 million in Germany.

The relationship between economic development and the presence of many foreign-born residents is complex. Economic development creates job opportunities for both high- and low-skilled migrants, especially in the larger global cities (Sassen, 2018). Looking at this the other way around, the presence of migrants might also cause economic development through innovation cultures, network effects or simply basic labour supply (Hollifield, 2004). The contemporary migration to the states of the Persian Gulf is a good example. The oil wealth establishes job opportunities, and at the same time, the many migrants are used to exploit this rich resource. Furthermore, the coexistence of economic development and migrants can also be a matter of self-selection of rich migrants in tax-havens such as Monaco, where the share of foreign-born is 56 per cent. In any case, it is worth noticing that the overall pattern is that economic development and a net inflow of migrants tend to go together. Furthermore, economic development goes together with lower fertility rates, which generate demand for humans (Rosling et al., 2018). In 2019, the German fertility rate was 1.54, the Dutch 1.57, the Danish was 1.70, and the Swedish 1.71. At least since the early 1980s, none of the four countries has been able to reproduce their population without immigration (normally requiring a fertility rate of 2.1 or above). Thus, with thriving economies, it is only to be expected

that Denmark, Sweden, Germany and the Netherlands experience an increased level of immigration as seen in the previous section. Thus, if a progressive dilemma puts economic pressure on receiving welfare states, it is a deviance from the general pattern of economic development and migration going hand in hand. The Northern European deviance could be caused by the historical ban on work migrants and the acceptance of humanitarian migrants; see further discussion in Chapter 9.

There are indeed two cases, Jordan and Lebanon, which challenge the description of large shares of foreign-born only being a characteristic of the rich states. Both Jordan and Lebanon are medium-income countries but still have shares of foreign-born of 34 and 41 per cent respectively. The reason is that both countries have a large stock of refugees, whose mobility is not (or at least less) linked to economic development. On the contrary, the outbreak of wars leads to a flow of migrants primarily following the logic of proximity to the country of origin. For Jordan and Lebanon, this is a matter of refugees from Palestine and Syria. This absence of coexistence between economic development and having a large absolute stock of refugees is shown in Figure 1.4.



Source: Retrieved from www.gapminder.org (6 January 2022).

Figure 1.4 *Economic development (x-axis, log), the share of international stock of migrants (y-axis) in relation to population, and stock of refugees (size of bubble), 2015*

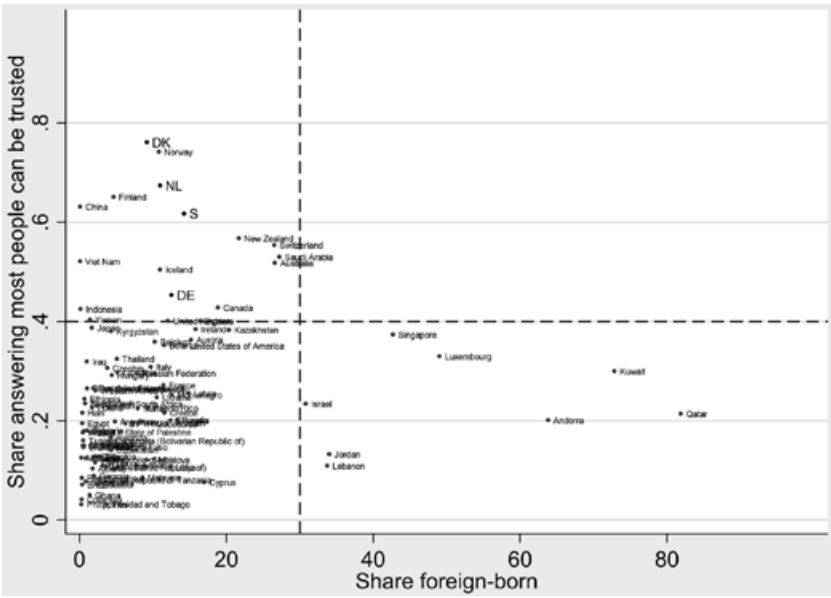
With 2.8 million, Jordan has the largest stock of refugees, followed by Turkey (2.5), Palestine (2.1), Pakistan (1.5) and Lebanon (1.5). The rich gulf states, with a large share of foreign-born, only have a small stock of refugees.

Among the richer states, the largest stock of refugees is found in Germany, the United States and Sweden. The statistics, however, are affected by the fact that naturalized refugees disappear from the stock (see next section). However, the absence of coexistence between economic development and having a large stock of refugees is valid. Thus, asylum seekers and their family unification are what potentially put economic pressure on Germany, the Netherlands, Sweden and Denmark. It is also this inflow that puts the countries in a dilemma between self-interest, international obligations (such as the UN refugee convention 1951/1967) and humanitarian standards (such as the right to family life established in the European Convention on Human Rights, 1953, which all four countries have ratified as national law). The inflow of asylum seekers is modelled in Chapter 2 and the dilemmas connected to liberal standards for states' policies in response to migrants from low-income countries outside the European Union are described throughout the following chapters.

THE INTEGRATION OF RESIDENTS OF STATES

There is no simple way to measure the degree of integration of residents of a state, the y-axis in Figure 1.1, as already discussed. However, to describe the level of overall integration, or social cohesion, of a state, many contemporary scholars make use of a survey-based measure of social trust (see Larsen, 2014 for an overview). The standard formulation used in the World Value Survey (WVS) and European Value Study (EVS) is: "Generally speaking, would you say that most people can be trusted – or – that you can't be too very careful in dealing with people?". The response categories are "most people can be trusted" or "need to be very careful". Figure 1.5 shows the share of residents answering that most people can be trusted in the latest available WVS or EVS survey conducted between 2000 and 2017. In all, we have data for 106 countries around the world. The reference lines are set more or less arbitrarily. On the x-axis, it is set at 30 per cent foreign-born, creating a distinction between high- and low-inflow states. On the y-axis, it is set to 40 per cent in the surveys answering that most people can be trusted. In combination, they form the four quadrants of Figure 1.1.

Depicted in this way, our four countries are indeed integrated low-inflow countries. In particular, Denmark comes close to the integrated low-inflow ideal-type. Trust levels are a little lower in the Netherlands and Sweden and somewhat lower in Germany. Thus, as already mentioned, the contextual point of departure is highly integrated states with a moderate stock of immigrants. Secondly, Figure 1.5 shows that most of the 106 states in our sample are found in the lower-left quadrant. The most ideal-typical cases are countries such as Ghana, Colombia, the Philippines and Trinidad and Tobago, where both trust levels and stock of foreign-born are low. These are states with a low



Notes: The survey data is linked to the UN-population 2000, 2005, 2010 and 2015 estimates in the following way. Surveys conducted the same year, two years before or two years after are connected to a given year. The survey is weighted (using standard EVS and WVS weight) and "do not know" answers excluded. N = 106.

Figure 1.5 Share answering most people can be trusted and share of foreign-born (latest available from 2000 to 2015)

level of economic development, which typically act as emigration countries. Thirdly, Figure 1.5 shows that the eight high-inflow countries all have fairly low trust levels. The most ideal-typical country in the sample is Qatar, where foreign-borns make up over 80 per cent of the population and around 80 per cent of the survey respondents answer that most people *cannot* be trusted. Finally, Figure 1.5 shows that none of the 106 states are located in the upper-right quadrant of integrated high-inflow states. Thus, depicted in this way, we do not have a real-world example of an ideal-typical integrated high-inflow state. The real-world examples that come closest are Singapore, Luxembourg, Switzerland, Australia, Saudi Arabia and New Zealand. However, for all these states, they are a long way from the trust levels found in Denmark and a long way from the share of foreign-born found in Qatar and Kuwait. Thus, for good reasons most political elites, civil servants and the public have a hard time imagining their country turning into an "integrated high-inflow state" (see Figure 1.1). This appears to be unknown and dangerous territory, at least

from a state perceptive. The idea of well-functioning ethnic diversity, or even ethnic superdiversity, is easier to imagine at a city level. New York is the old prime example. It should be mentioned that both the UN population data and the survey estimates used in Figure 1.5 come with uncertainties. As for the survey data, the largest problem is to establish representative samples of residents. Often the answers of the foreign-born themselves do not figure in these "national" samples. And it is exactly the non-integration of culturally distant migrants and descendants which has been the primary concern in all four countries.

THE INTEGRATION OF IMMIGRANTS

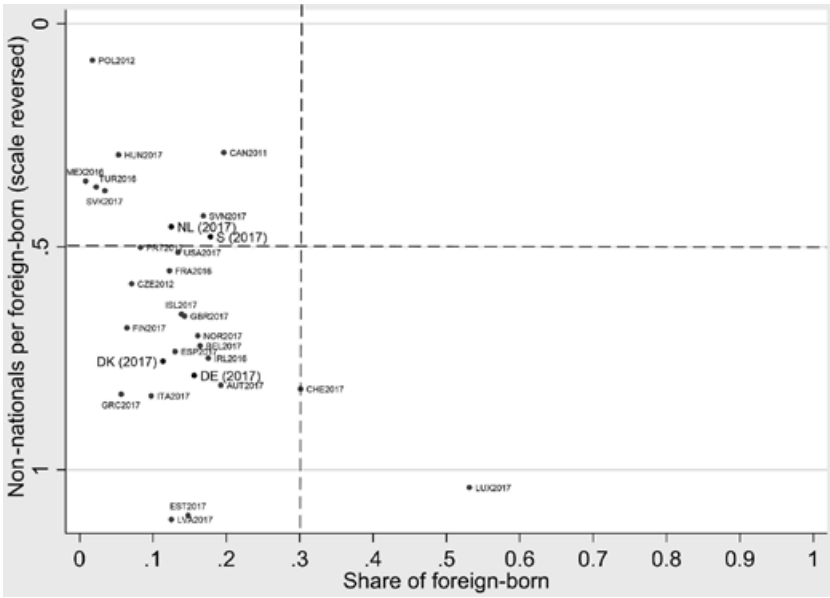
The inflow of migrants could potentially lower the degree of integration of residents within a given state. Figure 1.5 clearly shows that there is no linear relationship between the stock of foreign-born and trust levels. One finds states with few foreign-borns that are disintegrated. This kind of disintegration can hardly be blamed on migrants. However, the absence of integrated high-inflow states could point to a potential trade-off as suggested by the progressive dilemma. Leaving "the natives" aside for a moment, the standard perspective is that migrants upon arrival constitute a special category of non-assimilated, non-acculturated or disintegrated. Thus, one of the main topics of migration studies has been how this special group assimilates, acculturates or integrates over time in destination states; often using the already integrated "natives" as a reference point (with a long internal dispute about the terms used to describe this process, see Favell, 2015). However, all seem to agree that migration lowers the degree of integration of the residents of a given state, in the short run. In the long run, it is a matter of the degree and speed of assimilation, acculturation or integration (e.g. Hedegaard and Bekhuis, 2018; Gordon, 1964; Alba and Nee, 1997; Portes and Zhou, 1993).

This assimilation, acculturation or integration has in many Western states been underpinned by a large number of public policies, which will be the topic of this book. However, for a start, we will situate our cases by providing a rough indicator of the degree of naturalization of immigrants. Seen from a narrow state perspective (see discussion below), formal citizenship is what distinguishes "the foreign" from "the natives". Those with citizenship are typically recognized as equal residents of the state, that is, they are no longer "foreign". Thereby the naturalized enjoy the civil, political and social rights of the state though they were born in a different state. At the same time, accepting citizenship is also a leap of faith of the immigrant as the protection of the origin country is reduced, if not fully abandoned. Thus, naturalization both has a demand-side, the readiness of immigrants to become formal citizens, and a supply-side, the readiness of the destination state to grant formal

citizenship. Therefore a high naturalization rate could be seen as a hallmark of an ideal-typical "integrated high-inflow state"; the upper-right quadrant of Figure 1.1. In this ideal type, there is a large stock of foreign-born, but they are quickly naturalized into "natives". In contrast, in an ideal-typical "disintegrated high-inflow state", the lower-right quadrant of Figure 1.1, one would ideal typically have a large stock of foreign-born but they remain not naturalized "foreigners". The Gulf states are clear examples. The share of foreign-born is extremely high, as seen in Figure 1.4, but at the same time it is close to impossible for foreign-borns to obtain formal citizenship.

The international statistics on naturalization are limited; especially the historical statistics. However, the OECD International Migration Database has an indicator of the stock of non-nationalized living permanently within the state. The y-axis in Figure 1.6 relates this stock of non-nationalized to the stock of foreign-born. If the ratio is close to zero, it indicates that there are very few non-nationalized per foreign-born. This would indicate a higher degree of (formal) integration of the foreign-born. Therefore the y-axis is reversed to fit the ideal types presented in Figure 1.1. If the ratio is close to 1, it indicates that the stock of non-nationalized equals the stock of foreign-born. This would be an indication of "disintegration" of foreign-born. If the ratio is higher than 1, it indicates that the stock of non-nationalized is higher than the stock of foreign-born. The reference lines in Figure 1.6 are set to create the four quadrants of Figure 1.1. The exact position of the reference lines is again more or less arbitrary, 30 percentage points of a population being foreign-born is again set as a divider between a "low-inflow" and a "high-inflow" state on the x-axis. Having half as many non-nationalized as foreign-born is set as a divider between "integrated" and "disintegrated" states on the y-axis. The figure includes the latest available position of OECD countries.[1]

If naturalization is used as a yardstick, Poland (2012) comes closest to the "integrated low-inflow" ideal type. The share of foreign-born was 1.7 per cent. The ratio between the stock of non-naturalized and foreign-born was 0.08. In real numbers, there were around 55 000 non-nationals and around 675 000 foreign-born. Thus, the few foreign-born living in Poland are predominantly naturalized. For migrants, Greece (2017) was the clearest OECD example of a contemporary "disintegrated low-inflow state", again using naturalization as a yardstick. The share of foreign-born was 5.7 per cent and the ratio was 0.83. Thus, by relative standards, the share of foreign-born is low, while the share of non-nationals per foreign-born was high. This position fits with Greece upholding a strict ethnic dimension in access to citizenship (a *jus sanguinis*) (Mavroudi and Nagel, 2016: 184). The large Russian minority, who do not enjoy formal citizenship, explains the position of Latvia and Estonia. For migrants, Canada (2011) is the country that comes closest to the high-inflow integrated ideal-type (the upper right quadrant). According to



Source: Own calculation on OECD International Migration Database.

Figure 1.6 *Percentage of foreign-born and non-nationals per foreign-born (reverse-scale): OECD countries latest available*

the OECD, Canada (2011) had 19.6 per cent foreign-born. The ratio between stock of non-nationals and foreign-born was 0.29, that is, there were 0.29 non-nationals per one foreign-born. In real numbers, there were around 2 million non-naturalized and around 7 million foreign-born in Canada. Thus, most foreign-born were naturalized. For migrants, Luxembourg (2017) is the closest example in the OECD area to the "disintegrated high-inflow" ideal-type (the lower right quadrant). The share of foreign-born was 53 per cent, that is, by OECD standards an extremely open society. However, there were 1.04 non-nationals per foreign-born. In real numbers, there were by 2017 around 281 000 non-nationalized in the country and around 271 000 foreign-born. Thus, most foreign-born were not naturalized.

The position of Germany, Denmark, the Netherlands and Sweden in Figure 1.6 demonstrates one of the most remarkable differences between these similar countries. Germany and Denmark have large groups of foreign-borns who are not citizens. The ratio was 0.79 in Germany and 0.76 in Denmark (2017). In real numbers, Germany had around 10 million non-nationalized and Denmark around half a million. These non-nationalized do not have the right to vote

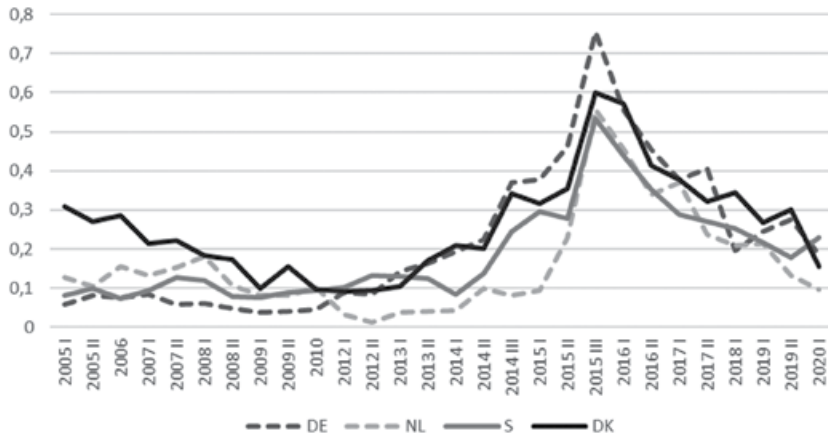
in national elections, which lowers their political strength. It also means that large groups in principle are the responsibility of another state, which makes deportation to home countries a credible threat. Finally, and most importantly, it makes it easier to apply special rules to these groups without violating the liberal norm of equal treatment of all the citizens of the state. In contrast, the Netherlands and Sweden have a larger group of citizens with foreign backgrounds who are nationalized. The ratios were respectively 0.45 in the Netherlands (a little below 1 million non-nationalized) and 0.48 in Sweden (around 850 000 non-nationalized). Thus, migrant groups have greater political strength in the Netherlands and Sweden, larger groups do not face a threat of deportation, and the possibility of unequal treatment, without violation of norms of equal treatment, is lower.

It is especially these differences in naturalization pattern that have given the Netherlands and Sweden a reputation of countries with a multicultural approach to the integration of migrants, and Germany and Denmark a reputation of a monocultural approach. The Swedish and Dutch states turned cultural distant groups into "real" Dutch and Swedes, whereas the German and Danish states reserved this recognition for those with stronger ethnic and cultural ties to Germany and Denmark. As will be described in Chapter 7, this was partly caused by historical legacies and ideological positions, and all four countries are often argued to be part of a civic-turn in naturalization policies (Mouritsen et al., 2019a; Joppke, 2005). However, the current number still points to remarkable differences in terms of nationalization.

THE REACTION OF "THE NATIVES"

How the "natives" react to the inflow of migrants has become the issue of a large research tradition (e.g. Hainmueller and Hopkins, 2014). During the "migration crises" of 2015, the issue of migration even became the dominant political theme throughout Europe. As an illustration, Figure 1.7 shows the share of citizens answering that migration is one of the two most important issues that respectively face Denmark, Sweden, Germany and the Netherlands. In the Eurobarometer fall 2015 survey, 76 per cent of Germans, 60 per cent of Danes, 55 per cent of Dutch and 54 per cent of Swedes pointed to migration, by far the most salient political issue. In the latest survey (March 2018), the shares were 34 per cent of Danes, 25 per cent of Swedes, 21 per cent of Dutch and 20 per cent of Germans answering "migration", which still makes migration one of the most salient issues (the most salient in Germany and Denmark and among the three highest in Sweden and the Netherlands). Moreover, the same Eurobarometer studies show that migration is also the most salient theme if the public – throughout all member states – are asked "what do you think are the two most important issues facing EU at the moment?". In 2018, 38 per cent

answered immigration, which is substantially above the 29 per cent indicating terrorism, and the 17 per cent indicating the public finances of the member states. Thus, according to the public, both their own country as well as the EU as a whole, face problems with migration. Thus, migration is not left unnoticed and the "natives" are not left unaffected.



Source: Own calculation based on data retrieved from http://ec.europa.eu/commfrontoffice/publicopinion/index.cfm/Archive/index (2 August 2018).

Figure 1.7 Share mentioning migration as one of the most important issues facing their country (Eurobarometer studies 2005–2020)

The political discussions are embedded in discussions about national identity, ideology and philosophical arguments about justice. The political discussions are also embedded in the interests of employer organizations, unions and political parties and of several external actors. One of the standard puzzles of political scientists has been why politicians in democracies allow higher levels of migration than what seems to be the preference of the electorate. One of the arguments has been that it is a matter of politicians listening more to the (concentrated) interests of employers than to the (dispersed) interest of the electorate (Freeman, 1995). This argument applies mostly to the case of work-migrants, for example Mexicans entering the US or Poles entering Germany. Another argument has been that at least European politicians adhere to liberal norms and international regulations, which are often defended by national and international courts. This argument applies mostly to the case of asylum seekers who, according to the Geneva convention, have a right to protection in another state if they are personally persecuted in the origin

state. The human rights declaration also sets standards for non-discrimination, which limits the political possibilities for limiting migration (Joppke, 1999). The right to a family life opens family unification and marriages as important pathways into Northern Europe.

Several studies have tried to verify or falsify the prediction of a connection between stocks or flows of migrants and public support for the welfare state in Europe. The results have been rather inconclusive (Schaeffer, 2013). With a popular welfare state already in place (in contrast to the US) and with a multiparty system making it possible to combine anti-migrant, anti-EU and pro-welfare attitudes (in contrast to the US two-party system), the more likely European result is welfare chauvinism or welfare nationalism (Bay and Pedersen, 2006; Careja et al., 2016; Eger and Valdez, 2015; Jørgensen and Thomsen, 2016). Andersen and Bjørklund (1990) coined the term "welfare chauvinism" in their study of how the Norwegian and Danish populist right-wing parties in the 1980s, the so-called Progress Parties, wanted to restrict welfare rights to natives and exclude migrants. The same idea of "welfare for our kind" has been salient in the political programmes of the Danish People's Party (in parliament since 1998), the Dutch Freedom Party (in parliament since 2016), the Swedish Democrats (in parliament since 2010), and the Alternative for Germany (in parliament since 2017). All four parties adhere to a narrative about a political elite allowing too high levels of migration against the true interest of "the people", the elite-people distinction being one of the defining characteristics of what has been labelled populism. This discourse and the exclusion of migrants from welfare benefits and services in the four countries are further discussed in Chapter 8.

THE STATE PERSPECTIVE OF THE BOOK

Categories, concepts and ideal-types are indispensable tools for research and human knowledge. However, often they also carry implicit assumptions about the world and normative standards. The idea of a progressive dilemma has evolved in Western destination-country states with a focus on the potential deterioration of current living standards (especially among the least well-off members within the destination countries) or the level of social cohesion (often with broad references to the bond or the glue that keeps "us" together). The residents of the less well-off states and their politicians are in a different position. From the perspective of the latter, the ability to migrate could be seen as one of the big advantages of living in a more globalized world. Thus, the progressive dilemma has been established from the perspective of relative rich net-migrant-receiving countries looking to the future. The Goodhart text cited above focused on whether the UK has become too diverse to maintain the "club goods" (Buchanan, 1965; see also Walzer, 2008) established by the

British welfare states of the 1960s and 1970s; see further discussion in Chapter 9. One could argue that this perspective is adopted by this book as we focus on the development in Denmark, Sweden, the Netherlands and Germany; a study of how the rich Northern European "clubs" and their members through a variety of different policies secure their privileges by denying new members to enter the "club". As Carens argues, "citizenship in Western liberal democracies is the modern equivalent of feudal privilege – an inherited status that greatly enhances one's life chances" (Carens, 1987: 252). It should be admitted that most of the authors of this book (but not all) are themselves members of the Danish, Swedish and German "club". Nevertheless, we will do our best to ignore these personal membership advantages and look as objectively as we can at the assumptions and the logic of the argument about the presence of a progressive dilemma. Furthermore, it is by no means evident that the north-west of the world will stay "the rich" and the south and east will stay "the poor". The potential for well-managed rich "clubs" around the world is greater than ever (Rosling et al., 2018). Thus, the motivation of this book is not only to secure well-functioning states in Denmark, Sweden, Germany and the Netherlands. Our broader motivation is to understand how states might best handle the combination of having a generous welfare state and an inflow of culturally distant migrants from low-income countries. The four countries we study might even set some good standards of how to do this in a more globalized world.

NOTE

1. It should be mentioned that the ratio of stock of non-nationalized to foreign-born is a complicated measure, which is likely to fluctuate over time. A sudden inflow of foreign-borns, for example caused by a sudden rise in asylum seekers, would increase the ratio (as most of these groups are unlikely to be non-nationals). A sudden outflow of foreign-borns, for example caused by an economic recession, would decrease the ratio (as the non-nationalized are most likely to leave). A sudden increase in naturalization, for example caused by the possibility to hold dual citizenship, would decrease the ratio (as the stock of non-nationalized will reduce and the stock of foreign-born will remain constant). Thus, there is a complex timing issue between inflow/outflow and naturalization. Thus, causality is extremely tricky. However, it might still be a valid descriptive indicator of the degree of state integration at a specific point in time.

2. Modelling the inflow of asylum seekers into Northern Europe: are access to generous welfare benefits and other policies affecting destination choice?

Anna Diop-Christensen and Lanciné E.N. Diop

The idea of a "magnetic" effect from generous social welfare benefits is a central part of the progressive dilemma discussed in Chapter 1. There are previous studies suggesting that generous benefits attract migrants (e.g. Borjas, 1999; Corneo and Neidhöfer, 2021). Borjas (1999) more specifically finds that migrants who receive welfare are overrepresented in the American states with the most generous benefits. He concludes that this supports the welfare magnet hypothesis (Borjas, 1999). However, previous studies do not focus on humanitarian migrants, but immigrants originating from countries where we must assume that they leave voluntarily. In the Northern European context, humanitarian or forced migration plays a much larger role as the main immigrant groups in these countries are asylum seekers and their family reunified members, as described in Chapter 1 (see also Kogan, 2007). We know little from the scientific literature about the extent to which access to generous benefits influences the choice of destination country for humanitarian migrants. There is a small but growing body of literature examining the impact of policies on asylum flows, including some measures for the generosity of welfare states (e.g. Neumayer, 2004; Beenstock et al., 2014; Brekke et al., 2017).

Despite the merits of the existing studies, they have two major limitations. First, the theoretical framework is underdeveloped, being based on the idea from neoclassical theory that all migrants (including humanitarian ones) seek to maximize their utility (see, e.g., Brekke et al., 2017). In the traditional understanding and application of the utility theory (see, e.g., Borjas, 1989), economic motivation is the main driver. The literature on asylum flows uses this theoretical body of thought, but without explicitly reflecting on whether the theoretical assumptions hold for forced migrants, and therefore do not

adapt it to the situation of asylum seekers. Nevertheless, it is likely that asylum seekers, on the one hand, are less maximizing of their economic utility than are non-forced migrants, and are therefore less affected by access to generous benefits. Forced migrants, on the other hand, may be more concerned with policies that address their immediate security needs, such as recognition rates and family reunification opportunities. Consequently, the theoretical framework of previous studies is too simplified and does not help us understand how humanitarian migrants may prioritize between different policy contexts. Second, and most likely due to the theoretical limitations mentioned above, the empirical strategy of previous studies does not allow them to identify the impact of individual policies. This is due to the use of composite indices or policy indicators that refer to natives. For example, Hatton (2009) has constructed a single index that measures policies that improve the welfare of asylum seekers, including rules and practices of detention and deportation, employment opportunities, and access to benefits and family reunification. Such an index does not allow us to draw conclusions about whether certain measures are more important for asylum flows than others. In other words, whether asylum seekers favour certain policy domains over others. A similar critique applies to the work of other major contributors to the literature (e.g. Brekke et al., 2017). Another common approach in the literature is to use indicators that refer to the native-born population. For instance, Neumayer (2004) and Beenstock et al. (2014) use social expenditure data from the International Monetary Fund. However, this is not an accurate proxy for access to benefits for humanitarian migrants, as a wide range of benefits are based on prior contributions and are therefore not accessible to newly arrived refugees (e.g. Kogan, 2007).

This chapter contributes to the literature by investigating the following research question: To which extent do policies (recognition rate, family reunification conditions, permanent residence policy, and social assistance benefits) influence the number of asylum applications, and what is the relative importance of these policies? First, extending the existing literature, we provide a theoretical framework for understanding asylum seekers' policy priorities when choosing a destination country. Secondly and while applying the latest methodological advances in the field, we make an empirical contribution by disentangling the influence of selected policy areas with the inclusion of single policy indicators as opposed to composite indexes. Specifically, we adapt the Migration Integration Policy Index (MIPEX) to the situation of asylum seekers and refugees. For instance, we construct a detailed and relative measure of the level of social assistance for refugees by combining information from MIPEX on the accessibility of welfare benefits to refugees and family reunified members with the level of social assistance from the Social Assistance and Minimum Income Protection Interim Dataset (SAMIP). This enables us to test the welfare magnet hypothesis against other drivers of forced migration.

Furthermore and as an extension to Neumayer (2004), we break down recognition rate by each country of origin and destination. Specifically, we use dyadic recognition rate (e.g., the proportion of recognized refugees from Afghanistan in Sweden relative to the total number of decisions on Afghans in Sweden) rather than the average recognition rate (e.g., from all countries of origin to Sweden) as in Neumayer (2004). Here – in line with Brekke et al. (2017) – not only do we account for the direct effect of policies, but also for the relative attractiveness of alternative destinations.

The current study is organized as follows: in the next section, we present our theoretical framework and hypotheses. We then describe and discuss the data and the methodology used in the next two sections. These three sections are in part a reproduction of our earlier work published in the *Journal of Refugee Studies* (see Diop-Christensen and Diop, 2021). In the next two sections, we present and analyse the results. Conclusions, limitations and policy recommendations are provided in the final section.

THEORETICAL FRAMEWORK AND HYPOTHESES[1]

If we theoretically expect that policies – among other drivers of migration – influence the number of asylum seekers, it implies the fulfilment of two conditions: first, it assumes that these migrants wish to apply in countries where they and their families can settle and build a decent life. Using terms from the neoclassical economic literature, we may say that asylum seekers attempt to maximize their utility by choosing the country where they will have the highest net return – and that policies affect their utility. This is also a standard assumption in the literature (see, e.g., Bertoli and Fernández-Huertas Moraga, 2013). However, we also find support for such an assumption from other social science disciplines. For example and using qualitative interview data, Crawley and Hagen-Zanker (2019) conclude that – while not being the sole decisive factor – policies or the perception of policies, particularly in relation to opportunities to obtain "papers" and family reunification, shape destination preferences. Moreover, Stathopoulou et al. (2019) conclude that "post-migration physical and psychological wellbeing of refugees and asylum seekers is strongly associated with the policy effectiveness and institutional capacity of the host country" (pp. i33).

Secondly and in order for asylum seekers to act on their wishes or destination preferences, there must be some degree of voluntariness in their choice of destination. As Bivand Erdal and Oeppen (2017) argue, the decision to migrate is indeed on a continuum between forced and voluntary migration. Unless they are forcibly deported (as was the case with the deportation of Jews during World War II or slaves from Africa to the Americas), even asylum seekers have *some degree of freedom* to choose whether to move on or stay

behind and where to seek asylum (see also Crawley and Hagen-Zanker, 2019). However, it is crucial to be aware of the factors that may prevent people from reaching their preferred destination. Such factors may be nearly universal or context-dependent. One factor is *access to information and communication*. We know from qualitative studies that asylum seekers have some information about entry and reception policies (including family reunification conditions) that shapes their general impression of a country and, in turn, their destination preference. Asylum seekers obtain this information through their network (family members and friends already living in Europe) and social media (Crawley and Hagen-Zanker, 2019). However, it is also important to recognize here that asylum seekers' information is often not complete and may vary with their background (Gilbert and Koser, 2006). Also, the journey is often non-linear, meaning that the migration process is not a direct journey from the country of origin to a (final) destination country, but what may end up being considered transit countries were destination countries in the process (Crawley and Jones, 2020). Consequently, access to the internet and mobile phones throughout the journey can enhance opportunities to communicate and acquire knowledge about migration routes, smuggling networks and asylum policies in potential destination countries (Gillespie et al., 2018). This first factor relates to the second factor, which is resources. Resources are needed to buy a phone or internet access, for example. Resources (or the lack of it) can also hinder or facilitate the degree of voluntariness, as (irregular) migration requires a certain amount of money to pay for transport, food, accommodation and traffickers. We also know from the literature that the price varies for different destination countries (e.g., Van Liempt and Doomernik, 2006). Thirdly, *psychical* (e.g., border fences, border controls) and *natural* (e.g., sea, mountain) *migration barriers* and sometimes the combination of both (e.g., the extensive FRONTEX border controls and surveillance in the Mediterranean Sea and previous strategic agreements between the EU on the one hand and Libya and Turkey on the other) may also influence migration outcomes. Finally, *agreements between third parties* may also restrict asylum seekers in their choice of destination. Such agreements can be between individuals or countries. An example of agreements between countries could be the Dublin Regulation, which stipulates that the responsible member state is the country through which the asylum seeker first entered the European Union (see also Brekke and Brochmann, 2015). In addition, and as examples of agreements between individuals, some asylum seekers may not have chosen their final destination because other family members have made the decision in their place (see e.g., Gilbert and Koser, 2006) or because agreements within a trafficking network sometimes influence the destination choice. Often, asylum seekers can only choose between selected countries when negotiating with a trafficker (see, e.g., Van Liempt and Doomernik 2006). Any empirical study of asylum

seekers' destination choice requires accounting for the above-mentioned factors through the choice of the study period and relevant control variables (see the description of control variables in the Data section).

However, and in contrast to previous quantitative studies of how policies affect migration flows, our central argument and the basis of our theoretical development is that various types of migrants are likely to prioritize different issues and have different time perspectives. As a starting point, we use traditional (economic) migration theories (see also Borjas, 1989; Brekke et al., 2017), but as they are too simplistic and not well suited to the case of forced migration (for further discussion of their limitations see also Crawley and Hagen-Zanker, 2019), we also combine them with insights from qualitative studies drawn from other social science disciplines. Consequently, and to put it formally, various types of migrants may value different types of utility and have different time perspectives – see also Figure 2.1. In terms of utility, we may distinguish between security and economic utility, while the time perspective may be short or long-term. In the literature, and predominantly in the economic literature, migration (especially labour migration or voluntary migration) is a decision-making process in which individuals or households move from a country of origin to a new destination country because they seek to maximize their lifetime economic utility (e.g. Graves and Linneman, 1979). Maximizing lifetime utility therefore also implies that such individuals have a rather long-term migration perspective. In this case, general characteristics of the potential host society, such as welfare state and labour market institutions, are likely to influence migration decisions (see upper-right corner in Figure 2.1). However, as asylum seekers are often in an emergency, we argue that they may prioritize their short-term security. In other words, they might therefore evaluate utility on a relatively short-term basis and respond according to a different logic than labour migrants. For example, they are likely to consider aspects related to their immediate security rather than long-term economic utility. This also implies that benefit levels and labour market institutions are unlikely to be as crucial as the prospects of obtaining refugee status for asylum seekers and their families. These expectations about what asylum seekers are likely to prioritize are also consistent with the qualitative findings of Crawley and Hagen-Zanker (2019) as they conclude that obtaining 'papers' and family reunification are more important than, for example, the right to receive welfare services and benefits. Therefore, and if we are to examine the extent to which policies influence the inflow of asylum seekers, we need to include policies that maximize utility in terms of security in the relatively short term (particularly the bottom left-hand corner of Figure 2.1).

Accordingly, a first step in maximizing their short-term security utility is to obtain refugee status in the country where they seek asylum (see Figure 2.1). Therefore, we expect that the more liberal the refugee status policy is (i.e.,

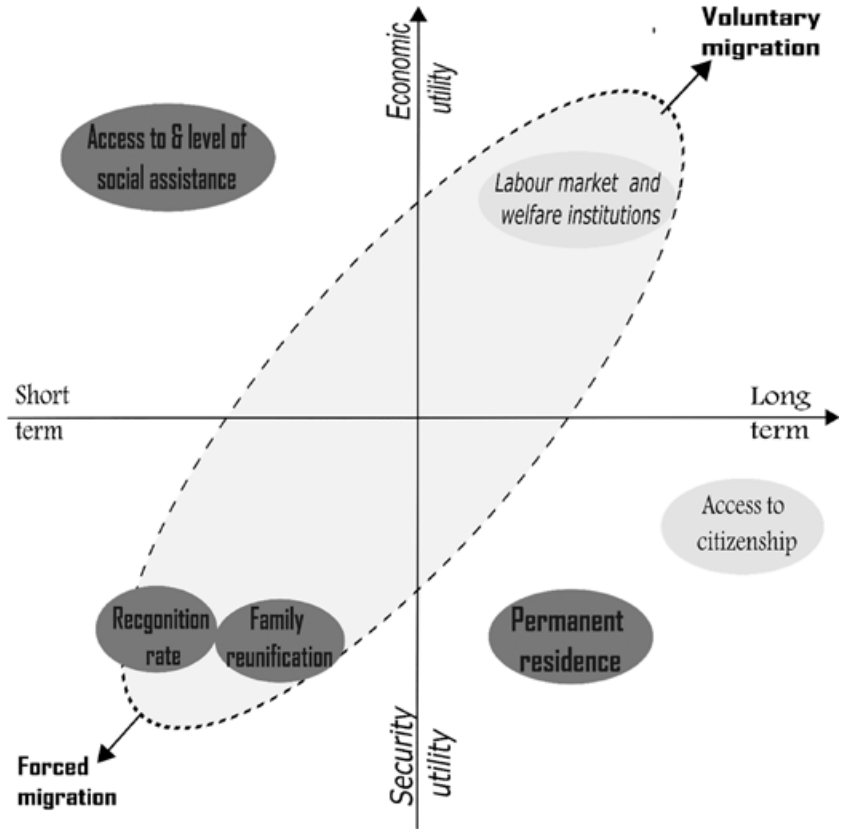


Figure 2.1 Utility, time perspective and policies

the easier it is for asylum seekers to be recognized as refugees), the more the country will attract asylum seekers (Hypothesis 1). The literature is somewhat mixed on this topic. Hatton (2009) examines the relationship between asylum application processing and access policies on the one hand and refugee stock fluctuations on the other. He operationalizes asylum application processing using a composite index. Hatton's (2009) results suggest that the 19 OECD countries studied experienced a slight decline in asylum applications over the period 1982–2006 due to more restrictive policies. More recently and using the same indicator as Hatton (2009), Brekke et al. (2017) come to similar conclusions in a study of nine North Western European countries (for the years 1985 and 2010). Neumayer (2004) and Keogh (2013), unlike Hatton (2009) and Brekke et al. (2017), use an indirect measure of asylum policy stringency, namely the recognition rate. While Keogh (2013) finds a positive

correlation between the recognition rate in one year and the number of asylum applications in the following year, Neumayer (2004) concludes that there is no effect of the recognition rate on the inflow of asylum seekers in the EU15 plus Norway and Switzerland.

A second step in maximising short- and medium-term security utility is the prospect of bringing their family with them. The decision to flee may be individual or discussed within the family. In the latter configuration, it is often the most able family members (typically young or middle-aged men) who take on the relatively expensive and difficult journey (see Pew Research Center, 2016). After receiving refugee status, many apply for reunification with their remaining family members, who still face immediate security risks. In this way, family reunification policies relate to utility in terms of security, but the perspective is longer than for recognition rates (see also Figure 2.1). The bottom line, however, is that the more liberal family reunification policies are (i.e., the easier it is for refugees to bring their families to safety), the higher the expected number of asylum applications (Hypothesis 2). The evidence from the literature is surprisingly sparse. The qualitative study by Crawley and Hagen-Zanker (2019) reports that many asylum seekers mention this as an important factor in deciding where to go, and several quantitative studies also include family reunification as part of a composite index. For example, family reunification policy is one of the components in Hatton's (2009) welfare index (The Asylum Policy Index Welfare – APIW). Beenstock et al. (2014) and Brekke et al. (2017) use the same APIW index, which includes not only family reunification facilitation, but also other policy indicators such as asylum seekers' work eligibility, access to welfare benefits, and detention and deportation policies. Consequently, such a composite index renders it impossible to determine which of these sub-policies influence the inflow of asylum seekers. All three studies mentioned above show that the APIW index had a small, but insignificant effect on the number of asylum applications.

In addition to short-term security factors, policies that may affect long-term security utility (e.g., permanent residence status policies) and short-term economic utility (access to and levels of social assistance) may also be important. Regarding permanent residence status, it seems reasonable to imagine asylum seekers choosing a destination where they can obtain permanent residence status relatively quickly and easily, as this allows them to make longer-term plans for themselves and their families. The work of Brekke et al. (2020) also supports such an expectation, finding that uncertainty and temporality strongly influence migrants' well-being. Consequently, we expect that the more liberal permanent residence status policies are, the higher the number of asylum applications will be. However, if we follow our theoretical reasoning (see Figure 2.1), permanent residence status policies should play a smaller role than

recognition rates and family reunification (Hypothesis 3). To our knowledge, there are no previous empirical studies that specifically examine this.

In terms of social assistance, destination countries differ in the level of benefits accessible to refugees and their families. Newly arrived refugees are generally not eligible for benefits other than social assistance, as unemployment and sickness insurance depend on prior contributions; see Chapter 3. Existing studies disagree on the effect of benefits on asylum applications or flows. This disagreement could be due to discrepancies and/or inaccuracies in the way they measure the generosity of welfare benefits. Specifically, some studies find support for the welfare magnet hypothesis, while others find no effect. Hatton (2009) suggests that the APIW index, which he generally claims relates to the welfare of asylum seekers, has little effect on inflows to selected OECD countries. On the other hand, Neumayer (2004) finds that the inflow of asylum seekers is positively correlated with the change in per capita social expenditure in the destination country (for similar results, see also Beenstock et al., 2014). However, as noted above, when using the APIW, it is difficult to determine which specific policy(ies) drives the results. As for Beenstock et al. (2014) and Neumayer (2004), they use social spending in the destination country, but such an indicator does not reflect whether this social spending is accessible to newly arrived refugees. Strictly from an economic perspective, the number of applications should be relatively higher in countries where refugees and their families have access to generous social assistance benefits. However, our theoretical argument suggests otherwise. We postulate that asylum seekers prioritize their short-term security utility over their short-term economic utility. Therefore, we expect variations in social assistance level to be marginal in explaining the number of asylum applications (Hypothesis 4).

DATA[2]

To examine the extent to which policies (recognition rate, family reunification conditions, permanent residence policies, and social assistance benefits) influence the number of asylum applications and how asylum seekers prioritize among these policy areas, we use data from the United Nations High Commissioner for Refugees (UNHCR) on first-instance applications. The UNHCR collects monthly data on asylum applications. For the purpose of this study, we construct annual dyadic asylum applications (i.e., the number of asylum seekers from, for example, Syria to Sweden in 2015) by aggregating the monthly datasets at the annual level to match the main independent variables. Due to data limitations related to the policy indicators, our destination countries are the EU15 for the period 2008–2015. We have deleted other OECD countries and smaller European states (such as Monaco, Andorra) from the list of countries of origin to reduce ‘noise’ related to the small number of

applications (for a similar practice, see Bertoli and Fernándes-Huertas Moraga, 2012). Consequently, our data include asylum applications from 112 countries of origin to 15 destination countries for the years 2008–2015.[3]

The Dependent Variable

In order to investigate whether policies influence the inflow of asylum seekers, we use the number of dyadic asylum applications as the dependent variable: in other words, the number of applications registered in a destination country (e.g. Sweden) from a given country of origin (e.g. Syria) in a given year (e.g. in 2015).

Main Independent Policy Variables

To capture the influence of refugee recognition policies, we construct a variable indicating the recognition rate using data from EUROSTAT.[4] EUROSTAT provides data for each member state on the number of accepted, rejected, and pending applications, as well as the total number of decisions separately for all countries of origin. These detailed data allow us to obtain an annual dyadic recognition rate by dividing the number of accepted applications by the number of total decisions – for example, the number of accepted applications by Syrians in Sweden divided by the total number of Syrians who applied in Sweden in 2015. Although this is an indirect measure of policy, it is quite an interesting and accurate indicator because this variable varies by country pair (or dyadic flows), while the policy indexes are constant for all migrants in the same destination country.

We develop the three remaining policy variables primarily using data from the Migrant Integration Policy Index (MIPEX). First published in 2004 as the European Civic, Citizenship, and Inclusion Index (ECCII) for the EU15 countries, the MIPEX is a unique data source – also used in previous studies (e.g. Green et al., 2020; Tatarko and Jurcik, 2020) – for measuring policies towards migrants across Europe. To construct the MIPEX index, independent experts complete a questionnaire. This raw data is subjected to review by researchers from the Migration Policy Group and Barcelona Centre for International Affairs. Where necessary, additional national experts have been consulted. Overall, this rigorous process improves the reliability and validity of the MIPEX data. From 2007 onwards, the original ECCII index was renamed MIPEX. The MIPEX provides data in different versions. Specifically, the MIPEX contains information on 140 policy indicators that are summarized into eight policy areas: (1) labour market mobility; (2) family reunification; (3) education; (4) health; (5) political participation; (6) permanent residence; (7) access to nationality; and (8) anti-discrimination. However, we do not use

these eight composite indexes because it will not allow us to disentangle the influence of individual policies. Moreover, there is a strong focus on integration in the MIPEX composite indexes, which is not the aim of the present study. Concretely, the MIPEX project provides an Excel file covering the period 2008–2014, including detailed comments. This allowed us to construct our new indexes from the raw MIPEX values by selecting only the indicators relevant to our hypotheses. It is also important to highlight that we adapted our new index to the situation of asylum seekers/refugees by using the detailed comments in the Excel file. Specifically, we searched for the words, 'refugee' and 'asylum'. Whenever we came across these words, we checked the context; for example, it could say that refugees or asylum seekers are exempt from meeting certain requirements for family reunification. All specific changes and justifications are in Appendix 2 in Diop-Christensen and Diop (2021).

Specifically, our *family reunification* index is an average of two MIPEX sub-indexes for 'Family Reunion', namely 'Eligibility' and 'Conditions for Acquisition of Status'. We rescaled this new index for family reunification so that it takes the value of '1' when family reunification is unrestricted and '0' when it is hardly possible. The variable also takes values between '0' and '1' indicating less extreme policies.

To measure the *opportunity of obtaining permanent residence status*, we combine the following five sub-indexes from the MIPEX 'Permanent residence index' and compute the average: (1) Required time of habitual residence; (2) Periods of prior absence allowed; (3) Language requirement (average); (4) Economic resource requirement; (5) State protection against discretionary procedure. This variable is thus a measure of how difficult it is to remain in the destination country. Similar to our new family reunification index, we also rescaled this variable so that it takes a value of '1' if it is quick and easy to obtain permanent status and '0' otherwise. The variable also takes values between '0' and '1', indicating less extreme policies.

Finally, to capture the impact of *social assistance*, we construct a variable in the following two steps. First, we use two sub-indexes from the MIPEX, namely access to social security for (1) refugees (from the index 'Labour Market Mobility') and (2) people obtaining residence status due to family reunification (from the index 'Family Reunion') and calculate the average. The reason we take the average access to social security for refugees and family reunified individuals is that seeking asylum is often a family affair where the most able person undertakes the difficult journey to Europe, while the rest of the family joins later (Pew Research Center, 2016). After averaging, this new variable takes the value '100' if refugees/family reunified individuals have equal access to social security as natives and '0' if they are completely excluded from receiving benefits. In the case of Denmark, for example, newcomers received social assistance at a much lower level than natives in the first

years (2008–2011) (see Rosholm and Vejlin, 2010). In these years, the value for the MIPEX benefit variable is 25. However, in the most recent reference years (2012–2015), social assistance for refugees and family reunification has been augmented (Ritzau, 2011). This is also reflected in the MIPEX benefit variable, as it now takes the value 75. Secondly, since we also want to account for the fact that benefit levels vary widely across Europe, we construct a variable to indicate the generosity of social assistance from the Social Assistance and Minimum Income Protection Interim Dataset (SAMIP), which is provided as part of the Social Policy Indicator database (SPIN) (Nelson et al., 2020). More specifically, from the SAMIP data we use the variable MIPavey, which is the mean value (adjusted for Purchasing Power Parity) of three variables indicating the average minimum income protection (social assistance benefits, housing allowance, refundable tax credits, and other benefits) for different household types (single person households (MIPsiy), single-parent households (MIPlpy), and two-parent households (MIPfay)). Within each country, this variable does not vary considerably over time, but since MIPEX usually varies more – for example, in the case of Denmark – we capture specific changes in social assistance. Concretely and still using Denmark as an example, we multiply the amount from the SAMIP by 0.25 for the years 2008–2011, while we multiply it by 0.75 for the years 2012–2015.

However, policies may not only influence the asylum flows to the country in question, but also the relative attractiveness of alternative destination countries. We account for this by controlling for deflection effects (see also Brekke et al., 2017). To explain why and how we control for the relative attractiveness of a country, we give an example. If for instance France adopts more restrictive access policies, the inflow of asylum seekers to other countries may increase. So let's add information to our hypothetical example and focus on asylum flows from Democratic Republic of the Congo. For these migrants, France is their preferred destination (see Schoumaker et al., 2018). Thus, if France implements stricter policies, some humanitarian migrants who would normally have applied in France are likely to choose an alternative destination country that is already popular among Congolese asylum seekers (e.g., French-speaking countries such as Belgium and Luxembourg), while they are less likely to go to Denmark. In this way, countries that belong to the same *destination cluster* for a given origin country (France, Belgium and Luxembourg for Congolese asylum seekers) will be more affected by each other's policy changes than a country that does not belong to the *destination cluster* of Congolese asylum seekers (e.g. Denmark). Concretely, we construct four deflection variables – one for each of our four policy variables – in two steps. The first step is to identify which countries are (and which are not) destination clusters for each country of origin. Specifically, we calculate the average number of asylum seekers from a given country to all EU15 destinations.

Then, we define a receiving country as part of a destination cluster and assign it the value '1' if that country has received more than half of the previously calculated average number of asylum applications from a given origin country over the past four years and '0' otherwise. The second step is to compute the average policy index for the other countries in the cluster. Continuing the example with Congolese asylum seekers, the 'French deflection value' would be the average policy (i.e., recognition rate) in Belgium and Luxembourg. This means that in the case of Denmark – a non-destination cluster country – this variable takes the value of '0'. This is also a similar approach to that of Brekke et al. (2017), who developed the concept of 'destination clusters'.

Origin and Destination Country Controls

In addition to the policy variables, we also include control variables representing important push (origin country variables) and pull (destination country variables) factors, as well as factors that may prevent asylum seekers from reaching their preferred destination. Regarding the pull factors, the literature shows that the presence of a diaspora influences immigration. On the one hand, the diaspora provides prospective asylum seekers with an immediate network and information and can thus reduce the costs and risks associated with migration (see also Collier, 2013; Kuschminder and Koser, 2016). On the other hand, the presence of a large refugee population from a particular country (e.g. Syrians) may lead governments to tighten recognition policies for that country. Not including such a variable may lead to omitted variable bias. Since a lag of one year is insufficient to account for this problem (see Neumayer, 2004; Brekke et al., 2017), we include the lagged (the last 2 to 4 years) average size of the refugee stock using annual dyadic data from UNHCR. We also include lagged migrant unemployment rates instead of general unemployment rates, as the labour market situation of migrants often differs significantly from that of natives (Kogan, 2006; Diop-Christensen and Pavlopoulos, 2016). Asylum seekers may be more inclined to choose countries where the diaspora has a successful labour market integration. Finally, we add GDP in the destination country and the population size of destination countries to account for country size.

With respect to push factors, and because of the statistical model we use, it is standard in the literature to account for origin country variables (e.g. GDP, conflict, unemployment, corruption, political violence) with the inclusion of origin-year fixed-effects (for a similar approach, see Brekke et al., 2017; Beine et al., 2011). This is because origin-year dummies capture all the variation due to circumstances that cause asylum seekers to leave their country of origin. Therefore, Poisson Pseudo-Maximum Likelihood model (PPML) estimation with origin-year fixed-effects is the most efficient way to control for push

factors, but it always requires omitting origin-country control variables (this explains the absence of origin country variables in Table 2.1).

METHODOLOGY

To investigate the effect of policies on asylum applications, we estimate a PPML. According to Santos Silva and Tenreyro (2006), this model has methodological advantages over, for example, OLS models, as it is consistent in the presence of heteroskedasticity and provides a solution to a large number of zero flows (e.g., no asylum applications between country pairs). Moreover, this statistical model is well suited to test the validity of our theoretical contribution, as it adapts to the gravity equation (see Santos Silva and Tenreyro, 2006). Gravity models, apart from being the standard method in the literature to study the influence of policies on migration flows, are theoretically and intuitively derived from a random utility maximization model (RUM). Consequently, this puts into perspective the utility that individuals gain from choosing to stay in their origin country compared to the expected utility of moving to an alternative destination (see Beine et al., 2011; Ortega and Peri, 2013).

In a formal way, we therefore estimate the following PPML model:

$$Y_{odt} = \beta_0 + \beta_1 Policy_{dt-1} + \beta_2 Deflect_{dt-1} + \beta_3 X_{dt-1} + fx_0 + fx_d + fx_t + fx_{od} + fx_{ot} + \epsilon_{dt}$$

where the dependent variable Y_{od} is the number of annual asylum applications from a given country of origin *o* (e.g., Democratic Republic of the Congo) to the country destination *d* (e.g., France) in year *t*. $Policy_{dt-1}$ and $Deflect_{dt-1}$ represent the four time-varying policy variables and their deflection effects. X_{dt-1} is a set of time-varying control variables in destination country *d* (e.g., France). The −1 indicates that we include the variables as so-called lagged variables, that is, the value of the variable one year before the reference period. We include the lagged values of the policy and control variables for both theoretical and methodological reasons. First, and from a theoretical perspective, although the preferred destination choice may change during the journey (see, e.g., Crawley and Hagen-Zanker, 2019), seeking asylum is in many cases a long process, from the decision to leave the home country, through the journey to and within Europe, to the formal application (Kvittingen et al., 2019). Therefore, if a country registers an application in a given year, it is likely that this application is influenced by the country's asylum policy in the previous year. Secondly and for methodological reasons, the use of lagged variables reduces problems related to simultaneity and reverse causality. For example, if we measure the recognition rate and the number of applications in

the same year, it is likely that pressure due to a large number of applications will lead policymakers to adopt stricter policies. We also include various fixed effects. First, we include origin (fx_0), destination (fx_d) and country-pair (fx_{od}) fixed-effects to ensure that unobserved time-invariant variables (e.g. language, geographic distance, postcolonial relations, etc.) are not driving the results. Secondly, we control for year fixed-effects (fx_t) to account for common time shocks that may affect both the inflow of asylum seekers and the policies of potential destination countries. For example, if the UN adopts a convention that increases the likelihood of obtaining refugee status, this could affect both the asylum flows and host country policies. Thirdly, we include origin-year dummies (fx_{ot}) to control efficiently for time-varying origin variables (such as GDP in the country of origin, population in the country of origin, conflicts etc.) and it is a way to control for Multilateral Resistance Term (MRT). The origin fixed effects therefore allow us to capture the change in the total outflow of asylum seekers from a country of origin (e.g., Democratic Republic of the Congo) given the share that went to a destination country (e.g., France) (for a detailed discussion, see Beine et al., 2016). Finally, ϵ_{dt} captures the unobserved part of the variation in flows. We have also adjusted the standard errors for arbitrary autocorrelation and heteroscedasticity.

DESCRIPTIVE FINDINGS

In Figure 2.2, we show the number of asylum seekers relative to the size of the population by destination between 2000 and 2015 to illustrate the variation in attractiveness of the EU15 countries. Following the Arab Spring, Figure 2.2 shows an unequal distribution in the increase in asylum applications across the EU15 countries. In detail, despite the fact that most asylum seekers enter Europe via the Mediterranean countries (Frontex, 2018) and should therefore apply for asylum there based on the Dublin Regulation, Southern Europe received relatively few applications (with the exception of Italy). Moreover, there was hardly any increase in these countries from 2011 onwards. This stands in stark contrast to the significant increase in some of the Northern and Western European countries. Here, Sweden in particular – the country with the most liberal and humanitarian policies towards refugees, sometimes referred to as 'the Swedish exceptionalism' (Dahlstedt and Neergaard, 2019) – saw a significant increase in applications. Previous studies suggest that asylum seekers often try to avoid registration in Southern Europe due to the relatively worse conditions compared to North-Western Europe (see, e.g., Brekke and Brochmann, 2015). Conversely, there is also evidence that Southern European countries had a permissive registration process (Reuters, 2015). However,

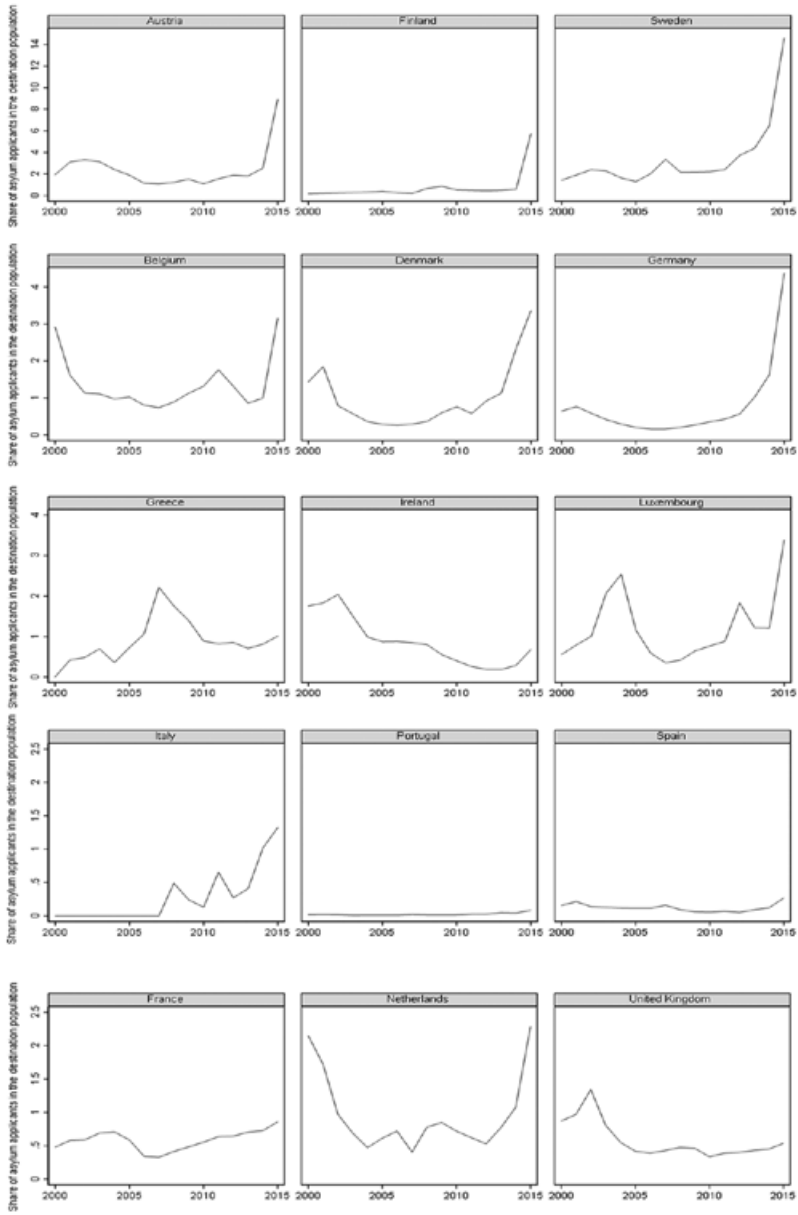
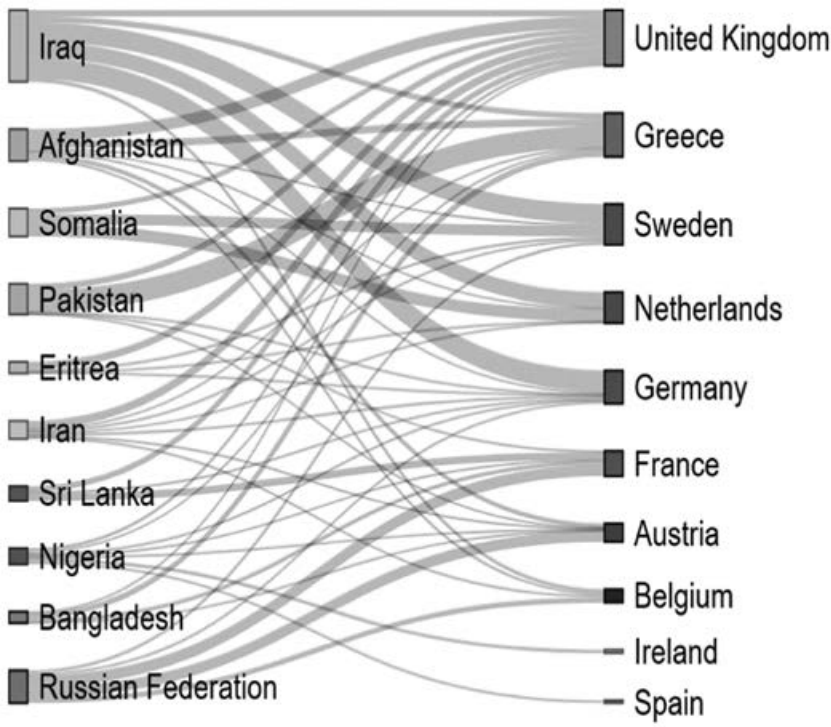


Figure 2.2 *Relative share of asylum seekers in the destination population (per cent)*

the temporary suspension of the Dublin Regulation from 2011 onwards may have given asylum seekers a greater choice of where to apply for asylum. Specifically, from 2011 and following two rulings by the European Court of Human Rights and the Court of Justice of the European Union, EU member states could no longer return asylum seekers to Greece on the grounds of serious human rights violations (European Commission, 2016). Moreover, from 2015, Germany decided not to send back Syrian asylum seekers even if they were already registered in another EU country (Deutsche Welle, 2015). This breakdown of transnational migration barriers (e.g. the suspension of the Dublin Regulation, the fall of Gaddafi in Libya) also makes the period between 2008 and 2015 particularly relevant for this study.

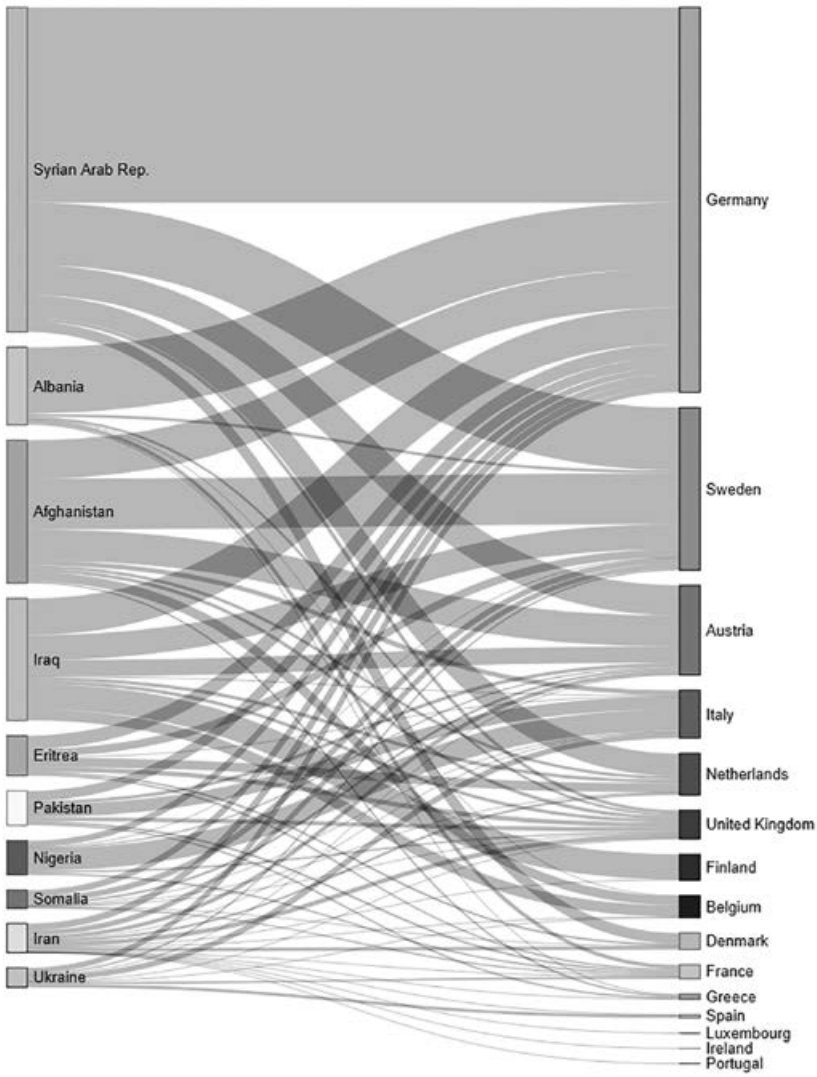


Source: Authors' own calculation.

Figure 2.3 *Top 10 origin countries of asylum seekers in the EU15 for 2008 and their destination cluster*

As mentioned in the section above, we account for the multilateral resistance to migration, meaning that we estimate not only the effect of the policies of a single country, but also the impact of policies adopted in alternative preferred destinations. We therefore also present the preferred destinations (destination clusters) for the origin countries 'sending' most asylum seekers. More specifically, we have created illustrative Sankey diagrams for the top 10 origin countries of asylum applicants to the EU15 in 2008 and 2015 (see Figures 2.3 and 2.4). According to our calculation, in 2008, most applicants who apply for asylum in the EU15 countries originate from Iraq (22 667), Afghanistan (10 108), Russia (10 330), Somalia (14 883), Pakistan (28 056) and so on. Among the likely explanations for these origin countries making the top 10 list in 2008 (see Figure 2.3) are the US-led wars in Afghanistan and Iraq, as well as civil unrest in Somalia. In 2008, asylum seekers from Iraq made up the largest group applying in the EU15 countries. Of the countries belonging to the destination cluster of Iraqi asylum seekers, Germany received the most applications in 2008 (6697 Iraqi applicants), while other important destinations were Sweden (6083), Netherlands (5207), United Kingdom (2030), Greece (1760) and Belgium (1070). In general, the United Kingdom (17 585 applications) have received the most application from these 10 origin countries in 2008, followed by Greece, Sweden, Netherlands and Germany.

In 2015, the top 10 origin countries of asylum seekers have changed, with Syria topping the list of origin countries (see Figure 2.4). The countries forming the destination cluster of Syrian asylum seekers are Germany, Sweden, Austria, Netherlands, United Kingdom and Denmark, with about 264 000 Syrians having sought asylum in these countries. Germany accounts for 60 per cent of all these applications (see size of node from Syria to Germany in Figure 2.4). Afghanistan and Iraq remain major 'sending' countries, with 99 097 asylum seekers applying in their respective destination clusters (see link between Iraq, Afghanistan and EU destinations in Figure 2.3). In 2015, Germany and Sweden remain among the preferred destinations for Iraqi asylum seekers, with 29 784 and 20 259 applications respectively. However, two countries were not part of the destination cluster for asylum seekers from Iraq in 2008, but make the top 4 list in 2015. These two countries are Finland (20 427) and Austria (13 285) (see Figure 2.4). This is an indication that the preferred destinations are not necessarily static, but dynamic, and possibly vary according to the policies adapted by single countries and by alternative destination, which is what we further explore in this chapter. It is also illustrative how Denmark both in 2008 and 2015 received fewer asylum applications than the three other countries covered by the book.



Source: Authors' own calculation.

Figure 2.4 *Top 10 origin countries of asylum seekers in the EU15 for 2015 and their destination cluster*

RESULTS FROM THE MULTIVARIATE ANALYSIS

In this section, we examine the effect of single policies on the inflow of asylum

seekers to EU15 countries between 2008 and 2015 in order to determine whether recognition rate, family reunification, permanent residence and access to generous social assistance are equally important for the asylum destination choice. What we are particularly interested in determining is whether asylum seekers navigate more after changes in certain policies when choosing where to apply. In Table 2.1 (Models 1 to 4), we separately include the aforementioned policy indicators as well as their deflection effects, meaning the effect of changes in policies in other preferred destination countries (cluster countries). Model 1 shows a positive effect of approval rate on asylum applications. In other words, if, *ceteris paribus*, countries increase their recognition rate by 1 per cent of its mean the year before, this will lead to 17.2 per cent[5] augmentation in the average number of asylum applications in the following year. This coefficient becomes smaller (10.8 per cent) but remains robust to the inclusion of all policy and control variables in the full model (see Model 5 in Table 2.1). These findings are consistent with the expectations from Hypothesis 1. Our findings are in line with Neumayer (2004) despite the fact that he uses an imprecise measure, namely the general acceptance rate (i.e. from all origins to one destination), while we use dyadic recognition rate (i.e. between country pairs). The negative coefficient for the cluster policy variable for recognition rate in Model 5 suggests that the number of asylum applicants to one country decreases when the recognition rate increases in alternative preferred destinations (countries within the same destination cluster). More specifically, when the recognition rate increases by 1 per cent of its mean in other countries within the destination cluster, the inflow of asylum seekers to a country decreases by 2.6 per cent.

To further explain, we present and interpret these findings in the light of a single destination country. For instance, Denmark began adopting more restrictive policies towards refugees and asylum seekers in the early 1990s, with further restrictions implemented with the incoming government in 2001 and to some extent also during the timeframe of our study (Brochmann and Hagelund, 2011). Yet between 2008 and 2015, the Danish recognition rate increased by 1.2 percentage points, while its deflection rate increased by 2.3 percentage points. When applied to the coefficient in Model 5 (Table 2.1), this suggests, *ceteris paribus*, that between 2008 and 2015, the number of asylum seekers to Denmark has increased by 67.9 per cent (see black diamond for Denmark in Figure 2.5) due to Denmark's slightly more liberal policy, but decreased by 139.3 per cent (see grey circle for Denmark in Figure 2.5) due to the relatively more liberal policy approach in the preferred alternative destinations (countries belonging to the same destination cluster).

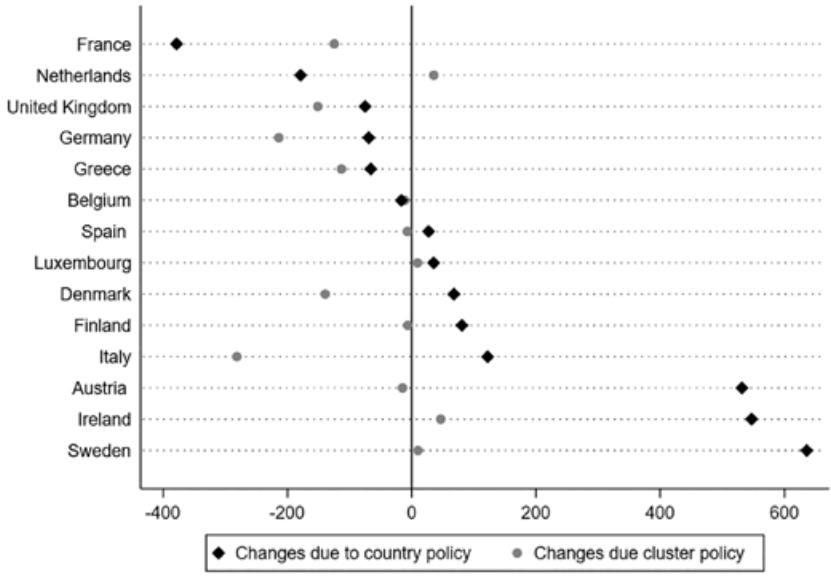
Overall, this means that the combined effect of the recognition policy of Denmark and countries belonging to the same destination cluster resulted in a *decrease* in the number of asylum applications to Denmark by 71.4 per

Table 2.1 The effect of asylum policy on dyadic asylum applications into EU15 (2008–2015)

	(1)	(2)	(3)	(4)	(5)
	PPML	PPML	PPML	PPML	PPML
Outcome variable	Level of yearly dyadic asylum applications				
Main independent variables					
Recognition rate	0.624***				0.435***
	(0.115)				(0.115)
Family reunification		1.364**			1.934***
		(0.596)			(0.591)
Permanent residence			0.195		−0.742
			(0.620)		(0.595)
Log Social assistance				0.014	0.024
				(0.049)	(0.053)
Destination cluster variables					
W_Recognition rate	0.245				−0.940***
	(0.242)				(0.326)
W_Family reunification		1.016***			2.828**
		(0.205)			(1.114)
W_Permanent residence			0.809***		0.348
			(0.195)		(1.393)
W_Log social assistance				0.041***	−0.097**

	(1)	(2)	(3)	(4)	(5)
	PPML	PPML	PPML	PPML	PPML
				(0.011)	(0.047)
Fixed effects					
Origin, Destination, Pair, Year	Yes	Yes	Yes	Yes	Yes
Origin X Year	Yes	Yes	Yes	Yes	Yes
Observations	10,876	10,876	10,876	10,876	10,876
R-squared	0.960	0.959	0.960	0.959	0.964

Notes:
All variables are lagged at least one year except the Log average refugees' stock, which is an average of year-2 to year-4 preceding the asylum application. The Destination country controls variables which are not presented in this short table includes Unemployment rates of migrants, log average refugees' stocks, log pop, log GDP.
Standard errors in parentheses: *** $p < 0.01$; ** $p < 0.05$; * $p < 0.1$.

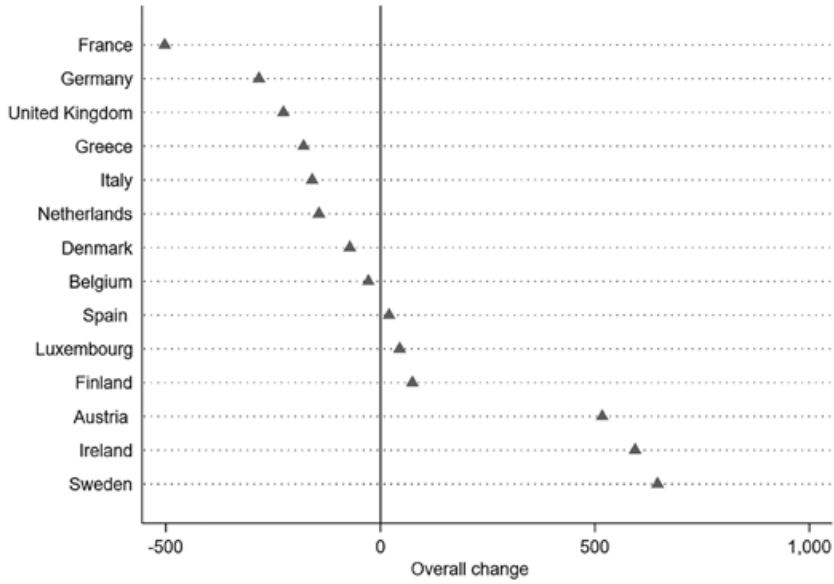


Source: Authors' own calculation based on UNHCR data.

Figure 2.5 Implication of our results for recognition rate and its deflection by country (2008–2015)

cent (see grey triangle for Denmark in Figure 2.6). The implication of these findings is that Denmark has reduced its inflow not because it adopted tougher policies during the period of analysis, but because the neighbouring countries within the same cluster adopted more liberal approval policies. A comparison between countries shows that Sweden is the country that has experienced the largest relative increase in the number of asylum applications, mainly due to an increase in the Swedish recognition rate, but also because of slightly more restrictive access in countries within the same destination cluster. In contrast, Germany – despite registering a large absolute number of applicants in 2015 – is in relative terms not the most affected by the increased number of asylum applications due to changes in recognition rate, according to our model. France is, according to our model, the country the least affected by the combined effect of its own recognition policy and that of countries within the same destination cluster (see grey triangle for France in Figure 2.6).

Family reunification is the second policy that has a significant positive effect on the number of asylum applicants when included alone (Model 2 in Table 2.1), but also in the full model (Model 5 in Table 2.1). In line with Hypothesis 2, the positive coefficient for a country's own family reunification



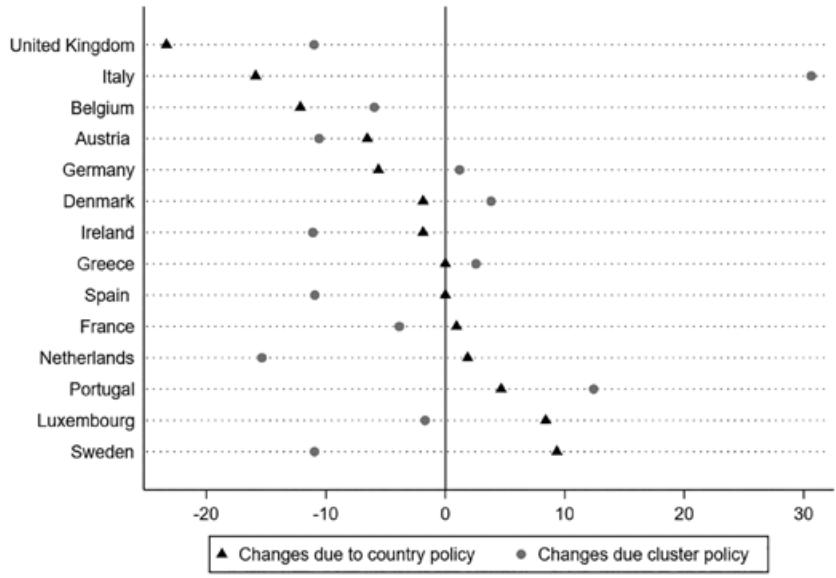
Source: Authors' own calculation based on UNHCR, Mipex and Samip data.

Figure 2.6 Combined single country and cluster recognition policy change by destination

policy in Model 2 suggests, *ceteris paribus*, that a liberal family reunification policy in the year before is associated with an increase in the number of asylum applicants. In detail, a 1 per cent increase in the average family reunification index at a given year corresponds to a 159 per cent increase in asylum applications in the following year. This is a relatively large effect, which increases and remains robust to the inclusion of all policy and control variables (see Model 5). A sensitivity analysis (see Diop-Christensen and Diop, 2021) indicates, however, that the sharp increase of the coefficient for family reunification in Model 5 compared to Model 2 could be due to multicollinearity.

In concrete terms and *ceteris paribus*, this means that a country like Sweden has increased its number of applications by 9.34 per cent (see black triangle in Figure 2.7) due to Sweden's own family reunification policy, but at the same time the inflow of asylum seekers to Sweden has decreased by 10.96 per cent (see grey circle in Figure 2.7) due to more liberal family reunification policies in other preferred destinations.

Overall, the combined changes in the family reunification policy of Sweden and countries in the same destination cluster decreased the total number of applications to Sweden by 1.6 per cent (see grey diamond in Figure 2.8).

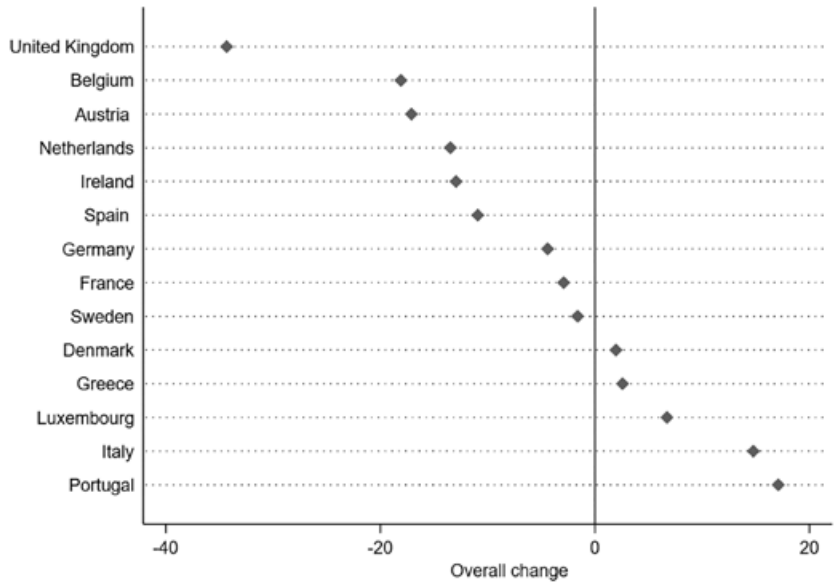


Source: Authors' own calculation based on UNHCR, Mipex and Samip data.

Figure 2.7 Implications of our results for family reunification and its deflection by country (2008–2015)

In relation to the recognition rate, these findings imply that the increase in asylum applications in Sweden between 2008 and 2015 is mainly imputable to Swedish liberal recognition of refugees' status policy. When comparing the EU15 countries, the Southern European countries of Italy and Portugal have experienced the largest increase in asylum applications due to the combined effect of family reunification policies (the effect of their own government policies and that of the alternative destination within the same cluster). The United Kingdom stands as one of the most restrictive countries, both in terms of recognition rate and family reunification, as they are among the top three of countries that are least affected by the combined effect of recognition and family reunification policies, according to our model (see black triangle and grey diamond for United Kingdom in Figures 2.7 and 2.8 respectively).

Regarding the remaining policy variables, Models 3 and 4 indicate that permanent residence and access to generous social assistance are unimportant for explaining the augmentation in the number of asylum seekers. The results remain unchanged in the full Model (Model 5), where all policy variables are accounted for.



Source: Authors' own calculation based on UNHCR, Mipex and Samip data.

Figure 2.8 Combined single country and cluster family reunification policy change by destination

CONCLUSION

This chapter contributes to the literature by theoretically and empirically analysing how asylum seekers are affected by different policies when choosing a country of asylum application. Based on UNHCR data and Mipex data, our results suggest policies that aim at maximising their short-term safety by obtaining refugee status (Hypothesis 1) and reunifying with their families (Hypothesis 2) left behind. As expected, our analyses suggest that permanent residence policies (Hypothesis 3) and the level of social assistance (Hypothesis 3) are unimportant for asylum seekers' destination choices.

Of relevance to the welfare magnet debate, our results suggest that lowering social assistance benefits is not a decisive tool for reducing the number of asylum applications. In other words, these results suggest that it is *not* the relative high levels of social assistance in Germany, the Netherlands, Sweden and Denmark that attract asylum seekers. This does not mean that economic incentives do not matter at all. Obviously, Europe is more economically attractive than peaceful African countries. However, for forced migrants, the

main attractiveness of countries such as Sweden is the high recognition rates of asylum application and easy access to family unification.

This study highlights the need to account for the relative attractiveness of alternative destinations as the number of asylum seekers to a specific country may decrease by the mere fact that other countries preferred by a group of asylum seekers adopt a more liberal policy. Comparing our results to previous studies focusing on the impact of benefit levels for non-refugee migrants (see literature review in the first section) also suggests that – in line with the seminal work of Vertovec (2007) – it is crucial for future research to distinguish between different migrant groups. Finally, it is important to acknowledge that these findings apply to the EU15. The results could have been somewhat different if destinations outside Europe were included.

NOTES

1. Reproduction of Diop-Christensen and Diop (2021).
2. Reproduction of Diop-Christensen and Diop (2021).
3. We have also conducted analysis using the deleted OECD origin countries and the results remain largely unchanged (results can be obtained upon request).
4. See https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Asylum_and_migration.
5. The mean of the recognition rate is 0.198974. The 17.2 per cent is calculated as follows (($e^{0.624}$ −1) * 100) * 0.198974 * 1=17.2 per cent.

3. Asylum seekers' social rights while waiting: comparative insights from Denmark, Sweden, Germany and the Netherlands

Karen Nielsen Breidahl[1]

In 2015, the number of asylum seekers peaked in the European Union, with around 1.3 million applications. Although asylum inflows have decreased in recent years, for example due to the Covid-19 pandemic, the number of people awaiting an asylum determination is still at a very high level. In 2020 the number of first-time asylum applicants in the European Union reached 416 600 (Eurostat, 2021). On a broader global scale, forced displacement has reached record numbers, with nearly 80 million individuals in 2020 (UNHCR, 2020). The large increase of asylum seekers recorded in 2015–2016 was far from an unprecedented event. Several peaks of asylum inflows in the last decades have confronted national governments all over the world with an unresolved dilemma between how to fulfil human rights obligations while protecting the national borders. A dilemma that is deeply historically rooted as 'international refugee law, in particular the 1951 Convention Relating to the Status of Refugees, places a legal constraint upon signatory states against the otherwise well-established right to decide who may enter and remain on their territory' (Gammeltoft-Hansen, 2014: 574).

In the heart of this dilemma lies the contentious question of what kind of social rights should be provided to asylum seekers in terms of housing, social benefits, health, the right to access the labour market, education and so on. On the one hand, European welfare states have to fulfil a number of international obligations in terms of protecting human rights and providing safety. Obligations that also comprise a provision of basic social rights to asylum seekers 'recognized' as legally waiting in the asylum determination process (Archer, 2015; Kohl, 2015). The social rights provided to asylum seekers while waiting have important implications for their everyday life while their case is pending and, moreover, for the integration prospects for those who obtain a resident permit (e.g. access to the labour market) (e.g. Hvidtfeldt et al., 2018; Hainmueller et al., 2016; Bakker et al., 2016a). A vast amount of asylum

seekers are not only waiting for *months, but for years* (see, e.g., the Rockwool Foundation, 2021). This is a period where they are considered as non-nationals by the society that they strive to be part of and where they are physically placed for extended periods. On the other hand, all over Europe, widespread adoption of deterrent approaches to asylum support has taken place whereby access to benefits, employment and housing have been restricted in an attempt to become less attractive asylum-seeking destinations. A withdrawal of social welfare benefits for 'outsiders' has become a common instrument to 'protect' national borders (Gammeltoft-Hansen, 2014; Szczepanikova, 2013), in order to avoid the so-called 'magnetism effect'; see Chapters 1, 2 and 9.

This chapter describes how Germany, the Netherlands, Sweden and Denmark have responded more recently to these dilemmas by legally reorganizing and adjusting asylum seekers' social rights while their asylum case is pending. The comparative analysis pays special attention to the situation around 2020 and 2021. Moreover, it traces the notable amendments that have taken place in the aftermath of the so-called 'refugee crisis' in 2015.

Frontline organizations responsible for asylum reception and accommodation have a considerable amount of discretion to decide how and in which way social rights and duties are produced on the ground[2] (Lipsky, 2010; Brodkin, 2013). Consequently, there can be a large gap between how social rights are formally stated in policies and how they are produced on the ground (see, e.g., Amelina et al., 2020; Breidahl et al., 2022; Ratzmann and Heindlmaier, 2022). Therefore, the reader should bear in mind that this chapter analytically mainly centres on the *legal framework* that regulates the social rights asylum seekers are entitled to – their formal social rights. However, at the end of the chapter, I will return to some of these issues.

CONCEPTUAL FRAMEWORK FOR DESCRIBING ASYLUM SEEKERS' SOCIAL RIGHTS

The formal social rights provided to migrants have been framed as a yardstick of the inclusiveness of contemporary welfare states (Koning, 2020; Breidahl et al., 2022). Some of the earliest discussions date back to the early 1990s (Hammar, 1990). In particular, Diana Sainsbury's (2006; 2012) writings have been highly influential in terms of bringing discussions on the social rights of migrants to the front of social policy debates by arguing for the importance of combining insights from comparative welfare state research and international migration literature to capture how social rights vary considerably across these categories. These insights revealed how asylum seekers and undocumented migrants are most vulnerable in terms of social rights (Sainsbury, 2006).

Only a few studies have explicitly studied asylum social rights in a comparative perspective (e.g. Archer, 2015) and the term 'reception conditions

for asylum seekers' is typically used in discussions on asylum seekers' access to housing, social benefits, health and education, not social rights. The prevalence of the term 'reception' reflects the predominant perception of what waiting time should be about: a short period of reception followed by a decision about whether to stay or leave the country. Therefore, asylum systems in most countries have been based on the assumption that, for the most part, receptions required only short-term services for basic shelter, health, and education needs, while individuals and families were processed through the asylum system (Breidahl et al., 2019; Kohl, 2015). After processing, they would either be sent out in society for integration or returned to their home countries for repatriation.

However, as stated in the introduction, 'reception' has become a status that for many continues, not only for months but for years. Revealing available data on waiting time (how long asylum seekers on average are legally waiting in the asylum determination process) confirms this picture. In Denmark, the average waiting time in 2019 was around 19 months (The Rockwool Foundation, 2021). In Germany, the average processing time, until a final decision is made, was 17.6 months in 2018 (ICMPD, 2020). In Sweden, the average processing time was 302 days in 2020 (and 507 days in 2019) (Swedish Migration Agency, 2020). Behind these average numbers, there lies a great variety as the waiting time depends very much on the specific cases, destination countries, reception capacity and so on. Moreover, many applicants appeal negative decisions, whereby the asylum procedure is extended.

To uncover the legal framework that regulates the social rights of asylum seekers legally awaiting a decision, the comparative analysis includes the following dimensions:

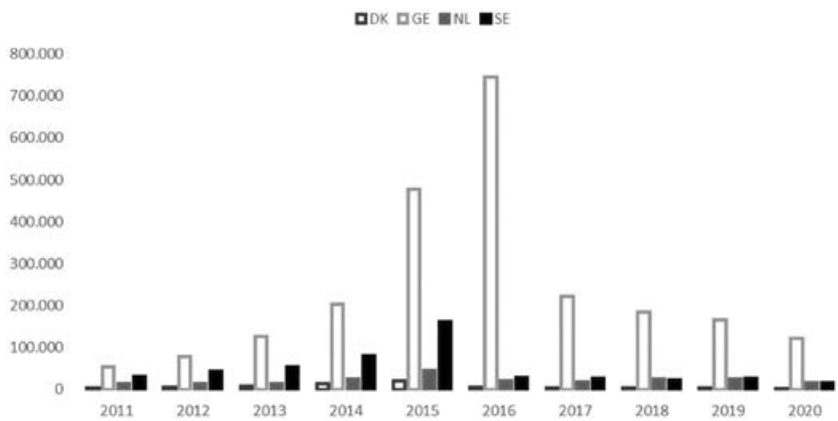
- accommodation and housing;
- social benefits;
- access to health care;
- access to employment;
- access to education.

These dimensions are not exhaustive but represent some of the central ones regulating the basic social rights provided and, moreover, their right to active participation in society, while waiting. In his classical writing, Marshall (1950) emphasized how social rights are not solely about having access to benefits and services. They also include 'the right to active participation in the society, autonomy and freedom' (Stephens, 2012). To be considered as a 'legal asylum seeker' in itself is a status that is hard to reach and the social rights of asylum seekers depend on their specific legal status, for example whether they are in the initial phase, whether their case is pending or whether their application has

been denied. This chapter will solely focus on the category of asylum seekers legally awaiting an asylum determination. The chapter does not cover the legal framework for individuals not recognized as eligible to have their asylum application processed (the initial phase) and for those whose application has been denied (living in deportation or detention centres).

EMPIRICAL DATA ON ASYLUM SEEKERS' SOCIAL RIGHTS

Figure 3.1 shows the number of asylum applications in the last 10 years, where 2015 and 2016 stand out as outliers in all four countries; see also Chapter 2. This is an important contextual factor for the findings of this chapter. Because the population in Germany is around five times as big as in the Netherlands, 8 times as big as Sweden and 14 times as big as Denmark, the rather high numbers in Germany in these years should not be exaggerated. In 2015, Sweden received more asylum seekers per capita than the other three countries. In 2016, Germany received the highest amount per capita. Of the four countries, Denmark stands out as the country that has received the lowest number of asylum seekers per capita in recent years. The figure illustrates how the number in all four countries has gone down in recent years. The number is so low in Denmark that you can hardly see it from the figure.



Source: Eurostat (MIGR_ASYAPPCTZA).

Figure 3.1 Asylum applicants 2011–2020

Denmark (together with UK and Ireland) is the only country (out of the four in this chapter) that has not signed the EU reception conditions directive for

asylum seekers. This is a directive that sets out common minimum standards for the reception of applicants for international protection across the Member States. The first directive is from 2003 and was updated again in 2013 (Council of the European Union, Directive 2013/33/EU). The formally stated aim of the directive was to improve and harmonize living standards for asylum applicants across the EU. The directive is not binding and has to be implemented in national law.

The comparative analysis of this chapter is based on a comprehensive documentary body of material consisting of national country reports from the so-called 'Asylum Information database' (AIDA: https://asylumineurope.org/) from 2020/2021 and 2015, official documents published by the state and government authorities and secondary literature. As Denmark is not included in this database, the Danish analysis will solely rely on written national law and other juridical documents from 2020/2021 and 2015.

The AIDA database is managed by the European Council on Refugees and Exiles (ECRE) and provides information from 19[3] member states of the EU (but not Denmark) on information about asylum procedures and reception conditions. Since 2013, data from each country have been collected by national experts and published on the AIDA homepage as yearly updated national reports. Experts from respective countries have been in charge of the country reports that are based on formal policy documents and available information from each country. Utilizing a database like this implies a certain risk of reproducing misleading information. To meet that risk, central information on the legal framework utilized in this chapter have undergone a 'double check' (by the author and a student assistant[4]) by scrutinizing official policy documents from each country.

THE LEGAL FRAMEWORK REGULATING ASYLUM SEEKERS' SOCIAL RIGHTS TO ACCOMMODATION

Asylum seekers whose applications are being processed in Germany, the Netherlands, Sweden or Denmark are regulated by a legal framework that defines their rights and duties while waiting. Of crucial importance is the specific framework on asylum accommodation as it in fundamental ways defines what they can do (and not do) while waiting and thereby their individual autonomy. In all four countries, so-called asylum centres are the central organizational domains for providing accommodation for asylum seekers while their applications are being processed. Some asylum seekers also have the right to external accommodation (external and/or private housing).

The rights to private housing have been most prevalent in Sweden, where asylum seekers since 1994 (when the so-called EBO-legislation was adopted) have had the formal right to settle outside collective centres during the

asylum procedure as long as they arrange their own accommodation (Prop, 1993/94:94; Breidahl et al., 2019). Asylum seekers who accepted housing from the state were identified as 'anläggningsboende' (ABO) and asylum seekers in private housing were termed 'eget boende' (EBO). Between 1999 and 2017, the share of asylum seekers in EBO has varied between 30 and 50 per cent (SOU, 2018, 22: 179). In 2019 (and with effect from 2020), the Swedish government decided to limit asylum seekers' right to find their own housing. To achieve this goal it was decided that asylum seekers in the EBO system that choose to settle in so-called 'socio-economic disadvantaged areas' should lose their monthly allowance (pocket money) (Prop. 2019/2020:10).

In both Denmark and the Netherlands, the majority of asylum seekers have for several years been housed in collective accommodation centres. In the Netherlands asylum seekers are transferred to so-called process reception centres after the initial period in a central arrival centre. Some asylum seekers will after some time be transferred to so-called centres for asylum seekers – if their application is processed in the extended asylum procedure (AIDA Netherlands, 2020: 77–8). In Denmark, few asylum seekers live outside the centres in private accommodation or together with relatives (if approved by the Directorate for Immigration). The predominant centre-based approach goes back to 1985 when the first asylum centres were established and it was decided that asylum seekers should be largely restricted to centres operated under state contract by Red Cross Asylum. Red Cross Asylum was the central operator until 2001, when a number of municipalities also entered the organizational landscape (Breidahl et al., 2019; Kohl, 2015).

Asylum accommodation in Germany – and asylum seekers' legal social rights more broadly – are regulated in the so-called 'Asylum Seeker Benefits Acts' from 1993 (Gottlieb and Schülle, 2021). It is a challenging endeavour to provide a coherent overview of asylum accommodation in Germany. Formally, it is stated in the law that asylum seekers after the initial period should be sent to a collective accommodation centre where they can wait for up to 18 months at maximum. However, the concrete responsibility lies with the municipalities. Consequently, different paths have been taken (AIDA Germany, 2020: 92). Some municipalities in Germany have dissolved collective asylum accommodation while others have not. More recently in 2019, the centre-based approach was tightened as it was decided in law that asylum seekers whose applications are being processed can be assigned to live in so-called 'initial reception centres' for a period of a maximum of 18 months while their asylum case is pending. Consequently, asylum seekers have no legal right to be moved out of the centres before 18 months. Families with children who are minors were an exception, as they can live in these centres for a maximum of six months. In 2015, the obligated period in the initial reception centre was much shorter (extended from three to six months in 2015) (AIDA Germany, 2020: 81).

In all four countries, it has implications for their legal social rights, for example the level of their social benefits, legal right to obtain employment and so on, whether asylum seekers are accommodated in reception centres or in external accommodation (see below). In all four countries, it is only asylum seekers who lack resources who are entitled to material reception conditions whereas asylum seekers with their own material resources (rarely the case) must pay for the accommodation themselves. Asylum seekers legally awaiting an asylum determination are allowed to come and go (contrary to people in the deportation centres). However, in terms of mobility, they are also restricted in a number of ways. In Denmark and the Netherlands – where most asylum seekers are housed in collective accommodation – asylum seekers have a duty to report their presence frequently (every week or every second week). This is also the case in some facilities in Germany (AIDA Germany, 2020: 93). Sweden is the country where the control of asylum seekers is least formalized.

ASYLUM SEEKERS' LEGAL ENTITLEMENTS TO SOCIAL BENEFITS

It is difficult to compare the exact level of social benefits that asylum seekers are entitled to across the four countries as the benefit level depends on their accommodation conditions (whether or not they are living in collective accommodation, whether or not food is provided at the centres, the size of the household, number of children, etc.). Moreover, the price level differs across the countries. As an attempt to provide a fairly comparative picture Table 3.1 provides updated information about the amount of the monthly financial allowance/vouchers granted to single adult asylum seekers in accommodation where they have to finance and provide food for themselves (2019/2020 figures).

In all countries, the social benefits provided to asylum seekers are at a much lower level compared to regular social assistance. According to a calculation in Sweden, the monthly allowance in Sweden is around half the size of that for settled persons on social welfare (AIDA Sweden, 2020: 69–70). According to the national AIDA report from the Netherlands, an asylum seeker receives less than 30 per cent of the social welfare allowance provided to Dutch citizens. It is, however, difficult to compare living standards based on these calculations as most asylum seekers have no rent expenses (AIDA Netherlands, 2020: 72).

A few conditionality principles have recently been introduced in Sweden. In changing the EBO legislation in 2019, it was enacted that asylum seekers should lose the right to a daily allowance in the event that they settle in so-called 'socio-economically challenged areas' (AIDA Sweden, 2020: 10). People that settle in the EBO-system outside these defined areas can still claim a daily allowance from the Swedish authorities.

Table 3.1 Amount of monthly financial allowance/vouchers granted to single adult asylum seekers in accommodation without food (2019/2020)

Sweden	Germany	Netherlands	Denmark
Single adult asylum seekers: €210.05	Single adult in accommodation centre: €139	Single adult housed by COA: €239.12	€219.75. If supplementary allowance is added (if they take part in the activities they have signed up for in the agreement) the amount is €347.96

Source: AIDA reports Germany, Sweden and Netherlands 2020; www.nyidanmark.dk, December 2021.

In Denmark, the social benefit level that asylum seekers are entitled to is relatively fixed and the majority are housed in collective accommodation where no food is provided. The legal framework that regulates the social benefits in Denmark stands out from the other countries in important ways as the level of 'supplementary benefits' is quite high (see Table 3.1). Moreover, the payment of the 'supplementary' benefit is conditional on asylum seekers participating in the activities they have signed up for in the agreement with the operator responsible for their accommodation, for example language classes, internal practice at the centres (cleaning, maintenance), external practice outside centres, help with translations and so on.

The Danish conditionality principles can be traced back to the so-called VUA reform in 2003 (an acronym referring to 'Adult education and activation program for asylum seekers') that made important amendments to the existing Aliens Act (Act No. 292 of 30 April 2003). The legal framework introduced work requirements for asylum seekers, making supplemental financial benefits contingent on 'activation' within asylum centres (Breidahl et al., 2019). In practice, it is the staff at the asylum centres who are responsible for controlling whether asylum seekers fulfil their obligations and the room for discretion to decide whether absence or non-attendance in activities is legal or not is rather wide.

Because most asylum seekers in the Netherlands are living in collective accommodation centres, the benefit rate for asylum seekers with pending applications is fairly fixed (see Table 3.1). The allowance of €239.12 a month covers food, clothing and personal expenses. The amount is regulated after the size of the family/number of children. As in Denmark, asylum seekers can earn a small amount of money for working at the centre (cleaning common areas, maintenance of the centre etc.) (around €14 per week) (AIDA Netherlands, 2020).

Currently, asylum seekers housed in the initial reception centres in Germany (where they can stay up until 18 months) will receive €139 per month.[5] It is hard to say whether this is much less than the level in other countries but it is indeed lower. The social benefits provided to asylum seekers in Germany have been controversially discussed over the last decades. Back in 2005, the level was reduced to a minimum. Later in 2012, this decision was overruled by the court, after which a minimum standard level was settled (Archer, 2015).

Asylum seekers in Germany (unlike the situation in the three other countries) have a legal right to improved social conditions after 18 months whereby they are entitled to the 'standard' social benefits, access to healthcare under the same conditions that apply to German citizens who receive social benefits, employment, education and so on. This leaves the impression that there is more of a two-tier track in Germany when it comes to asylum seekers' social rights. To complicate the picture, there are also different ways of providing benefits in Germany as asylum seekers living in initial reception centres often will receive benefits as vouchers, while it is more up to the local authorities to decide how social benefits for asylum seekers in decentralized accommodation should be provided. The legal entitlement to social benefits has been reduced in Germany as the period of not receiving regular social benefits was extended from 15 to 18 months in 2019 (AIDA Germany, 2020: 75).

In all four countries benefits can be withdrawn if asylum seekers refuse to corporate (e.g. if they do not report their presence regularly, make trouble at the centres, are absent from meetings etc.) (AIDA Netherlands, 2020: 74–5). This regulation is relatively new in Sweden as it was not stated in law in 2015. This indicates, once again, that since 2015 Sweden has adopted a more restrictive approach in the aftermath of the 'refugee crisis'.

ASYLUM SEEKERS' ACCESS TO HEALTHCARE

Adult asylum seekers' formal access to healthcare differs significantly from that of regular inhabitants as they either in the entire waiting period or in a defined period of time only have access to 'emergency' healthcare – and thereby a minimum level of healthcare. What is exactly meant by a 'minimum level of healthcare' is rather unclear and often up to discretionary judgement by the frontline organizations. Consequently, social rights in this area are rather vaguely defined and a number of studies have problematized whether asylum seekers get the healthcare they are in need of and entitled to. In all three national reports from the AIDA database, it is stated that asylum seekers only to a 'limited' degree '… have adequate access to health care in practice' (AIDA Netherlands, Sweden and Germany, 2020). To give an illustrative example of how vaguely defined the term 'emergency healthcare' is in the

legal framework, direct quotes from the homepage of the Danish Ministry of Immigration and integration are provided in Box 3.1.

BOX 3.1 ILLUSTRATION OF VAGUE DEFINITION OF EMERGENCY HEALTHCARE

Asylum seekers and foreign nationals without legal residence in Denmark are not covered by the national health insurance system. Instead, your healthcare expenses are covered by the Danish Immigration Service.

The Immigration Service pays healthcare expenses, provided the treatment is necessary and:

- Urgent (treatment cannot be postponed), and/or
- Pain-relieving.

Treatment is considered urgent if delaying it could lead to: life-threatening injuries, degeneration or serious worsening of your condition, or your condition becoming chronic.

Whenever treatment is deemed necessary, the centre-operator needs to request the Immigration Service to provide a guarantee of payment. Certain forms of treatment can be initiated by the healthcare staff at your centre on their own initiative, however. These include consultation with a general practitioner, initial consultation with a psychologist or psychiatrist, as well as consultation with a midwife or medical specialist, such as an ear–nose–throat doctor.

Source: https://www.nyidanmark.dk/en-GB/Waiting/Asylum/Conditions%20for%20asylum%20seekers.

The quotes in Box 3.1 also indicate how operators in the asylum system in Denmark hold a large amount of discretion in terms of deciding what should be counted as 'emergency needs'. To send adult asylum seekers to treatment in the health system often requires permission from the Immigration Service.

The legal framework in Denmark bears resemblance to the legal framework that defines asylum seekers' access to healthcare in the other three countries. In Germany, the Asylum Seekers' Benefits Act restricts healthcare for asylum seekers to cases 'of acute diseases or pain' (Gottlieb and Schülle, 2021), which also leaves significant room for discretion. Again Germany stands out from the other countries due to their 'two tier track'. Once asylum seekers are entitled to the 'standard' social benefits (after 18 months), they are also entitled to access to healthcare under the same conditions that apply to German citizens.

Minor asylum seekers (under the age of 18) in Denmark and Sweden have the same right to health treatment as other children in Denmark. In Germany,

the social rights of minor asylum seekers to healthcare is not stated in the law in the same way.

In the Netherlands adult asylum seekers awaiting a decision of their case in an asylum reception facility are entitled to so-called 'emergency and necessary and non-postponable health care' in the first two months. After these two months they are entitled to the same basic healthcare as other residents in the Netherlands. Children of asylum seekers (under 18) have the same right to healthcare as other children, as in Denmark and the Netherlands (EMN, 2020).

Comparing the legal framework for access to healthcare in 2015 and 2020 reveals that notable changes have not taken place in this period.

ASYLUM SEEKERS' LEGAL ACCESS TO EMPLOYMENT

Asylum seekers' legal access to employment and education is not only important for fulfilling human rights obligations but also for making the waiting time bearable. As mentioned earlier in this chapter, many asylum seekers wait in the system for extended periods. If they are prevented from entering employment, improving their skills and so on, it can have consequences later on and for their potential integration prospects if they obtain a resident permit (Bakker et al., 2016b). Hence, existing research finds negative effects on their subsequent employment prospects once they have been granted residency (e.g. Marbach et al., 2018; Fasani et al., 2020). These negative effects come in the form of scar effects, a term used to describe long-lasting negative effects due to a period of unemployment or inactivity.

All four countries provide 'very small openings' for asylum seekers to access employment while their case is being processed. According to the EU reception directive, signed by Germany, Sweden and the Netherlands, asylum seekers whose asylum application is being processed should have access to the labour market no later than nine months from the date when the application for international protection was lodged. However, how this right is implemented depends on national law.

In the Netherlands, asylum seekers have a legal right to access employment after six months – a legal right that can be traced back to 1995. There is a limit to how much they must work (maximum 24 weeks per 12 months) and a number of other restrictions. Research has pointed to the many limits and how asylum seekers in practice seldom enter the labour market due to administrative hurdles and the fact that many employers are not eager to make contracts with asylum seekers (AIDA, Netherlands, 2020).

In Sweden, asylum seekers (whose applications are being processed) have a legal right to enter employment from day one – a right that was stated several decades ago. However, also in Sweden, the actual number of asylum

seekers entering employment is at a rather low level due to the prevalence of administrative hurdles (e.g. a complicated process of preparing a contract with the employers, lack of a bank account and civil identification number etc.). According to a calculation from 2016 fewer than 500 out of almost 163 000 asylum seekers entered regular employment.[6]

Also in Germany asylum seekers' access to employment is full of obstacles – many of the same obstacles as in the other countries. In addition to this, asylum seekers settled in the initial reception centres (sometimes lasting for up to 18 months) are not allowed to work. Due to an amendment of the Asylum Act in Germany in 2020 a narrowly defined group of asylum seekers were allowed to work as self-employed. Except for this limited extension – and the extension of 18 months for some asylum seekers in initial reception centres – the conditions to enter employment have not changed much between 2015 and 2020.

Although Denmark has not signed the EU asylum reception directive, it is stated in the law that asylum seekers have a legal right to access employment after awaiting a decision for six months. A legal right that was introduced in 2013 (Breidahl et al., 2019). However, as in the other countries, reaching this legal opening is hampered by many administrative barriers and obstacles. To name a few of them: it requires a special permit from the Immigration Service to be allowed to work; the work has to be performed on ordinary terms and cannot include subsidized work or workplace training; the person applying for the permit must either have an employment contract or have a job offer from an employer who promises to hire the person in question. Moreover, a bank account has to be created – something that is very difficult without a civil registration number. The consequence of these heavy administrative burdens (Herd and Moynihan, 2018) is a de facto administrative exclusion (Brodkin and Majmundar, 2010), as practically no asylum seekers in Denmark have entered employment since 2013, when it became a legal opening. In effect, this means that there is almost a de facto employment ban for asylum seekers in Denmark.

Based on insights from the four countries it is safe to conclude that one should be very careful in making a distinction between 'legal openings' and how these openings are provided on the ground. Hence, it is well-documented that there are a vast number of obstacles encountered by asylum seekers entering regular employment – not least administrative barriers and obstacles. Moreover, if an asylum seeker manages to enter employment in one of the four countries, they need to pay for their reception conditions (including housing) themselves. Consequently, the incentive to enter employment is at a very low level.

ASYLUM SEEKERS' LEGAL ACCESS TO EDUCATION

In all four countries, primary school age children of asylum seekers have the legal right to participate in education. In three of the countries – except Sweden – participation is a mandatory requirement. How this right (and demands) is implemented in practice varies. In Denmark, it depends on the operators as to whether asylum seeker children are sent to public schools or NGO schools. Although children with an asylum background formally have the right to participate in education (until they are 16 years old) many children will not have access to the regular school system as long as they stay in initial reception centres in some of the federal states (AIDA, Germany, 2020: 96).

With regard to adult asylum seekers, there are also small and vaguely defined openings for entering education in the four countries. However, only a few asylum seekers enter these programmes. Moreover, vocational training for asylum seekers is also very rare in the four countries as entering this form of education is an administrative challenge (AIDA, Germany, 2020: 74–5).

All four countries provide some sort of language training: in Denmark, it is a right, and a duty, to participate in language training. The training counts as one of the activities that are a precondition for receiving the 'additional payment' according to the VUA-legislation from 2003. Whether the vocational training is in Danish or English depends on the operators and the contracts they are facing. In Sweden, it is neither a right nor a duty but a free offer – depending on the provision thereof. Often education programmes are delivered by NGOs. At the political level, it is currently up for consideration whether some sort of introduction or language courses should be obligatory for asylum seekers awaiting a decision. In Germany, it is not a stated right that asylum seekers can enter language training. Since 2015 it has become a legal right for refugees with a resident permit. Finally, in the Netherlands language courses are offered for asylum seekers 'who are likely to receive international protection' (AIDA, Netherlands, 2020: 111).

THE LIMITED SOCIAL RIGHTS OF ASYLUM SEEKERS

This chapter has investigated the legal framework that regulates the social rights asylum seekers are entitled to while their asylum application is pending in Germany, the Netherlands, Sweden and Denmark. Asylum seekers' everyday life is filled with a heavy amount of structural constraints limiting their autonomy to decide what to do (and what not to do). As one of the most vulnerable groups in society, the social rights provided to them are of crucial importance for fulfilling their social needs. The comparative analysis reveals how asylum seekers are eligible for social rights at a minimum level. They

are provided with some basic social rights while waiting and a few openings that are difficult to attain. In many ways, the four countries have addressed the overall dilemmas between protecting human rights/protecting national borders in similar ways. Deterrence measures including reduction of welfare benefits play a prominent role in countries' attempts to become less attractive asylum-seeking destinations. At the same time, at least on paper, the legal framework serves the function of providing safety.

These trends have been prevalent for several years. However, between 2015 and 2020 a more restrictive approach has taken place – most notable in Sweden and to some extent in Germany. Among others, the legal framework for asylum accommodation has moved in a direction in which centres, rather than decentralized accommodation, have gained more prominence in Sweden. Also, the legal framework around social benefits has been restricted (e.g. in Germany and Sweden) as well as the legal access to employment (e.g. Germany). Not much has changed since 2015 in Denmark and the Netherlands, reflecting how the social rights for asylum seekers were already at a minimum level before 2015. However, although Denmark is commonly referred to as a 'hardliner', the Danish legal framework also provides basic rights and a legal right to activities and language courses while waiting. In a broader comparative perspective, asylum seekers' social rights provided in the four countries do reflect that people applying for asylum are waiting in fairly comprehensive and generous welfare states. This does not imply that everyone that 'knocks on the door' can access these rights. To be considered as a 'legal asylum seeker' in itself is a status that is hard to attain!

Finally, the findings of this chapter reveal how asylum seekers' social rights in many instances are very vaguely defined. From ongoing research on how policies are produced in practice, it becomes visible that what is stated in the legal framework – in particular in terms of access to employment, education and healthcare – is far from how these policies are produced. Much is left to discretion and negotiation. This leads to the impression that asylum seekers' social rights are probably more generous in formal law than in practice, where it is even more difficult to reach the small openings stated in the law. The social rights provided to asylum seekers are not only very limited, they are also vaguely defined and laden with administrative burdens and the risk of administrative exclusion. This is something that confirms what Sainsbury pointed out years ago. Namely that asylum seekers are one of the most vulnerable groups in society in terms of social rights.

NOTES

1. Besides the FLOW project, this chapter builds on insights from the research project 'Life in a suspended state: Rethinking the reception of asylum seekers and

pathways to integration in Sweden and Denmark' (Funded by the Independent Research Fund Denmark, Social Sciences) and the research project, *The State at the Street* (Funded by Neubauer Collegium at the University of Chicago) (https://voices.uchicago.edu/stateatthestreet/).

2. For a more in-depth introduction to these analytical issues see the ongoing research project that the author is involved in (https://voices.uchicago.edu/stateatthestreet/).
3. Austria, Belgium, Bulgaria, Cyprus, Germany, Spain, France, Greece, Croatia, Hungary, Ireland, Italy, Malta, Netherlands, Poland, Portugal, Romania, Sweden, Slovenia and four non-EU countries (Switzerland, Serbia, Turkey, United Kingdom).
4. Thanks to Monika Deleuran Laursen (bachelor student, Aalborg University) for very helpful assistance.
5. Single adult outside accommodation centre €351.
6. See: https://www.thelocal.se/20160531/fewer-than-500-of-163000-asylum-seekers-found-jobs/.

4. Labour market policies and refugees: the case of Denmark, Sweden, the Netherlands and Germany

Rasmus Lind Ravn, Emma Ek Österberg and Trine Lund Thomsen

The refugee crisis of 2015 and 2016 led to a sharp increase in the number of people seeking asylum in Europe, with over one million asylum seekers applying for asylum; see Chapter 2. The humanitarian crisis did not however entail a unified European response to the crisis (Galgoczi, 2021). Instead, European countries responded in various different ways to the challenge – not least in terms of policies to promote labour market integration of newly arrived refugees. The labour market integration of refugees is of utmost importance, since failure to secure employment for refugees will lead to increased spending on income replacing benefits in the advanced northern European welfare states.

The significance of labour market integration of refugees is clearly illustrated through the 'progressive dilemma' (see Chapter 1). In essence, progressives face a dilemma in relation to immigration and, in particular, in relation to immigration due to forced displacement such as refugees. On the one hand, progressives want to accept a significant number of refugees due to humanitarian considerations, but on the other hand, migration might put a strain on public expenditure and undermine support for the welfare state, if a large share of refugees do not obtain employment in their new host country. Securing employment for refugees, and migrants in general, is thus extremely important if the progressive dilemma is to be overcome. If labour market integration of refugees (and migrants in general) is successful, the progressive dilemma ceases to exist, at least in relation to the economy and the labour market. Refugees will thereby contribute to economic growth and financial sustainability of the welfare state by paying taxes.

The migration histories of Denmark, Sweden, Germany and the Netherlands are in fact rather similar – at least until the mid-twentieth century. None of the four countries experienced large-scale immigration until the 1950s and 1960s when the so-called guest-workers came to the countries to alleviate labour shortages (Aagesen, 1971; Roodenburg et al., 2004; Schunka, 2016). Denmark,

the Netherlands and Germany were all characterized as 'reluctant immigration countries' (Cornelius et al., 1994; Schwenken, 2021), whereas Sweden was much faster at embracing the multi-cultural society (Borevi, 2012; Holmqvist et al., 2020). From the 1980s, migration to the four countries shifted from mainly labour migration to migration due to forced displacement such as refugees. In the period until the 'refugee crisis' in 2015–2016 the countries have attempted to integrate people with a foreign background on the labour market (and society more generally) in several ways. A thorough description of this is beyond the scope of this chapter, however. For more detail on this, see for instance Breidahl (2012) and Hammer (2019) for a description of the Danish immigration and policy history. See Bade (1995), Green (2013) and Schunka (2016) for the German case, Breidahl (2012) and Qvist (2012) for the Swedish case, and Cornelius et al. (1994) for the Dutch case. The similar migration histories partially resulted in parallel adoption of integration policies. Sweden established a national integration policy in 1997 (Qvist, 2012). Denmark adopted its first national integration legislation in 1998/1999 (Breidahl, 2012) and the Netherlands in 1997 (Groenendijk, 2011). Germany, however, was a 'late starter', adopting its first Integration Act in 2016.

Our focus of the chapter are the policies to promote labour market integration of refugees that have been initiated, or are in place, in the years from 2015 and onwards. During the 'crisis' politicians in all four countries experienced a sense of urgency to enact new policies to promote labour market integration of refugees. The aim of the chapter is to describe, explore and categorize the labour market policies targeting refugees in the four countries in the wake of the refugee crisis. To do this, we use a typology distinguishing between supply-side policies, demand-side policies and 'matching' policies.

The chapter is structured as follows. First, we describe our conceptual framework, outlining the supply-side approach, the demand-side approach and the matching approach to labour market integration. Then, we highlight the most important features of the integration policies in each of the countries before 2015 and we analyse the integration policy reforms from 2015 and onwards using the concepts mentioned. The chapter ends with a conclusion about differences and similarities in the policy set-up and policy responses and with a discussion of potential lessons to be learned.

CONCEPTUAL FRAMEWORK

In this section, we outline our conceptual and analytical framework. The distinction between supply-side approaches, demand-side approaches and matching approaches in active labour market policies (ALMPs) is by no means new. The distinction has been used for several decades. Nor is the classification used solely in relation to labour market integration of refugees.

Rather, it is a generic approach and classification tool that can be used for analysing policies directed towards all groups in society subject to ALMPs. As mentioned, the three approaches to ALMPs are: the supply-side approach, the demand-side approach and the matching approach (Bredgaard et al., 2017; Bredgaard and Thomsen, 2018). Each of the approaches carries implicit understandings of the root of unemployment and offers vastly different policy solutions. The approaches can be understood as ideal-types or typologies. In reality, the specific policy mix in a specific country will not consist of only *one* of the approaches but rather a combination of each of the approaches. As such, the approaches are not mutually exclusive but rather complementary.

The supply-side approach to active labour market policies and labour market integration of refugees, focuses on policies targeting the unemployed themselves (Bredgaard et al., 2017; Bredgaard and Thomsen 2018). It is by far the most prevalent of the three approaches in labour market policies across countries. In essence, the cause of unemployment lies with the individuals themselves in the supply-side approach. Therefore, explanations for unemployment typically focus on individual characteristics as the root of the unemployment. Policies should therefore focus on either helping or pressuring individuals into employment. The problems that might be hindering employment may be plentiful. For instance, the unemployed in general, and unemployed refugees in particular, might not have the right skills or formal qualifications for the labour market (Borsch et al., 2018), they might have physical, mental or social problems (Blight et al., 2006; Borsch et al., 2018), or they might simply not be motivated for work or looking for jobs (Arendt, 2020). Furthermore, when focusing on refugees and migrants more generally, language barriers to obtaining employment are likely to exist (Lundborg and Skedinger, 2016). If the cause of unemployment is a lack of skills or qualifications, the natural policy solution would be to initiate training or education programmes. If the problems are physical or mental problems, the solution would be to initiate a health-based intervention. If the problem is a lack of motivation, incentives or job search activity, the solution would be a reduction of cash benefits, to motivate people to become employed or to initiate mandatory job search requirements or job search courses. In the case of inadequate language skills of the host country, the solution would entail language training and language courses.

The demand-side approach shifts focus from potential employees (jobseekers) to the employers. The main explanations for the unemployment among refugee jobseekers in the demand-side approach is that employers either discriminate (directly or indirectly, consciously or subconsciously) against refugees in the recruitment process or they lack incentives to recruit refugee employees. As such, the employers are at fault and are seen as the cause of unemployment among refugees – and jobseekers more generally

(e.g. Zschirnt and Ruedin, 2016; Midtbøen and Rogstad, 2012). In so far as employers discriminate, there are several policy instruments that can be utilized. For instance, general anti-discrimination legislation can be implemented in national policies. Furthermore, discrimination can be combated by implementing quotas, making it mandatory for workplaces of a certain size to employ certain disadvantaged groups in society, for instance disabled people or refugees. Failure to comply with the quota will entail a fine or an economic penalty for the business. Quotas are very rare in most advanced welfare states, and non-existent in relation to employment of refugees, because politicians do not want to impose burdens on the business community. A softer form of policy regulation would entail strengthening employer incentives to recruit refugee employees, for instance through wage subsidy schemes, economic bonuses for having employed refugees for a period of time or a lower entry wage for newly arrived refugees.

Lastly, we have the matching approach to labour market integration. The explanations of refugee unemployment in the matching approach highlight the fact that refugees lack access to informal recruitment networks. As such, the lower labour market participation of refugees is caused by information asymmetries on both the supply-side (refugee jobseekers) and the demand-side (employers) (Larsen and Vesan, 2012). Vacant positions in businesses are most often filled through personal contacts and networks (Bredgaard, 2017), and newly arrived refugees have inadequate labour market networks in their new host country. Likewise, employers who are interested in recruiting refugee employees might also be missing information about how to do so, if they do not already have refugee employees with relevant contacts. The apparent policy solution in line with the matching approach points to an increased role of public employment services or privately owned placement services. Here, the employment or placement service needs to act like a job broker and provide credible information to both jobseekers looking for a job, and to employers looking to recruit labour. In essence, they need to match the supply and demand of labour. For the individual jobseeker and the individual employer, this entails that the skills and qualifications of a particular jobseeker need to be matched with a specific job opening demanding these skills. The role of the employment or placement service in this regard will be to facilitate contact between the two parties. Job brokering is thus central in the matching approach. In addition, policies such as workplace training programmes at real workplaces (where the intern performs unpaid work for an employer), wage subsidy schemes, internships and so on are also examples of the matching approach, since an employer gets to access the work of a potential employee *before* making a final decision about recruitment.

However, some of the aforementioned schemes and programmes operate in a grey area since they can be regarded as cross-cutting strategies, operating

with elements of all three approaches. Let us use a wage subsidy scheme as an example. In wage subsidy schemes, employers hire a worker on a time limited (short-term) contract. Employers are typically compensated financially for part of their wage expenditures for that particular employee. The employee in a wage subsidy scheme will typically receive pay at the same level as their cash benefit or receive a 'real wage' for the work they carry out. A wage subsidy scheme can be initiated with the purpose of motivating the recipient to take up work or to test labour market availability. In this example the wage subsidy scheme can be viewed as a supply-side policy, because it is supposed to increase the motivation of the participant to enter into employment. It can, however, also be seen as an example of the matching approach since the employment service facilitates contact between a potential employee and a potential employer and lets them access each other for a limited time period. Lastly, the wage subsidy schemes can be regarded as an example of a demand-side policy, providing an economic incentive in the form of the subsidy in the hope of hiring the person in question on ordinary terms after the wage subsidy expires. With this important addition: that the approaches are not always mutually exclusive.

THE CASE OF DENMARK: LABOUR MARKET INTEGRATION POLICY RESPONSES TO THE REFUGEE CRISIS

Labour Market Policies for Refugees Before the Refugee Crisis

Historically, policies to promote integration of refugees, and immigrants more generally, have drawn upon the supply-side approach. From the start of the introduction programme in the late 1970s, the programme has focused on developing the Danish skills of programme participants (Breidahl, 2012). In 1980, the introduction period was set to be of 18 months' duration. The strong focus on learning the Danish language originated in a strong idea that in order to be included in the labour market a certain mastery of the official language is required. Furthermore, a fundamental idea was that refugees should be prepared to participate in the labour market through a strengthening of their qualifications. Therefore, labour market training programmes and educational activities with a focus on development skills applicable at work were high priority in the Danish integration programme.

Refugees, and other immigrants, generally participate in the same types of active labour market policies as the majority population. Active participation in activation policies is a requirement to be eligible for benefits. As early as the 1990s, Denmark introduced the 'active-line' for social assistance recipients (which unemployed refugees could be eligible for), which stressed mandatory

activation in exchange for benefits and placed much of the responsibility on the unemployed themselves to find employment (Larsen et al., 2001).

Furthermore, there have been attempts to introduce schemes for recognizing and validating the formal education of refugees and immigrants, obtained in their home country, as well as ways of transferring more informal qualifications. Attempts have, however, remained scattered and with limited success. The use of workplace training programmes and wage subsidies has also been used in relation to labour market integration of refugees. The volume of participation in these types of programmes has been rather low historically. This, however, changed rather drastically with a reform of the integration programme in 2016, as described in more detail shortly.

Benefit Reductions

Income transferring benefits are means to secure a certain standard of living for residents in a country who cannot currently support themselves financially through paid work. They can, however, be used as an active supply-side policy instrument in relation to labour market policies that seek to increase employment, for instance as economic incentives (in the form of benefit reductions), or by making receipt conditional upon participation in labour market programmes. Until 1998, unemployed refugees and migrants in Denmark were eligible for social assistance (cash benefits) on equal terms, and at the same level as Danes on social assistance. This, however, changed from 1998 with the introduction of the so-called 'introduction benefit' (social assistance for recently arrived immigrants) which was at a significantly lower level than social assistance. Since then, the name of the benefit has changed numerous times (e.g. 'introduction benefits', 'start aid', 'integration benefits' and so on) and the benefit levels have also been adjusted up and down several times (Breidahl, 2012; Bredgaard and Ravn, 2021). The logic behind this is to push the unemployed into employment by lowering their budget, thereby increasing financial hardship, which is supposed to motivate the unemployed to look for a job by 'making work pay'. Since the refugee crisis, the benefit levels have been reduced twice, making refugees the most impoverished group in Danish society – this was already the case with the 'start aid' benefit but levels have been lowered even further recently. Several Danish studies investigated the effects, including side-effects, of benefit reductions (e.g. Arendt, 2020; Andersen et al., 2019).

Labour Market Policies for Refugees – During and After the Refugee Crisis

The refugee crisis sparked a sense of urgency among Danish politicians. Something had to be done to secure employment among refugees arriving in the country. The dominant narrative at the time was that previous integration policies and employment programmes for refugees and immigrants from outside the EU had failed (Bredgaard and Ravn, 2021). The way to make rather big changes in the integration programme was paved by an Expert Committee on labour market integration of disadvantaged jobseekers, who were asked to speed up their recommendations concerning integration of refugees (Expert Committee, 2015).

Subsequently, most of the recommendations of the Expert Committee were followed in a tripartite agreement between the government and the social partners (Danish Employers Association and the Danish Confederation of Trade Unions). A legislative framework followed the agreement and all parties in parliament, with the exception of the Danish People's Party, voted in favour of the proposal in 2016.

A rather ambitious government target for employment of refugees was set at a 50 per cent employment rate of refugees after three years of residency. This target was 10–20 percentage points higher than the prior employment rates (Tripartite Agreement, 2016). As part of the reform, the duration of the integration programme was lowered from three years to one year, signalling that labour market integration should occur much faster (Bredgaard and Ravn, 2021). However, if employment is not obtained, the programme can be extended for up to five years.

The integration programme for refugees begins right after the asylum application is approved and the people in question are relocated (dispersed) to a Danish Municipality. Thereafter the municipality is responsible for delivering the integration programme focused on employment. As stated previously, prior to the 2016 reform, the integration programme consisted mainly of supply-side policies such as language courses and training and educational activities. The supply-side focus remained after the reform, but the use of supply-side instruments widened, and an increased focus on both the demand-side and the matching approach emerged.

The supply-side policies shifted strongly away from the 'staircase approach', with its focus on learning Danish and acquiring relevant skills, towards a job-first or work-first policy approach, focusing on getting refugees into employment as quickly as possible. The work-first approach entailed a strengthened focus on using workplace training (unpaid internships at a workplace) and the use of wage subsidies. In fact, the use of both of these activation policies more than doubled from 2015 to 2016 (Bredgaard and Ravn, 2021). The increased use

of these tools is partly due to a strong belief that they are effective and partly to signal to refugees that the norm in Denmark is to work. In fact, workplace training has to be initiated 2–4 weeks after refugees are transferred from the asylum centres to the municipality where they are to live. Activation is thus to be initiated at an earlier stage to advance a 'motivation effect' among the refugees. The municipal job centres (employment services) are responsible for placing participants in workplace training, which is also the case for the unemployed without a refugee background. The job centres are thus required to 'match' the unemployed refugees with an appropriate employer. The increased focus on workplace training programmes throughout the integration period has thus strengthened the matching approach significantly.

A quasi-experimental study has also been carried out to explore the employment effects of this shift in the supply-side approach, from a human-capital based approach to a work-first approach (Arendt, 2019). The new integration programme, with a strong emphasis on workplace training, shows large and positive employment effects for male refugees but no effects for females (Arendt, 2019).

As part of the reform, with the increased focus on workplace training and wage subsidies, the focus on language courses and language training decreased. Refugees were still required to attend language courses, but to a lesser degree than previously. As such, one supply-side policy gained prominence at the expense of another. Having basic Danish skills was no longer seen as a prerequisite for obtaining employment or participating in workplace training. Instead, it was argued that the Danish language could, and also should, be learned at the workplace when talking to colleagues (Tripartite Agreement, 2016). In relation to this, a recent study by Arendt and Bolvig (2020) finds that while the early workplace training implemented increases short-employment employment, it produces rather large negative effects on language (Danish) acquisition measured as test scores on the standardized national language test at the end of the language course. Time spent in workplace training crowds out time spent in language courses. A trade-off thus exists between language acquisition and early workplace training.

An additional quasi-experimental study examines the employment effects of language training courses (Arendt et al., 2020). They explore the effects of the 1998/1999 integration programme, where participation was made mandatory for the newly arrived and the number of hours of participation in Danish courses was markedly increased. The authors do not find any short-term employment effects. They do, however, find rather large and positive effects after four years, which indicates that the effects of language courses occur rather long-term.

The tripartite agreement also strengthened policies aiming to bridge the supply and demand and to match unemployed refugees with employers. The

new policy initiative focuses on providing refugees with qualifications that can be used for quickly obtaining a job that requires a certain skillset (Tripartite Agreement, 2016). These short-term vocational educational programmes were labelled 'sector/industry packages (*branchepakker*). Short-term vocational education activities are initiated for participants aiming at providing them with skills that are directly applicable in certain types of low-skilled jobs. Examples are agricultural workers, cleaning, manufacturing and so on. The packages differ from municipality to municipality because the demand for certain skills varies on the local labour market. As such, the industry packages aim at matching supply and demand. After the educational course is completed, several internships (usually three) at real workplaces are initiated. Each internship serves different purposes. The first internship is rather short. Here, participants enter a business in the industry of their choice, so they can determine if they want a job in the industry or should choose a different industry instead (VIVE, 2020: 18). After this 'trial' the subsequent internships focus on developing skills and competences that can be used in the industry in question. While participating, the progression of participants is measured to ensure that they obtain the skills needed in order to move on to the next phase. Throughout the programme, an effort is also made to initiate training in industries in demand of labour and to match refugees with employers in demand of labour in an effort to increase their likelihood of getting a job as quickly as possible and to alleviate labour shortages.

Related to skills and qualifications, the Tripartite Agreement of 2016 also put a stronger emphasis on the identification, recognition and formal validation of skills of refugees. There have been many initiatives, with differences on the local level. However, most skills assessments take place within the adult vocational education system (AMU-systemet). The validation typically comes in the form of IKVs (Individual Competence Assessments) carried out at an AMU education centre. For refugees, the competence assessment takes roughly ten days.[1]

The Tripartite Agreement, and the subsequent legislative reform, also contained some additional policy innovations targeting the demand side (i.e. the employers). During the refugee crisis, the Danish employer association argued in favour of so-called 'entry wages' for newly arrived refugees. These were wages below the level set in the collective agreements (Bredgaard and Ravn, 2021). The argument for the entry wages was that refugees are not at full productivity when entering the Danish labour market. They should therefore be paid a lower wage for a period of time until their productivity increases. Naturally, the unions opposed this, and a compromise was struck as part of the tripartite agreement, with the introduction of the IGU (*integrationsgrunddannelse*), an apprenticeship programme for newly arrived young (aged 18–40) refugees. The participants (the young refugees) are hired by an employer

for two years and are covered by the collective agreements. While working for the employer, they receive apprenticeship pay, which is roughly 50 per cent lower than the ordinary wage level (Bredgaard and Ravn, 2021), thereby providing positive incentives for employers to participate in the programme. During the IGU, the participants are required to participate in, at minimum, 20 weeks of Danish education. To incentivize the demand side to participate, employers are eligible for two one-off economic bonuses of roughly €2700 for participating after they have had an IGU participant employed (after 6 and 24 months of employment respectively). The effects of the IGU are yet to be investigated, but an evaluation of the programme shows that both employers and employment services are satisfied with the programme (Rambøll, 2018). The programme was initiated as a trial set to expire in 2019. Politically, and among employers and unions, it has however been regarded as a success and the programme has therefore been extended to run until June 2022.

As part of the political agreement, employers who hired a refugee on ordinary terms were also eligible for the economic bonus scheme. However, numbers from the employment committee (*Beskæftigelsesudvalg*) of the Danish Parliament show that take-up of the scheme has been very low, even among employers who are eligible for the bonus.[2] There was also a rather low take-up rate of 56 per cent of the economic bonus for employers participating in the IGU scheme (Rambøll, 2018: 66). The plausible explanation for the low take-up is limited knowledge of the scheme among both employers and the employment services.

Since 2016, there have been no memorable reforms of the content of the Danish integration programme or labour market policies. There have, however, been substantial discursive changes and major changes in the political rhetoric worth mentioning here. In the winter of 2019, the right wing parties, the liberal government, and the social democratic party heralded a 'paradigm shift' in relation to integration. This signalled a shift from 'integration' to 'repatriation' – or perhaps even deportation, since repatriation signals voluntary return to a home country.

The 'integration programme' was relabelled as 'the self-support and repatriation programme'. The benefit levels were further reduced and the name of the benefit changed from 'integration benefits' to 'self-support and repatriation benefit'. Both discursive changes signal that refugees should return to their home country as quickly as possible, but be self-supporting while staying in Denmark (Danish Parliament, 2019).

Whether or not the paradigm shift will affect employment and repatriation outcomes remains to be seen.

THE CASE OF SWEDEN: LABOUR MARKET INTEGRATION POLICY RESPONSES TO THE REFUGEE CRISIS

Labour Market Policies for Refugees Before the Refugee Crisis

In Sweden, integration policy became a policy area on its own in 1997 when the former immigrant policy was reformed. It was preceded by growing criticism of the municipalities' refugee reception and integration activities, which were seen as too caring and too weakly linked to labour market establishment. Also, it was argued that the immigration policy had become stigmatizing and tended to lock-in immigrants in lengthy programmes and public benefit dependencies (Borevi, 2012). The key principle of the 1997 reform was that special measures against immigrants should be avoided and that general welfare policy should take the multicultural society as a starting point. Targeted measures for the newly arrived were justified only for a limited period of time. The aim of these measures, which were organized in locally designed and individualized Introduction Programmes, was to accelerate the process of entering the labour market. The organization and content of these programmes for the newly arrived have changed over the years, but basically the same overarching national goals and principles remain (Qvist, 2016; Wiesbrock, 2011).

Swedish labour market integration policy traditionally contains all three approaches (supply, demand, matching) with a special focus on measures directed towards supply and matching. The basic idea has been to gradually equip the individual with the knowledge and skills needed in the Swedish labour market. Language education (Swedish For Immigrants, SFI) has been seen as a natural starting point. Further educational measures, traineeships, various employment preparation activities and, finally, matching have then been introduced step-wise. Until 2010, these measures were organized within the municipalities' Introduction Programmes for the newly arrived. There was no standardized design of the programmes. Rather, it was up to each municipality to develop the content and structure in collaboration with local businesses and civil society organizations. Employment promotion has been the overall norm for the programmes which the state has enforced through soft law.

A recurring point of criticism during the 1990s and 2000s was that the staircase model in the Introduction Programmes delayed labour market establishment. An interconnected problem was that the state Employment Service, which in Sweden has the primary matching assignment, was involved too late in the process. Their requirements for language skills used in assessing whether individuals are matchable or not were also seen to counteract a fast

labour market establishment. The so-called *Establishment reform* in 2010 was brought forward largely as an attempt to meet these problems. Through the reform, a new law came into force which meant that a renewed programme for the newly arrived was introduced: the establishment programme. At the same time the responsibility for the programme was transferred from the municipalities to the Public Employment Service (PES).

The overall goal of the Swedish integration policy "equal rights, obligations and opportunities for all, regardless of ethnic and cultural background" remained unchanged in the Establishment reform. The new programme, however, entailed strengthening the requirements for more active participation. The law stated that participants *had a right to* an establishment plan which entitled them to establishment compensation; this right was conditional on following the activities in the individual plan. In the policy debate, this was described as a shift from (public) caring to (individual) responsibility, reflecting a general trend in Swedish labour market policy of focusing the need of strengthened incentives to work (Wikström and Ahnlund, 2018).

The supply and matching oriented measures have been complemented by wage subsidies as a way to stimulate the demand for immigrants' labour. Subsidized employment has traditionally had a strong position in the Swedish Introduction Programmes, where they have been shown to have positive effects on employment for the newly arrived, at least for men (Calmfors and Sánchez Gassen, 2019). In 2007, 'Entry-level jobs' and 'Start-up jobs' with an 80 per cent wage subsidy level were introduced to facilitate early matching and workplace-based language training. Later, 'Extra jobs' in welfare services, civil society and the cultural sector were introduced (with a 100 per cent wage subsidy level) particularly aimed at those newly arrived or long-term unemployed who are far from the labour market.

After the election in 2014, the integration policy was more or less abandoned. No integration minister was appointed but the issue was shifted to the minister for labour market policy. However, the general integration goals and the multicultural principle still applied (Martín et al., 2016; Holmqvist et al., 2020).

Benefits and Other Incentives

Reductions in the level and length of compensation as a supply-side measure were brought to the fore in the election campaign of 2006 under the slogan that 'work should pay off' emphasized by the centre-right coalition. It was not directed towards the newly arrived specifically, but to all those not working because of unemployment or long-term sickness. In the years that followed, a series of reforms were launched with the aim of increasing the driving forces

to work. Increasing the economic differences between paid work and benefits was a key strategy in this endeavour.

With regard to the compensation to the newly arrived, the system has been the subject of several reforms over the years. Historically, municipalities offered social assistance to the newly arrived on the same terms as others in need of support for their livelihood. In 1993, it became possible for municipalities to offer a specific introduction compensation to those newly arrived who participated in the Introduction Programmes. It was up to each municipality to decide on both the level of compensation, and whether it should be implemented at all. The basic idea was that the level of introduction compensation would be above the level of social assistance, that it should not be based on an assessment of needs but should rather resemble grants for studies. However, the local application of the compensation varied a lot between municipalities, and some continued to use social assistance (Qvist, 2012).

Through the establishment reform, a standardized state and time-limited financial compensation to the individual was introduced, conditional on active participation. The level was just over 300 SEK per day (about 30 EUR). Side incomes were allowed without the compensation being reduced. This was considered crucial to counteract lock-in effects and incentivize the newly arrived to seek ways into the labour market at an early stage. At the same time, a market-based client-choice system was implemented, with establishment coaches (*etableringslotsar*) with their own financial interest in supporting their clients to enter the labour market as quickly as possible. Thus, the government aimed to bring about a shift in power where the newly arrived were to be given increased influence to 'make their own choices for the future' instead of somebody else deciding for them (Prop. 2009/10:60, p. 35). The client-choice system was abolished in 2015 after several follow-ups showing serious shortcomings and lack of efficiency. However, even more interesting for the purpose of this chapter is the shift in rhetoric that took place later, where increased autonomy and freedom of choice for the individual was replaced by measures such as 'compulsory education' and 'assignment to programme'. This we will come back to in the following section.

Labour Market Policies for Refugees – During and After the Refugee Crisis

In 2015, close to 163 000 asylum seekers arrived in Sweden, an increase of 80 000 compared to 2014. This sharp increase accentuated what had already been high on the political agenda for a long time: the need to accelerate labour market integration of the newly arrived. As such, the 'crisis' entailed a window of opportunity for policy makers to further reinforce ongoing efforts as well as open up new avenues for effective establishment. Significant for

the development was the emphasis put on initiatives by local collaborative partnerships. This was not a new policy solution, but rather a continuation of a long tradition in Swedish integration policy to pursue bottom-up social innovation. However, the acute situation in 2015 and the years that followed clearly drove the realization of these ambitions. A wide range of public, private and civil society organizations were mobilized to take joint action locally. Focusing only on Göteborg, the second largest city in Sweden, a survey identified more than 175 local initiatives for labour market integration of newly arrived immigrants, many of them refugees from the Syrian war (Diedrich and Hellgren, 2018). The content of these initiatives varied greatly and contained, to varying degrees, features from supply-side, demand-side and matching approaches, some of which developed into relatively stable operations while others terminated or changed target group for and content of their efforts when reception decreased.

In parallel with this development locally, an agreement was made in late 2015 between the government and the centre-right coalition on refugee reception and labour market establishment. Based on this agreement, a number of policy changes with regard to labour market integration of the newly arrived were initiated. Although these include both supply, demand and matching-oriented efforts, two tendencies stand out in particular: a reinforcement of the individual's obligations and the emphasis put on the competence supply perspective in labour market integration policy (Ek Österberg et al., 2021).

As for the establishment of the newly arrived, the political intentions were manifested in *a new regulatory framework* which became effective in 2018 and replaced the Establishment Act from 2010. It more or less means that the newly arrived are treated in the same way as other unemployed people and that the establishment programme becomes a labour market policy programme like any other. One consequence of this is that to participate in the establishment programme and receive an establishment plan is no longer a right as it was expressed before, but a responsibility that lies with the individual. First (s)he needs to meet the criteria for admission and then (s)he must participate in the activities planned for as part of the programme.

The obligations on the newly arrived are thus the same as for other unemployed people. This also means that the same *sanction system* is applicable. If the participants do not follow the activity plan, they can be warned or suspended from compensation. This was difficult with the rights legislation that previously applied. The *handling of the establishment compensation is also removed* to the Social Insurance Agency to facilitate sanctioning if necessary, and at the same time strengthen the alliance between the individual and the employment services' representatives.

The changes made also entailed that the *time aspect is tightened* to 24 months of full-time activities spread over a maximum of 36 months and former

rules on skippable time were removed. Furthermore, *an education obligation* (*utbildningsplikt*) was introduced which means that the individuals assigned to the establishment programme (who are assessed as not being able to get a job during the time in the programme due to lack of education) must participate in education to increase the chances of becoming employable in the Swedish labour market. The municipalities provide the education, which must comprise a certain number of hours and be cohesive. The education obligations are estimated to include about 50 per cent of the participants in the establishment programme. However, it is still under development and not yet in full operation.

Problematizing the former rules indicating the individual's influence over planning, the government stated:

> There are also rules that the establishment plan must be set up together with the newly arrived, which can be perceived as consensus should prevail between the Swedish Public Employment Service and the newly arrived on the content and scope of the establishment plan. This differs from what applies to other jobseekers, who after a labor market policy assessment are to be assigned to initiatives or programs.

Seen in light of the rhetoric in 2010 that emphasized the ability for the newly arrived to make their own choices for the future instead of somebody else deciding for them, the shift is significant. With current regulations, the PES is given significantly greater opportunities to decide on appropriate initiatives and to change the planning along the way.

In line with this logic, another obligation – language obligation (*språkplikt*) – was introduced in 2021 through changes in the Social Security Act. The changes made entail that financial support in the form of social assistance becomes conditional on language education if it is deemed necessary to be available to the labour market.

All in all, a number of changes have been made that strengthen the individuals' obligations to make themselves employable, based on the assessments and plans made by the authorities.

In parallel with this general shift towards mandatory and sanctioned supply-oriented approaches, various efforts aimed at demand and matching have also been intensified. For instance, in 2015, the government funded the development of 'fast tracks' aimed at utilizing the skills of (educated) immigrants in areas where there is shortage of labour. They are based on recruitment needs in specific professions and industries and are created in close cooperation with business representatives and trade unions. In a similar way, municipalities have developed local job tracks based on the local or regional business community's competence supply needs. Furthermore, intensified efforts are made to make use of public procurement to stimulate labour market integration, through setting employment requirements. Several municipalities

have developed local models of 'employment promoting procurement', which led to the launch of a national model in 2019. A wide range of initiatives has also been taken locally to stimulate the market for labour integrating social enterprises, for instance by using reserved contracts in procurements (Ek Österberg et al., 2021).

Research indicates that newly arrived immigrants prioritize work before studies, since work due to various changes in migration policy has become increasingly important for the opportunities to stay in the country and get housing. While this is in line with policy ambitions, there are unintended consequences of matching between employees' skills and work tasks becoming more difficult (Holmqvist et al., 2020).

Furthermore, various administrative reforms have also been initiated in recent years, which will be likely to affect the development of labour market integration measures, not least to those in continuing need of support after the establishment programme. In 2019 a major reform of the PES was decided on as a result of a large political compromise. The reform entails a sharply reduced organization with 3500 fewer employees, increased digitalization and less local presence (the number of local offices was suggested to be more than halved), and contracting out through client choice system for support and matching services. What the consequences of the reform will be for labour market integration of newly arrived immigrants remains to be seen, but the role of municipalities will most certainly increase.

THE CASE OF THE NETHERLANDS: LABOUR MARKET INTEGRATION POLICY RESPONSES TO THE REFUGEE CRISIS

Labour Market Policies for Refugees Before the Refugee Crisis

Refugees have free access to the Dutch labour market as soon as they receive their residence permit. The identification card (W-document) must contain a notification stating: 'free access to the labour market, no work permit required' (*arbeid vrij toegestaan, tewerkstellingsvergunning niet vereist*). Free access to the labour market means in this context: free access to employment, the right to entrepreneurship, to follow workplace training programmes (internships) or to do voluntary work. A work permit or a so-called 'volunteer's declaration' is not required. The Dutch law makes no distinction between refugees or subsidiary protection beneficiaries (Dutch Council for Refugees). The work permit system is based on the Dutch act of Employment of Migrants (*Wet Arbeid Vreemdelingen* – WAV). According to WAV, employers are not allowed to hire migrants who do not possess a work permit or an EU single

permit for residence or work. However, restrictive immigration policy in the 1990s did not decrease immigration flows (Zorlu and Hartog, 2001).

Since the late 1990s integration policy in the Netherlands has undergone numerous revisions and has become more restrictive. During this process, the attention has over time shifted from rights to duties. This indicates that the earlier policy framing did not facilitate efficient integration (Roodenburg et al., 2004). Due to high unemployment among migrants, focus has been placed on learning the Dutch language in order to facilitate integration in the Dutch society and labour market. From 1998 it became mandatory for migrants to take integration courses with language training and civic integration. The municipalities facilitated these courses and the participants had to complete a special integration exam. From 2007, the integration courses have been outsourced to private providers and migrants have to pay the full price for participating. It became possible for migrants to receive a special loan to cover the cost of attending the course. The loan is neutralized if the refugees pass the exam within three years. If the exam is not passed within this time, it has to be fully repaid (Lievens, 2017). Furthermore, it became mandatory to have completed the integration exam in order to apply for permanent residence in the Netherlands. Since 2013, it has become the responsibility of the migrants themselves to select a suitable integration course and to complete the integration exam within three years. The exam consists of four language tests and two tests on knowledge about Dutch society. This arrangement has been criticized, as more responsibility has been placed on the asylum seekers (Joyce, 2018). The development shows a tendency of increasing focus on the supply-side approach, where the refugees are given more responsibility for the integration process.

The Netherlands has a system of civic integration (*inburgering*), which has been obligatory for all migrants from outside the EU and Switzerland since 2006. The focus was however on active participation in terms of cooperation and interaction between various groups and in this process migrant-orientated organizations play a significant role, indicating a matching approach. Earlier integration policy has mainly focused on alleviating the deprivation of immigrants and not so much on integration. The focus of policies was placed on immigrants' access to employment, education, housing and legal status. There is no coherent integration programme in the Netherlands as there is in the Nordic countries, and the civic integration process for migrants is at the local level.

Benefits and Other Incentives

Dutch law provides access to social welfare for beneficiaries of international protection under the same conditions as national citizens. There is

no special legislation for beneficiaries of international protection beyond general legislation valid for every resident legally present in the Netherlands, except for asylum seekers whose rights are regulated by Rijksdienst voor Arbeidsvoorziening (RVA). No distinction is made between refugees and subsidiary protection beneficiaries.

The Coalition Agreement of October 2017 has introduced a new plan with regard to the access to social welfare of beneficiaries of international protection (Cabinet, 2017). According to that plan, prospective beneficiaries of international protection will no longer be entitled to the social benefit, rent benefit and health care benefit during the first two years of their legal stay in the Netherlands. Instead, beneficiaries of international protection will receive services by the municipalities such as housing, a healthcare insurance and assistance in the integration process in kind. In addition, beneficiaries of international protection will receive an allowance. However, the implications of these plans are not clear yet.

The main idea of 'integration while preserving ethnic identity' was criticized in the 1990s because it could possibly contribute to the unemployed and segregated position of many first and second generation immigrants. This initiated a second phase in Dutch integration policies. In the 1990s, the emphasis was placed on reducing unemployment and welfare dependency for immigrants, particularly through improving labour market participation. Integration has been interpreted as equal participation in the major social institutions of society (WRR, 1989). However, multicultural policies were still important, on the national as well as on the local level. The millennium change brought another change in the nature and idiom of integration policies and introduced a third phase. Active citizenship with a strong emphasis on the social obligations of citizenship and on the individual responsibility of citizens became the main goal. Integration policies became not only strongly related to issues such as shared norms about the rule of law and the obligation to know the Dutch language and culture, but also in relation to social problems of public order and crime. Particularly after the 2002 election, integration policies became more assimilistic and immigration policies more selective (Entzinger, 2003).

Labour Market Policies for Refugees – During and After the Refugee Crisis

During the refugee crisis in Europe in 2015 and 2016, the Netherlands was one of the destination countries for refugees from different countries, including Syria, Eritrea and Afghanistan; see Chapter 2. Refugees who have obtained residence permits will more than likely stay in the Netherlands for a long period of time because of the uncertain security situations in their home countries. Therefore, policy makers need to focus on solutions that can help

these refugees to successful integration into the labour market. A solution is crucial because after arrival most refugees face multiple challenges. Such challenges go beyond cultural differences and include a lack of proficiency in the Dutch language, a lack of social networks with Dutch natives, struggles with the recognition and evaluation of educational diplomas, as well as mental health concerns (e.g., stress and depression). Additionally, the labour market in the Netherlands is very regulated and requires highly skilled workers, which may negatively affect refugees' labour market integration. Asylum seekers less than 30 years old who have received refugee status can obtain a government-financed loan to study if they have acquired Dutch or English language proficiency. This is linked to the labour market programme where studying, job training and internships have become important to gain access to the labour market (Heelsum, 2017). The policy approach does, however, create vulnerability in the sense that participation in language and integration courses is considered the refugee's own responsibility, providing a supply-side approach.

The employment rate of immigrants from non-Western countries is three-quarters of the Dutch national average. Most European countries have a relative low employment rate of non-EU citizens and the rate in the Netherlands is among the lowest in the EU (Eurostat, 2019). The Netherlands also has the biggest difference in employment rate between natives and foreign workers in the European Union. The employment rate among refugees is quite low during their first years in the country, only around 30 per cent, but after ten years, 55 per cent are in employment (Joyce, 2018).

For many job opportunities, professional qualifications are required. In order to obtain recognition of these qualifications, the Cooperation Organisation for Vocational Education, Training and the Labour Market (*Stichting Samenwerking Beroepsonderwijs Bedrijfsleven* SBB) jointly compare foreign diplomas with the Dutch educational system. In the case where a refugee follows an obligatory Dutch integration course this is provided for free. The main obstacle is that many refugees lack any credible documents to prove their qualifications. Also, a low educational level impedes access to language courses or vocational educational training (Mikaba, 2016). Refugees who have higher education from their homeland do not necessarily benefit from it in terms of employment opportunities in the Netherlands (Kortese, 2021). Furthermore, studies show that it is beneficial for refugees to have Dutch qualifications in order to achieve labour market integration.

The focus on refugees' need to require Dutch education is primarily based on a supply-side approach, placing the responsibility on the refugees. The Central Agency for the Reception of Asylum Seekers (COA) aids asylum seekers who have received residence permits with the first steps in their integration in Dutch society and the labour market. COA assists asylum seekers

(who have residence permits) with preparation of a portfolio mapping the skills and education they have obtained (Martín et al., 2016). The evaluation of qualifications and skills is today not only based on formal proofs, but also on complementary procedures in order to indicate the educational level of refugees.

In the Netherlands, the labour migration law and regulations are selective depending on skills, education, income level, nationality and so on. When it comes to low skilled work, labour migration policy is rather restrictive. In the policies, migrants are categorized according to activity, employer and sector, and this defines the migrants' rights, the involvement of employers and of labour unions. This illustrates a matching approach to labour market integration that includes responsibility of both the refugee and the employer. In order to facilitate the integration and participation of refugees in the labour market, the Task Force for Employment and Integration of Refugees (TWIV) was initiated recently. A main aim of the task force is to invest in screening, matching and integration as well as securing information and knowledge exchange between involved authorities, businesses and organizations (Martín et al., 2016).

Most of the labour migration schemes in the Netherlands are placed under the responsibility of the Minister of Social Affairs and Employment. The Dutch labour migration law and regulations do not as such create a barrier for labour migration (de Lange et al., 2019). The Dutch municipalities have much autonomy in choosing what type of labour market assistance they wish to provide. A study has shown that municipalities previously waited several years before starting to integrate refugees in the labour market, but now they start up much faster. The study also shows that more than half of the refugees receiving public welfare only receive social activation. There is a large difference between the municipalities concerning ambitions, and some of the larger cities, such as Amsterdam, are more actively engaged in labour market integration of migrants. The municipalities are responsible for assisting refugees in finding work or starting a regular education. Some municipalities and employers have been taking a proactive approach in order to strengthen the job intermediation for refugees, including establishing a partnership with other authorities (Martín et al., 2016). The action taken by both authorities and employers indicates a need of a matching approach as well as demand-side approach to labour market integration of refugees.

In 2016 the Screening and Matching measure was launched in order to establish a more efficient and adequate labour market integration process. A central aim was to find a match between housing allocation and the work experience, qualifications and competences of the refugees and the work opportunities in the municipalities (Lievens, 2017). The Screening and Matching measure established cooperation between municipalities, COA (Central Organ Sheltering Asylum Seekers) and other stakeholders such as

employment organizations and refugee foundations. This collaboration has provided an organizational structure with a matching approach in order to facilitate labour market integration.

Civic organizations have an important role in the Dutch integration system as well as in the Dutch welfare system as such. The civic organizations provide language training and other activities in asylum centres. Furthermore, they are responsible for integration courses for refugees and provide social and medical assistance as well as legal help to refugees. Asylum seekers and refugees are also encouraged to do voluntary work for civic organizations in order to improve their integration (Joyce, 2018). The Department of Integration and Society, under the Ministry of social Affairs and Employment, is responsible for implementation of the Civic Integration Act as well as for improving the effect of the official policy framework with reference to migrants in the Netherlands. This area includes more general issues such as diversity, discrimination and social tensions. The Netherlands has implemented a civic integration process for migrants at the local level. A part of this agenda is to support the civic integration exams and the loan system for participants as well as language courses. Another issue under the department's responsibility is that of creating a dialogue with civil society organizations and for implementing the European Agenda for integration of third country citizens. The department is also responsible for the inclusion of newcomers in the Dutch society and labour market through implementation of participation agreements (Fischler, 2015).

According to the current Dutch resettlement policy, the preferred durable solution for refugees is to return to their country of origin on a voluntary basis. If return is not possible, local integration is then the second preferred solution. Only if both these solutions are not accessible or available in a reasonable timeframe, can the UNHCR submit refugees for resettlement in the Netherlands. Resettlement should be considered a possibility within the context of all three durable solutions. The Government of the Netherlands attaches importance to the strategic use of resettlement (UNHCR, 2018). The Dutch national resettlement quota is established for a four-year period by the Government. The quota applies to refugees individually submitted by the UNHCR either in connection with selection missions or on a dossier basis. The Netherlands reserves the right to assess all aspects of resettlement, including the determination of refugee status, based on its national policies.

THE CASE OF GERMANY: LABOUR MARKET INTEGRATION

Labour Market Policies for Refugees Before the Refugee Crisis

Germany can be regarded as a 'late starter' in relation to active integration policies. As mentioned, Germany adopted its first Integration Act in 2016. This has to be seen in relation to the German policies from the 1980s and 1990s, where policies were enacted to deter refugees from coming to Germany by limiting integration opportunities. The most notable reform was the 1993 Welfare Act for Asylum Seekers (*Asylbewerberleistungsgesetz*). Here, employment bans for asylum seekers were introduced as part of the reform, as well as travel restrictions and limited access to healthcare for asylum seekers (Crage, 2016: 354). Later on, a noteworthy policy adoption was the Immigration Act from 2005. This act was the first comprehensive law for managing migration and it extended and simplified the rights to residency in Germany (Crage, 2016). The realization that Germany was de facto an immigration country led to the introduction of a supply-side policy to promote integration into Germany society (and the labour market). This policy is known as the German Integration Course, which is still in place today.

The German Integration course consists partly of German language training (600 hours of teaching) and civic orientation. The civic orientation component of the course lasts 60 hours (it was increased to 100 after during the 'refugee crisis') (Brücker et al., 2016). The course covers topics such as German history, culture and values, rights and obligations in Germany (including labour market participation). The logic behind the integration course is to create 'good citizens' who are active in society and on the labour market (Heinemann, 2017). The target group of the integration course is quite encompassing. It includes all migrants and people with an immigrant background who want to learn German. As part of the Integration Act of 2016, the course was also made available for asylum seekers with good prospects of staying in Germany.

Labour Market Policies for Refugees – During and After the Refugee Crisis

Most of the German policy changes after the humanitarian crisis of 2015–2016 have actually focused on *early* integration measures for *asylum seekers* with a good prospect of staying, for instance through an increased focus on labour market integration and participation in ALMPs as part of the Integration Act of 2015 (Konle-Seidl, 2017; Brücker et al., 2019). These changes are, however, beyond the scope of this chapter, since we focus explicitly on policies for

people who have obtained a refugee status (residency). Once the asylum application has been approved and a residency permit is obtained, the refugees have a right and obligation to participate in the standard active labour market policies (Konle-Seidl, 2017). These policies are not solely for refugees and migrants, since all beneficiaries are subject to them (Schwenken, 2021). There are, however, projects and programmes that target refugees specifically, as will be described later on.

Keeping the above in mind, Germany operates with a dual system in relation to labour market integration with a split responsibility between various stakeholders. The German federal states (Länder) are tasked with implementing the legal framework the federal government sets. The Länder have considerable leeway in implementation, leaving large policy variation between Länder (Konle-Seidl, 2017). The Länder operate 156 Employment Agencies that are in charge of labour market integration of asylum seekers (prior to obtaining a residency permit). Once the claim for asylum is recognized and a refugee status is obtained, the refugee is allocated to a county and city according to a dispersal 'key' (Schwenken, 2021). Hereafter, refugees are entitled to the basic income scheme for jobseekers. With this entitlement follows a number of responsibilities, such as looking for work, participation integration courses and labour market policies. This is characterized as a rights and responsibility approach '*Fördern und Fordern*' (promoting and demanding) (Konle-Seidl, 2017). Others have understood this as a partial turn towards *workfare* or *work-first* since the Integration Act states that you actively have to look for work and participate in ALMPs to be eligible for social benefits as defined in the German Social Code II (Hinger, 2020; Konle-Seidl, 2017). After obtaining status as a refugee, the responsibility for labour market integration is transferred to local *Jobcentres* typically run by the municipalities alone or in collaboration with the local employment agencies.

As mentioned, Germany can be regarded as a 'late starter' in relation to immigration and integration policies, with Germany adopting its first Integration Act in August 2016 as a direct result of the 'refugee crisis'. This does not, however, mean refugees and other immigrants have not been offered support before the Integration Act (the Immigration Act of 2005). However, a stronger emphasis has been put on *early integration measures,* in particular concerning asylum seekers with a good prospect of staying.

The official strategy of The Federal Employment Agency for labour market integration resembles the aforementioned Danish Staircase model of integration. Ideal-typically, it consists of three phases or 'steps' with a duration of roughly 9–15 months: (1) The integration course (language training); (2) A 'trial' period; and (3) Employment or vocational training (Schwenken, 2021).

The first step in the model is the Integration Course, where participants are taught the German language and are given a basic understanding of German

society. Thus, the first step towards labour market integration is to learn German or improve the German language skills of participants and to achieve an understanding of German society and culture. As such, the integration course can be understood as a supply-side policy that aims to create 'good citizens' (Heinemann, 2017) and to improve the capacities and prerequisites for labour market participation, since language proficiency is regarded as crucial for labour market participation (Brücker et al., 2019).

That next step is the 'trial' phase. Here, the competencies of participants are to be analysed in order to determine if the skills of participants are transferable to a German context. The aim is formal recognition of the skills and competencies that refugees have brought with them from their home country. In order to do this, the Federal Employment Agency (*Bundesagentur für Arbeit*) has developed a computer-based test called MYSKILLS to test the vocational skills of participants (Konle-Seidl, 2017). The target group of the test is people without formal qualifications or people who have lost their credentials. The MYSKILLS test is available in six different languages focusing on validation of skills in 30 different professions.[3] MYSKILLS has been running as a pilot programme until 2018 and was afterwards upscaled and made available in all 156 German employment agencies. An official evaluation of the MYSKILLS tool has not yet been carried out, meaning that no outcome data is currently available (Eurofound, 2019).

The MYSKILLS tool can be understood as a supply-side policy that aims to increase the likelihood of employment by making formal and informal qualifications of refugees visible to employers in a recruitment situation. As such, it is also a policy that seeks to alleviate information asymmetries (by making skills and qualifications visible to employers) thereby easing the 'matching process'. This typically occurs in the third phase/step (see below).

Also as part of the trial phase, refugee jobseekers can be placed at a workplace in order for them to familiarize themselves with jobs and employers. A noteworthy point concerning the labour market integration of refugees in Germany is that the official policy aim is not to push refugees into the first available job (as is the case with a work-first strategy; Jørgensen et al., 2017; Klindt and Ravn, 2019). Instead, the efforts focus on creating the conditions necessary for long-term employment relationships (Schwenken, 2021). This implies a need to match the skills and qualifications of refugees to specific jobs, through documentation of qualifications (cf. the MYSKILLS tool) and through efforts to motivate young refugees to educate themselves (Schwenken, 2021). As such, the German approach to labour market integration resembles a human-capital approach or a train-first-then-place approach (Andersen and Jørgensen, 2020; Klindt and Ravn, 2019). This connects to the third step or phase, which focuses on getting refugees into employment or education.

The third phase focuses on getting refugees into ('in-firm') vocational training or to enter into employment (Schwenken, 2021). Here, the staff at the employment service and job centres play an integral role in Germany (Dietz et al., 2018). The staff (often referred to as job counsellors) assume the role of 'job-brokers'. They provide information to refugees about job openings, assist them in job search and job placements, and provide an overview of job opportunities for the individuals (Dietz et al., 2018: 2). As such, they try to match supply and demand. Research has also been undertaken into the barriers and opportunities job counsellors face in their work with unemployed refugees (Bähr et al., 2018). Job counsellors (case workers) highlight language skills as crucial to job counselling since a shared language is of importance in the counselling work. However, communication problems often occur due to low German proficiency of clients, making job placements difficult.

As has been evident, 'pure' demand-side policies focusing on employer incentives to recruit refugees have so far been absent in our description of Germany. This is because these types of policies are largely non-existent in Germany – at least when focusing solely on refugees. There have, however, been demand-side policies that have targeted asylum seekers specifically. For instance, a wage subsidy scheme was implemented from August 2016 where asylum seekers could work for an hourly wage of €0.80 in addition to receiving social benefits. This scheme was abolished in 2017, however, due to low uptake of the scheme (Konle-Seidl, 2017). Furthermore, an approach to improve labour market participation is temporarily to make exemptions to the minimum wage (like the Danish IGU programme). This has also been a German strategy with unpaid internships (workplace training) for asylum seekers (Eurofound, 2016).

As described above, German policies to promote labour market integration of refugees consist of a combination of supply-side and 'matching' policy instruments. Overall, funding of early labour market integration efforts is often given to targeted projects, as opposed to an overarching programme (Schwenken, 2021). In particular, projects are often funded through the European Social Fund (ESF). Some of these projects are described in the following.

A number of targeted programmes are offered by the Federal Employment Agency (*Bundesagentur für Arbeit*). These programmes have been developed by the Federal Office for Migration and Refugees (BAMF) in collaboration with employer associations. These are 'Perspectives for refugees (PerF)' 'PerjuF and PerjuF-H' – (perspectives for young refugees in the skilled craft sector), 'PerF-W' (Perspectives for female refugees) and KompAS (competence assessment, early activation and language acquisition) as well as the aforementioned MYSKILLS assessment tool (Konle-Seidl, 2017).

The PerF programme has a total duration of 12 weeks and aims at teaching job-related German language skills to provide first insights into the German labour market and to inform participants about possibilities to get their qualifications recognized in Germany. The skills identification process takes place in a real workplace (Konle-Seidl, 2017). These aspects of the PerF programme focus on improving the employability of participants through language training and skills recognition and improvement and are, as such, a clear example of a supply-side policy. There are, however, strong elements of the matching approach to labour market integration in the programme. The provider or counsellor in charge has to look for suitable workplaces for each participant (to ensure a sufficient match). At the end of the programme, a report is written describing the skills of each participant including recommendations for further initiatives (Konle-Seidl, 2017).

The PerjuF and PerjuF-H have a strong focus on formal education (a supply-side focus), and the PerjuF-H programme explicitly aims at getting refugees enrolled into, and completing, a vocational education in the skilled craft sector through ordinary apprenticeships (Konle-Seidl, 2017). The target group of the programmes is young refugees and the programme aims at providing information about the German training and educational system as well as improving the German language skills of participants. The programmes last from two to eight months and consist of career/vocational guidance so participants can make an informed choice about their future career. The next step in the programme is to initiate 'vocational training support courses' or 'initial qualification courses' with the aim of preparing them for three year-long in-company apprenticeships providing them with a formal vocational education (Konle-Seidl, 2017). Along the same lines, the Perf-W focuses on labour market integration of refugee women through orientation about the role and rights of women in Germany, employment related training, activation and support through provision of childcare (Konle-Seidl, 2017).

The last programme to be described in relation to Germany is the KompAS programme (competence assessment, early activation and language acquisition). The programme is strongly supply-side focused. As the name suggests, it consist of competence assessments, early activation and language training. The KompAS programme is conducted in parallel with the integration course (see above). The idea behind the programme is to test skills at workplaces and eliminate obstacles for access to jobs (matching and supply-side approach), while at the same time improving German language skills and preparing for further qualifications and training (Konle-Seidl, 2017).

COMPARATIVE ANALYSIS

In the previous sections, we have characterized integration policy developments in Denmark, Sweden, Germany and the Netherlands, focusing on the period from 2015 onwards. These developments did not, however, emerge out of a vacuum. Rather, the policy responses taking place in the wake of the 'refugee crisis' should be seen in light of both the different and similar historical pathways in the four countries. For instance, there is a difference between the countries regarding their previous experience with inclusion/integration of minority groups. Common to the four countries is the increased emphasis over time on *early* labour market establishment, as well as the sharpened focus on obligations for the individual. Another similarity is that all four countries emphasize local collaboration in the delivery of integration policy, in particular collaboration with employers. In addition to these country characteristics with regard to integration policy, there is of course a difference in the number of asylum seekers entering the four countries. The inflow to Germany and Sweden was significantly greater than to Denmark and the Netherlands, and there are also differences in discourse and political rhetoric.

In Table 4.1 we summarize recent developments in policy content in the four countries, using the typology of labour market policy approaches: supply-side, demand-side and matching approaches.

In all four countries, the situation in 2015 sparked policy responses in terms of intensified labour market integration efforts. The supply-side measures which had historically been dominating labour market policy in all four countries were widened. For instance, validation programmes and educational activities of various kinds have been intensified. However, while Denmark has clearly focused on a work-first approach, Sweden and Germany have maintained focus on education and thus allowed a slightly longer time perspective in the operations. Sweden has even strengthened the focus on education for those having particular difficulty in entering the labour market by the introduction of the education obligation which assigns individuals to coherent education programmes rather than early matching. The Dutch case probably has the programme that places the greatest responsibility on the individual for making themselves employable, which also includes financial responsibility (through a loan). With regard to supply-side measures, the Danish way of using (lowering) benefits to motivate immigrants is also different from the other countries.

At the same time an increased focus was put on demand-side and matching approaches in all countries but Germany. Wage subsidy programmes have been extended in both Denmark and Sweden. In Sweden, there are also ongoing efforts to upscale innovative local practices of using public procurement to engage (force) private providers in labour market integration as well

Table 4.1 Characterization of policies in the four countries

	Denmark	Sweden	Netherlands	Germany
Goal	Early employment New goal: 50% employment rate 3 years after arrival	Same goal as before: Equal rights, obligations and opportunities for all, regardless of ethnic and cultural background.	Early employment	Long-term employment
Programme	12 months, possible extension for up to 5 years	2 years	2 years	9–15 months
Supply-side measures	– Job-first approach – On-the-job language training – Lowering (already low) benefit levels – Validation of formal and informal skills	– Focus on obligations, conditionality, sanctions – Education obligation for low-educated – Language obligation – Validation of formal and informal skills	– Obligatory integration course, including language education (individual responsibility) – Validation of formal and informal skills	– Step-wise (staircase) employability – Validation of (formal) and informal skills (MYSKILLS) – Various projects focusing on education – Various programmes focusing on employment

	Denmark	Sweden	Netherlands	Germany
Demand-side measures	– Wage subsidies – Apprenticeship programme/pay (IGU) – Economic bonus scheme	– Wage subsidies – Social procurement – Stimulating markets for labour integrating social enterprises	– Municipal proactive measures of involving employers – Stimulating civil society organizations	
Matching measures	– Job centre arranging early workplace training – Short-term, since repatriation has become the end goal of policies – Sector/industry packages (short-term vocational education for industries in demand of labour) – Workplace training	– Fast tracks and matching – Workplace training	– TWIV, matching of refugees and employers/industries – Screening and Matching measure	– Enabling vocational training – Job centre arranging matching, e.g., by help of MYSKILLS – Various projects aimed at testing skills in workplaces

as stimulating markets for labour-integrating social enterprises. A similar trend towards engaging private and civil-society actors in the local arena is seen in the Netherlands. Here initiatives such as the Screening and Matching measures place more focus on the role and effect of combining the demand-side and matching approach.

With regard to matching approaches these have been common in all four countries, but have been intensified since 2015. In Denmark, Germany and the Netherlands, municipal job centres play a key role here, while the state employment agency has had a strong position traditionally in Swedish matching activities. There are two variants of matching: matching to employment (long-term and making use of immigrants' education and former experience), and matching to activation, which can be more or less seen as a means towards integration/establishment and more or less as a condition for as long as you are allowed in the country. The latter is closely linked to the repatriation policy in Denmark, which clearly changes the conditions for integration.

CONCLUSIONS

In this chapter, we set out to explore labour market integration policies in Denmark, Sweden, the Netherlands and Germany. We focus particularly on similarities and differences in policy developments in the wake of the refugee crisis of the mid-2010s. The analysis shows that policy makers in all four countries acted on the sense of urgency and took a series of measures to intensify efforts to establish effective labour market integration for the newly arrived. In Denmark and the Netherlands, this meant an even more strengthened orientation towards early labour market entry. In contrast to this, the long-term perspective was more salient in Germany and Sweden, most clearly manifested in educational activities to improve long-term employment.

In all four countries there is a clear focus on the obligations of the newly arrived. Denmark was a 'first-mover' in this regard, and the remaining countries have followed suit. These obligations apply to taking part in the activities planned in order to become employable and also, as soon as possible, self-sufficient. This also means a shift in the supply-side measures towards motivation-strengthening at the expense of capacity-building. The Danish 'staircase' approach to integration, gradually preparing refugees for the labour market, has been abandoned in favour of a work-first approach. However, the staircase approach is still in place in Germany and Sweden in particular. As such, the work-first approach is quite strong in Denmark, whereas the human capital approach (staircase approach) is rather prevalent in both Sweden and Germany.

The differential use of economic incentives is worth highlighting in this conclusion. Denmark has a rather long tradition of using negative economic

incentives in the form of benefit reductions for refugees to increase their motivation to become employed. The Netherlands also utilizes economic incentives. Participants in the integration programme take up a loan to cover the expenses of the integration course. If participants pass the integration exam within three years, the loan is terminated. In contrast, the explicit use of these types of economic incentives is absent in Sweden and Germany.

In some instances, the demand side (the employers) are also incentivized to recruit refugees. In contrast to the refugees, employers are motivated through positive incentives (reduced wages or wage subsidies). These policies are strongly pursued in both Denmark and Sweden but to a lesser extent in the Netherlands and Germany. Economic bonuses, in the form of direct payments to employers (another version of positive incentives), are only pursued in Denmark.

Through our analysis, we have furthermore identified a few policy innovations that are rather unique in each of the countries. These may serve as lessons to be learned. In Denmark, the IGU scheme stands out as well as the use of economic bonuses for employers who hire refugees. In Sweden, the use of social procurement seems an innovative way of incentivizing employers to recruit refugees. In the Netherlands, the possibility of terminating loans in the case of successful integration outcomes seems rather innovative. In Germany, the computer-based skills assessment tool MYSKILLS seems like an innovative way of making skills visible to employers, thereby easing the matching process. In our opinion, these are the national policies and tools most likely for policy learning and diffusion (Shipan and Volden, 2008).

However, when reflecting on the policies in the four countries, similarities rather than differences stand out. This applies to the intensity, content and organization of the labour market integration measures. What future developments mean for labour market integration policy, and whether similarities or differences between the countries will increase, remains to be seen. For instance, current repatriation/deportation policies in Denmark imply a clear change of approach to integration issues.

NOTES

1. See: https://www.uvm.dk/arbejdsmarkedsuddannelser/hvad-og-hvor/individuel-kompetencevurdering--ikv-.
2. See: https://www.ft.dk/samling/20181/almdel/beu/spm/13/svar/1575718/2048091/index.htm.
3. For a list of the professions see: https://www.arbeitsagentur.de/en/myskills-test-english.

5. Education policies and the dilemmas concerning migrant students in the Northern European welfare states: the case of mother-tongue instruction

Nanna Ramsing Enemark, Jin Hui Li and Mette Buchardt

The school achievements of migrant students, including students with a migration history in their families, keep on drawing political and public attention in the context of the Northern European welfare states and their school systems. Distinctions are in education political contexts not so much drawn between children of refugees and other types of migration. The questions discussed rather build on a language of description that focuses on the foreign national origin of the students and often also on their foreign language. A recurrent Danish debate has been on how to receive newly arrived migrant students in the so-called *Folkeskole* – directly translated as the people's school – covering primary and lower secondary level. Should students be integrated through special arrangements in the form of reception classes before being transferred to conventional forms, or are students better integrated through direct enrollment? Also a longstanding topic for policy disputes and public debates has been the provision of instruction in the 'mother tongue' of the migrant students. The discussions touch upon central political challenges concerning migration in relation to the European nation-states – which at the same time are welfare states – and their school systems. Are migrant students and their first language (or their parents' first language) a resource or a burden to the welfare-state school? Should migrant students be assimilated as quickly as possible in order to bring them on equal footing with the rest of the student population or rather be prepared for possible 'repatriation'? Is equality only possible to achieve by means of special arrangements such as reception classes and mother-tongue instruction, or do such arrangements disrupt the welfare-state school 'for all'?

Such questions about migrant students in the welfare-state school that at the same time have been the school and tool for the nation since the nineteenth century (e.g. Tröhler, 2020), however, resemble questions that have posed

dilemmas since the development of the social- or welfare-state school 'for all' and have thus been played out in school debates since the beginning of the twentieth century.

These questions have been especially salient in the Nordic context. Often described – from the inside as well as from the outside – as a 'third way' between the state socialism and planned economy of the Eastern bloc and the market economy of the Western bloc, the Nordic welfare-state model may be characterized as a combination of a state-controlled sector with the support and facilitation of market economy and the aim to distribute resources across social classes without dissolving class society and by retaining the division of labor (Hilson, 2008; Kettunen, 2011b). In continuation, a certain Nordic model of education can be identified as an ideological and strategic program that serves especially two purposes: to distribute welfare through an education system mainly free of charge and to educate the population into welfare-state mentalities, celebrating equality and enhancing social cohesion and societal solidarity through labor and thus also by means of retaining division of labor through compromises between classes. What became named and apparent, especially in the heyday of the Nordic welfare state under Social Democratic leadership during the Cold War, actually also had its historical roots in late nineteenth-century state modernizations (Buchardt et al., 2013).

This ideological program can be said to raise challenges that curriculum historian and sociologist Ivor Goodson (1992) has described as the challenge of how to differentiate in a school where the whole population allegedly is to be schooled under the same school roof. Do 'all' become equal by receiving the same treatment? Are 'all' in reality treated the same way? Does being equal mean being similar? Whereas the main question until the late 1960s was concerned with schooling social classes under the same school roof – opposite the class-divided tripartite system that 'the school for all' replaced – from the late 1960s the question of schooling all social classes under the same school roof was further sharpened by the emergence of the children of labor migrants as possible attendees in the Nordic welfare-state schools.

The question is, however, if this is an exceptional problem in the Nordic versions of the welfare-state model and its schools such as in Denmark and Sweden. A broader outlook to other European welfare states with different models of schooling, such as Germany and the Netherlands, points to similar challenges having been at stake.

With regard to school systems, the Nordic states of Sweden and Denmark developed throughout the twentieth century a so-called school for all with no distinction between primary and lower secondary level. The aim was to provide 9–10 years of mandatory education at the same academic level for all, and that at least at the principal level 'all' students should have access to

further academic or vocational upper secondary schooling according to choice and talent.

An earlier streaming has been kept in other European welfare states, and the same level and type of schooling 'for all' thus ends earlier. The German system has kept divisions in vocational and academic streams as early as after what would in Anglo-Saxon terms be described as primary school; more precisely streaming takes place from grade 5. Also in the school system of the Netherlands, divisions between vocational and academic streams happen after elementary school, meaning from around the age of 12. In addition, the Dutch school system has divided streams with regard to school types, with general public schools and religious private schools as the most central distinction.

Where the welfare states of Germany and the Netherlands have thus kept more elements from an institutionally class-segregated school system before the modernization and democratization processes of the twentieth century, institutional social class differentiation has been gradually removed in the Nordic welfare-state school models of Sweden and Denmark since the late nineteenth century.

The question is, however, if the education policies that developed towards migrant students are mirroring these differences between respectively the models of a long common schooling for all and the earlier differentiated and segregated models. How are the four European welfare-state school systems in question handling the balance between equity, sameness and difference with regard to migrant students? Based on the case of mother-tongue instruction policies with regard to the 'foreign' mother tongue of migrant students as they have evolved in the late twentieth century and up until the present, the chapter will shed light on this question.[1]

THE EDUCATION SYSTEM AS POLITICAL WELFARE TOOL AND THE 1960S' MIGRATION WAVE

Besides its nineteenth-century function of creating national cohesion in the emerging nations, the education systems of the nation-states can be said to serve to sustain social structure and maintain the division of labor (Bourdieu, 1971; Bernstein, 1990; Bernstein, 2000; Goodson, 1992). At the same time, education as a political tool has been used for aiming at equity and social cohesion since the modernization of the European states in the late nineteenth century. A prevalent example of this is how education in the Nordic welfare states during the twentieth century became a tool for making class mobility possible without radically aiming at removing class society (Buchardt, 2021).

Also, the education system can in some senses be said to border the distribution of welfare within the nation-states. Drawing on education theorist and curriculum historian Thomas S. Popkewitz (2008), this process can be described

as double registers of inclusion and exclusion, and as hierarchies of different forms and levels of being included. The equity-aiming education system in *welfare nation states* (Kettunen, 2011a) thus can be said to be framed by an inner conflict between the ideologies of universal rights and the national bordering of welfare. If translated into the political question of migrant students in the European national school system, the analytical question to explore is thus to what extent an education system aiming at equity can provide special arrangements for 'some' in order to achieve the 'same' for 'all'. This political discussion on education can in some sense be said to mirror or maybe rather be a recontextualized and transformed version of the so-called 'progressive dilemma' (see Chapter 1), but here played out in and taking a different and field-specific form within the field of state education. This dilemma and challenge of the national school that serves to distribute welfare within the nation-state concerns how much difference an education system can make space for without losing its ideological key function as equity-aiming. And to what extent is 'sameness' perceived as the condition for equal opportunities? This dilemma or challenge became especially prevalent in Northern Europe from the 1960s.

In the 1960s and 1970s, the European states further expanded their social programs for which the ground was laid since the late nineteenth century and began addressing a number of new social questions (Buchardt et al., 2013; Borevi, 2014; Bonjour and Duyvendak, 2018). Many of these were thought to be solved through education, including that of the emerging group of 'guest-worker migrant children' who had (to most countries' surprise) seemingly accompanied or joined their parents. When the Northern European welfare states recruited what they at the outset perceived to be temporary labor through so-called 'guest-worker programs', political actors were in general under the impression that guest-worker migrants would be temporary *guests* (Willke, 1975; Jønsson, 2013; Bonjour and Schrover, 2015). However, this was not what happened. The discovery of the fact that migration also meant children,[2] and the predicaments and dilemmas this produced, can be traced in the national responses through policy. Moreover, such policy text can inform us about how the welfare state was continuously crafted, while at the same time handling the newcomers in the nation-state and its schools.

In this chapter we show, with mother-tongue instruction as a case, how the realization of the permanence of the guest workers through their children was intertwined with nation- and welfare-state crafting and handling, including the question of national belonging, often framed in cultural terms, which became apparent through the question of language. As will be revealed, we challenge the notion of Denmark being particularly unique with respect to the policy developments within mother-tongue instruction and the way this relates to national belongings. Quite the contrary, the four Northern European states

in question in many ways exhibit the same traits. In the following section, we show across national sites how mother-tongue instruction policies have produced migrant students as different from majority students while simultaneously mother-tongue instruction policies have aimed at making the migrant students increasingly similar to the non-migrant ones.

MOTHER-TONGUE INSTRUCTION: A CROSS-STATE COMPARISON

Denmark

In the early 1960s, Denmark began inviting people particularly from Southern Europe, Morocco, Pakistan and Turkey to work in Denmark temporarily. Those taking up the invitation were largely presumed to be young men. However, children also showed up to form part of the migration wave, and the school authorities in Copenhagen addressed the Ministry of Education inquiring about the status of the guest workers' children (Jønsson, 2013; Buchardt, 2016). In 1970, the Ministry of Education advised Danish public schools to welcome 'foreign children' and to provide them with 'foundational' (basic) Danish lessons in smaller groups outside the mainstream classroom, but otherwise maintained that the migrant students would be temporary[3] (Odde, 1974; Coninck-Smith et al., 2015; Buchardt, 2016; Padovan-Özdemir, 2016). When this was followed up in 1976 by legislation further outlining how to organize reception classes similarly to the practices of Copenhagen Municipality (Clausen, 1982), it included a requirement that the municipalities offer mother-tongue instruction with a cultural component[4] (Undervisningsministeriet, 1981, p. 24). Also, municipalities were to offer mother-tongue instruction if more than 12 children could be gathered within a language group (Buchardt, 2016), so they could 'maintain and develop their knowledge of their mother tongue and conditions in their home country'[5] (§12), so their 'possible return to the home country can be eased' (§12, para. 2). The purpose of mother-tongue instruction during this period was thus to facilitate the return of guest-worker children to their country of origin (Jønsson, 2013; Normann Jørgensen, 2003), while simultaneously adhering to the European Union's 1970 recommendations (Salö et al., 2018, p. 598). Responsibility for further legislation on migrant education was delegated to the sitting Minister of Education (Salö et al., 2018), who can release a statutory order.

The revised statutory order of 1984 reiterated mother-tongue instruction's purpose as students obtaining knowledge of their home language and culture,[6] while also stating the importance of learning Danish.[7] As this area was the responsibility of the sitting Minister of Education, the 1993 School Act, for example, merely stated that '[t]he Minister of Education can decide if

foreign-language students should receive lessons in their mother tongue',[8] leaving this decision out of the general education legislation and, by extension, treating these students' language as removed from general public schooling.

Besides the German minority in Southern Denmark, which is a recognized linguistic minority (Moldenhawer and Øland, 2013), the division of majority/minority has rarely been used in Danish education policy. Instead, Western/non-Western[9] or European/non-European has been the dominating dichotomy (Padovan-Özdemir, 2016), partly because European citizens, for example, have certain rights established by the EU. This came into play in 2002 when the public subsidy of non-EU mother-tongue instruction became financially at the discretion of municipalities,[10] resulting in a significant drop in the number of students receiving mother-tongue instruction[11] as municipalities were only required to offer mother-tongue instruction to those students with languages originating in an EU member country.[12] This removal was the result of a political problematization of migrant students' mother tongue by the prime-minister-elect during the election campaign (Kristjánsdóttir, 2006), who framed mother-tongue instruction as being in opposition to so-called integration efforts.

The emphasis on Danish as not only the lingua franca but as the very foundation for schooling in Denmark became clear in 2005, when a paragraph was introduced to the School Act allowing municipalities to refer students with 'linguistic needs' to schools other than their district school.[13]

In the most recent 2019 curriculum guide, the purposes of mother-tongue instruction include gaining an insight into the 'country of origin's culture and civic conditions' and '[easing] the students' possible return to that country' (Børne- og Undervisningsministeriet, 2019, p. 5). The latter formulation implies a return to the notion of students with non-Danish mother tongues as temporary residents.

Summing up the development of Danish education policy directed towards migrant students read from the policy concerning mother-tongue instruction, the pattern with regard to governance has been that the concrete policy implementation was largely at the discretion of the local level, more specifically municipalities and/or schools. Also, mother-tongue instruction has been formulated in terms of types and degrees of belonging; either dominated by aiming at a possible return to a 'home country' outside Denmark, or formulated in terms of integration in Denmark. This means that the perceptions through policy have prioritized the aim of shifting terms of and plans for national belonging. The cultural-national dimension has been in the foreground rather than linguistic-pedagogical purposes and the welfare-state aim of equal opportunities.

(West) Germany

Guest-worker migrant children gradually garnered political attention in the early 1960s across West German *Länder* (states) as Italian parents in particular banded together and requested exemption from compulsory German schooling. Instead, they favored general schooling in their mother tongue organized by the embassies and consulates of their country of origin, the so-called 'consular classes' (Lehman, 2019, p. 57). There was also political will to direct these children to some sort of organized schooling, as Minister of Culture and Education Gerhard Storz wanted to avoid migrant children aimlessly wandering the streets by using compulsory schooling as a means to uphold social order through state intervention.[14] The first *Länder* recommendations were published in 1964, following the 1963 Standing Conference,[15] which encouraged states to leave migrant children's home countries' embassies and consulates responsible for only their instruction in the mother tongue during the afternoon, whereas the children would be admitted to segregated classes in German language instruction during the morning.[16] Congruent with the Danish assumption, the guest workers (*Gastarbeiter*) were perceived to be temporary. Compared to other migrant groups, they were therefore largely assumed to merely need their mother tongue to repatriate.[17] If these presumably temporary foreign children ended up staying, they could be relegated to low-skilled jobs needing only a minimum of German language skills, a tactic that has been a point of critique of the German 'Ausländerpädagogik' (foreigners' pedagogy) model.[18] The non-German children who might potentially stay simply 'needed enough German language to integrate socially and be able to hold an (unskilled) job' (Lehman, 2019, p. 135). The Standing Conference's recommendations therefore fully supported these 'temporary' migrant children's right to develop their mother-tongue language skills.[19] However, the consular instruction was not permitted universally for migrant children. As early as 1962, in North Rhine-Westphalia in West Germany, only guest-worker children deemed 'culturally distant' from Germany were allowed to receive consular instruction about their home country[20] (Lehman, 2019). This meant that the 'culturally different' (temporary) migrant students from Italy, Greece and Turkey could receive politically supported lessons in their home country's language and culture. Dutch guest-worker children, however, were deemed 'Germanic' and did not receive this privilege but were instead relegated to the regular German classes. The 'culturally other' migrants were portrayed in the media as both economically and culturally poor and hence problematized as different from perceived Germanic peoples (Faas, 2008; Lehman, 2019). While the 1971 Standing Conference recommended that all foreign children receive instruction of some sort in their mother tongue, leaving this up to the different states led to huge variations in provision (Crul et al., 2019), overcrowded

classes and overdependence on the different embassies and consulates that at this point were still financing the provision and supplying teachers (Willke, 1975). In the individual *Länder*'s administration and local politics, focus was instead increasingly directed towards ensuring the migrant children were acquiring German-language skills, even though (non-educational) national immigrant policy emphasized the perception that labor migrants would return to their home country (Qureshi and Janmaat, 2014).

By the 1990s, mother-tongue instruction had become a recommendation in the national guidelines, but the quality and quantity remained uncertain, due to differing *Länder* interpretations of the guidelines (Duarte, 2011). When bilingual programs or mother-tongue instruction was often halted after the 1990s it tended to be ascribed to the 'feasibility, financing and the prioritisation of German language skills' (Miera, 2007, p. 20). In the 2020s, mother-tongue instruction legislation was delegated to the *Länder*, which has resulted in some *Länder* ensuring broad access to mother-tongue instruction (e.g. North Rhine-Westphalia) while others have abandoned it altogether (e.g. Bavaria) (Olfert and Schmitz, 2018). This delegation to local authorities is not dissimilar to the effect of municipal autonomy on mother-tongue instruction in Denmark. Only in schools for minorities, such as the Danish and Sorbian schools, is mother-tongue instruction in Germany as a subject integrated into the timetable and fully supported both financially and politically (Olfert and Schmitz, 2018). The four official Germany minorities receive special status and federal support.[21]

Summing up the development of German education policy directed towards migrant students read from the policy concerning mother-tongue instruction, the decentral elements of policy practices have been prevalent, where, for example, embassies have been operators. Moreover, the goal of possible repatriation has, as in the Danish case, been a cross-cutting aim. The distinction between different categories of cultural otherness and thus the measuring of degrees of belonging in relation to the ((West-)German) nation-state seem more explicit than in the case of Denmark. The same goes for formulations concerning division of labor, that is, guest-worker children's possible future in Germany being primarily directed towards unskilled jobs. However, the pattern found in the Danish case concerning degrees of national belonging as the main parameter for mother-tongue instruction rather than pedagogical and equal opportunity arguments applies for the German case as well.

The Netherlands

Migrant children more or less stayed out of the policy spotlight until the 1980s for primarily two reasons (Stevens et al., 2011). First, the Netherlands' status as a colonizer meant that the post-WWII influx of citizens from the former

Dutch-speaking colonies (particularly Suriname and the Dutch Antilles) were assumed to blend into the school system relatively smoothly, as the structure was largely comparable to that of their home country (and language) (Rijkschroeff et al., 2005). Secondly, since as early as 1967, larger cities had left embassies, NGOs and private entities in charge of instruction in the mother tongue, similarly to the German approach (Braster and del Mar del Pozo Andrés, 2001). This meant migrant children were either presumed to be like their Dutch counterparts or simply not visible, and therefore not detectable, in the mainstream schools (Driessen and van der Grinten, 1994; Driessen, 2004). In the late 1960s, however, a social democratic public discourse suggested that the state had a moral obligation to help socially disadvantaged people in the country, also benefiting migrant students (Bonjour and Duyvendak, 2018), when the government from 1970 began partly financing the existing mother-tongue education offered by embassies and consulates. Furthermore, through the Educational Incentive Policy (EIP) of 1974, migrant students' right to schooling on an equal footing with nationals and to mother-tongue instruction was established and the group therefore enjoyed the same right as in the Danish legislation by the late 1970s (Rijkschroeff et al., 2005). The purpose of the 1974 EIP was twofold; on the one hand, it attempted to cater to migrants assumed to be settling permanently, and on the other to those who were assumed to be in the Netherlands merely temporarily. In this regard, mother-tongue instruction could serve as a mediator for learning Dutch, as it will also be shown in the Swedish case, but also to facilitate return to the home country, as emphasized in the Danish case (Driessen and Dekkers, 2009). The arguments used when passing the policy included references to Cummins' interdependence theory (Driessen and Dekkers, 2009; Stevens et al., 2011). The government wanted to ensure that migrant students were prepared for both outcomes: integration and repatriation.

During the 1980s, there was a widespread realization that the guest workers would not return to their countries of origin, and in the political debates the emphasis shifted to migrant students' future as permanent residents in a predominantly Dutch-speaking society. The Ethnic Minorities Policy of 1983 recognized the permanency of guest-worker migrants and simultaneously framed them as a group with 'poor prospects' and thus in need of help (Bonjour and Duyvendak, 2018). Their status as a social problem was closely linked to their perceived socioeconomic situation, and migrant children with guest-worker migrant parents were therefore lumped together as having the same 'difference'. The 1983 Ethnic Minorities Policy thus applied to Southern Europeans, the four major migrant groups[22] and Roma and Sinti groups. However, it did not apply to Chinese migrants, for example, because they were not seen as *the same kind* of minorities (Vasta, 2007). In 1985, the Dutch weighted funding system (from 1974) for schools therefore included migrant children as a cate-

gory resulting in more funding (Guiraudon et al., 2005; Bruquetas-Callejo et al., 2011), where a student qualified if 'at least one of the parents was born in a Mediterranean country or former colony, or is a refugee' (Driessen, 2000, p. 60). During the 1980s, certain large migrant groups were therefore expanded to be considered distinct ethnic minorities[23] (Guiraudon et al., 2005), and it was possible to get mother-tongue instruction for both migrant children and children of migrants upwards of five hours a week (Driessen, 2000), but with considerable variation between schools and municipalities.

The migrant category and special provisions were removed again from the extra funding scheme in 1998, when the funding category returned to exclusively socioeconomic factors (Driessen and Dekkers, 2009, p. 452). Part of this new policy direction emphasized early intervention, enacted as special attention being paid to migrant children learning the Dutch language rather than their mother tongue (Rijkschroeff et al., 2005). The argument was similar to that in the Danish case, that is, that all children should speak *the same* language. This sameness argument was also used when the emphasis on learning the culture of the child's home country in mother-tongue instruction was taken out of the subject description in 1991 (Rijkschroeff et al., 2005).

Mother-tongue instruction was mostly received by students with a Turkish or Moroccan background until the withdrawal of government financing in 2004, when there was public skepticism of the effect of mother-tongue instruction on the learning of Dutch. As was the case in Denmark, for example, the focus was shifted exclusively to the mastering of the Dutch language (Driessen, 2000; Vasta, 2007; Driessen and Dekkers, 2009).

Summing up the development of Dutch education policy directed towards migrant students read from the policy concerning mother-tongue instruction, as in the German case, this policy area was from the outset dominated by non-governmental operators. Also, the policy area as it later developed seems to have been dominated by distinctions between groups and categories of migrants, including their degree of belonging, but in the case of the Netherlands, the aim of integration seems more explicit from the outset during the 1980s, though possible repatriation has also been a goal with regard to selected groups. As will be shown in the Swedish case as well, the Dutch policy development seems more than the German and the Danish cases to calculate with pedagogical factors aiming at equal opportunities. However, the question of degrees of national belongings is equally apparent.

Sweden

Between as early as 1888 and until at least the 1950s, the minority education policy championed 'Swedifying' and assimilation (von Brömssen and Olgac, 2010, p. 124), which included enforcing Swedish as the national language.

However, concurrently with the expansion of the Swedish universal democratic welfare-state model (Esping-Andersen, 1990), this changed in the late 1960s when policies begin to emphasize equality across social groups, and also historic minority groups, such as the Sámi minority, benefited from the attention on the emerging group of labor migrants (Borevi, 2014). In 1966, mother-tongue instruction and lessons in the culture of the country of origin were therefore systematically offered to migrant children[24] (Bajqinca, 2019). The distinction between minorities and migrants, however, is important in the Swedish context. First, it is important due to the (widely regarded as shameful) history of 'Swedifying' groups such as the Sámi minority (von Brömssen and Olgac, 2010; Borevi, 2014), which resulted in a distinct attention towards ensuring rights of minorities. Combined with concerns over the potential 'semi-lingualism'[25] of Finnish Swedes at the time, the historical treatment of minorities was pivotal in convincing Swedish legislators to adopt a more multicultural and integrationist approach (Salö et al., 2018) backed by both scientists and officials in an appointed Commission of Immigration (Wickström, 2015). Concurrent with (especially Finnish-speaking) activists' persistent push for extensive and explicit rights for migrants in order to preserve their cultural and linguistic identity, 1975 saw the introduction of the 'immigrant and minorities policy' (Borevi, 2014; Salö et al., 2018). This policy favored 'equality, freedom of choice and partnership' (Borevi, 2014, p. 710), and had the foresight to assume that a number of the migrants would settle permanently in Sweden. The right to mother-tongue instruction was introduced broadly in 1976 for both immigrants and minorities from pre-school all the way through secondary level,[26] while mother-tongue instruction at the primary level had existed locally since the early 1970s (Kupský, 2017, p. 54). In 1977, the Home Language Reform was put into effect, legislatively considered to be the 'cornerstone' of mother-tongue instruction in Sweden for students speaking a language other than Swedish at home (Salö et al., 2018). The reform was aimed at migrant children to ensure they were able to maintain their home language and culture, but also to enable them to learn more languages (implicitly Swedish) (Bajqinca, 2019). The migrant guest-worker children were considered a new group, which also meant a new chance for Sweden to avoid the assimilatory policies of the 1960s. The 'old' minorities were instead mainly in focus in the late 1990s (Cabau, 2014; Kupský, 2017). In 1986, the government declared that the new groups of immigrants were not comparable to the old, and thereby historical, minority groups.[27] In 1999, five minority languages were recognized as belonging to the 'historical' minorities: Finns, Tornedal Finns, Roma, Jews and Sámi[28] (Cabau, 2014). Clarified again in 2009, official minorities' languages are regarded as official national minority languages, including receiving special status (Sälo et al., 2018, p. 593).

An evaluation of mother-tongue instruction in 1990 during emerging economical discourses suggested that too much was being spent on the subject (Bajqinca, 2019), and a concurrent law decentralizing school funding meant municipalities no longer had to offer mother-tongue instruction for less than five students or if a qualified teacher could not be hired. A part of the reasoning behind the school decentralization law was the insufficient mother-tongue instruction some schools offered, suggesting the law could open up for migrant parents to choose different schools for their children (Cabau, 2014). In 1994, this regulation was altered, so that these restrictions to mother-tongue instruction only apply to 'immigrants' (Axelsson, 2005). The restrictions did not apply to the now recognized historical minority groups, further driving a categorical wedge between the two groups by indicating that minority languages are legitimate. This wedge is not dissimilar to the distinction between EU/non-EU citizens of the Danish case. Much as in Denmark, the measures resulted in a sharp decrease in the number of both hours taught and students receiving mother-tongue instruction (Bajqinca, 2019), as migrant students in Sweden heavily outnumber minorities. The assumption of Sweden offering great quality and quantity of mother-tongue instruction has thus waned in recent decades (Cabau, 2014), exacerbated by, for example, a government report in 1996 describing how mother-tongue instruction had inadvertently become low status among teachers and painted a picture of a subject with poor financing and administrative mismanagement.[29] While municipalities should have ensured that students have full access to mother-tongue instruction, they have generally been receiving only a few, scattered hours of such instruction (Salö et al., 2018).

In 2020, Sweden still offered mother-tongue instruction for students speaking a language other than Swedish at home, mainly perceived as the 'key to Swedish society' (Bajqinca, 2019, p. 158), suggesting one national unifying language is the ideal. Migrant students' mother tongues can through mother-tongue instruction then facilitate the learning of Swedish. Mastering Swedish is seen as enabling migrant students to attain the 'sameness' of the national majority language speakers.

Summing up the development of Swedish education policy directed towards migrant students read from the policy concerning mother-tongue instruction, the greater focus on national minorities than in the other country cases seems to have paved the way for a stronger focus on equal opportunities for, for example, the guest workers and their children than is the case the other way around. As in the Dutch case, the Swedish policy development seems more orientated towards integration from earlier on than in the Danish and the German country cases. However, the pattern of leaving the main agency to local operators is to be found in the Swedish case as well, lowering the status

of the subject matter area, which thus seems not fully integrated in the Swedish welfare-state school.

SCHOOL DILEMMAS IN THE NORTHERN EUROPEAN WELFARE STATES

Summing up, in all four states in question the provision of mother-tongue instruction has varied widely and has been mostly at the discretion of the local and non-governmental operators, placing it as an unstable special arrangement in the periphery of the school systems. Also, mother-tongue instruction has not predominantly been seen as a pedagogical resource but rather as a question of belonging to another nation-state, and/or as something which should not be prioritized exactly in order to aim at integration in the Northern European welfare states in question. However, differences between the four states in question also become apparent: while Sweden and Denmark are similar in models of welfare-state schooling, whereas the Netherlands and Germany used early streaming and thus an early division of labor through the education system, the similarities and differences arise differently when looking at policies towards migrant students based on mother-tongue instruction policies and practices. Here, Danish and German policies seem to have the strongest framing with regard to the parameters of national belonging, and to be more strongly framed in the ways migrant students are perceived as different in the welfare nation-state school. On the other hand, Sweden and the Netherlands, the former with a long history of debating and recognizing minorities, and the latter with an extensive history of migrants from the former Dutch colonies, seem in comparison more integration-oriented and aiming for equal opportunities.

This suggests that the welfare-state cohesion dimension is stronger in Swedish and Dutch education policy towards migrants, and the nation-state element more decisive in the ways policies have been crafted in the German and the Danish cases. All together, this leads us to propose that the nation-state project and the welfare-state project as they are crafted through the national school systems and education policies are to be understood as inseparable. The dilemmas between difference and sameness in the school systems of the Northern European welfare states are thus not so much a question of deservingness of welfare-state privileges, but rather a question of handling degrees of national difference, often formulated in cultural terms, in the school of the nation-state. The fact that the basic pattern of degrees of national belonging has not changed at its core, along with it becoming apparent that most migrant students were and are to stay in the Northern European welfare nation-states only underlines this.

NOTES

1. This chapter is based on research done in the research project FLOW – Global flows of migrants and their impact on North European Welfare States 2018–2021. Part of the source material has previously been analyzed in Li and Enemark (2021). In this chapter, it is analyzed from a different optics, drawing on insights from e.g. Buchardt (2018) and Buchardt (2021).
2. European Council Resolution (70)35, adopted by the Ministers' Deputies on 27 November 1970: 'School Education for the Children of Migrant Workers'.
3. 'Circular of Education in the Comprehensive Schooling of Foreign Children' by the Ministry of Education, Circular Number 293 of 30 November 1970.
4. Mother-tongue instruction traditionally consisted of a linguistic and a cultural heritage component, as recommended by the European Council Resolution (70)35 (see note 2).
5. All translations are by the authors unless otherwise stated.
6. As well as history, geography and civics (see note below for reference).
7. Regeringen (1984). 'Bekendtgørelse om folkeskolens undervisning af fremmedsprogede elever' [Statutory order on the people's school education of foreign-language students]. BEK number 583, 20 November 1984. Available at: https://www.retsinformation.dk/eli/lta/1984/583.
8. Folketingstidende (1992–1993). 'Forslag til lov om folkeskolen' [Bill for the School Act]. Law number 509, 30 June 1993. Available at: https://danmarkshistorien.dk/leksikon-og-kilder/vis/materiale/lov-om-folkeskolen-30-juni-1993.
9. For example, Statistics Denmark uses this distinction.
10. Following Directive 77/486/EEC, only students who are citizens of the EEA or the Faroe Islands and Greenland have the legal right to mother-tongue instruction. Stipulation Number 618 of 22 July 2002 therefore does not grant the right to mother-tongue instruction in Denmark for groups other than those previously mentioned.
11. In 2008, a report showed that fewer than 10 percent of the non-EEA children eligible for mother-tongue instruction actually received it (Timm, 2008).
12. This includes countries within the European Economic Area (EEA) and the Faroe Islands and Greenland.
13. Regeringen (2005). 'Bekendtgørelse af Lov om Folkeskolen' [The School Act]. LBK number 393, 26 May 2005. Available at: https://www.retsinformation.dk/eli/lta/2005/393.
14. Gerhard Storz presented a revised State School Act in the Kultusministerium [Ministry of Culture and Education] in Baden-Württemberg, 'Schulische Betreuung ausländischer Kinder und Jugendlicher', Beilage (in Stuttgart: State Parliament of Baden-Württemberg, 29 October 1962).
15. (West) Germany's federal organization gives the *Länder* primary responsibility for education, meaning nationwide education policies are generally the result of agreements at the Standing Conferences for the *Länder* Ministers of Education (and Culture).
16. Schulausschuß [School Commission] and Reimer, 'Unterricht für Kinder ausländischer Gastarbeiter: Beratung über eine Empfehlung' [Lessons for Children of Foreign Guest Workers: Advice on a Recommendation], Record (Rendsburg:

Kultusministerkonferenz, 7 February 1964), B 304/2058, Federal Archives Koblenz, in Lehman (2019).

17. There were three post-war migrant groups aside from labor migrants (*Gastarbeiter*). These include refugees with German roots (*Flüchtlinge*), resettlers (*Aussiedler*) and asylum seekers (*Asylbewerber*). For more, see Faas (2008).
18. For more on 'Ausländerpädagogik', intercultural education and antiracist education measures and history, see Faas (2008).
19. Schulausschuß der Kultusministerkonferenz [School Committee of the Culture and Education Ministers' Standing Conference], 'Unterricht für Kinder von Ausländern' [Education for children of foreigners], Working template for the 88th meeting of the School Committee on 6/7 February 1964 in Rendsburg, point 12 (Rendsburg, 7 February 1964), B 304/2058, Federal Archives Koblenz; Rist, Guestworkers in Germany, 187–190.
20. North Rhine-Westphalia actually went on to become an eager national proponent for intercultural education. For more on this, see Faas (2008).
21. The four official minorities in Germany are the Danes, the Frisians, the German Sinti and Roma, and the Sorbs.
22. The big four migrant groups referred to people from Turkey, Morocco, Suriname and the Dutch Antilles.
23. The minorities of the 1980s were therefore: Surinamese, Antilleans and Arubans, Moluccans, Turks, Moroccans, Italians, Spaniards, Portuguese, Greeks, Yugoslavs, Tunisians, Cape Verdians, Roma/Sinti.
24. Previously, it was financially and organizationally supported by the state and the municipalities to Finnish and Estonian minority children.
25. 'Semilingualism' denotes linguistic minorities not developing two full languages, but instead two 'half' or flawed languages.
26. Swedish government, 'om hemspråksundervisning för invandrarbarn' [on home language education for immigrant children], Proposition 1975/76: 118. Available at: https://www.riksdagen.se/sv/dokument-lagar/dokument/proposition/om-hem spraksndervisning-for-invnndrarbarn_FZ03118.
27. Swedish government, 'om indvandrarpolitiken' [about immigration policy], Proposition 1985/86: 98. Available at: https://www.riksdagen.se/sv/dokument -lagar/dokument/proposition/om-invandrarpolitiken_G90398.
28. Previously known in English as 'Lapps' (now considered derogatory by many Sámi people).
29. Swedish government, 'Skolgång borta och hemma. Utlandssvenska barns skolgång – skolinackordering – skolgång för vissa minoriteters barn' [Schooling out and at home. Schooling of foreign Swedish children – school accommodation – schooling for children of certain minorities]. Report by the 1964 Foreign and Boarding School Inquiry, Stockholm. See Bajqinca (2019).

6. Memories of recognition in school: a survey of young adult immigrant descendants in Denmark and Sweden

Kristian Kriegbaum Jensen and Tore Vincents Olsen

How do young adult immigrant descendants remember being positively recognized by teachers and classmates in their years of basic schooling (primary and lower secondary education)? Do the memories of immigrant descendants differ from majority natives, or are differences larger between ethnic groups because of Muslim identification and religiosity? Looking back at their school experience, individuals might develop different interpretations of what transpired in their relations with other students and teachers. As adults, we often develop a more acute awareness of social dynamics and we come to see our school experiences in a different light. Still, while it is not certain that immigrant descendants retain their adolescent perception of school as adults, it is reasonable to presume that positive childhood experiences on average lead to a positive memory and negative experiences on average lead to a negative memory. Exploring not only the actual ongoing experience of recognition, but also the memory thereof is important in the context of personal development and the feeling of belonging to society as an equal and valued member. Experiences turn to memory and memory will condition how individuals relate to themselves and to society and its institutions.

Existing research mostly studies adolescents in school to see whether majority and minority students report different levels of school satisfaction and well-being. Indeed, studies often find that students born to immigrant parents are *not* significantly disadvantaged in terms of psychological adjustment, peer relations and social acceptance (Berry et al., 2006; Grødem, 2009; Hjern et al., 2013). Hjern et al. (2013), in an impressive study of 15-year-olds in Sweden, find that immigrant descendants have a significantly more positive perception of themselves and their school context. However, no studies, as far as we are aware, have examined how immigrant descendants remember their years of basic schooling as young adults and few take a comparative country perspective.

This chapter addresses the question of the memory of school recognition using a survey of young adult (20 to 30 years) immigrant descendants and native-born citizens in Denmark and Sweden. The sample is comprised of immigrant descendants born to parents who immigrated from Iraq, Pakistan, Somalia, Turkey, Poland or Vietnam. These six minority groups make up a large share of the total descendant population in both countries. The survey asks the respondents about how positively they remember their basic schooling years in terms of overall satisfaction, whether they felt cared for by their teachers and classmates, and if teachers showed minority cultures equal respect and esteem. The analysis examines how answers to these questions vary between Denmark and Sweden but also between ethnic groups within the two countries. The survey was also conducted in Norway. Although this chapter focuses on Denmark and Sweden, you will find some of the Norwegian results reported in endnotes when relevant.

Denmark and Sweden are particularly interesting to compare because each country has been exposed to quite different public discourses on immigration, multiculturalism, and nationhood (Borevi et al., 2017) – which have also affected how school subjects are prioritized and centrally managed by state authorities (Fernández and Jensen, 2017; see also Chapter 5). Danish politics has in general been highly impacted by a rather exclusive civic-assimilatory notion of nationhood critical of immigrants maintaining a strong ethnic identity and culture, a notion that most Swedish politicians would fiercely object to in support of a more multicultural understanding that does not see a conflict between minority and majority identities and cultures. Moreover, whereas issues of civic integration, regarding both immigrants and their descendants, have been highly politicized, and often a decisive factor in national elections, in Denmark since the late 1990s with numerous consecutive policy restrictions, this has not been the case in Sweden (Brochmann and Hagelund, 2010; Jensen et al., 2017; Green-Pedersen and Krogstrup, 2008).

Recognition comes from abstract relationships such as those one has with public authorities and institutions, but also comes from close relationships with teachers, peers and parents. Thus, an underlying presumption is that different conceptions of immigration, multiculturalism and citizenship transmitted through everyday school policy interactions condition the experience of recognition of different groups of students differently. In particular, less culturally inclusive school policies, that is, policies that do not confer positive social esteem on groups that are (perceived to be) outside 'the national normal' and perhaps even would deny them equal (citizenship) rights would result in members of those groups experiencing a lower level of recognition. However, this effect can be offset or counterbalanced by recognition deriving from other relations, in the present case not least teachers and classmates who may or may

not transmit the conceptions of immigration, multiculturalism and citizenship inherent in the national education policy.

The main question this chapter addresses is whether the difference between the Danish and Swedish educational policy contexts is reflected in how positively immigrant descendants remember their basic schooling years. Is it in fact the case that immigrant descendants in Denmark remember their teachers and classmates as less caring and less open to recognize and appreciate cultural differences? Are certain immigrant groups, such as those predominantly Muslim or very religious, more prone to having a worse memory of school in Denmark compared to Sweden? Or perhaps the country differences do not influence the schooling experience of immigrant descendants because teachers continue to have a high degree of autonomy which insulates their practice from national politics?

The analysis addresses these questions. First, however, this chapter explains its theoretical framework, presents the two countries and their school systems in more detail as well as the data and measures. It ends with a discussion of the findings.

THE THEORY OF RECOGNITION

A number of recent qualitative and theoretical studies analyse wellbeing in school in terms of recognition (Thomas et al., 2016; Thomas, 2012; Graham et al., 2017; Wulf et al., 2012). Recognition results from the relation to 'significant others'. How others relate to you has important consequences for how you are able to relate to yourself. Those others may be concrete others in relatively close relations such as parents, friends, teachers and community leaders, but they can also be part of abstract relations such as those to opinion makers, political leaders, public authorities, and country institutions (Honneth, 1996; Galeotti, 2002; Modood, 2007). The symbolic order of society reflected in its institutions and its (more or less) shared 'value horizon' convey a status on its individual members and the groups to which they belong.

Following the general theory of Honneth (1996) there are three dimensions of recognition. All three are important in a school context. The first is love or care. Being cared for is important for the development of a child's self-confidence. Knowing that you can voice your needs and desires without being abandoned by your caregiver is important for developing an understanding of the legitimacy of having needs and desires. The second dimension is respect. Being treated as a person with equal rights and standing to those of others enables you to develop self-respect and view yourself as a moral and political equal. The third is social esteem. Obtaining esteem for your particular identity and your contribution to your community and to society in general

allow you to develop self-esteem. Typically, this type of esteem is related to one's group identity or group identities, not least at the societal level.

While the three dimensions are analytically distinct, it can be difficult to separate them in practice: one's self-confidence, self-respect and self-esteem may be violated or insufficiently supported by the same act, for example by a harsh and unjustified criticism (scolding) or by the voicing of negative stereotypes. Given this close relationship between the three dimensions, it is plausible that educational policies that represent a less culturally inclusive view of immigrants and minorities would have a negative effect on the feeling of being recognized overall and conversely that a culturally inclusive policy would have a positive effect. Groups with specific identities or backgrounds that are perceived as problematic in public discourse may be particularly affected by such policies. This would give reason to expect that immigrants and minorities not least with Muslim and/or Middle Eastern and African backgrounds would feel most negatively affected by non-inclusive educational policies. As mentioned however, the effects may be counterbalanced by other factors, not least whether teachers and fellow students transmit views of the educational policy in their daily teaching practice and interaction.

It is also possible that the care dimension of recognition which is predominantly mediated in concrete relationships with others rather than in abstract relationships with societal authorities – as is the case with respect and social esteem – might overshadow recognition deficits on these two latter dimensions. Or in other words, the feeling of not being seen as an equal and valuable member of society might be contravened by the concrete experiences in the classroom either because the negative view of minority groups in society is not transmitted by teachers and peers and/or because the care dimension is more important and cancels out negative effects of lack of recognition on the membership dimensions.

This theory of recognition forms the basis of testing whether variation in conceptions of immigration, multiculturalism and nationhood and the school policies informed by such conceptions result in different memories of recognition among immigrant descendants. It is important to notice, however, that our cross-sectional survey data does not allow causal interpretations of the statistical results. So, what we test is whether there is an association between the country context and how different ethnic minority groups remember school.

We develop two different indexes of the memory of recognition. The first taps into the concrete relations of care that students have experienced in school with their teachers and their fellow students. The second relates to the broader sense of status as an equal and valued member of the school. While the memory of recognition is dependent on the concrete relations between students and teachers, it is likely to be mediated by society's institutions, policies and public debates. That is, the actions and motivations of teachers are likely

to be interpreted through the lens of public discourses either concurrently or retrospectively. The retrospective character of the data is important to keep in mind. As years go by and we become older, we might come to view our school experiences in a different light, finding something wrong or problematic that we found innocuous as it took place. Such changing interpretations could well reflect becoming exposed to new ideas or becoming more politically aware and engaged. As suggested above, it is therefore possible that we will find differences in the levels of memory of recognition not only because of how situations were experienced as they happened, but also because as adults our respondents are part of two quite different national political contexts.

To better understand the context in schools and outside, the next section describes citizenship education in Denmark and Sweden as well as the broader political context that influences policy choices.

CITIZENSHIP EDUCATION IN DENMARK AND SWEDEN

The Scandinavian countries share the basic idea that free, comprehensive public schooling is an important tool to reduce inequalities and create social mobility; see also Chapter 5. The school systems are also similar in the sense that they combine state centralization in the choice and prioritization of subjects and the formulation of binding learning goals for the individual subjects with a high degree of teacher autonomy in deciding how to achieve those goals through teaching style and curriculum selection (Telhaug et al., 2004).

Nonetheless, we find quite telling differences in how governments tend to view the integrative role of the school when it comes to cultural and religious diversity. As described by Enemark et al. in Chapter 5 of this book, Danish school policies have highlighted concerns around transmitting Danish culture, while Swedish school policies have been preoccupied with supporting the maintenance of ethnic minority cultures (even if it does not allocate enough resources to follow through on such goals). Denmark has refrained from changing an officially monocultural approach to common schooling with a low degree of accommodation of ethno-religious diversity, while Sweden has largely done the opposite, with public praise of diversity and an officially intercultural school approach with a strong focus on human rights. This difference seemingly reflects a divergence that started to gather momentum from the 1990s, when Swedish school politics began emphasizing more strongly cultural diversity, the individual and human rights in contrast to more exclusive notions of nationhood (Hällgren et al., 2006). In Denmark school politics seem to have moved in the opposite direction towards stronger emphasis on a historically grounded national culture as the foundation of a strong Danish

democracy, welfare state and identity (Haas, 2008; Horst and Gitz-Johansen, 2010).

Fernández and Jensen (2017) detail how Denmark during the last 15 to 20 years has removed mother-tongue instruction as a right, increased teaching in history and introduced a specific canon of events as a mandatory part of the curriculum and has maintained that the teaching of religion heavily prioritizes Christianity (in fact, the subject is called *Christianity studies*). In fact, the teaching of history tends to be seen as more important for the rearing of citizens than civics. Much of the political debate has revolved around concerns with Muslim students and their families and that the schools must foster their emotional attachment to Danish society by exposing them to the historical events, values and norms that define Danish culture.

In sharp contrast, Sweden has not changed much during the same years. It maintains the importance of offering mother-tongue instruction (although as demonstrated in Chapter 5, there are too few resources to follow through on this in practice), that the teaching of religion only entails a slight emphasis on Christianity, and that civics not history is the main subject that helps to build the national community. A secular and often quite cosmopolitan approach to citizenship education dominates in Sweden, and policy documents tend to emphasize the importance of cross-cultural interactions and intercultural competences to strengthen tolerance and engagement with cultural differences to foster an inclusive notion of nationhood.

Still, as already mentioned, teachers in both countries have a large degree of autonomy. For the most part, the curriculum is decided locally, and this makes teachers strong gatekeepers between national politics and what enters the classroom. Yet, it is also reasonable to think that teachers are not immune to the dominant discourses of society and that it is likely to affect their teaching choices to some extent. Reichert and Torney-Purta (2019) compare twelve countries using the ICCS 2009 data set and find that the Nordic countries of Denmark, Finland and Sweden are relatively similar when it comes to what teachers think are the most important aims of citizenship education. The regular ICCS surveys on citizenship education present teachers from lower secondary education with ten different aims of citizenship education and asks them to choose the three they find most important. The results show that Nordic teachers are more likely to emphasize independent, critical thinking and tolerance compared to teachers from other countries. However, on the one aim that directly relates to cultural differences, namely 'the promotion of effective strategies to reduce racism', clear intra-Nordic differences appear. Specifically, in the 2009 survey 31 per cent of Swedish teachers choose this aim compared to only 9 per cent of Danish teachers. The 2016 ICCS survey shows the same pattern: 38.9 per cent of the surveyed Swedish teachers chose the aim of reducing racism compared to only 5.5 per cent of Danish teachers.

This indicates that the differences on the level of national politics are to some extent visible in the attitude of teachers.

Do the memories of school inclusiveness expressed by immigrant descendants reflect the national differences described above? One hypothesis is that it never really enters the classroom and that the school context largely remains insulated from the ebbs and flows of national politics. In that case, we should *not* expect immigrant descendants to be more disadvantaged in Denmark and therefore more inclined to express negative perceptions of their basic schooling years. An opposite hypothesis is that Swedish schools are in fact more culturally accommodating and therefore make schooling a more positive experience for immigrant descendants. Yet, might this be more important to some immigrant groups? Immigrant descendants with a Muslim background are likely to be more at risk of alienation because they are more often the target of public scepticism and criticism than other religious groups. Hence, a more specific hypothesis is that a culturally accommodating school environment is especially important for the memories of ethnic groups whose members are predominantly Muslim. Another possibility is that it is especially important for students who are highly religious. Those who are not particularly religious arguably assimilate more easily in the rather secular Nordic schools that still prioritize the teaching of Christianity over other religions (although this is much more pronounced in Denmark). In that case, we could expect religiosity to have a stronger negative relationship with perceptions of school inclusiveness in contexts such as the Danish where there is a greater public expectation of assimilation as a prerequisite for genuine national belonging and where Christianity is highly prioritized in the teaching of religion. The following analysis provides answers to these different questions but first we present the data and measures used.

DATA AND MEASURES OF SCHOOL MEMORIES

To investigate memories of recognition, we use a unique survey conducted in Denmark and Sweden (but also Norway[1]) by the national statistics offices. The survey, completed in spring 2018, is based on random sampling within seven strata: young adult ethnic majority respondents as well as immigrant descendants with family backgrounds from Iraq, Pakistan, Somalia, Turkey, Poland and Vietnam. The six minority groups make up a large share of the total descendant population in all three countries. Ethnic majorities were defined as respondents who had two parents born in the country. Immigrant descendants were defined as those born in the country whose parents had immigrated from one of the six countries, or who themselves immigrated before the age of 11 from one of the countries. Respondents in the sample were between 20 and 30 years old. The first round of responses was collected by email or post.

A second round was collected as telephone interviews. The response rate was 14.7 per cent in Sweden and 33.1 per cent in Denmark. These response rates do add some uncertainty to the quality of the data – especially the rather low Swedish response rate. The Danish respondents and the initial gross sample are similarly distributed in terms of educational level, employment and income. Among the Swedish respondents, there is an overrepresentation of majority-native respondents and there are fewer with a low educational level. The majority-native respondents in the Swedish sample are on average better educated than descendants of immigrants. This underscores the importance of including educational level as a control variable to reduce biased estimates.

As explained above, we work with two dimensions in the memory of recognition, one pertaining to care, and another pertaining to membership, and we therefore construct two measures on the memory of recognition in school. Both indexes range from 0 to 1, with equal weight to the items. The first combines two questions that corresponds to the care dimension, namely the statements: 'My teachers accepted me as I was' and 'My classmates accepted me as I was'. The second dimension combines two questions that relate to cultural recognition in the form of respect and social esteem, namely: 'My teachers respected all students equally, regardless of their cultural background' (recognition in the form of respect) and 'My teachers tried to give all students the opportunity to express their culture' (recognition in the form of social esteem). The theoretical justification for combining and measuring memory of recognition in two indexes is that while the care dimension predominantly rests on the concrete relationship between students and teachers, the membership dimension is also mediated through the reflection of different groups in society's institutions, policies and public debates.

Regarding all four statements, participants were asked to think about their years in primary and lower secondary schooling before responding and to evaluate the degree to which the statement corresponded to their personal experiences in school. They chose between five response categories, ranging from 'never' (1) to 'very often' (5). For each country data set, factor analysis only reveals one factor on each measure (eigenvalues between 1.32 and 1.4 and Cronbach's Alpha scores between 0.51 and 0.65).

The analysis of group differences on the measure of cultural recognition excludes majority natives because we do not know how many, if any, of their classmates had an ethnic minority background. Hence, we do not know the extent to which majority natives understand the two questions in a similar way to ethnic minorities. If none or perhaps just one of their classmates had an ethnic minority background, the two questions appear less meaningful for majority natives.

In addition, to examining group differences on the two measures of memory of recognition, we also test differences concerning how positive respondents

Table 6.1 Group differences

	No. of respondents		Religiosity		Identify as Muslim	
	DK	SE	DK	SE	DK	SE
Native	263	368	2.4	1.7	0.00	0.00
Iraq	170	158	5.8	5.3	0.71	0.47
Somalia	212	102	7.4	8.0	0.93	0.90
Pakistan	149	98	7.3	6.5	0.91	0.78
Poland	192	203	3.1	2.7	0.01	0.01
Turkey	143	101	6.6	5.5	0.89	0.42
Vietnam	218	158	3.3	1.9	0.00	0.00

overall evaluate their years in school. Participants finished the statement 'Would you say that your time in school was…' using five response categories from (1) 'very negative' to (5) 'very positive'. The analysis uses a dummy variable with the value 1 if respondents answered either 'mostly positive' or 'very positive'.

The analyses use ordinary least squares (OLS) regression to test how scores on the two indexes correlate with ethnic group in Denmark and Sweden, and logistic regression to test differences on the binary variable describing whether or not respondents evaluate their time in school as mostly or very positive. The country data sets are analysed separately to investigate whether the national context is associated group differences in the memories of recognition in school.

Table 6.1 reports how respondents from the different groups vary on self-reported religiosity and identification as Muslim. Religiosity is measured by asking: 'How large a role does religion play in your life?', with response categories on a scale from 0 (no role at all) to 10 (a very large role). Identification as Muslim is measured by respondents finishing the statement: 'What is you religion? Are you…', with Muslim as one of several response categories. The table reveals substantive group differences and close correlation between ethnic group, religiosity, and Muslim identification.

First, in both countries close to no one identifies as Muslim among majority natives, Polish descendants and Vietnamese descendants. These three groups are also the least religious in all three countries. The groups where most identify as Muslim are also the most religious groups. Particularly, Somali and Pakistani descendants stand out in this regard. Interestingly, in Sweden fewer than half of those with an Iraqi and Turkish background identify as Muslim, which deviates from the higher numbers found in Denmark. They also show lower levels of religiosity.

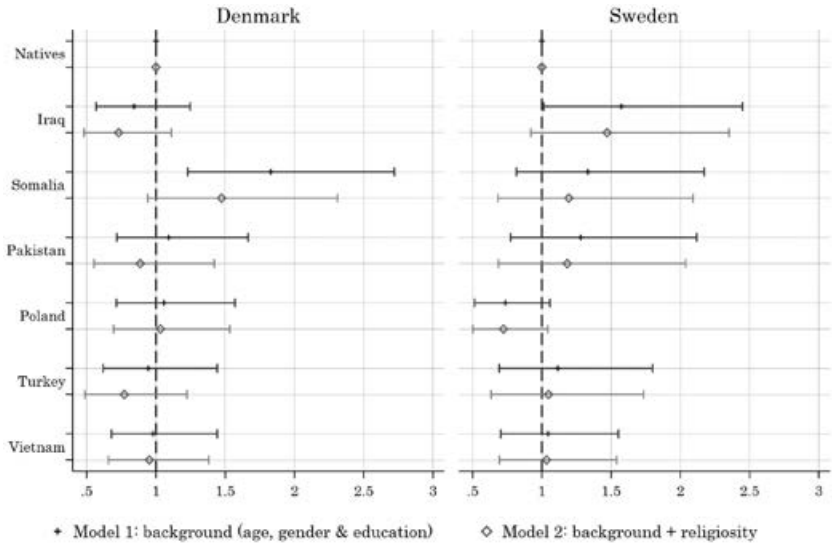
The rather high correlation between ethnic group and identification as Muslim makes it difficult to isolate these two factors statistically. Hence, the analysis does not include Muslim identification as a variable in the statistical models. For each of the three dependent variables, the analysis tests two different models. The first model examines group differences while controlling for the gender, age, and educational composition of the groups. The second model include religiosity as an additional control to examine whether group differences are explained by different levels of religiosity. This is to test the hypothesis that religiosity, especially among Muslims, not ethnic group membership, relates to more negative school memories. If so, we should expect groups where most respondents identify as Muslim to show significantly more negative memories in Model 1 and that this statistical relationship weakens or becomes insignificant in Model 2.

Information on immigrant background/group, gender, age and education comes from the national administrative registers. The education variable measures the respondents' highest completed education level and contains three categories. The first category is 'secondary school or less' which corresponds to 10 years of schooling. The second category is 'further education', which includes high school as well as adult education of less than two years (the case for many vocational educations). This category corresponds to 11–14 years of schooling. The third category is 'higher education', which corresponds to 14+ years of schooling, including university bachelor's and master's degrees but also bachelor's degrees from university colleges.

The following section presents and discusses the results of the statistical analyses. We first discuss differences in the overall memory of school before turning to the respondents' experiences of care and cultural recognition.

FINDINGS ON SCHOOL MEMORIES

Figure 6.1 shows group differences on the measure of how positively respondents overall remember their time in school, with majority natives as the reference group. Odds ratios are reported based on logistic regression models. The results from Model 1 show group differences controlled for age, gender and education, while Model 2 also include religiosity as a control variable. Both models show that there are no systematic differences between the different ethnic minority groups and majority natives in either country. Thus, there are no indications that immigrant descendants have worse memories of their time in school compared to majority natives in a country like Denmark where national school policies and the public debates are dominated by assimilationist notions of immigrant integration, nor better memories in a country like Sweden, where such notions have little influence on school policies and public debates.



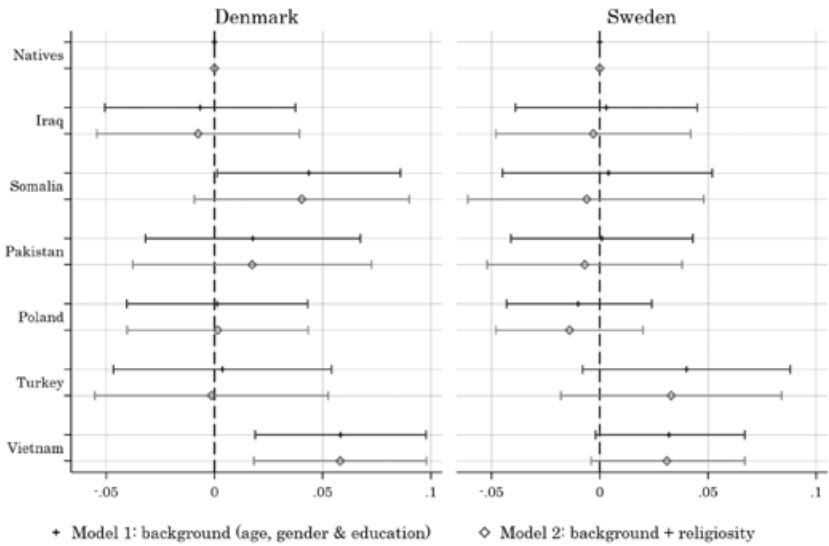
Notes: Logistic regressions; odds ratios with 95 per cent confidence intervals.

Figure 6.1 Group differences on the overall memory of school

In Sweden, no minority group has a statistically significant different overall evaluation of their time in school compared to majority natives. In Denmark, descendants of Somali parents are significantly more positive before including religiosity as a control in Model 2. This indicates a positive influence of religiosity. Still, religiosity is not statistically significant for any particular group when a model is tested that includes an interaction term between ethnic group and religiosity.[2]

Figure 6.2 shows group differences on the measure of memory of care from teachers and classmates based on OLS regression. Again, the majority natives serve as reference group. A similar pattern emerges to the one seen in Figure 6.1. There are no systematic differences between majority natives and minority groups across or within the two countries. This picture remains when religiosity is included as a control variable in Model 2. Most immigrant descendants do not report a significantly different memory of care from teachers and classmates compared to majority natives. Indeed, in Denmark descendants of Vietnamese parents report a significantly more positive memory than majority natives and before controlling for religiosity (Model 2). Somali descendants also report a significantly more positive memory. However, the confidence intervals are rather wide, with p-values just below the 0.05 threshold, so we

should be prudent and not interpret the differences with a high degree of certainty. Thus, the overall conclusion is that the Danish school system does not leave immigrant descendants with a worse memory of care compared to Sweden. There are no signs that the quite strong Scandinavian differences in terms of how national school politics incorporates cultural diversity seep down into how ethnic minorities experience care.[3]

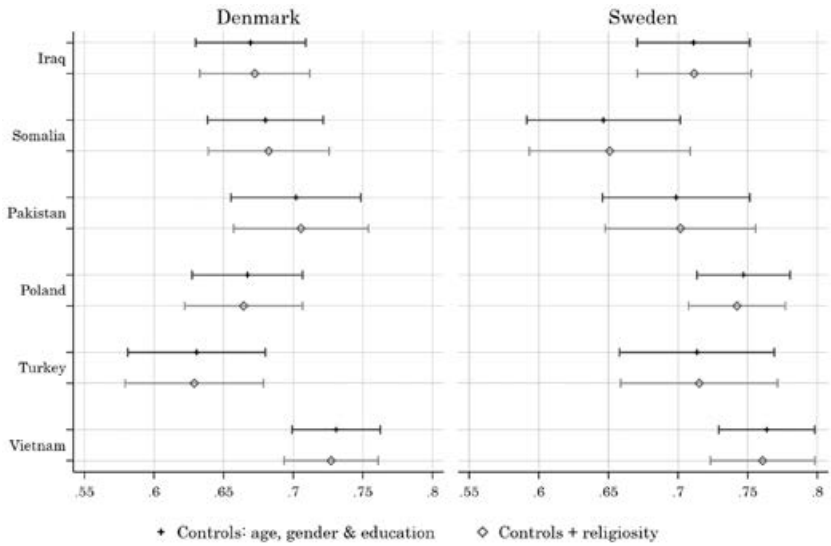


Notes: OLS regression; 95 per cent confidence intervals.

Figure 6.2 *Group differences on the measure of perceived care from teachers and classmates*

Finally, Figure 6.3 shows group differences on the measure of memories of cultural recognition by teachers. Remember that this part of the analysis excludes majority natives because the questions making up the measure are arguably less meaningful for a significant part of this group. Figure 6.3 reports predicted values so no one group is the reference group. No clear pattern emerges, within or across countries. Those groups where most identify as Muslim do not generally show a worse memory of cultural recognition by teachers. Moreover, including religiosity as a control variable does not change the pattern.

However, within each country a few significant group differences do appear. In Denmark, descendants of Vietnamese parents have better memories of cultural recognition compared to descendants of Turkish parents. In Sweden,



Notes: Predicted average values based on OLS regression; 95 per cent confidence intervals.

Figure 6.3 *Group differences on the measure of perceived cultural recognition by teachers*

descendants of Polish and Vietnamese background have better memories of cultural recognition compared to descendants of Somali parents.[4] Comparing groups across countries, most differences are statistically insignificant.[5] The exemptions are descendants from Polish and Turkish parents who have significantly better memories in Sweden compared to their counterparts in Denmark (p-values of 0.003 and 0.028, respectively).[6]

There are perhaps some indications that certain ethnic minority groups have better memories of cultural recognition by teachers in Sweden, although no group shows significantly better memories in Sweden compared to Denmark. Hence, no systematic differences appear that provide strong grounding for the assertion that the Swedish attentiveness to including cultural differences in schooling, and in policies in general, has the effect that descendants from ethnic minority groups remember their teachers as being more culturally inclusive.

Finally, it is noticeable that religiosity does not show a significant relationship with memories of cultural inclusiveness in any of the countries. Thus, it appears that religious individuals are *not* more likely to feel that their teachers were less culturally inclusive, contrary to what was hypothesized. An addi-

tional model was tested that interacts religiosity with the different immigrant groups to see if religiosity mattered more for particular groups. The results are for the most part insignificant. The one exemption is that Somali immigrant descendants show a positive, significant relationship in both Denmark and Sweden. Consequently, the Somali immigrant descendants who are not particularly religious are among those whose memories are the worst in both Denmark and Sweden.

Taken together, the results of the analysis do not show as hypothesized that immigrant descendants in Sweden generally have a better memory of recognition in school compared to Denmark. The more culturally inclusive discourse and school policies that differentiate Sweden from Denmark are not reflected in the memory of immigrant descendants. This could mean one of two things. One possibility is that teacher autonomy has the effect that, on the ground, schooling in Denmark and Sweden is not that different in terms of how ethnic minorities are cared for and included in the classroom *and* that public discourse does not serve as a lens through which students interpret the actions and motives of teachers.

Alternatively, it could be the case that the memories of recognition are affected by time so that they do not align with differences in actual practices. If memories converge over time it implies that there is no general, strong long-term effect on descendants' feelings of recognition of how teachers relate to cultural differences in their practice. Yet, this latter hypothesis also assumes that the Danish public debate, with its strong expectations of assimilation and scepticism towards cultural diversity, does not have a negative impact on the memory of recognition. Instead, convergence is an effect of other time-related factors.

IMMIGRANTS' MEMORIES OF RECOGNITION IN SCANDINAVIAN SCHOOLS

Our results show that despite different public discourses and policies on cultural and religious diversity, national identity, citizenship and integration, there are no systematic differences between minority groups in the Scandinavian countries when it comes to their memory of recognition in school. This suggests that public discourses and policies do not have a significant effect on how minority members remember the level of recognition of their school days. In fact, it is possible that the level and nature of recognition was mainly transmitted via teachers and peers in schools and that it has cancelled out differences in recognition found in public discourses and policies. While this contradicts our hypothesis on how different national policies would affect immigrant groups differently, it is nonetheless an important finding. It points to the relative importance of concrete interaction contexts and institutions over and above

public discourses and official policies when it comes to the experience of being seen as a person with legitimate needs and as a valued member of society.

More generally, the results seem to contradict – at one level – the explanatory power of different integration philosophies (cf. Favell, 1998) and integration policies on integration broadly conceived. Indeed, this follows the point made by some authors that the everyday practice of 'street level bureaucrats' is more important than official policies in relation to integration (e.g. Rothstein and Stolle, 2008; Dinesen and Hooghe, 2010). As suggested above, Scandinavian teachers have a high degree of autonomy, and our results might be an effect of them using this autonomy to circumvent the strictures of official policy.

Finally, in line with earlier studies of adolescents that show that immigrant descendants do not generally express less school satisfaction than native-born students do, the surveys examined here show that this remains the case when immigrant descendants look back upon their years of basic schooling as adults.

NOTES

1. The Norwegian response rate was 45 per cent. In the analysis, you will find endnotes with results from the Norwegian data. Both in terms of policy and discourse, Norway falls in between the two more extreme cases of Denmark and Sweden and thus allows us to evaluate whether a more moderate approach creates different results.
2. Analysis of Norwegian data provides similar results with no clear, systematic differences. However, in Norway, descendants of Iraqi parents show significantly more negative memories and the difference increases slightly in Model 2. In addition, children of Turkish immigrants show memories that are significantly more negative in Model 2.
3. Again, we find similar results in Norway. All groups except one report similar positive memories of care. Only descendants of Iraqi parents do report statistically significant worse memories of care compared to majority natives when the model controls for religiosity. But again, the confidence intervals are very wide.
4. This is also the case in Norway.
5. We test equality of coefficients across separate country regressions using the formula $Z = \frac{\beta 1 + \beta 2}{\sqrt{SE\beta 1^2 + SE\beta 1^2}}$ provided by Clogg et al. (1995).
6. When compared to Norway, descendants of Iraqi and Vietnamese parents have significantly better memories in Sweden compared to their counterparts in Norway (p-values of 0.019 and 0.001, respectively). Moreover, descendants of Somali parents have statistically better memories in Denmark compared to Norway (p-value of 0.013).

7. From convergence to divergence? The evolvement of North European citizenship politics

Kristian Kriegbaum Jensen

Going back a decade, qualitative case studies and quantitative studies on the politics of naturalization were quite common. The interest derived from the fact that in the 2000s most West European governments began perceiving citizenship as something immigrants earn through integration efforts rather than as a right after some years of stay (Mouritsen et al., 2019a). Concurrently, the perception that current policies had failed to assist the integration of immigrants and their children gradually took hold of European public debates (Vertovec and Wessendorf, 2010). Indeed, many political actors were late to leave the naïve expectation that many immigrants, especially work migrants, would eventually return home. The blame for integration failure was often directed at the lack of integration requirements and the (perceived) priority given to policies supporting the maintenance of ethnic minority cultures.

Accordingly, most states began implementing civic integration policies, as they are often termed, that condition access to citizenship on speaking the language of the host country, having knowledge of liberal values and the country's history, culture and institutions, and/or being economically self-sufficient using instruments such as tests, courses and contracts (Goodman, 2014). This widespread adoption of civic integration policies restricting access to citizenship countered the broad historical trend of liberalization towards *jus soli*, dual citizenship, and less administrative discretion.

In recent years, the academic debate on naturalization politics has subsided, and new studies are infrequent. Arguably, this is because the overall rate of policy change has slowed down considerably, almost to a complete halt, and other issues, such as the withdrawal of citizenship in the case of citizens who joined the Islamic State, have dominated public debates on citizenship. Most countries have not made substantive changes to naturalization requirements in more than 10 years. The Syrian refugee crisis did not even bring a new round of restrictive changes to European naturalization policy. Considering this, it is relevant to ask whether the analytical narrative of convergence on a civic

integration model more concerned with employment and less with nationhood that some offered to understand the restrictive turn of 2000s remains relevant when trying to understand the general lack of change in the 2010s (e.g., Joppke, 2007; Goodman, 2010). Or if the alternative analysis offered by critics remains relevant, namely that the restrictive turn is characterized by strong national differences reflecting path dependencies and different conceptions of nationhood (e.g., Jensen et al., 2017; Koopmans et al., 2012; Mouritsen, 2013).

This chapter explores this question by comparing how naturalization policies and politics have developed in Denmark, Germany, the Netherlands and Sweden up until today. Today, Germany and the Netherlands have similar naturalization requirements despite responding quite differently to immigration in the 1970s and 1980s, while Denmark and Sweden have never been further apart from each other. Comparatively, Denmark has some of the most restrictive requirements in Europe, Sweden barely has any requirements, while Germany and the Netherlands are in between, with somewhat moderate requirements, although Germany is more restrictive than the Netherlands. From the outset, then, it is clear that strong national differences exist.

The chapter is structured as follows. First, the chapter briefly introduces the previous debate on naturalization policy convergence. Second, the chapter describes the policy trajectories of the four countries, provides an updated 2021 measurement of the CITLAW ordinary naturalization index and describes naturalization rates. Thirdly, the chapter describes the political dynamics and dominant ideas driving the politics of the citizenship in the four countries. Finally, the chapter ends with a discussion of convergence and path dependency based on the policy trajectories of the four countries.

THE DEBATE ON CONVERGENCE

Joppke (e.g., 2007; 2017) argues that civic integration policies were mainly introduced to incentivize and facilitate the employment of newcomers, in turn lessening the financial strain on the welfare state but also to promote liberal values. He argued that West European welfare states turned to civic integration policies to alleviate structural economic pressures arising from immigration, opposing the theory that how West European states approach naturalization politics is largely defined by different, historically rooted conceptions of nationhood. The latter has been a mainstay in the field of citizenship research since the seminal analysis of German and French citizenship politics by Brubaker (1992), the basic hypotheses being that ethno-cultural and civic-assimilationist conceptions of nationhood tend to produce more restrictive citizenship policies while pluralist and voluntarist conceptions tend to produce comparatively liberal policies. Brubaker and others (e.g., Favell, 2001; Mouritsen, 2013) stress that the politics of citizenship is characterized

by, first, the answer given to the basic question of what it means to belong to the nation and, second, that how governments tend to answer this question is marked by extended periods of mainstream consensus, ideational inertia and path dependency. Joppke (e.g., 2007; 2010; 2017) has argued that this approach cannot explain why West European states converge around defining nationhood using the same set of liberal values and implementing similar civic integration policies. Others (e.g., Bonjour and Lettinga, 2012; Borevi et al., 2017; Jensen et al., 2017; Meer and Modood, 2009; Mouritsen et al., 2019a; Schmid, 2020) have challenged Joppke, arguing that civic integration policies do not look the same in all countries but vary in terms of their demandingness and the reasons offered for supporting them – if they are even implemented (Goodman, 2014). This diversity, it is argued, reflects how policy choices are constrained by historically embedded perceptions – functional and normative – of the nation and its relation to the state and social cohesion.

Within this literature, the Netherlands and Germany have been highlighted to demonstrate convergence on a civic integration model because the introduction of civic integration policies broke with policy legacies. In the Netherlands this was a move away from a multiculturalist approach to integration while Germany broke with a highly segregationist approach where it was almost impossible to naturalize (Entzinger, 2003; Green, 2000; Joppke, 2007). In Denmark and Sweden, the policy trajectories display a greater degree of continuity and do not conform to a story of convergence. They have only moved further apart, with Denmark gradually implementing a highly restrictive set of integration requirements. Although the Swedish multicultural policies implemented in the 1970s have weakened over the years, scholars (Borevi, 2014; Jensen et al., 2017) argue that the notion of Swedishness as pluralist and voluntarist has continued to shape naturalization policy. In Denmark an ethno-cultural conception of nationhood has always been a strong undercurrent of naturalization policy (Mouritsen and Olsen, 2013).

That the comparison of these four countries does not lend itself to a simple analytical narrative of convergence or path dependency might explain why they are rarely brought together in the same comparative case study. Yet, existing comparative studies are for the most part based on the policy developments of the 2000s. In the following, I detail how policies and politics have developed in the 2010s to see if extending the comparison to include recent developments makes it possible to form a stronger verdict on the convergence–divergence discussion, or not.

MAPPING RECENT POLICY DEVELOPMENTS

Commonly, naturalization requirements concern years of legal residence, renunciation of other citizenships (i.e., whether multiple citizenships are

allowed), absence of criminal convictions, language skills, economic self-sufficiency, and knowledge of the host country. Naturalization typically also requires a permanent residence permit which may also require fulfilment of similar requirements. In this chapter, I only detail and discuss the requirements for ordinary naturalization while acknowledging that immigrants often also face integration requirements for permanent residence, although typically less demanding than those for citizenship, and that some immigrants may be exempted from one or more naturalization requirements (e.g., immigrants that the state regard as having a certain cultural affinity or historical bond to the state).

The introduction distinguished civic integration requirements from other naturalization requirements. What defines civic integration requirements is that they cannot be fulfilled by inaction. Instead, they require that immigrants invest not just time but also personal resources towards acquiring skills and knowledge. Consequently, requirements regarding language skills, economic self-sufficiency, and knowledge of the host country are typically defined as civic integration requirements because they ask immigrants to actively engage with society. Of course, whether such efforts bear fruit also depends on the opportunities for work and education offered by the economy and welfare state. Requirements regarding residence, renunciation of other nationalities and lack of criminal convictions do not belong to civic integration requirements because they can be fulfilled without investing personal resources towards acquiring new skills and knowledge.

As Goodman (2010, 2014) demonstrates, before the mid-to-late 1990s, most countries had no formalized civic integration requirements attached to citizenship. In addition, most countries did not allow dual citizenship (Sejersen, 2008). Both applies to the four countries of this book. Following increased political salience of immigration issues, civic integration requirements were eventually introduced in most West European countries in the 2000s, although with significant variation in terms of the kind of requirements implemented, who the requirements target, and what they require (i.e., demandingness).

However, Sweden did not partake in this trend and still has not introduced any civic integration requirements (Borevi, 2014; Jensen et al., 2017). The Netherlands pioneered civic integration debates (Entzinger, 2003), but early on their civic integration policies developed in tandem with Denmark and both countries experienced a strong political backlash against immigration and notions of multiculturalism. A concern for Muslim immigrants was front and centre in many public debates on integration requirements. In both cases, mandatory language and civic integration courses were introduced in the late 1990s and a similar language test and citizenship test implemented in the beginning of the 2000s. Also in both cases this was a move away from an informal language test where a public servant interviewed an applicant to assess whether

they possess the necessary language skills to partake in everyday conversation. Since then, Denmark has followed a restrictive path through a succession of regular policy changes up until today resulting in the currently most restrictive set of naturalization requirements in Western Europe (Jensen, 2016; Jensen et al., 2019). The Netherlands stopped in its tracks after the first restrictive changes, with the result that it has comparatively liberal policies today despite having witnessed, like Denmark, prolonged, highly salient and heated public debates on immigration and Islam.

In Germany, the introduction of civic integration requirements succeeded a ground-breaking liberalization of naturalization requirements. Before 1990, ordinary naturalization, a process directed purely at the discretion of authorities, could only be considered if in the public interest (Anil, 2005: 455). In 1990, naturalization was formalized, and a 15-year residence requirement was introduced along with renunciation of other nationalities, absence of a criminal conviction for a serious offence and ability to earn a living. In 2000, the residence requirement was lowered to eight years, but an informal language requirement was also introduced. In 2007, the then government, consisting of SPD and CDU/CSU, formalized the language requirement by requiring applicants to have oral and written language skills at level B1 (Farahat and Hailbronner, 2020).

Table 7.1 summarizes current naturalization requirements in the four countries. Notice that the level of language proficiency required is defined by the Common European Framework of Reference for Languages (CEFR) which provides a common basis for defining and comparing levels of language proficiency across European countries. The framework distinguishes six levels (A1 – A2 – B1 – B2 – C1 – C2) going from the lowest 'breakthrough' (A1) to the highest 'mastery' (C2). A test consists of a reading test, a writing test, and an oral test. The citizenship test, on other hand, is a multiple choice test in Denmark, Germany and the Netherlands on historical events, societal institutions and national culture.

Denmark has the most restrictive language and economic self-sufficiency requirements, the longest residence requirement and the lowest minimum fine or conviction resulting in an increased waiting period or exclusion from naturalization, respectively. Denmark does, however, allow dual nationality in contrast to Germany and the Netherlands, which only provide some exemptions from renunciation of other nationalities. Germany has more restrictive residence and language requirements than the Netherlands, while Sweden stands out with no civic integration requirements and a right to dual nationality.

It is important to remember that not all requirements are equally exclusive. The exclusive potential of civic integration requirements is greater because they require both personal effort and some degree of luck to fulfil, depending on how demanding they are. Moreover, Jensen et al. (2019) demonstrate, using

Table 7.1 Requirement for ordinary naturalization

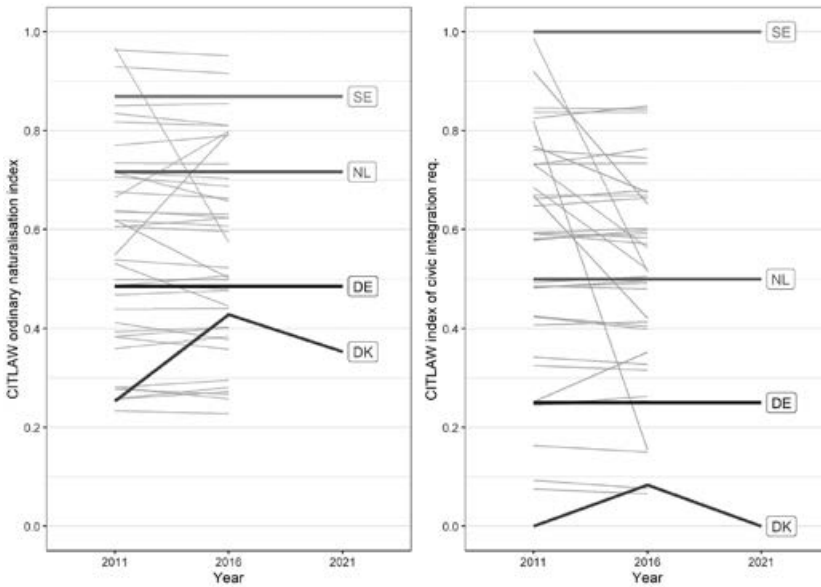
	Denmark	Germany	The Netherlands	Sweden
Residence	8/9 years	8 years	5 years	5 years
Renunciation of other nationalities	No	Yes (with exemptions)	Yes (with exemptions)	No
Language test	B2	B1	A2	No
Economic self-support	No more than 4 months of social welfare in last 5 years and not within last 2 years 3.5 years of ordinary full-time employment within last 4 years	Self-supportive at the time of applying	No	No
Citizenship test	Yes	Yes	Yes	No
Non-criminality: minimum fine resulting in increased waiting period	400 euros	91-day fines	810 euros	30 times daily income
Non-criminality: minimum conviction resulting in permanent exclusion	Any prison sentence (conditional or unconditional)	Prison sentence of 3 months or more	Convicted of crimes under Article 1F Refugee Convention	None

Danish register data, that the Danish language requirement at the B2 level is far more exclusionary than the economic self-sufficiency or non-criminality requirements. This is despite Denmark, along with its Scandinavian neighbours, having the most 'developed, extensive, state-sponsored integration programmes … within the European context' (Breidahl, 2017: 14–15). It is more demanding to acquire language proficiency at the B2 level than fulfilling a rather restrictive economic self-sufficiency requirement.

Only Denmark and Germany require applicants to be able to support themselves financially. However, in Germany, this de facto requires having ordinary full-time employment at the time you apply for naturalization, while Denmark requires both three and a half years of ordinary full-time employment (30 hours per week or more) within the last four years *and* not having received social benefits within the last two years as well as no more than four months within the last five years. The Danish requirement is vastly more restrictive than a simple employment requirement.

Figure 7.1 uses the CITLAW ordinary naturalization index (EUDO CITIZENSHIP Observatory, 2016) to illustrate how naturalization requirements have developed since 2011 in our four countries as well as the rest of the EU-27 (grey lines). The official data set provides country measurements from 2011 and 2016. I have calculated 2021 scores for our four countries based on the same method. The index is a weighted average of scores on six types of indicators, each representing a type of requirement. On each indicator the country is scored from 0 to 1 according to restrictiveness, with the lowest score 0 representing the most restrictive category. The six indicators (with the weight in parenthesis) are residence (40 per cent), dual citizenship/renunciation (20 per cent), language (10 per cent), self-support (10 per cent), non-criminality (10 per cent) and knowledge (10 per cent). As already argued, civic integration requirements are arguably more exclusionary, which is somewhat at odds with the weight they are given in the CITLAW ordinary naturalization index. This is especially if the index aims to measure the overall restrictiveness of naturalization requirements. Consequently, Figure 7.1 presents both the CITLAW ordinary naturalization index (the left-hand side) and an index consisting of the average score (equal weights) on the civic integration requirements (the right-hand side).

Figure 7.1 demonstrates that policies have been mostly stable over the last decade. The Netherlands introduced most of their current requirements in 2003, while Germany has not changed their requirements since introducing the B2 level language requirement in 2007. Of our four countries, only Denmark has experienced changes in the last decade. First, a short period of eased requirements from 2014 to 2016. The then centre-left government lowered the language requirement to B1, the economic self-sufficiency requirement to no more than two and a half years of social welfare within the last five

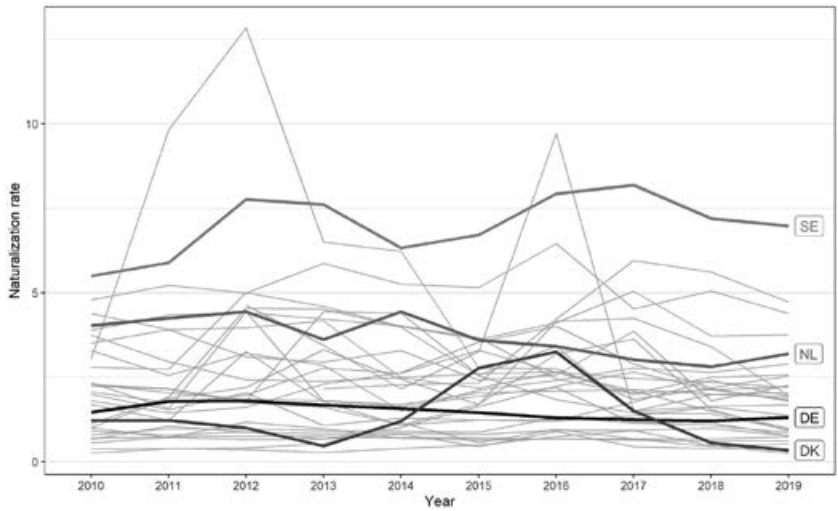


Note: Data from GLOBALCIT CITLAW Indicators. The civic integration requirements index on the right is a subset of the ordinary naturalization index that only includes the language, self-sufficiency and knowledge requirement with equal weights.

Figure 7.1 CITLAW ordinary naturalization index

years, and, finally, made dual citizenship a right. In 2016, the new centre-right government reversed these changes, except the right to dual citizenship, with the support of the Social Democrats. It was never their idea in the first place to ease requirements, but something they were pressured to do by the Social Liberal Party whose votes they required to form a government. The current Social Democratic government introduced the additional requirement to have three and a half years of ordinary full-time employment within the last four years as well as the requirement that any prison sentence (conditional or unconditional) permanently excludes non-citizens from naturalization.

Finally, Figure 7.2 demonstrates that the differences in policy restrictiveness translate to differences in naturalization rates (yearly naturalization divided by number of immigrants in the country). Unsurprisingly, the restrictive Danish policies result in a very low naturalization rate, Sweden's liberal policies in a high naturalization rate, with the Netherlands below Sweden, and Germany below the Netherlands. The brief Danish spike reflects the short-lived easing of requirements from 2014 to 2016.



Source: Eurostat.

Figure 7.2 Naturalization rate

Observing these national differences leaves us with the question of what explains them. Why do we not observe a higher degree of convergence, as predicted 10 or 15 years ago? Indeed, the analysis of countries converging on a similar civic integration model appears less relevant today. Policies have remained too stable and too different over the last decade. Although civic integration requirements now are common and widely accepted in most countries, countries have implemented very different versions in terms of demandingness. And over the last decade, only a minority of countries have continued along a restrictive path. In the next section, I turn to short individual case studies to examine the political dynamics and ideas behind the implemented policies. Afterwards, I compare the cases to evaluate the relevance of the convergence thesis.

THE POLITICS OF CITIZENSHIP

The trend of convergence driven by shared structural conditions that many described 15 years ago has not continued. To understand why the restrictive turn came to a halt in some cases and not others, the following brief case studies of our four countries review the political dynamics and dominant ideas that have formed naturalization politics.

Denmark

Since the turn to civic integration policies in the 2000s, Danish politics has been consistently dominated by a concern that immigration poses a challenge to the civic cultural homogeneity that many political parties, especially on the political right, perceive as the foundation for the Danish welfare state (Jensen, 2014; Mouritsen and Olsen, 2013). Danish norms and values are typically understood as presupposing a certain work ethic, privatization of religion, egalitarian family life and dedication to interaction with native Danes through settlement, day care, school, work, and associational life (Mouritsen, 2006; 2013). Becoming integrated is pictured as a demanding and difficult one-sided process towards a fixed end-goal that civic integration requirements both encourage and test (Jensen et al., 2017). Consequently, citizenship is most often seen as the end-goal of an integration process. It is typically described as a gift from Denmark that immigrants must earn through their integration efforts rather than a basic right after some years of settlement or an important stepping stone in the integration process.

Today, there is a strong consensus in Danish politics on highly demanding citizenship requirements. Indeed, the latest round of restrictive changes was under the current Social Democratic government with the support of all right-wing parties. The general impression is that one cannot hold government power in Denmark without pursuing and defending restrictive immigration and naturalization policies. The success of the far-right Danish People's Party until late has affected the saliency of immigration and integration issues. However, it is mainly the decision in the late 1990s by the two centre-right parties, the Liberal Party and the Conservatives, to politicize immigration issues and more openly and persistently promote a restrictive policy direction as well as an ethno-cultural notion of nationhood that set Danish policies on a restrictive path. Green-Pedersen and Odmalm (2008) argue that the coalitional opportunity structure changed for the centre-right parties, with the centrist Social Liberal Party choosing to form a government with the Social Democrats (SD) in 1993 *and* the increasing success of the Danish People's Party with their founding in October 1995. The Social Liberal Party, a more diversity- and immigration-friendly party, had traditionally, with success, cooperated with both left-wing and right-wing coalitions. However, by the mid-1990s, pursuing a government alternative with the Social Liberal Party was becoming increasingly unrealistic. Instead, the Liberal Party and the Conservatives decided to pursue a parliamentary majority based on the support of the Danish People's Party.

During the 2000s and 2010s, the Social Democrats gradually accepted most of the immigration and citizenship policies implemented by the different centre-right governments. The prevailing analysis, most succinctly stated in

Bale et al. (2009), is that they succumbed to the electoral pressure produced by the politicization of immigration and integration issues. The internal Social Democratic analysis was, and still is, that elections cannot be won without taking a restrictive immigration position to diffuse right-wing efforts at politicization. Slowly, the party also adopted the discourse on nationhood and social cohesion promoted by the political right. Today, there is close to no difference between how the Social Democrats and right-wing parties position themselves on citizenship policy (Jensen, 2016). Even though the current Social Democratic government bases its parliamentary majority on left-wing and centrist parties, it mostly collaborates with the political right on immigration and citizenship policy. Only the two minor parties, the Social Liberals and the far-left Unity List remain vocally critical of the current policies but both parties have been ostracized from policy making on naturalization as well as most immigration issues.

Germany

Until the 1990s, the German citizenship regime relied almost exclusively on *jus sanguinis*, resulting in incredibly low naturalization rates (Green, 2000). This citizenship regime is the reason Brubaker (1992) described Germany as a national community based on common ethnic and cultural descent. As described earlier, naturalization was liberalized during the 1990s, representing a major policy shift. The Social Democratic government at the time saw naturalization as a means for integration, as a precondition for equal societal participation, but also as a tool to incentivize integration efforts to learn the German language and become knowledgeable about German society (Green, 2000; van Oers, 2021: 278). This more inclusive conception of citizenship found support from the Greens and FDP but CDU/CSU were highly critical, fearing a sharp increase in naturalization of immigrants not properly culturally assimilated because too little was required of applicants (Green, 2000). Initially, the government also proposed allowing dual citizenship, but CDU ran a highly successful petition campaign that pressured the government to drop it. These years saw a deepening divide between the political left and right as CDU/CSU vehemently defended a highly culturalized civic-assimilationist conception of Germany that left-wing parties did not subscribe to (Green, 2000; Hertner, 2021; Mouritsen et al., 2019b). This divide remains today.

In 2007, the then government, consisting of SPD and CDU/CSU, formalized the language requirement by requiring applicants to have oral and written language skills at level B1. The new legislation also required citizens to have 'knowledge of the juridical and social order and of the living conditions in Germany'. That is, to pass a citizenship test. The government argued that these

changes would improve immigrant integration. The changes received little attention in political debates and entered into force in 2008 (van Oers, 2021).

Since then, the naturalization requirements have stayed the same and have been low on the political agenda. Even the Syrian refugee crisis did not result in serious political talks about restricting access to naturalization. Yet, the new 2021 government coalition between SPD, the Greens and FDP is proposing further liberalization by allowing dual citizenship and reducing the residence requirement to five years. The government argues that these changes ease access to citizenship, helping immigrants to solidify their life in Germany. The political right has responded negatively to the proposal voicing similar concerns as in 2000. Still, what characterizes German citizenship politics is that it is slow-moving, low on the political agenda, and has been on a long journey of mainly liberalization counteracted by a language and knowledge requirement.

Like other countries, Germany has also experienced, particularly in the early 2000s, highly salient public debates about nationhood and social cohesion. The German debates on *Leitkultur* have seen CDU/CSU argue for a more culturally thick conception of German nationhood connecting liberal-constitutional values to a German way of life (Mouritsen, 2013; Mouritsen et al., 2019b). The party predominantly frames immigration as a cultural issue with a particular concern for the integration of Muslims (Hertner, 2021). Unlike Denmark, SPD and the political left has met a culturally thick conception of German nationhood with resistance, arguing that loyalty to democracy and liberal values is more European than German and contesting the culturalization of such values (van Oers, 2021). Nevertheless, SPD also emphasizes loyalty to liberal values as the core of immigrant integration without now hesitating to call Germany a country of immigration.

The Netherlands

For a long time, the Netherlands was seen as a clear example of multiculturalism – although this was partially a mischaracterization according to some (e.g., Maas, 2010). Naturalization was relatively easy but by the 1990s political parties on both the left and right became sceptical. Well before the Netherlands introduced a formalized language test and a citizenship test on knowledge of society in 2003, Dutch politics was marked by discussions about the failure of multiculturalism and a prolonged debate about whether citizenship is something immigrants should earn through learning the language, getting employed and learning about Dutch society (Entzinger, 2003). Particularly the Social Democrat Paul Scheffer argued that the Dutch must reinvigorate their national identity, stressing liberal values as the core of Dutchness (Duyvendak, 2020; Mouritsen et al., 2019b).

In the 1990s, the success of the centre-right VVD was often attributed to Frits Bolkestein's critique of the so-called Minorities Policy, which he and VVD argued undermined integration by not expecting and even requiring of immigrants that they adapt and learn the language (van Oers, 2021). It was very much the success of centre-right parties on integration issues that prompted the centre-left government to replace the Minorities Policy with the 'Integration Policy' requiring immigrants to follow an integration course and pass an informal language test in 1998. In 2007, a new integration act was introduced with a new integration exam replacing the naturalization test. It is noticeable that language skills received a high degree of attention in the public debate, and several centre-right parties asked the Minister Verdonk of the VVD to increase the level of language proficiency required to naturalize (van Oers, 2021). However, the minister refused, stating that naturalization should not 'unintentionally function as a selection instrument' (quoted in van Oers, 2021). This contrasts with the Danish debate where civic selectionism is an outspoken aim and where most politicians do not see low naturalization rates as problematic.

Since 2007, there have not been changes to the Dutch civic integration requirements. Instead, discussions about naturalization have mainly been about dual citizenship. The Netherlands requires that applicants renunciate other nationalities to the extent that it is possible. However, the current Dutch government does have plans to raise the required level of language skills to B1, like the German language requirement.

Dutch debates about nationhood and naturalization have remained divided in several senses. The political left remains highly critical of efforts to speak of one form of Dutchness emphasizing a pluralist account of nationhood. The Social Democrats as well as centre-right parties do not outright reject a pluralist account of Dutch nationhood but emphasize the importance of national pride and link liberal values to an enlightened modern sense of Dutchness (Mouritsen et al., 2019b). Secular-liberal values are routinely emphasized as the core of Dutch traditions and what it means to be integrated into Dutch society.

Sweden

Swedish immigration politics is dominated by a top-down, welfare state integration logic according to which the extension of rights – particularly social rights – is believed to be a necessary condition for the fostering of individual empowerment and a sense of national belonging (Borevi, 2014; Jensen et al., 2017). Citizenship continues to be perceived mostly as a vehicle for the extension of rights and is in itself largely vacuous of national sentiment. Instead, many political parties are more likely to point out structural discrimination as

the single most significant hindrance to the inclusion of immigrants and their descendants into society, emphasizing that it is mainly Swedes and Swedish institutions, not immigrants, that need adjustment. Ethnic Swedes must learn to become more open and tolerant and sensitized to the different forms that discrimination may take (Jensen et al., 2017). State institutions must develop multicultural competence and supply a more culturally flexible service, making it easier for immigrants to both identify with and use state institutions and services.

Still, the Conservative Party opposed dual citizenship as a right in 2001, stressing the need to create a strong sense of belonging. Moreover, since the late 1990s, the Conservative Party have supported a language requirement for citizenship, which the Liberal Party also began to support with success in the 2002 parliamentary election. In government, the two parties initiated a revitalization of citizenship by appointing a commission to deliver a report on, among other things, potential ways of using citizenship as an incitement for further integration. However, the report discouraged the use of a language requirement, and the ensuing law proposal only introduced a new voluntary citizenship ceremony that received broad support from the opposition parties (Jensen, 2016). In recent years, the Social Democrats, which have formed government since 2014, have begun supporting mandatory language training and an easy language requirement for naturalization (Milani et al., 2021).

Even though the Conservative Party occasionally talk about Swedish culture being the foundation of a multicultural society, they simultaneously appreciate that society at large must open itself up and accept cultural diversity in order to flourish in a globalized world and they clearly distance themselves from any notion of Swedish nationhood as culturally fixed (Jensen, 2016). Most political parties, including the Social Democrats, subscribe to a rather pluralist account of nationhood (Borevi, 2014; Jensen et al., 2017). Yet, recently the Social Democrats have begun talking about the importance of shared liberal values in the context of immigrant integration (Milani et al., 2021). Still, Swedish citizenship politics is characterized by broad political consensus and stability. It is an area of politics with a low degree of societal and political salience.

It is particularly telling that since the far-right party the Sweden Democrats – a party inspired by the Danish People's Party and Danish immigration and naturalization policy – won their first seats in parliament in 2010, all other political parties have rejected cooperating with them. In fact, the Conservative party (the largest party on the right) even rejected to form a government based on a parliamentary majority that included the Sweden Democrats when this was an opportunity in 2014 and 2018. In the 2018 election, the Sweden Democrats won 17.6 per cent of the vote and since then several centre-right parties, including the Conservatives, have softened their stance, although they still reject cooperating on immigration and naturalization issues.

CONVERGENCE OR DIVERGENCE?

During the late 1990s and early 2000s, many European governments adopted the analysis that the integration of immigrants had failed and that naturalization requirements such as integration courses, language and knowledge tests and economic self-sufficiency are viable tools to incentivize individual integration efforts. In some cases, such as Denmark and the Netherlands, it was also a case of formalizing existing requirements. Some scholars argued that this was a turn away from old national models of integration towards a new, shared civic integration model that defined the core of national membership as reciprocity in the form of working and adhering to secular-liberal values. Looking at how citizenship policies and public debates developed in the 2000s, this analysis appears probable. Many Western states were indeed implementing mandatory integration courses and tests and took part in the same story of a failure of multiculturalism and integration and emphasizing liberal values as the core of nationhood and a shared sense of belonging.

Yet, the convergence of the 2000s did not continue into the 2010s. As documented above, since 2010 citizenship policies have not changed much in many countries – particularly Germany and the Netherlands. Sweden never took part in the restrictive policy turn and Denmark has continued along the restrictive path established in the 2000s. Consequently, Germany and the Netherlands have quite similar policies today – especially if counting the policy changes proposed by the current governments in the two countries – while both appear further from the policy regimes of Denmark and Sweden than they were in the late 1990s. So, whether we see convergence or not is very sensitive to which countries we compare during which time periods.

Moreover, the national debates are no longer as similar. In Denmark, both centre-left and centre-right parties, especially the major bloc parties, have rallied around a similar ethno-cultural notion of Danishness and retaining highly restrictive naturalization requirements. Indeed, nothing in Danish politics suggests that any requirements will be eased in the foreseeable future, and a stable majority of political parties – including the Social Democrats – do not see low naturalization numbers as problematic. Citizenship is described as a gift from the Danish society reserved to those immigrants that integrate and adjust to Danish society and culture to the extent that it becomes an entrenched part of their identity. None of the major parties express any concern for the negative impact on social cohesion or democratic quality caused by having large groups of permanently settled immigrants and descendants without Danish citizenship.

Denmark is the only one of the four countries where such an understanding of nationhood and citizenship has come to dominate. In the other countries,

it is indeed present among some right-wing parties – in Sweden it is only the far-right Sweden Democrats that subscribe to such ideas, while it also turns up among centre-right parties in the Netherlands and Germany. Yet, ethno-cultural notions of nationhood and highly restrictive integration requirements are met with resistance in all three countries. In Sweden, it is also centre-right parties that denounce such notions of citizenship, while it is mostly left-wing parties in the Netherlands and Germany that promote pluralistic accounts of nationhood and resist highly restrictive policies.

Still, most of the political left and right in the Netherlands and Germany accept integration requirements – even if they disagree on the right level of demandingness – and also that they have a function in terms of promoting integration. The political left in both countries is more likely to view naturalization as a stepping-stone in the integration process – as a precondition of integration – while the political right is more likely to see it as the end-goal of the integration process. Hence, the political right often seeks more demanding integration requirements and is less concerned with low naturalization rates. Similarly, the political left is more likely to understand nationhood in pluralist terms, while the political right is more likely to emphasize core liberal values in a culturalized fashion where they become 'our' values and are tied to national traditions and history. This creates a certain political balance, not only because there are two rival perspectives, but also because you find some sympathy for both perspectives in both left-wing and right-wing political camps. This appears to have the effect of restraining the number of policy changes.

All in all, there is little to suggest that these four countries are all moving towards a similar civic integration model less concerned with nationhood and more concerned with employment. Instead, Danish political parties have converged on a highly restrictive model and ethno-cultural understanding of nationhood, while Swedish political parties on both sides deny the notion that social cohesion and the sustainability of the welfare state rests on cultural homogeneity. However, if we only compared the Netherlands and Germany, it indeed would appear as if they have converged on a similar civic integration model. Both countries broke with policy legacies to form new naturalization policies – multiculturalism in the Netherlands and strict *jus sanguinis* in Germany – and have since implemented quite similar naturalization requirements. Moreover, the national debates have centred on the same concerns and have been structured by similar ideological differences between the political left and right.

8. Public opinion about migrant selection in Northern Europe

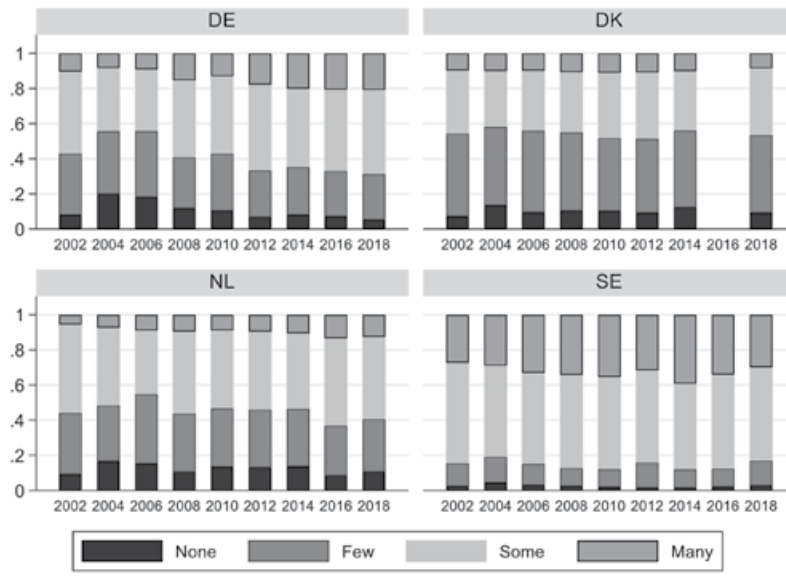
Troels Fage Hedegaard and Christian Albrekt Larsen

This chapter describes what kinds of migrants the residents of Germany, Sweden, the Netherlands and Denmark think should be granted permanent residency and citizenship in their respective countries. These questions about who to "let in" and who to give full "membership" are pivotal questions related to the progressive dilemma. Previous research has also demonstrated that attitudes to migration generally can be explained in terms of fears about both the economic and cultural impact of migration (Citrin and Sides, 2008; Sides and Citrin, 2007). Therefore, one way to mitigate the economic side of the dilemma is to ease the cost side of migration. This could be done by welcoming the migrants who are more likely to be an economic gain and rejecting those who are more likely to be an economic loss. With such policies in place, migration could potentially turn into an economic gain, even in welfare states providing a large package of services and benefits. Migrant selection might also be a way to ease the cultural us-and-them divides by selecting cultural proximate migrants and rejecting the culturally distinct. The chapter describes widespread public support across the four countries for selecting migrants based on economic potential and cultural proximity.

The chapter is divided into seven sections. In the first section, we provide an overview of public opinion measured in face-to-face interviews in the flagship European Social Survey (ESS). Following previous research, we describe public scepticism about migration from outside Europe and public polarization. In the second section, we introduce results from primarily experimental designs. In the third section, we describe the methodology of our conjoint experiment conducted in the four countries in 2019. In the fifth section, we describe results for public attitudes to giving residence. In the sixth section, we describe public attitudes to giving full citizenship. The final section summarizes our findings.

PUBLIC OPINION MEASURED IN THE EUROPEAN SOCIAL SURVEY

The migration issue has been on the public agenda for decades and turned into the dominant theme during the "refugee crisis" in 2015, as described in Chapter 1. The dominant interpretation is that the Northern European public is sceptical about the inflow of non-European migrants with low human capital (Eger et al., 2020). To illustrate this, Figure 8.1 shows public attitudes to the question of how many migrants from poorer countries outside Europe their country should allow to settle in the country, using the ESS (foreign-born excluded).



Notes: Foreign-born excluded. Not-weighted. The wording of the question: "To what extent do you think [country] should allow people from the poorer countries outside Europe?".

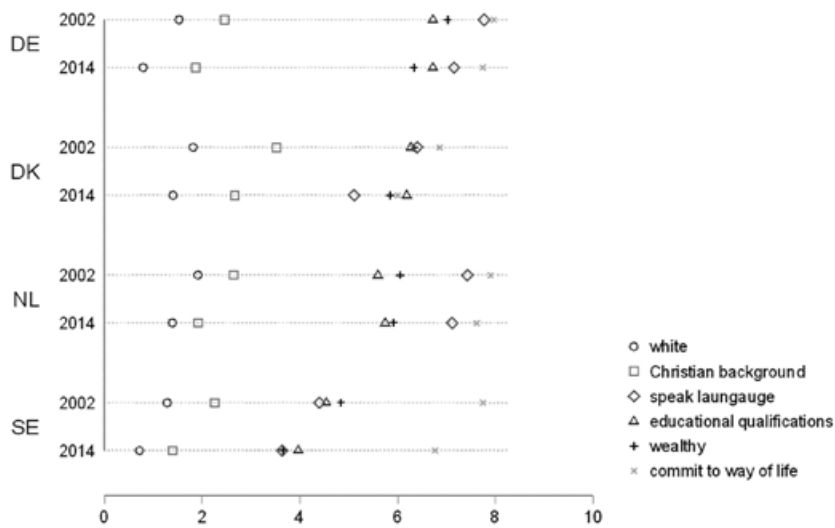
Figure 8.1 Public attitudes towards the number of migrants entering from poorer countries outside Europe

In all four countries, it is a small minority who answers that "many" non-EU migrants from poorer countries should be allowed to settle in their country. In the Netherlands and Denmark, the share is below 14 per cent in the period from 2002 to 2018. In Germany, the share of the population who supports allowing "many" has increased over time, but still only constitute 21 per cent in 2018.

Sweden is the exception, where up to 40 per cent in 2014 answered "many". However, by 2018, the share is down to 30 per cent in Sweden. Thus, in all three countries, the majority consists of the other more sceptical categories answering "some", "few" and "none". The extreme "none"-answer makes up 5 to 20 per cent in Germany, Denmark and the Netherlands. Thus, the idea of polarized opinions seems to apply to these three countries, while Sweden is distinguished by having a very marginal group answering "none": below 5 per cent in all years. Thus, in the ESS, the Swedish respondents seem more welcoming and less polarized than the public in the other three countries. Another relevant observation is that the "migration crisis" of 2015 did not much alter attitudes towards the inflow of migrants from poorer countries outside Europe in Germany, Denmark and the Netherlands. In contrast, there was a 10 percentage-point decline in the share answering "many" from 2014 to 2018 in Sweden.

The level of rejection of migrants from poorer countries outside Europe is an indication of public attitudes to migrant selection. It is, however, a quite indirect measurement, which tells us little about public attitudes towards the more sophisticated migration selection, which states conduct every day. A more direct measurement is provided in the ESS from 2002 and 2014, where the respondents were asked to rate the importance of various attributes for deciding whether a foreign-born (unspecified) should be able to come and live in the country. The respondents rated the six aspects on a scale from 0 (extremely unimportant) to 10 (extremely important). The results are shown as the mean scores in Figure 8.2.

In all four countries, being white and having a Christian background are assigned the least importance. On the 0–10 scale, the mean score for both categories is below four in all four countries. Furthermore, one sees a drop in the assigned importance to these criteria from 2002 to 2014. This speaks against the idea of the public supporting the selection of the most culturally proximate migrants. At the other end of the scale, the highest importance is assigned to the attribute of being committed to the way of life in the respondent's home country. Thus, while ethnic criteria are assigned low importance, there is more emphasis placed on being committed to assimilating. Speaking the language was assigned high importance in Germany, the Netherlands and Denmark, but with a decline in importance from 2002 to 2014, especially so in Denmark. In this regard, Sweden stands out as the exception, as destination country language proficiency ranks markedly lower. The results also show that having good educational qualifications and being wealthy fall in between ethnic attributes and the commitment to assimilation. While the importance of being wealthy declines a little in all countries from 2002 to 2014, the importance of education remains the same in Germany and increases a little in the Netherlands. The ESS results confirm what we know from the literature, that



Notes: Foreign-born excluded. Not-weighted. The wording of the question: "Please tell me how important you think each of these things should be in deciding whether someone born, brought up, and living outside [country] should be able to come and live here. Firstly, how important should it be for them to be …".

Figure 8.2 *Public importance assigned to various attributes for deciding whether a foreign-born should be able to come and live in the country: mean scores on a scale from 0 (extremely unimportant) to 10 (extremely important)*

the four countries are civic nations (Larsen, 2017), who also place importance on assimilation, though Sweden does stand out as a bit of an outlier.

The results from the ESS tell us a lot about attitudes to migrant selection, but also come with some important limitations. The most obvious is that the ESS has not covered public attitudes towards giving full citizenship, which we cover in this chapter. Furthermore, a methodological limitation is that data were collected in face-to-face interviews, where interviewers visited respondents in their homes. In contexts with strong liberal norms about freedom of religion and irrelevance of skin colour, this face-to-face interaction might lead to issues of social desirability bias (An, 2015) or non-response (Piekut, 2021). This can obscure the real preferences, compared to the secrecy of the voting booth, where large segments have voted for anti-immigrant parties, as described in Chapter 9. Below we use online data-collection and vignettes to lower such social desirability bias. Another methodological problem is that it is difficult to tell what it is about migrants from poorer countries outside Europe that makes

natives reluctant to give "many" access. Below we use conjoint experiments to find the relative importance assigned to different attributes.

EXPERIMENTAL EVIDENCE

The literature on the public's attitudes on who should be granted access or residence has mainly focused on how attitudes tend to be polarized along various lines (Ceobanu and Escandell, 2010; Hainmueller and Hopkins, 2014). This can be across economic lines, comparing winners or losers on migration (Burns and Gimpel, 2000; Scheve and Slaughter, 2001), across national versus cosmopolitan identities (e.g. Inglehart and Norris, 2016), or between mainstream voters and those mobilized by anti-migration rhetoric to vote for far-right parties (Eger and Valdez, 2015; Kitschelt and McGann, 1997; Zaller, 1992; Hellwig and Sinno, 2017). The interpretation of polarization is, however, challenged by several studies, which, utilizing experimental designs, show a consensus of criteria for selecting migrants (Hainmueller and Hopkins, 2014; Hainmueller et al., 2015; Harell et al., 2012; Reeskens and van der Meer, 2019; Sides and Citrin, 2007; Weiss and Tulin, 2019).

Survey experiments have the advantage that the researchers can directly manipulate the traits of different migrants. For example, the survey experiment embedded in the ESS from 2004 asked about "skilled from Europe", "skilled from outside Europe", "unskilled from Europe" and "unskilled from outside Europe" (Blinder and Markaki, 2019). The results indicate that there is greater support for skilled migrants and little distinction between coming from inside or outside Europe. However, such classic split-sample experiments also have limitations. For every attribute added to the study, the sample is split an additional time. Further, the problem is that the variations might carry many different meanings. "Skilled" might carry meanings of religion, economic means, or reason for migration, while "outside Europe" in itself has little meaning. More specific manipulation of the country of origin has the same problems when it comes to interpretation because the origin countries become a black box for many different attributes such as culture, religion, or general levels of human capital.

Therefore, we apply a conjoint survey experiment, which varies several migrant attributes at the same time. This allows us to describe the marginal effect of each factor (more on the method in the section below). To our knowledge, only two other conjoint studies on migration selection have been conducted in Europe, and they both differ in important ways from ours. The first study is by Weiss and Tulin (2019), who cover the German case for access to residency in the municipality of the respondents but with a specific focus on the importance of the migrants' following a mentoring programme. They found that labour market-related issues (i.e. profession, student/doctor,

education, employment plans, and language capacity) mattered. They also found that taking these traits into account, there is no direct effect from the country of origin (i.e. Afghanistan, Eritrea, Kosovo, Nigeria, Pakistan, Sudan and Syria, and reference Serbia). However, they did find a weak negative effect of being a Muslim (compared to an atheist). The second study is by Bansak et al. (2016); during the refugee crisis in 2015 they studied attitudes to let asylum seekers stay (or be sent back to the country of origin) across 15 European countries. They find that their respondents are less likely to accept asylum seekers who have inconsistencies in the asylum records, who are men, who are older, Muslim, or agnostic (compared to Christian), who migrate for economic reasons (compared to persecution for political, ethnic or religious reasons), and who have little or no language skills. In contrast, they find that respondents with a history of work and who are more vulnerable due to PTSD, torture, handicaps, or have no family are more welcome. Similar to the studies presented earlier, they find little to no effect from the country of origin. This study is very similar in set-up to ours but differs both in terms of the migrants in question (i.e. asylum seekers versus non-EU migrants in general), the timing of the survey (i.e. during the "migration crisis" in 2015 versus more ordinary circumstances in 2019 and 2020), and the attributes used to describe the migrants (see below).

Studies of native Europeans' attitudes to migrant selection for citizenship are limited. Using regular surveys in Germany (ALLBUS 1996 and 2006), Diehl and Tucci (2011) report on public attitudes to preconditions for naturalization as deemed more or less important. They find that being born in Germany, being of German descent, or being a member of a church is generally perceived to be of low importance, while mastering the German language, adaption to the culture, the ability to earn a living, and not having committed a crime is of high importance. These patterns are similar in both years, though more distinct in 2006 than in 1996. Based on this they conclude that criteria related to what they labelled "civil-cultural factors" seem to be of greater importance than "ethnic factors" (see also Erdal et al., 2019 for a study of younger cohorts' attitudes to naturalization criteria in Sweden, Denmark and Norway). A more advanced design is found in Hainmueller and Hangartner (2013), which provides results from the local ballot box voting procedure in practice in Switzerland until 2003. Analysing 2400 recorded naturalization referendums across 45 municipalities, they found little effect from the provided information on gender, marital status, age, and migration history, some effect from skills (high-skilled less rejected) and unemployment (more rejected), and large effect from the country of origin (former Yugoslavia and Turkey more rejected). Thus, in these real-world referendums, ethnic origin seems more important than economic credentials for naturalization. A follow-up study (Hainmueller et al., 2015) showed that this real-world voter behaviour could

be replicated in the Swiss conjoint-experiment (see below), especially in the paired conjoint variety used below. Whether these Swiss results from real referendums and conjoint experiments are replicated in our Northern European context is studied below.

SAMPLE, DESIGN AND MEASUREMENT

Our survey experiment was conducted in Denmark, Sweden, Germany and the Netherlands at the end of 2019 and the beginning of 2020 using YouGov's online panels. In total, 8073 respondents were included in the study, almost equally split between Germany (n = 2033), the Netherlands (n = 2014), Sweden (n = 2013), and Denmark (n = 2013). Because we are sampling from YouGov's panels, the respondents are not fully representative of the population, and therefore national weights on age, gender, the region of the country, education, and vote in the last election are used to balance the samples. The conjoint design follows previous recent studies within social science (Hainmueller et al., 2015; Harell et al., 2012; Reeskens and van der Meer, 2019; Weiss and Tulin, 2019).

The respondents are given the following introduction to the study as a framing for the survey and to provide the overall definitions: "Thank you for participating in our survey. It will be about how the rules on migration should be in the future, regarding migration from countries outside the EU. In the context of this survey, a migrant is a person who is born in a country outside the EU, whose parents also are born outside the EU". Then respondents were exposed to three screens, each including two fictitious migrants: migrants 1 and 2; see Figure 8.3 for a random example. For each screen, the respondents were asked to indicate whether migrants 1 and 2 should be given the right to permanently reside in Germany, the Netherlands, Sweden or Denmark (depending on the respondent's country of residence). We use this as our dependent variable, which means that we will get six answers per respondent. The acceptance rate for each country was 57 per cent in Germany, 53 per cent in the Netherlands, 53 per cent in Sweden, and 48 per cent in Denmark. Thus, in the experiment, the Swedish public did not stand out as the most welcoming. The acceptance rate did not vary significantly across the three screens or between migrants 1 and 2.

The respondents were then introduced to the question about giving non-EU migrants citizenship with the following text: "Thank you for participating in our survey. There is debate about how the rules about granting citizenship to migrants from outside the EU should be in the future. Citizenship gives migrants the same rights and obligations as the rest of the population". Again, the respondents were exposed to three screens, each including two fictitious migrants: migrants 1 and 2. For each screen, the respondents are asked to

Einwanderer 1	Einwanderer 2
Männlich	Männlich
Spricht fließend Englisch	Spricht schlecht Englisch
Muslimischer Hintergrund	Muslimischer Hintergrund
Verlässt das Heimatland, um mit einem Ehepartner/Ehepartnerin zu leben, der aus dem Heimatland stammt und bereits in Deutschland wohnt	Verlässt das Heimatland wegen höherer Löhne in Deutschland
Hat keine Verbindung zum deutschen Arbeitsmarkt	Hat keine Verbindung zum deutschen Arbeitsmarkt
Qualifizierte Ausbildung	Qualifizierte Ausbildung
44 Jahre	64 Jahre

Figure 8.3 Example of the format taken from the German survey

indicate whether migrant 1 and migrant 2 should be granted citizenship in [Germany/ the Netherlands/ Sweden/ Denmark]. We will use this as our dependent variable, meaning we again get six answers per respondent. The acceptance rate was 54 per cent in Sweden and the Netherlands, 50 per cent in Germany, and 44 per cent in Denmark. Thus, in line with the actual policies, see Chapter 7, the Danish public stands out as the hardliners. Again, the acceptance rate did not vary significantly across the three screens or between migrants 1 and 2.

The variation in the attributes of the fictitious migrants can be seen below in Figure 8.4 (for residence) and Figure 8.6 (for citizenship). For each respondent, the attributes are chosen at random, but the overall categories are chosen to remain the same, although the order of the categories is also randomized. For instance, all of the fictitious migrants will have the category "religious background", but we randomized whether the migrant is described as having a Christian, Muslim or Hindu background. None of the options are mutually exclusive, and two profiles can also have the same attribute. This means that there can be overlaps, as in Figure 8.3, where both are men.

In total, there are 6912 possible variations of the residence profiles. We arrive at this number by multiplying the number of attributes shown in Figure 8.4 by each other ($8 \times 4 \times 2 \times 3 \times 3 \times 4 \times 3$). Even though we have 8073 respondents, split evenly among the four countries, who are presented with six profiles each, the approximate 48 348 answers (6×8073) would not be nearly enough if we were to compare directly between the profiles. Therefore, we use the average marginal component effect (ACME) from an ordinary least squares regression (OLS), which is the average marginal effect of one attribute in a given profile averaged over all the possibilities. For instance, we compare the effect of men versus women and then assume that all of the attributes that they are presented with are an average of all the possible attributes. Given enough variations, we can then estimate the relative utility or preference for each attribute (Hainmueller et al., 2015). For the naturalization profiles, we have 4320 possible variations. We arrive at this number by multiplying the

Table 8.1 Party groups by country

	Far left	Mainstream left	Mainstream right	Far right
Denmark	Enhedslisten Socialistisk Folkeparti Alternartivet	Socialdemokratiet Radikale Venstre	Venstre Konservative Liberal Alliance Kristendemokraterne Klaus Riskær Pedersen	Dansk Folkeparti Nye Borgerlige Stram Kurs
Sweden	Vänsterpartiet	Socialdemokraterna Miljöpartiet de gröna	Moderata samlingspartiet Centerpartiet Liberalerna Kristdemokraterna	Sverigedemokraterna
Germany	Die Linke	Sozialdemokratische Partei Deutschlands (SPD) Bündnis 90/Die Grünen	Christlich Demokratische Union Deutschlands (SDU) Christlich-Soziale Union in Bayern (CSU) Freie Demokratische Partei (FDP)	Alternative für Deutschland (AfD)
Netherlands	Socialistische Partij (SP) Partij voor de Dieren (PvdD)	Partij van de Arbeid (PvdA) Democraten 66 50PLUS	Volkspartij voor Vrijheid en Democratie (VVD) Christen-Democratisch Appèl (CDA)	Partij voor de Vrijheid (PVV) Forum voor Democratie (FvD)

number of attributes shown in Figure 8.6 by each other (4 × 3 × 3 × 5 × 3 × 4 × 2).

We expect to find consensus in what traits are preferred when comparing between the countries, as this has generally been the result in the literature. However, we also want to challenge this consensus, and we believe the best way to do this is through voting intention, as this captures both the cultural and economic side of attitudes to migration. To do this, we put the parties in the four countries into four overall groups: far left, mainstream left, mainstream right, and far right. The latter category is also sometimes referred to as radical- or populist-right parties (Kitschelt, 2007; Schumacher and van Kersbergen, 2016). How we coded the parties is presented in Table 8.1.

We will show the effects of each attribute by using graphs, as this visual representation is much more intuitive to understand than the massive tables they represent. For each attribute, there is a reference that the marginal effect of the attributes is measured against. The reference attribute is plotted at the top of each category and at the vertical line, which represents zero effect. The

"wings" on each attribute represent the confidence interval of statistical insecurity. Standard errors are clustered on the level of individuals to control for the fact that the six responses are given by the same individual.

PUBLIC ATTITUDES TO MIGRANT SELECTION FOR RESIDENCY

Figure 8.4 describes the marginal effects of the attributes across countries. The figure shows not only large variations in the impact of the attributes on the willingness to allow a non-EU migrant to live permanently in one of the four countries but also a remarkable consistency in the impact of the attributes across the four countries. Most of the attribute patterns are as expected from the previous experimental findings.

Starting with the reason for migration, we see that this attribute matters significantly for the respondents' preference for granting residency to migrants, independent of the other attributes. The reference attribute is personal persecution, which should be a strong reason for giving residency rights. Consequently, almost all of the effects are negative, which means that they are less prone to receive residency when compared to this category. The first of the attributes, civil war, is not significantly different from the reference category for any of the four countries, probably because our respondents see it as more or less the same. Next, we see that climate change has a negative impact, meaning that they are less prone to receive residency (see also Hedegaard, 2021). In Germany, for example, being a climate migrant is estimated to have a 12-percentage point lower acceptance rate than a personally persecuted migrant, all else being equal. This effect is even stronger for people moving because of poverty, higher wages, and especially better social rights. In Germany, for example, migration due to better social benefits is estimated to lower acceptance rates by 21 percentage points when compared to a personally persecuted migrant. We found somewhat mixed results for people moving to live with a spouse from the origin country (OC) or recipient country (RC). For the Netherlands and Germany, we see small negative effects of these attributes when compared to personally persecuted migrants, while the effect is not found in Sweden and is slightly positive for the RC spouse in Denmark. This is the largest variation that we find across the countries. Thus, for unknown reasons, migration due to marriage with a native matters more for acceptance in Denmark than it does in the Netherlands and Germany. However, in general, the effects of the reasons for migration are quite similar across the four countries.

We see a strong and straightforward relationship between the connection to the labour market and willingness to allow a non-EU migrant to live permanently in the four countries. The reference attribute is "no connection" to the

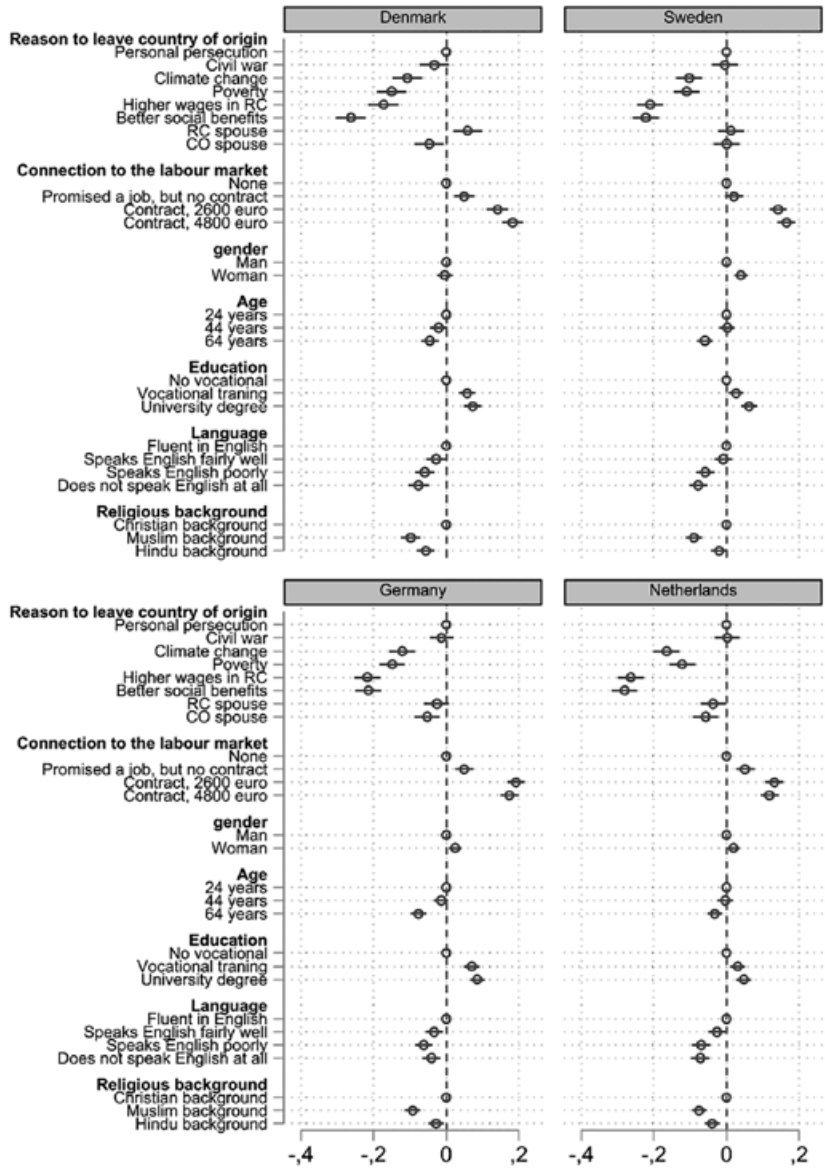


Figure 8.4 *The average marginal component effect of migrant attributes on the probability to allow a non-EU migrant to live permanently in Germany, the Netherlands, Sweden or Denmark*

labour market. The stronger the connection to the labour market, the higher the probability of acceptance. The effect from labour market connection is slightly smaller in the Netherlands than in the other three countries, but overall the pattern is the same. For education, we observe that migrants with vocational training or a university degree are preferred above those with no vocational education. However, there is no significant difference between vocational training and a university degree. In all four countries, we also find that those fluent in English are preferred over those with lower skills, although the graduation between different levels of proficiency is not statistically significant. Compared to other studies of willingness to allow migrants residency, this finding is a bit surprising (Green, 2007; Greene, 2008; Hainmueller and Hopkins, 2015). However, it is likely to be caused by the fact that labour market chances are covered by the other variables (i.e. the independent effect of English skills is lowered). It should also be mentioned that larger effects could probably have been found if Danish, German, Dutch and Swedish language skills had been included, as they were in the ESS; see Figure 8.2. We did not include proficiency in national languages because it is rarely found among non-European migrants entering these countries. Finally, our experiment indicates a small effect of gender: female migrants are slightly more welcome than male migrants in all countries but Denmark. Similarly, the older groups of migrants (64 years) are less welcome. However, in both cases, the effects are quite small. Our interpretation is that gender and age matter little when the other attributes are held constant by the conjoint method.

For religious background, we find that a Muslim religious background is estimated to reduce the acceptance by 9 percentage points in Germany, by 10 percentage points in Sweden, and by 8 percentage points in Denmark and the Netherlands. Thus, there is a punishment for being Muslim. This result is in line with previous experimental results but differs (for example) from the results from the ESS (2002/2014), where Christianity is reported to matter little when the respondents are asked directly in a survey. Our interpretation is that the conjoint survey experiment, in line with the list- experiment, is better at avoiding social desirability bias than are regular surveys, particularly face-to-face surveys such as the ESS. There is also a small independent effect from having a Hindu background as compared to a Christian background. This is smaller than from a Muslim background, but the effect is significant in Denmark, Germany and the Netherlands (but not in Sweden). The more unexpected results are that the Muslim penalty is as high in Germany and Sweden as it is in Denmark and the Netherlands, despite differences in political rhetoric and policy (Jensen et al., 2017). Our interpretation is again that this is a matter of the conjoint experiment being able to lower the social desirability bias.

These results indicate that the attributes of the constructed migrants matter equally across the four countries, both in terms of direction and effect sizes.

Thus, in general, we find a consensus on the importance of attributes across the four covered countries. The one exception was the Danish higher acceptance of spouses to natives than of refugees due to personal persecution.

Variation Across Voting Intentions

The apparent consensus seen in Figure 8.4 might hide internal polarization between segments. Figure 8.5 shows the relative importance of attributes among those who intend to vote for respectively the far right, mainstream right, the mainstream left, and far left.

The most remarkable finding is the absence of differences between the groups. In all four groups, good connections to the labour market, education, and language skills increase the likelihood of giving a migrant residency. Likewise, we also find a penalty from a Muslim and Hindu background in all groups. Even in terms of the Muslim penalty, we find that those who intend to vote for the far-right parties were not significantly different from the other two groups of voters. Our interpretation is that this might again be a matter of the conjoint experiment being able to lower the social sociability bias, which is especially important for those voting for mainstream parties. In addition, the voters of the far-right parties might also have more nuanced attitudes when presented with Muslim migrants with attributes other than being Muslim, such as good education, labour market connections, and language skills.

In terms of attributes connected to the reason for migration, the only statistically significant difference is that the far-right voters punish migration due to better social benefits less than do the voters from the other parties, in comparison to those migrating due to personal persecution. Again, our interpretation is that this is a matter of the far-right voters giving more agency to the personally persecuted than is the case among voters for mainstream parties. We also find that having an employment contract of 4800 euros per month is significantly more important for mainstream right-wing voters than for populist right-wing voters. This is expected, given the importance that mainstream right-wing voters normally give to the free markets and the importance of economic growth, in contrast to the more national-conservative ideas of populist right-wing voters in these four countries. However, the differences should not be overstated. Both groups have lower acceptance rates for migrants due to better social benefits in the country of destination. The direction is the same, it is only a matter of the relative importance of this attribute. From our point of view, Figure 8.5 indicates a consensus across all four voter groups, which is even more remarkable than the consensus on migrant selection found across Democrats and Republicans in the United States (Hainmueller and Hopkins, 2015).

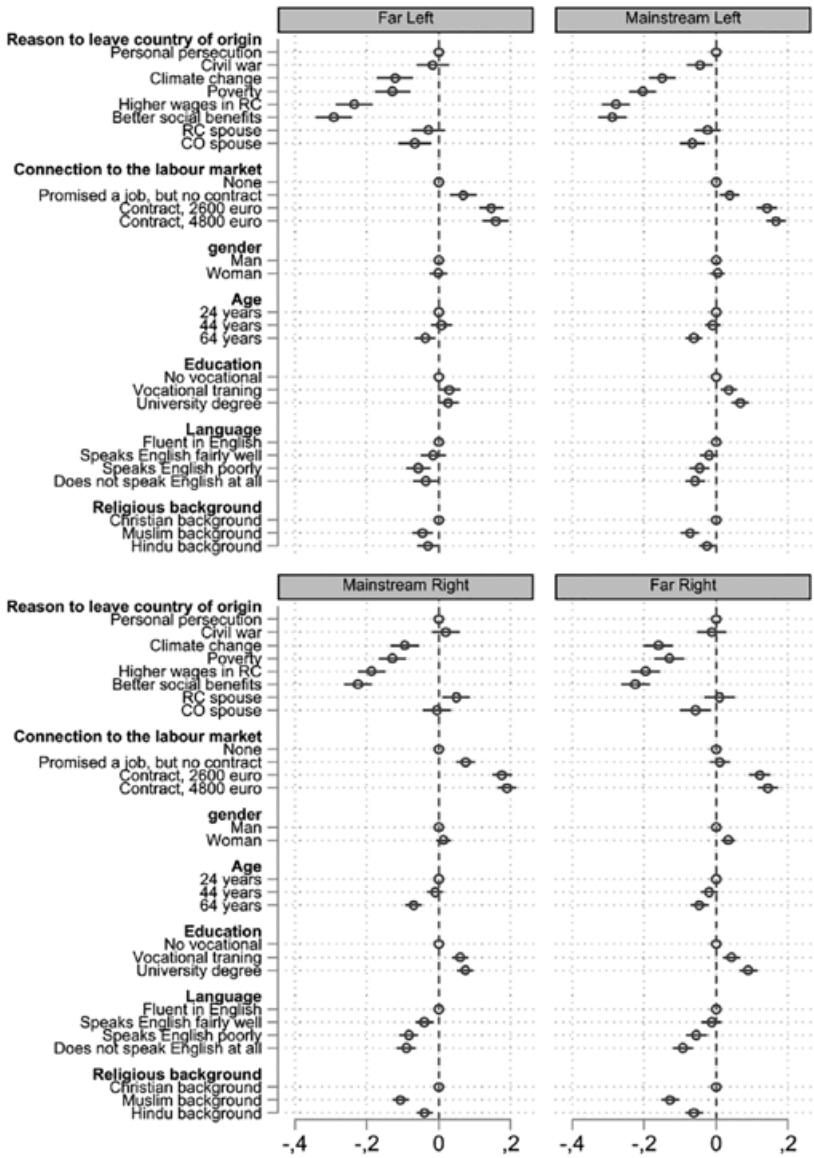


Figure 8.5 *The average marginal component effect of migrant attributes on the probability to allow a non-EU migrant to live permanently in Germany, the Netherlands, Sweden or Denmark across voting intention*

PUBLIC ATTITUDES TO MIGRANT SELECTION FOR NATURALIZATION

In the naturalization experiment, we also included the attributes of gender, education, labour market experience, and religious background. Instead of asking about English skills, as we did for the experiments on residency, we asked about the majority language in the four countries, so German, Swedish, Dutch or Danish. We changed this as migrants applying for citizenship have better possibilities to learn the language and because learning the language is often taken as a sign of bought willingness and ability to assimilate. Finally, we included family connections and time of residence in the destination country.

Variations Across Countries

The relative importance of the traits of migrants for attitudes towards granting citizenship is quite similar across the four countries, as seen in Figure 8.6. In all four countries we find that students, pensioners and the unemployed are less likely to be given citizenship than are the employed. The unemployed are around 18 percentage points less likely to be granted citizenship by the respondents than are those who are employed. The effect of education is not as strong. However, in all four countries the fictitious migrants with "vocational training" and "university degree" are more likely to be given citizenship than are those with "no vocational education". Those with a university degree are 4 to 6 percentage points more likely to be given citizenship than those with vocational training. We find no clear difference between having vocational training and a university degree. Thus, it is mainly a question of whether or not the migrants have an education. Our interpretation is that there again seems to be rational economic reasoning behind the migrant selection. It is important to note that the effects from labour market status and education must be present after controlling for the other attributes. In line with previous research, the strongest marginal effects are found for language skills. Those who speak the language of the destination country "not at all" are 21 to 23 percentage points less likely to be granted citizenship than those who speak the destination country language fluently. Those whose language skills are "poor" or "fairly poor" are found in between. Thus, in all four countries, there is a clear premium for speaking the language.

Family attachments to the country also matter. Those migrants with a native spouse and (mixed) children are between 13 and 22 percentage points more likely to be granted citizenship than those with no family attachment. The effect is somewhat greater in Denmark (22 percentage points) and the Netherlands (18 percentage points) than in Germany and Sweden (13 percent-

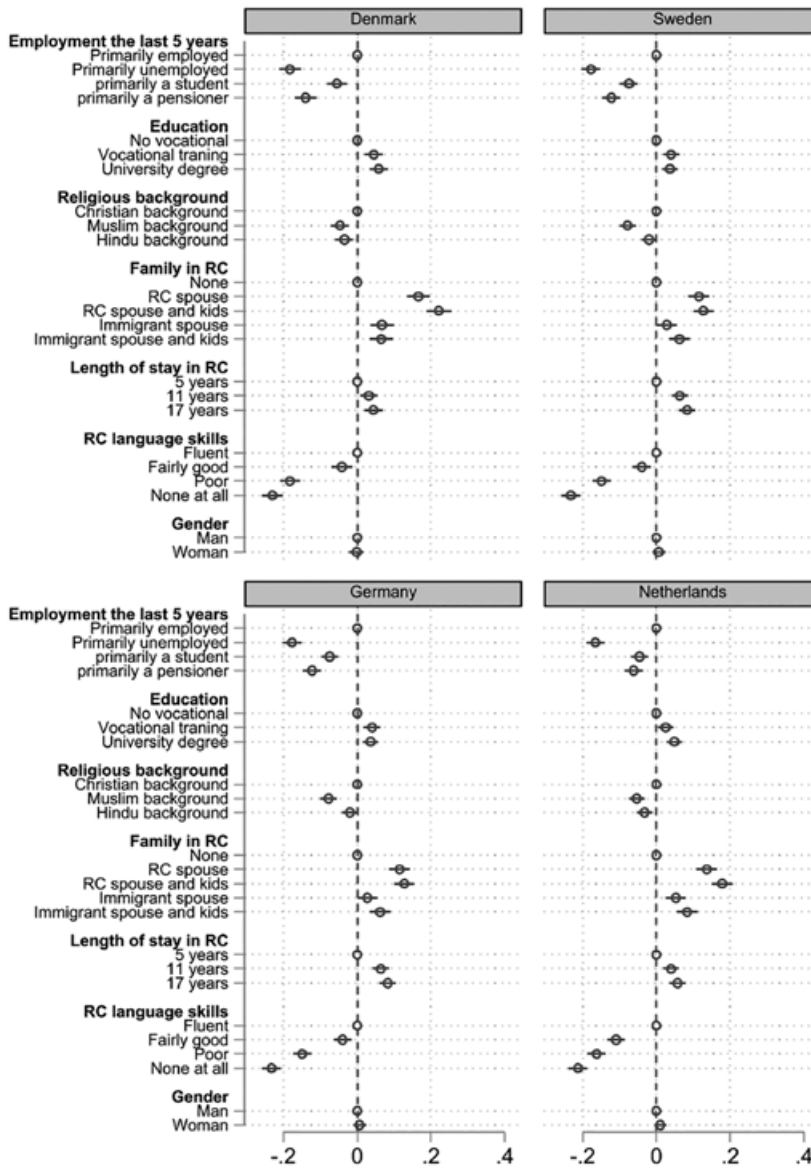


Figure 8.6 *The average marginal component effect of migrant attributes on the probability of granting non-EU migrant citizenship in Germany, the Netherlands, Sweden or Denmark*

age points). In between these two extremes are a migrant with a native spouse (without children), a migrant spouse with children, and a migrant spouse. In the Danish case, there is no distinction between the latter two categories.

The impact from time lived in the country is modest in all four countries. A migrant who has lived 17 years in the destination countries is only 4 to 8 percentage points more likely to be granted citizenship than a migrant who has lived five years in the countries. The independent time-effect is smaller in Denmark (4 percentage points) and the Netherlands (6 percentage points) than in Sweden and Germany (8 percentage points). However, it is a general pattern that time does not seem to be among the most important attributes. In fact, there is an indication in the data that time in combination with low language skills can lower acceptance rates (not shown). Thus, a fictitious migrant who does not speak the destination country language "at all" *and* who has been in the country for 17 years is less likely to be accepted than migrants who have been in the country for less time. Thus, in combination with attributes of less assimilation, time can be a drawback.

We again find a Muslim penalty in all four countries. A migrant with a Muslim background is 5 to 8 percentage points less likely to be accepted for citizenship than an immigrant with a Christian background. A migrant presented with a Hindu background falls in between. Thus, despite control for labour market status, education, language skills, family attachment, and years in the country, the public in all four countries is more likely to "give" full membership to a migrant presented with a Christian than with a Muslim background. The Muslim penalty is as sizeable in Sweden as in the other three countries. Finally, we find no significant effect, in any of the four countries, from the fictitious migrant being a woman and or man.

Variation Across Voting Intentions

Again, we compare across voting intentions to challenge the consensus presented in Figure 8.6. As in Figure 8.5 the voters are divided into far left, mainstream left, mainstream right, and far right parties.

Figure 8.7 again shows very similar patterns between the voters of different parties. Employment generally has the same overall effects, though voters of far-left parties do seem to place a little less emphasis on it than other voters. The impact of education is small and largely similar, but again the voters of far-left parties do seem to place a little less emphasis on it. For religious background, we see that not being of a Christian background carries a small penalty among all voters, but also that the effect is greater for Muslims than for Hindus among far-right and mainstream left parties. For mainstream right and far-left parties, there is no difference between how migrants of Hindu and Muslim backgrounds are viewed. The impact of family in the receiving

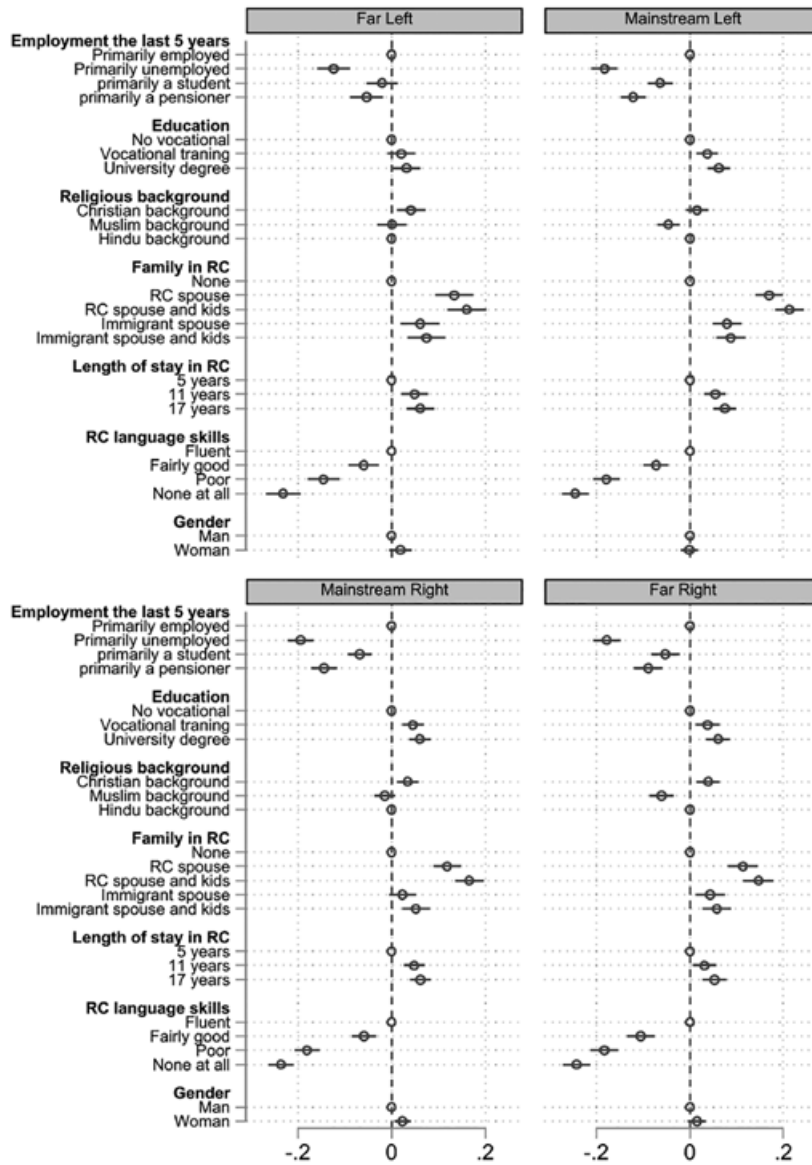


Figure 8.7 *The average marginal component effect of migrant attributes on the probability of granting non-EU migrant citizenship in Germany, the Netherlands, Sweden or Denmark across voting intention*

country is very similar between the party groups, though voters of mainstream right and far-right parties do seem to be a little less willing to grant citizenship to migrants with a migrant spouse. Language skills of the receiving country are viewed as important by voters of all the party groups, and the effect is very similar, with a lack of language skills being punished hard in terms of the willingness to grant citizenship. Finally, gender does not seem to matter.

THE PROGRESSIVE DILEMMA AND PUBLIC ATTITUDES TO MIGRANT SELECTION

This chapter describes attitudes to migrant selection, meaning the process by which some migrants are selected over others. As argued in the chapter, the migrant selection might also help mitigate the progressive dilemma as it can reduce some of its inherent economic and cultural issues (see further discussion in Chapter 9). Though this might be normatively unappealing to some, then states engage in this process every day, for example through the complicated set of rules for work migrants.

In the chapter, we do find support for migrant selection in all four countries, both regarding permanent residency and citizenship. Our conjoint experiment demonstrated that attributes related to human capital were found relevant in all four countries. Migrants of working age, with English language skills, education, and labour market connections were granted residency more often than migrants with low human capital. The economic line of reasoning also seems to apply to granting citizenship. The employed and those with education were more often given citizenship by the public. Our survey experiment even showed that this pragmatic economic reasoning could be found among populist right-wing voters. These findings are in line with findings from previous survey experiments, and in line with the importance given to educational qualifications given in ESS face-to-face interviews in the four countries.

Our conjoint survey experiment also demonstrated a preference for selecting the most culturally similar. In all four countries, we find a Muslim penalty for residence and citizenship as compared to having a Christian background. We even found a Muslim penalty among voters with mainstream voting intentions. These findings are in line with previous experimental findings but stand in contrast to the ESS face-to-face interviews conducted in the four countries. Our interpretation is that the joint experiment is better at revealing the actual preferences. Thus, despite strong norms of freedom of religion, the public in all four countries prefers rejection of the distinct Muslims, both in terms of residency and citizenship. The alternative to selecting the most culturally similar migrants is making the migrant more culturally similar through assimilation. Here the ESS findings from 2002 and 2014 indicate that the public assigns high importance to migrants' commitment to "the way of life" in the receiving

countries. Our conjoint experiment on naturalization supports these findings by showing that destination country language skills were the most important attributes. This result is controlled for the other attributes in the experiment. The length of time lived in the destination country also mattered in all four countries but, for us, had surprisingly little effect. Thus, in none of the four countries does the public adhere to citizenship following automatically from living 17 years in the country.

The chapter has largely demonstrated support for migrant selection both in terms of human capital, cultural similarity, and signals of willingness to assimilate. However, this does not mean that public support cannot be found for accepting culturally distinct migration with low human capital. Our residency experiment shows that personal persecution and exposure to civil wars did indeed increase the likelihood of the public providing residency permits. The conjoint experiment also shows a willingness to accept marriage as a legitimate reason for giving residency. Finally, the social sociability bias, especially present in the Swedish case, demonstrates that the public, as their politicians, is caught in a dilemma between humanitarian and liberal values on the hand and preference for selecting "the best" migrants.

9. Revisiting the progressive dilemma

Christian Albrekt Larsen

In this final chapter, I seek to re-visit the idea of a progressive dilemma based on the insights from the previous chapters. In Chapter 1, the idea was assigned to Goodhart, who in 2004 popularized the term in his essay "Too diverse?" published in the British *Prospect* magazine. In fact, the potential negative impact from immigrants has a long history. Karl Marx famously diagnosed that the British working-class movement was hampered by the inflow of cheap Irish workers. However, Goodhart's formulation is a good example of a more contemporary diagnosis, which resonates with politicians, the public and many contemporary social scientists, as described in Chapter 1.

The revisiting of Goodhart's formulation of the progressive dilemma is structured in nine sections. The first section describes the stability of welfare schemes in Northern Europe with a focus on social assistance. The second section discusses the idea of welfare schemes being a magnet for migrants from low-income countries outside the EU. The third discusses the idea that immigrants are an economic burden, especially for Northern European welfare states. After these sections, dominated by the economic reasoning behind the progressive dilemma, the fourth section discusses the political dynamics in the four countries, with a focus on the rise of anti-immigration/pro-welfare parties. The fifth section specifically discusses the politics of migration selection. The sixth section discusses the sociological dynamics imagined by the progressive dilemma. Finally, the progressive dilemma is put into perspective by theorizing the nation state as a club-good in the eighth section and outlining different future scenarios in the ninth section, the latter with a reference back to the four ideal types established in Figure 1.1 in Chapter 1.

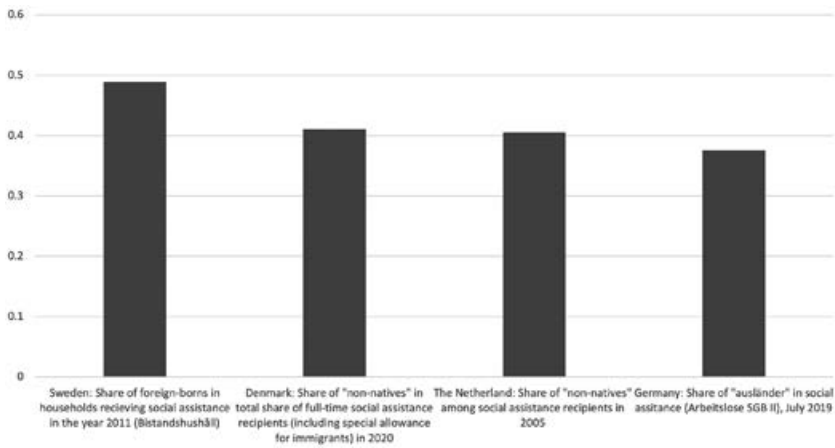
THE WELFARE STATES THAT DID NOT DISAPPEAR

The first simple point to make, which is made by many of my colleagues, is that the European welfare states did not disappear, not even in those countries with the most generous schemes and the largest inflow of immigrants from low-income countries. The OECD database tracking social expenditure back to 1980 indicates stability. Looking systematically at social expenditures for all OECD countries from 1970 to 2007, Soroka et al. (2016) find a weak neg-

ative relationship between changes in the share of foreign-born and changes in social expenditure as a percentage of GDP. They conclude that if there is any effect at all, immigration only made social expenditure grow at a slower pace than in countries with less immigration. Thus, the large prediction of vanishing European welfare states did not happen. There is evidence that spending on unemployment benefits might have been reduced. Looking at specific expenditure, Soroka et al. (2016) do find that changes in the share of foreign-borns go together with lower increases in expenditure on unemployment benefits, in the period from 1980 to 2007 in OECD countries. Analysing 13 Western European countries from 1977 to 2007, Spies (2018: Chapter 6) also finds a negative relationship with the inflow of foreign-born, controlled for level of unemployment, economic growth and so on. However, reduction in unemployment benefits might be driven by many factors other than migration that cannot be incorporated into a regression analysis. In the Danish case, Larsen and Andersen (2009) for example show how retrenchment in unemployment benefits was primarily driven by new elite ideas about the working of macroeconomics.

The more relevant discussion is whether immigration led to a retrenchment of the social assistance schemes. Using the quasi-experimental set-up connected to the distribution of refugees in Swedish municipalities, Dahlberg et al. (2012) show that the inflow of refugees goes together with increased preferences for spending less on social assistance. However, in terms of actual spending, the link between changes in the share of immigrants and changes in spending is almost non-existent in the 13 countries studied by Spies (2018: Chapter 6), even with the suggested optimal specification for retrenchment. It is, however, true that there is an overrepresentation of immigrants in social assistance schemes, which easily turns politically salient. Figure 9.1 shows the relative share of immigrants in social assistance systems of the four countries covered by the book, using various indicators and national definitions available from the web pages of the national statistical units. The statistics in this field are haunted by different national concepts of "immigrant" and "native", differences in social schemes and differences in how to calculate receivers. Thus, the data in Figure 9.1 cannot be compared across countries. However, Figure 9.1 illustrates the basic fact that "non-natives" (calculated in various ways) in all four countries are overrepresented in the main social assistance schemes. At the timepoint available in Figure 9.1, the "non-natives" made up between 35 and 50 per cent of social assistance recipients (by national account with the highest share in Sweden and the lowest share in Germany). The share of "non-natives" of the total of social assistance recipients in the four countries resembles the share blacks made up in the Aid to Families with Dependent Children (AFDC) scheme, which until the reform in 1995 was the main target for right-wing political mobilization against the black dependency

culture (Gilens, 1996; 2009; Soss and Schram, 2007). Thus, as a point of departure, the inflow of immigrants from low-income countries created new opportunity structures for political mobilization against the old white and the new non-white "free-riders" in the Swedish, Danish, Dutch and German welfare states.

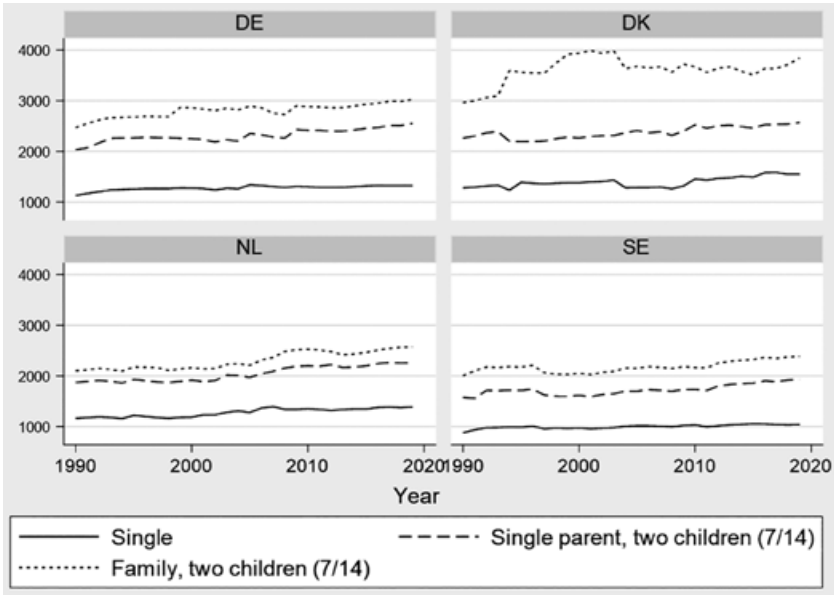


Source: Sweden/Denmark: Own calculations based on retrieved data from websites of national statistical units. The Netherlands: Own calculations based on Zorlu (2013). Germany: Own calculations based on retrieved data websites of Bundes Agentur Für Arbeit.

Figure 9.1 Share of "non-natives" in main general social assistance schemes: non-comparable national definitions

The inflow of immigrants from low-income countries, however, has not caused a decline in the means-tested social assistance systems (for able-bodied persons of working age). The generosity of these systems is immensely complex to describe as the main social assistance benefit often is supplemented with access to other benefits and services, typically housing benefits and extra child allowances, and the total "income package" might be subject to local discretion. However, the Social Assistance and Minimum Income Protection (SAMIP) dataset has calculated benefits levels for three model households in the period from 1990 to 2019. The first, and simplest, household consists of a single person of working age, implicitly a legal permanent resident of the country without access to unemployment insurance, disability pension or other more generous benefits than social assistance. The second household consists of a single parent and two children aged 7 and 14. This "lone parent" household is more complicated as it typically has access to extra housing benefits and child allowance. The third household consists of two parents on

social assistance and two children again aged 7 and 14. This "family" is also complicated as the social assistance level of the second adult is often lower than the first adult. Figure 9.2 shows the monthly "income package" (taking housing, child allowances etc. into account) for these three household types (in PPP-adjusted US dollars, fixed 2015 prices).



Source: Own calculation based on data from SAMIP, provided as part of the Social Policy Indicator (SPIN) database (Nelson et al., 2020). PPPs based on OECD 2017.

Figure 9.2 *Minimum income protection, amount per month (PPP-adjusted US dollars, fixed 2015 prices): three different model households*

In 1990, the single household received per month, in US dollars (2015 prices), $877 in Sweden, $1128 in Germany, $1167 in the Netherlands, and $1282 in Denmark. In 2019, levels were $1042 in Sweden, $1325 in Germany, $1391 in the Netherlands and $1551 in Denmark. Thus, in all four countries there has been a growth in the real value of the minimum income package for a single household. The same has been the case for single-parent and family households; see Figure 9.2. More or less the same pattern emerges if one only includes the main social assistance benefit programme estimated within the SAMIP database. The countries became richer along the way (a real GDP growth between 50 and 80 per cent over the three decades) and wages have

risen, which could lead to an expectation of rising benefits levels. Thus, if any retrenchment happened, it has been a matter of not developing the minimum income package enough. To this one should add that social assistance in the period became more dependent on job search activity and participation in the active labour market policy, as described in Chapter 4. However, American-style retrenchment has not been experienced.

The main potential retrenchment has been the exclusion of immigrants from the general social assistance scheme. The exclusion of EU migrants without a track record of formal work in the destination country is fairly simple. If they have lived less than five years in the country of destination, they can simply be asked to return to the member state of origin (but see Martinsen and Werner, 2019, for the court dispute about non-EU workers' access to social assistance in Germany). For those having, or formerly having EU-worker status, several transitional rules apply. The exclusion of non-EU migrants from social assistance is more complex. In all four countries, all residents of the country are entitled to assistance. Thus, as a point of departure, the exclusion mechanism is being or not being legally resident in the country, with the addition that receiving these means-tested benefits might have a negative influence on moving from having a temporary to a permanent legal right to reside in the country (see discussion on migration selection below). Only Denmark has introduced a transitional time requirement, established in 2002, abolished in 2012 and re-established in 2015. Initially, the requirement was seven years of residence within the last eight years. In 2018 this was changed to nine out of ten years. Those not qualifying receive approximately 60 per cent of the general social assistance benefit. As described in Chapter 3, those applying for asylum are entitled to less generous benefits in all four countries. In the Swedish and German cases, they may claim the ordinary social assistance before being given asylum. In the Dutch case, the asylum seekers enter the ordinary social assistance schemes after obtaining asylum. As described in Chapters 3 and 4, those getting asylum in Denmark receive a special benefit approximately 40 per cent lower than ordinary social assistance. Then after nine years they will be entitled to ordinary social assistance.

Of the four countries, it is Denmark which has pushed the limits of exclusion of non-EU migrants from social assistance. This has been done in a legal framework, which still applies a resident and not a citizenship criterion. Thus, Danish citizens who have not resided for nine out of ten years in the country will also receive a lower benefit. Denmark also introduced an upper limit to the value of all benefits that could be received (*kontanthjælpsloft*, primarily reducing the value of housing benefits) and work requirement (225 hours-rule) for receiving full benefits. While these terms also apply to Danish citizens, the changes were targeted at couples both receiving ordinary social assistance, where immigrants from low-income countries outside the EU were heavily

overrepresented. There is a clear political logic to this retrenchment; see below. However, there is also the functional logic that Denmark, according to the SAMIP data (see Figure 9.2), had, and has, the most generous benefit to social assistance families. In the Danish case, these indirectly targeted retrenchments have led to increased (relative) poverty rates for non-EU migrants living in Denmark. Thereby a specific (relative) poverty and child-poverty question has re-emerged in a Nordic context. However, it has re-emerged in the context where most households are unaffected and where all households have access to child care, free schooling, free university education, free healthcare and free elderly care (see Chapter 4 for the potential plans for increased exclusion of non-EU migrants in the Netherlands).

THE MAGNETISM MECHANISM

The magnetism mechanism is central to the idea of a progressive dilemma, as argued in Chapter 1. Our point of departure was the guest worker programmes of the 1960s, where the four states actively tried to recruit low-skilled labour. The backdrop was four booming economies in need of labour, especially in the industrial sector. As argued in Chapter 1, it is a standard pattern that economic development is a pull factor for immigration. As economic growth slowed in the four countries, and as the importance of industrial production declined, the guest worker programmes came to a halt in all four countries. Though there was an outflow to origin countries, the four countries found that many of the "guest workers" stayed in the country. When getting married, often with ethnic peers from the country of origin, most new couples choose to live in the Netherlands, Germany, Denmark and Sweden and not in the country of origin. Therefore there was a continuous inflow of immigrants from low-income countries, despite the official halt to labour immigration, and a sizeable second generation was in the making. Thus, there is little evidence that it was access to welfare schemes that triggered the initial movement of guest workers. If access to welfare schemes matters for work migrants, the magnetism effect is more a matter of immigrants staying, rather than a matter of work immigrants in origin countries calculating the optimal place to optimize return to their (absence of) human capital.

After the end of the guest worker programmes, the other large inflow of immigrants from low-income countries outside the EU came through asylum seeking, that is, using the legal rights of the UN refugee conventions in combination with the European Convention on Human Rights. In Chapter 2, it was argued, based on numbers from 2008 to 2015, that recognition rates and rules for family reunification were larger pull- and deterrence factors than was access to fairly generous social assistance. The latter turned out not to be insignificant for asylum applications.[1] This is an important corrective to the

initial formulation of welfare magnetism effects. Thus, in terms of deflecting asylum seekers, it is more a liberal dilemma related to the acceptance of international and national laws than a progressive dilemma related to generous social benefits. Thereby one can extend Joppke's (1998) argument about courts being pivotal for liberal states' acceptance of unwanted immigrants with the finding that applying to these rules also is estimated to be a significant pull factor. Thereby the Northern European countries are also captured in an internal game, where lowering acceptance rates and tightening rules for family unification in one country, for example in Denmark, deflects asylum seekers to other countries in the destination cluster, for example Sweden and Germany. Thus, without communication, coordination and courts, a potential race-to-the-bottom can be imagined. In Chapter 3, it was described how the social rights of asylum seekers were at a basic level in all four countries and indeed seem to deteriorate in the most generous country, Sweden. In the case of asylum seeking, Chapter 3 also describes how there is a long waiting time, often lasting more than a year, between arriving and potentially receiving the full benefits and services of the Northern European welfare state.

Another important supplement to the initial formulation of the magnetism argument is that economics might matter less in the future. Thus, the emphasis put on income gaps, for example in the classic migration hump model (House of Commons International Development Committee, 2004) needs rethinking. The big unknown is future climate change, where heatwaves could affect between 300 million to 2 billion vulnerable humans on the African continent (Marcotullio et al., 2021). In such a context, it is not those with the lowest human capital who manage to find resources to leave local areas, leave the country of origin, penetrate the external EU border and find their way to the Northern European countries. In a situation with personal persecution, war or unbearable climate conditions even those with a high return to skills in their origin countries have incentives to leave (in contrast to Borjas, 1999, where those with high return stay in the origin countries) and they are the most likely to succeed. This might lower the deservingness of arriving immigrants, as they are not completely helpless, but at the same time, it might ease integration into labour markets and educational systems.

My conclusion is that it is problematic to transfer the magnetism idea developed and verified in the American context to the European context. This is *not* to argue that access to welfare benefits and services for migrants with low human capital is irrelevant in a European context. The overall attractiveness of Europe is without doubt linked to the prospect of improved living standards and economic security, including what is provided by the welfare state to groups faring badly in labour markets. Furthermore, access to welfare benefits and services is probably important for decisions to stay in Denmark, Sweden, the Netherlands and Germany, though it might only have had a marginal effect

on the decision to come. However, as argued in Chapter 2, the basic utility maximization of the humanitarian migrants at the EU's external borders is likely to be fundamentally different from the utility maximization of work migrants with decent alternatives in a destination country such as Mexico. Therefore reduction in access to social assistance, such as the American Personal Responsibility and Work Opportunity Reconciliation Act of 1996, will be of less importance for the deterrence of migrants from low-income countries in Europe.

THE ECONOMIC BURDEN OF IMMIGRANTS

From the assumption of those with low human capital choosing to migrate to generous welfare states it followed that migrants would be an economic drain in countries such as Germany, Sweden, Denmark and the Netherlands. This prediction was false for the guest worker programmes of the 1960s. These programmes primarily attracted young men and women who worked and paid taxes without receiving much in return. The same is the case with the internal EU migrants from Eastern European countries currently working in the four countries (Martinsen and Werner, 2019). At least, in the short run, the migrant workers are an economic benefit for the receiving countries. However, the prediction does seem to hold for the groups entering from the asylum systems in the four countries (for example Ruist, 2015, on the Swedish case). In the reception phase, the economic drain is inevitable due to the location in often remote camps without the rights or the practical possibilities to sell their labour, as described in Chapter 3. Thus, in this phase, the economic burden is not (only) a matter of low human capital but a direct consequence of the set-up of the asylum-seeking system. It is a dilemma between costs, on the one hand, and, on the other hand, rationales about the deterrence of asylum seekers, prevention of labour migration through the asylum-seeking channel, and the ease of expelling those with rejected asylum applications. The four countries chose to bear the costs of non-working asylum applicants, as described in Chapter 3, in practice, including Sweden.

In the long run, the economic burden is dependent on unemployment levels. As described in Chapter 4, immigrants from low-income countries outside the EU do have higher unemployment rates than natives, especially among females. Based on EU-SILK data, Jakubiak (2020) demonstrates higher welfare dependency (when old-age benefits are excluded) among non-EU immigrants in Denmark, Sweden and the Netherlands (Germany is not included due to missing data on migration status). However, an important corrective to the low human capital diagnosis is that the four countries have not simply accepted high unemployment rates in these groups. In contrast, all four countries developed labour market policies aimed at facilitating the inte-

gration into the labour market. Chapter 4 described how all four countries have initiated demand-side, supply-side and matching measures. In doing so, the Swedish and Danish strategies rely on the many tools of their generally active labour market and refrain from lowering wages, partly as a result of strong unions (see also Breidahl, 2012, for the Swedish and Danish case). Thus, it has always been part of the progressive Nordic project to reduce a (potential) gap between negotiated wage levels and the human capital of workers. The successfulness of this "mission impossible", challenging the basic laws of neoclassical economics, varies. Some of the classic active labour market policies show greater effects among the group of immigrants, maybe because discrimination is part of the absence of a match between supply and demand; see Chapter 4. In practice, however, wages and working conditions do deteriorate in smaller segments of the Nordic labour markets dominated by immigrants. However, this is primarily a matter of the inflow of Eastern European work migration (Refslund, 2016; Wagner and Refslund, 2016) rather than the effect of migrants from low-income countries outside the EU.

The Dutch and German strategy for combating unemployment among immigrants with low human capital is less developed than in the Nordics. As described in Chapter 4, the Dutch active labour market policies towards refugees are more recent and less institutionalized than in Sweden and Denmark. Neither do there seem to be strong efforts to open the regulated Dutch labour market specifically for these groups (besides attempts to recognize educational origin country certificates and new matching systems). Thus, as described in Chapter 4, by 2019 the Netherlands had some of the largest employment gaps between native and foreign workers. Germany was also a latecomer, especially concerning an introduction programme, which first was established after the inflow in 2015. Though being a latecomer, the policy instruments largely resemble those found in the other three countries; see Chapter 4. Before the recent inflow, one can observe how wages levels have declined, which eases the matching of immigrants with jobs. Thereby the economic gain of immigration increases for the state, employers, and natives benefiting from cheap service personnel. At the same time, the ability to find jobs (that are not so low-wage from an immigrant perspective) makes the German labour market more "magnetic" than those found in the other three countries. This liberal trend is linked to the Hartz reforms, which generally sought to liberalize parts of the German labour market (Seeleib-Kaiser, 2016). From a progressive perspective, the downside is naturally that wage and working conditions deteriorate for large segments of the labour market. In the German case, the workaround has been the introduction of a legislated minimum wage in 2015, clearly, a second-best solution seen from the perspective of (Nordic) unions.

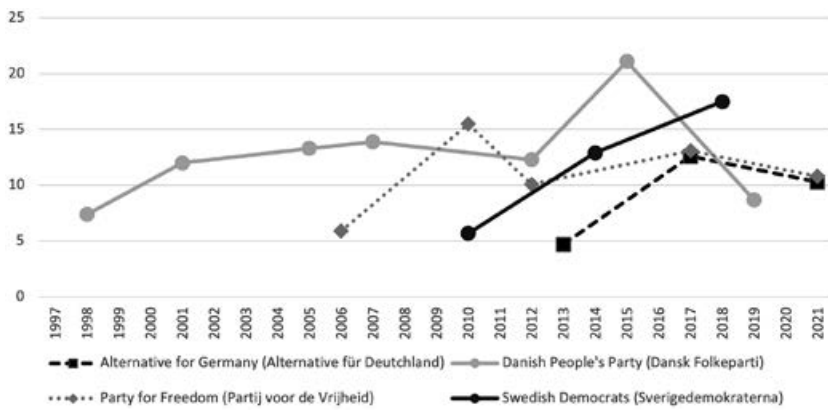
The calculation of economic costs associated with the inflow of immigrants from low-income countries outside the EU is based on public expenditures

contrasted with tax revenues. However, in the long run, the big unknown is the issue of demographics. The four countries of the book have for decades had fertility rates below the 2.1 level needed for the populations to be able to reproduce themselves. Thus, without an inflow of immigrants, the four countries would have experienced a significant population decline. In particular, Germany would have been hit hard as fertility rates had already fallen below 2.1 in the 1970s. It is difficult to get an idea of the counterfactual experience of Germany, Denmark, Sweden and the Netherlands not experiencing an inflow of immigrants described in Chapter 1. Nevertheless, seen from a broader historical perspective, the lesson is clear. A sizeable population is an asset for a nation-state. It is telling that the most celebrated social engineers of the progressive Swedish model, the Myrdal couple, in their famous book *Kris i Befolkningsfrågan* [Crisis in the Population Question] (1935) argued for increasing the population through increased fertility rates utilizing family-friendly welfare policies (in contrast to the Malthusianism argument of their times).

THE POLITICAL DYNAMICS

The political mechanisms attached to the progressive dilemma are also modelled over the American case, as argued in Chapter 1. There is already an extensive body of literature discussing the ability to infer from the American to the European situation (for example Banting, 2005; Eger, 2010; Larsen, 2011; Spies, 2018). The potential added value of this book is to apply it to the nuances of the four countries. First, as noted in Chapter 1 and by other scholars, there is a fundamental difference between establishing and maintaining welfare benefits and services. Since the 1960s, Germany, the Netherlands, Sweden and Denmark have had large constituencies with vested interests in the existing welfare schemes. They also have populations that have come to think of welfare benefits and services as a natural part of modern society. Thus, as argued by Pierson (2001), the political opportunities structures for the overall retrenchment of welfare states have been modest. When retrenchment has occurred, it has in all four countries typically been in opposition to the will of the citizens. Secondly, scholars sometimes forgot that "welfare" has a different meaning in the American context than in the Northern European context. In Northern Europe, it incorporates schooling, healthcare, pensions, child- and elderly care, while in an American context it refers to means-tested social assistance schemes. The hard American evidence of a progressive dilemma was based on blacks' access to these residual schemes. The other (broader) welfare benefits and services followed different political logics. Thirdly, in the initial formulation of a hard progressive dilemma, e.g. Alesina and Glaeser (2004), there was no attention to the difference in party systems (see Spies,

2018 for the same point). In the American first-past-the-post two-party system, an anti-migration/anti-black vote was a vote for the Republican party, which also wanted to retrench welfare benefits and services. In the Danish, Dutch, Swedish and German proportional multiparty systems, the anti-immigration segment gave rise to new parties that did not necessarily oppose the welfare state. The most successful of these instead combined the anti-migration position with a pro-welfare position. This was the case of the Danish People's Party (*Dansk folkeparti*), the Dutch Party for Freedom (*Partij voor de Vrijheid*), and the Swedish Democrats (*Sverigesdemokraterne*), while The Alternative for Germany (*Alternative für Deutschland*) is still struggling to find its political position on the classic left–right dimension. Thus, anti-migration was not linked to support for welfare states' retrenchment, as in the US. See Figure 9.3 for voting shares since the first entry of parliament (see Gerdes and Wadensjö (2008) for a more causal analysis of this mechanism).



Source: Retrieved from parties and elections in Europe, by Wolfram Nordsieck http://www.parties-and-elections.eu/index.html.

Figure 9.3 *Share of all votes at national election among successful anti-migration parties: from the first entry of parliament to the latest election result*

The logical position of the anti-migration/pro-welfare parties was to restrict migrants' access to welfare schemes and reserve, or even extend it for the natives, especially the elderly (Koning, 2020; Rathgeb and Busemeyer, 2022). While lowering benefits and services specifically for blacks (while maintaining them for whites) is out of the question in the US, the differentiation based on "natives" and "non-natives" resonated in large segments of the Northern European public. At least in principle. In practice, it comes down to spe-

cific benefits and services. Asked directly about access to specific schemes, the public of the Northern European countries (including the voters of the anti-migration parties) largely wanted to uphold existing access rule, including migrants' free access to service provisions (Eick and Larsen, 2021; Larsen, 2020). The classic contribution-based benefits found in Germany are also somewhat sheltered from public opposition as there is link between taking out and putting in (Ruhs and Palme, 2018); see below on free-riding.

Instead the public political discussions focused on access to social assistance and the special case of EU migrants' access to child allowance sent to children living in the origin country. The social assistance schemes are indeed *not* defended by large and resourceful groups. Those reliant on these schemes are the unwanted immigrant and the deviant natives. With the overrepresentation of non-EU migrants, this is one of the areas where mainstream right-wing parties and the rising pro-welfare/anti-migrant parties might find consensus. However, as argued above, even in the case of social assistance, one has not seen a general retrenchment of the schemes. This might be open to different interpretations. In the German case, the political dynamic to redraw social assistance as a sanction mechanism for non-compliance was counteracted by the Supreme Court in November 2019's decision about a right to minimum allowance to all residents (Gantchev, 2020); see Chapter 4. The Supreme Court does not have the same authority in the three other countries. Here the social assistance schemes seem to be defended by national ideologies about being non-accepting of poverty, especially child poverty. In the Danish case, the removal of low benefits to non-EU migrants in 2012 was exactly framed as removal of "poverty-benefits". The introduction of the lower benefits in 2015 indicates the instability of such protection, but at least increasing child poverty rates come with a political cost for governments in the four countries. So does the classic long-run social problems that arise from poverty.

MIGRATION SELECTION

The discussion of the progressive dilemma was often framed as a matter of open versus closed borders. Thereby the nation-state border was imagined as a fence, at varying heights. Therefore it ignored the fact that in rich advanced countries, the nation-states' boundaries primarily function as "filters". Well-established bureaucratic procedures have the effect that some migrants can cross nation-state boundaries easily, while others meet insurmountable fences (De Haas et al., 2018). The American visa types run from A, B, C, D up to V, with a myriad of pathways for turning temporary residence permits into permanent ones. Some of the largest schemes are the H1-B visas, whereby employers recruit high-skilled labour on the international market, and the H2 visas, whereby employers recruit seasonal workers (Borjas, 2001). The

filtering processes have also been in place in the four European countries. The establishment and closure of the guest worker programmes of the 1960s is a classic example of changing filtering rules (Ruhs, 2013). If the filtering is sophisticated enough, the progressive dilemma dissolves. The economic burden would disappear if only those with high human capital are permitted access. It is often imagined that the economic sustainability of large welfare states is dependent on companies attracting the best brains on the international global market. As demonstrated in Chapter 8, this logic can be found in the electorate in Denmark, Sweden, the Netherlands and Germany. The concerns for the erosion of broad national solidarity could probably also disappear if only those culturally similar to natives are permitted access. As demonstrated in Chapter 8, this logic can also be found in the electorate in all four countries. In a fascinating study, Elrick (2021) describes how the Canadian points system that replaced the race-based system in 1967 was not simply a matter of economic merits and objective family connections. At the ground level, and prior to the actual changes in legislation, the frontline workers established a "middle class multiculturalism" by selecting those migrants imagined to fit the existing (imagined) Canadian middle class society. With reference to Figure 1.1 in Chapter 1, one could interpret it as a policy of the "integrated-high-inflow-state".

There is indeed evidence that suggests that the four countries strengthen the filtering processes, making entrance easier for some migrants and more difficult for others. The deflection of work migrants from low-income countries outside the EU is done through strict visa requirements (including carrier responsibility) and the inability to enter the labour markets without legal residence permits. The possibility of entrance of non-EU migrants through marriage has also been tightened. Most severely in the Danish case, where the "native" (non-refugee) applicants are for example met with requirements about not having received social assistance within the last three years, not being convicted within the last 10 years, having housing facilities (minimum 20 square metres per person, located outside so-called "ghettos"), and filing a financial deposit (around 14 000 euros), while the migrating (non-EU) applicant, for example, is met with requirements about employment and education from their country of origin.

The deterrence of asylum seekers is more difficult due to the international obligations. The main strategy of the four countries has been to externalize this "dirty" deflection. The first line of deflection was the Dublin Convention from 1997, where asylum seeking was to occur in the first entry country. Due to geography, this means that the deflection was externalized to Southern and Eastern (after the EU expansion in 2004/2008) member states. As the system broke down during the "refugee crisis" in 2015 (arrival countries, not registering asylum seekers), the second line of deflection, Frontex, has been

strengthened. Thereby the four countries have externalized the deflection to an EU institution. The third line of deflection is the political deals made between the EU and countries such as Libya and Turkey. Thereby the deflection is externalized outside the EU territory, whereby legal responsibility connected to refugee convention is conveniently avoided for all EU members.

At the same time, the four countries try to attract other migrants. This migration selection is imminent in the green-card arrangements for high-skilled workers from outside the European Union. The four countries have had exceptions for work permits for required high skills in place since the general closure of the guest worker programmes (Lowell, 2005; Ruhs, 2013). However, based on 2001 data, Lowell (2005) shows that the EU countries, including Sweden, the Netherlands, Denmark and especially Germany, attracted fewer of these high-skilled workers than did the liberal welfare regimes such as Australia, Canada, United States, New Zealand and Great Britain, which could support the magnet argument about the high-skilled choosing low-tax environments. However, again one can observe that nation states and their political systems are not passive observants on structural conditions. In the so-called Lisbon strategy of the EU becoming the most competitive and dynamic knowledge-based economy, devised in 2000, the idea of picking the best employees entered the best-practice framework for countries (open method of coordination). Based on the 2007 legislation, Cerna (2014) found Sweden and Denmark to be more open to high-skilled immigration than USA and Canada, and Germany and the Netherlands more closed. In 2009, it turned into a "soft" Blue Card Directive that forced member countries (Denmark excluded due to exception of the Maastricht Treaty) to install such programmes (but with requirements and numbers still decided on the national level). In Germany for example, the applicant should have an offer for a job paying a minimum of 44 800 euros, with a threshold of 34 944 euros for an applicant on a list of professions that are high in demand.

This, however, is not a simple story about deterrence of the "bad" migrants and a competition for the "good" migrants, where policies can be deduced from the national interests. What complicates the matter is the four countries' embeddedness in more local open-border areas. Denmark and Sweden have since 1954 been part of a Nordic open border area, given the right to permanent residence and full social rights, social assistance included. The free mobility of workers across EU members was mentioned in the funding treaty from 1957 and gradually implemented in the following decades. A milestone was the Treaty of Maastricht in 1992, which implemented an EU citizenship whereby all could reside in a different EU country (having the means to do so) and equal social rights of the moving workers were guaranteed, with modifications on access to social assistance. All EU citizens have a right to reside in a different EU country for three months; six months if they seek work. For longer stays,

EU citizens need a residence permit that is granted on the permission of being an EU worker or EU student (or a family member thereof) or in a vague formulation simply by being a person with sufficient means not to be an economic burden for the destination country (a large part of this group is pensioners with origin-country entitlements). Within a push–pull framework, the importance of such free mobility is dependent on the level of income inequality within the zone. The level of income inequality increased with the large Eastern expansion in 2004 (ten countries) and the addition of Bulgaria and Romania in 2007. Sweden (and the UK) opened their borders for labour immediately, while the Netherlands, Denmark and Germany installed transitional rules, which have now come to a halt.

Thereby employers in Northern Europe have a potential labour supply much broader than the guest worker programmes of 1960 could offer. In my view, the absence of selection in this inflow is the most surprising element. One explanation is that old EU legislation simply was transferred to new members: a path-dependent logic. Another explanation is that politicians at last partially caved in to the preferences of the employers. In any case, it is this inflow of Eastern European workers, which potentially put pressure on wages and working conditions in the four countries, and at the same time contributes to the Swedish, Danish, Dutch and German economies.

The corrective to our initial discussion of a progressive dilemma in Chapter 1 is that the four states are not simply left with the option to close or open borders. They are also left with the option of strengthening or loosening the level of migrant selection (see Ruhs, 2013 for a similar argument). For the four countries we study, the attempts to deflect asylum seekers and install blue-card schemes point to a general strengthening of migration selection, in convergence with previous high inflow countries such as the US, Canada, Australia and New Zealand (Ruhs, 2013). However, the four countries have also opened their labour market to Eastern European workers, which is a loosening of migrant selection. This combined strengthening and loosening of migrant selection might be a historical coincidence attached to a very specific European Union integration process. However, it might also reflect a balance between the will of the people and the will of employers or even a functional balance between limiting the cost of the welfare states and securing the labour needed for the economic foundation of the four fairly generous welfare states.

THE SOCIOLOGICAL DYNAMICS

The initial formulation of the progressive dilemma exaggerated the need for national solidarity as a necessary condition for maintaining large welfare states such as Sweden, Denmark, the Netherlands and Germany. The welfare services and benefits are supported by their own political and maybe even

functional logics. However, in my opinion, the prediction of us–them divides caused by the inflow of immigrants from low-income countries has proven to be accurate, even in four countries with natives dominated by what can be labelled low-intensity civic nationalism (Larsen, 2017). Our four cases show that us–them divides are present despite variations in elite discourses on immigration and variations in practical policies. The us–them divides could not be prevented in Germany despite its extreme sensitivity towards processes that stereotype ethnic minorities. Neither could it be prevented in the Netherlands, despite its tradition of so-called "pillarization" whereby Catholics, Protestants and socialists had learned to live side by side. The Dutch multiculturalism of the 1980s did not last long. Nor could the divides be prevented in Denmark, where politicians from mainstream parties across the political spectra bragged in 1983 about having established the most liberal immigrant law in Western Europe. Finally, the us–them divides could not be prevented in Sweden, despite the political elites' consistent commitment to both inclusive discourses and inclusive policies. Asked about migrants in face-to-face surveys, the Swedish public for a long time stood out as the deviant case, as described in the introduction in Chapter 8. However, online survey experiments reveal the underlying us–them divides, for example, the one presented in Chapter 8. So does voting for the Swedish Democrats in the secrecy of the polling booth. Thus, with reference to Figure 1.1 in Chapter 1, the inflow of immigrants from low-income countries did cause a symbolic push towards disintegration.

The converging us–them divides across the four countries might be given different interpretations. A dominant interpretation is that ethnic differences inevitably lead to us–them divides, through psychological process uncovered by group identity (Tajfel, 1981). This is often the point of departure for the large body of literature trying to establish a general link between ethnic heterogeneity in states, municipalities or small groups and (negative) outcomes such as social trust (see for example Dinesen and Sønderskov, 2015 for a review) or various public services (see Stichnoth and Van der Straeten, 2013, for a review). A more macro-oriented sociological interpretation would be that concerns for social integration and the construction of "them" are typically linked to deviant dangerous behaviour (for example Larsen, 2013). In that perspective, the progressive dilemma could be seen as part of a general securitization of the immigration issue. Securitization is defined as:

> a speech act that has to fulfil three rhetorical criteria. It is a discursive process by means of which an actor (1) claims that a referent object is existentially threatened, (2) demands the right to take extraordinary countermeasures to deal with that threat, and (3) convinces an audience that rule-breaking behaviour to counter the threat is justified. (Buzan et al., 1998).

Goodhart's essay was not in itself an act of securitization but it resonated within a British context where immigration was linked to crime and terrorism. Of high symbolic importance were the riots in Burnley, Oldham and Bradford in 2001. The Islamist London bombings in 2005, the year after Goodhart's essay, added further fuel to the fear of immigration being an essential threat to British society. The Netherlands, Denmark, Sweden and Germany have *not* had such riots and only a few incidents of Islam terrorism but still there is, without doubt, an element of security in their immigration debates. A sizeable share of the natives in all four countries indicate in surveys that they think immigrants increase crime rates and migrants are overrepresented in crime statistics, of which immigrants are a sub-group. In Chapter 8, we provided another little piece of evidence. In all four countries, the natives were less inclined to give residency and citizenship to a migrant with a Muslim background than one with a Hindu or Christian background, even when differences in gender, age, education, labour market connections and language skills were kept constant. Thus, it is reasonable to suggest that there is an element of fear behind the concern of social integration. The referent object is the survival of the contemporary welfare states, which the anti-migration/pro-welfare parties set out to defend.

The construction of the dangerous deviant Muslim is not simply the creative outcome of anti-immigrant parties playing the fear of the electorate and the focus events of terrorism. In my opinion the construction is underpinned by the socio-economic difficulties of immigrants from low-income countries outside the EU. In a situation with socio-economic problems, the classic mechanism of immigrants settling among peers created deprived areas in the larger cities in the Netherlands, Sweden, Denmark and Germany. The negative social construction of these areas was boosted by adopting the "ghetto-label" and its American connotations. Thus, in terms of labelling, the American sociological mechanisms around blacks were directly installed in the four countries, despite deprivation and crime levels in Muslim-dominated areas never coming anywhere near the black inner-city ghetto in the US. Thereby natives had a deviant other, which needed to be changed or simply was out of reach. At the same time, the socio-economic difficulties underpinned the internalization of being "them" among the Muslim minorities. Being unsuccessful in the labour market generates a position of inferiority, which often is followed by a basic human coping mechanism of blaming employers or society. Thereby starts an endless chicken-and-egg discussion about causes of deviance, which tends to be vicious no matter whether the "Muslim" or "society" is the villain. The most solid documentation is that (fictitious) applicants with Muslim-sounding names have less chance to make it to job interviews in the Netherlands (Blommaert et al., 2014) and Sweden (Carlsson and Rooth, 2007). In that regard, Goodhart was right.

THE NATION STATES IN A CLUB-GOOD PERSPECTIVE

In even more abstract terms, the idea of a progressive dilemma is linked to a fundamental question about whether nation-states' borders are constitutive for the establishment of political communities and democratic decision making. According to Michael Walzer it is a matter of whether nation-state borders are a necessary condition for establishing what he labels "the sphere of security and welfare" (Walzer, 2008). If they are, which is an implicit assumption within the progressive dilemma, the exclusion of immigrants at nation-states' borders can be justified. Not only as a matter of securing the social integration of the UK, Sweden, Denmark, the Netherlands and Germany but also as a matter of finding a model for human developments in other nation-states; including those currently being net-senders of immigrants. In my view, this is the most interesting perspective on Goodhart's progressive dilemma. Taking words literally, it is in this spirit that the essay was written. Thereby Goodhart can be seen as a representative of a Northern European social democratic intelligentsia, which feel committed both to a national and international reformist project. Across the four countries covered by this book, this intelligentsia has been particularly strong in Sweden. In this prism, the Swedish "Nordic model" was seen as the prime example of how to create a just and equal hyper-modern society to which the rest of the world's many nation-states could aspire. It is this progressive Northern European intelligentsia which suddenly felt and feel captured in a troublesome dilemma.

Migration is in its very nature contingent on our way of dividing the earth into distinct states. These states can be taken as historical giving; a heritage from the Peace of Westphalia (1648) and the nation state-building process that followed. However, one can also think of states as a functional way of providing common and public goods. It is indeed easy to observe that living within some state boundaries can provide the residents with a number of "goods". Using more abstract terms, one can say that states (or other things within these states' boundaries) to varying degrees deliver common or public goods; see Table 9.1. Using the words of Olson: "The basic and most elementary goods or services provided by the government, like defence and police protection, and the system of law and order generally, are such that they go to everyone or practically everyone in the nation" (1971: 14). These goods are something that seems to benefit everybody within a given state border. One of the defining characteristics of common and public goods is that it is impossible, or at least difficult, to exclude potential beneficiaries; see Table 9.1. Some of the classic examples of these kinds of goods are law and order, road and train systems, well-functioning state bureaucracy, hospitals, and public schools. One could

Table 9.1 Four types of goods

		Subtractability of use	
		High	Low
Difficulty of excluding potential beneficiaries	High	Common-pool resources: groundwater basins, lakes, irrigation systems, fisheries, forests, etc.	Public goods: peace and security of a community, national defence, knowledge, fire protection, weather forecasts, etc.
	Low	Private goods: food, clothing, automobiles, etc.	Toll goods [Club goods][a]: theatres, private clubs, daycare centres, etc.

Note: [a] Own addition. Club goods and toll goods are used synonymously.
Source: Ostrom Nobel prize lecture slide: https://www.nobelprize.org/uploads/2018/06/ostrom-lecture-slides.pdf.

also add the pool of job possibilities as the world is still to some extent divided into national economies. Some states simply provide better job possibilities than others do. As described in Chapter 1, migration typically goes together with economic development. It is this openness to everyone, which potentially, within a push–pull framework, could be a motivation for migration.

Following this logic, it is expected to be of utmost importance for the political processes among the natives, whether immigrants are perceived to consume public or common goods. One of the classic interests in the field is job competition. If migrants' consumption of job possibilities is perceived to be a consumption of a common good, that is, a migrant taking a job, reducing the job chances of others, then natives (especially the least well-off) are expected to be reluctant to welcome migrants. In Table 9.1, this is the case where the so-called subtractability of use is high. If on the other hand, migrants' consumption of job possibilities is perceived as consumption of a public good, that is, something that does not reduce the job possibilities of others, then natives are likely to welcome migrants. In Table 9.1, this is the case where the subtractability of use is low. The positive narrative in classic destination countries such as the US, Canada and Australia was that migrants primarily benefited from public goods in the new context. In the early days, farmland and job opportunities were perceived to be plentiful. One migrant's consumption did not reduce the possibilities of others. The situation is different in modern Northern European states, where land and job opportunities are less likely to be perceived as public goods and where the welfare state provides a large variety of common goods. Using Ostrom's terms, the subtractability of use seems to be higher, at least within public perceptions. In such a context it is only to be expected (from basic political science reasoning) that increased inflow of immigrants is controversial and conflictual.

The worry of free-riders eroding the foundation of public and common goods is embedded in the idea of a progressive dilemma. Due to the difficulty of excluding potential beneficiaries, the classic worry of economics and political science is that nobody will be willing to pay for common and public goods (Ostrom, 1990). It is indeed easy to observe how the power of the state is used to exclude and prevent free-riding. The power of the state is used to ensure that everybody pays their tax or call it a membership fee. In order for this to be effective the modern states control who resides in the territory and who does not. The establishment of a passport system is the clearest manifestation of the modern control of modern states (Torpey, 2018). Those that violate the rules are typically labelled "illegal migrants" and are exposed to rough sanctioning by the state. Or in more abstract terms, the (imagined) free-rider is punished. From such as a public choice perspective it is only to be expected that natives will be concerned with the potential free-riding within unemployment and social assistance schemes.

The other classic worry connected to difficulties of excluding potential beneficiaries is the problem of overconsumption. Hardin's classic example was a pasture open to all. In this case, it would be in the interest of the individual herder to increase the number of animals, which would lead to overgrazing: a tragedy of the commons (Hardin, 1968). The first crucial step to avoid this tragedy of the commons is to control the numbers of herders using the pasture (Ostrom, 1990: 185). The next step is to commit this included group to not follow their individual rationality. Thus, if the welfare state provides common goods in a boundless world, there could be a risk of overconsumption. This is the core of the magnetism-argument of Borjas and Freeman; see Chapter 1. Such a common good could, for example, be free healthcare. Again nation-state control is the typical solution. The first line of defence of overconsumption is border control. The next line of defence of overconsumption is a bulk of internal rules about the access to the established common good. In the case of health, the pivotal gatekeeper is a state-authorized assessment about who is sick and who is not sick.

While these basic political science arguments can be used to explain and legitimize the exclusion of immigrants, the economic idea of club goods points in a somewhat different direction. The initial formulation of the "club good" theory was based on a situation where the subtractability of use (or rivalry) is low and where the difficulty of excluding potential beneficiaries is low. These goods are found in the lower-right quadrant in Table 9.1. In the initial formulation, Buchanan (1965) for example used the example of a club created to establish and run a swimming pool in a middle- and low-income community. With a limited number of members, the use of the swimming pool by one member does not reduce the possibility of another. Thus, the subtractability of use is low. Buchanan predicted that in such a situation it will be rational to

increase the number of members as the cost per member thereby decreases. Olson labelled this the case of "inclusive groups" as "usually the larger the number available to share the benefits and costs the better" (Olson, 1971: 37). As the number of members increases, the rivalry of finding a space in the pool increases, that is, the level of subtractability is low but not zero. Therefore the cost per member and the consumption possibilities per member need somehow to be balanced (in a rational framework the marginal utility of lowering the cost equals the marginal decline in utility caused by crowding). On the other dimension, the difficulty of excluding the non-members is low. In the swimming pool case, it might be done with a keycard for the paying members.

Welfare states are clearly not swimming pool clubs but the analogy might be useful as a point of departure for progressive thinking about how to organize the high-inflow contexts, depicted in the right-hand side of Figure 1.1 in Chapter 1. Thus, progressives might begin to think of goods with low subtractability of use that could benefit from cost-sharing. As for the latter, there is a payment side to the welfare state, which is often forgotten in public discourse, or at least carries less symbolic value than the issue of taking money out as benefits. As for the former, it is worth noticing that rule of law, peace and bearable climate have lower subtractability of use than welfare benefits and services. At the same time, progressives might begin to think of ways of excluding potential beneficiaries – other than exclusion at the nation-state border. The four countries of this book have large bureaucratic apparatuses that are constantly used to install different membership levels and regulate natives' use of welfare benefits and services. The same might be done for immigrants. This could potentially solve part of the problems of the progressive dilemma pinpointed by basic public choice theory. The troublesome part is to find the effective and legitimate membership criteria; in a historical context, where the progressive mantra is that nation-states should provide all residents, or even all humans, with the same rights (see Ruhs, 2013, Chapter 7 for a discussion on the ethics of Labour immigration policy). This is, in my opinion, one of the most topical discussions for "progressives".

FUTURE SCENARIOS OF COMBINING IMMIGRATION AND INTEGRATION IN NORTHERN EUROPE

In relation to Figure 1.1 in Chapter 1, one can imagine different scenarios moving forward at the scale of nation-states. The most likely scenario seems to be a "retreat" to the ideal-typical integrated low-inflow state described in Chapter 1. In this scenario, the inflow of migrants is reduced and the integrating policies are intensified. Thereby the four countries would follow the classic settler countries with their history of reducing inflow (or at least turning it more selective) and installing integrating national policies and identities. Thereby

the four countries have been through a process of maturing as net-receiver countries. The presence of well-developed integrating welfare schemes gives the four countries advantages in comparison to the historical settler societies. The findings from Chapter 6 on the memories from the Swedish and Danish school systems provide hope for the symbolic integration of second-generation migrants, including those with a Muslim religious background. However, there is a dark side of denied access of the outside potential migrants and the classic suppression of alternative national and cultural identities of the minorities living inside the state borders. The political pressure for such a "retreat" is found in all four countries and seems to be the dominant strategy in the Netherlands and Denmark.

The second scenario is that the four countries turn into low-integrated high-inflow states such as other extremely rich front-runner societies have done; see Chapter 1. In this scenario, the natives sacrifice their previous integration for the luxury of having an inflow of global elites and low-paid workers from the global market. With a little compensation to the least well-off natives with citizenship, this could benefit close to all current natives in the short run. In my perspective, this would be a matter of these societies learning to play the brutal game of global capitalism, as they did with the guest-worker programmes of the 1960s. As described in Chapter 5, this was (at least in Germany and Denmark) initially played without basic attention to the children of these "guest workers", and as described in Chapter 7, it was (at least in Germany and Denmark) initially played without the prospect of naturalization. In a more optimistic scenario, this might be organized to the mutual benefit of both the guest workers and the natives through strict regulation of "guest worker" programmes (Ruhs, 2013). The potential dark side of failed regulation is increased levels of economic inequality that could install what Carens (1987: 252) labelled the feudal privileges of citizenship directly to the inside of what previously were believed to be equal meritocratic nation-states. This is the situation in the Gulf states. In an era of strong awareness about the destructive forces of economic inequality within nation-states, this seems to be an unattractive path for progressive forces. For the four countries of this book, Germany would be the most likely candidate for such a trajectory.

A third scenario is that the countries turn into what in Chapter 1 was labelled integrated high-inflow states. In this scenario, the inflow of immigrants is increased but so are integrating policies and practices. Progressive forces in Denmark and Germany have never really imagined this scenario despite the lip service paid to liberal values and civic-integration policies for naturalization described in Chapter 7. Immigration has always been seen as an unfortunate, sometimes necessary, evil. After the Dutch retreat, Sweden stands as the remaining hope for many progressives. However, in my view, the (former) Dutch and Swedish attempts to imagine an "integrated high-inflow-state"

have mostly been at the discursive levels. The first was the multiculturalism idea, which was believed to ease the assimilative pressure of the nation-state and underpin distinct identities. The inherent problem is that a realization of such a project would not provide integration, but disintegration. The second was the hyper-modernity idea, which was believed to install a culture-free society. A society without fixed gender norms. A society without class identities. A society without religious and ethnic hierarchies. Through the reading of social science textbooks for school children, Geugjes (2021) illustrates the presence of this non-culture idea in Sweden. The inherent problem is that a non-culture is also a culture, potently experienced as highly invasive for those adhering to a culture. In opposition to Joppke, Jensen and Mourtizen (2019) convincingly argue that what Joppke called hyper liberalism can be a disguised nationalism that can be used instrumentally to strengthen the exclusion of the Muslims, exemplified by Dutch and Danish policy developments.

In my view, both the multiculture and non-culture projects point to the limitations of discursive integration philosophies. These ideas seem to be of limited relevance when it comes to actual reception policy, as described in Chapter 3, labour market policy, as described in Chapter 4, school policy, as described in Chapter 5, and effects of school policy on memories of generation migrants, as described in Chapter 6. Only in the case of naturalization policy is the relevance of integration philosophies high, as described in Chapter 7. One could imagine more substantive mechanisms connected to an integrated high-inflow state (see also Holtug, 2022) than access to citizenship. A pivotal element would be securing decent wage levels and working conditions, especially for those with human capital not matching wage levels. One way to square this economic impossibility is through hiring low-skilled immigrants in the sheltered public service sector that is well developed in all four countries. Another element would be legitimate transitional rules, which secure immigrants gradual access to welfare benefits and services. These are more or less installed for EU immigrants but undeveloped for non-EU immigrants. Of the countries of this book, Sweden (still) seems to be the only candidate with a potential to actively target moving towards an integrated-high-inflow-state. In my view, the pivotal question is how the sizeable groups of first and second-generation immigrants with citizenship will use their political power in a "new" Sweden; will they be representatives of the world, opening borders to the outsiders, or will they assimilate to the normal behaviour of club-members of nation-states, described throughout this book?

Finally, it should be mentioned that progressive thinking and policy-making might move beyond the scale of the nation-states. Such speculations are outside the scope of this book. However, in my opinion, it is difficult to imagine policy-making by a world government. Strengthening the cooperation between existing nation-states within the United Nations is probably

the most progressive force that can be imagined. But doing so is exactly a further strengthening of nation-states. It is easier to imagine progressive policy-making in regional settings. Here the European Union is the most advanced and interesting exercise in moving beyond the scale of nation-states (as argued by Hollifield, 2004). The hardening of the EU border to the outside and opening of free mobility inside resembles the historical experiences with nation-states' formation. From a progressive perspective, the unresolved question is whether the EU solidarity and EU governance ever will match the political opportunities provided at the nation-state level.

NOTE

1. The only study, to my knowledge, indicating a significant effect from level of social assistance on asylum applications used the policy changes in Denmark in 2002, 2012 and 2015 as natural experiments (Agersnap et al., 2020). However, following the critique from Landersø and Schultz-Nielsen (2019), I believe the results are problematic. Using better specification, Landersø and Schultz-Nielsen find no effect.

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