Integration Policies in Europe: National Differences or Convergence?

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1 Introduction

European societies have experienced large scale immigration since the end of World War II. The illusion of temporary migration has disappeared and confronts the new immigration societies with the necessity of integrating the new groups. The integration of immigrants is a challenge to the established patterns of nation building and welfare state policies. European societies are struggling with the problem of how to best include the immigrants in their social structures.

In this situation, a search for "models" has occurred and different national "strategies" of integration are discussed as to their relative merits or problems. A prevailing discourse in Europe compares different national "strategies": for instance, a French republican, culturally unifying, universal model is confronted with British or Dutch "multiculturalism", and with a German social policy orientation towards migrants. According to the national difference paradigm there is an "Intégration à la Française" linked to the tradition of nation building since the foundation of the Republic and aiming at a culturally homogenous nation. British or Dutch "multi-culturalism", on the other side, supposedly are willing to retain cultural differences and ethnic identities of immigrants. And Germany, due to its "Volk"-centered ethnic nation concept, will not accept immigrants as citizens, but nevertheless includes them in almost all social policy measures.

The different "strategies" are supposed to be linked to traditional ways of macro societal integration, to specific national ideologies and to certain key decisions during the immigration process (Brubaker 1994; Heinelt 1994; Köppinger et al. 1992; Wihtol de Wenden 1999).

This paper is interested in the question whether the idea of different national "models" or strategies of immigrant integration can be upheld, or whether there are processes of convergence which point towards the development of a common European immigrant integration policy. We shall look at key aspects of the policies of France, Germany and the Netherlands to answer these questions. Before analyzing the three cases we will introduce some conceptual suggestions as to the meaning of integration, integration policy and "mode of integration". On the basis of these suggestions we will present a scheme for analyzing national integration policies which we will use for the country analyses.

We shall not present any newly collected data for our study, but will utilize existing research and literature. The new perspective that we bring in is to look at trends of convergence towards a possibly European pattern of integration policy in an area of research and writing that has been dominated by the national difference paradigm.

2 Integration, integration policy and mode of integration: conceptual suggestions

We suggest a concept of integration that leans partly on ideas of "assimilation" as formulated by Gordon (1964) and Esser (1990), and on a general and formal understanding of integration. For pragmatic reasons we do not use the term "assimilation" because it almost immediately evokes emotional reactions and connotations of cultural suppression in many publics.

Integration as a general and formal concept may be defined as a) forming a new structure out of single elements; or b) as "improving" relations within a structure and c)
as adding single elements or partial structures to an existing structure and joining these to an interconnected “whole”. Integration refers both to the process of connecting the elements as well as the resulting degree of interconnectedness within the “whole”. In the context of immigration integration refers to the inclusion of new populations into existing social structures and to the kind and quality of connecting these new populations to the existing system of socio-economic, legal and cultural relations.

Connecting the new populations with the existing structures and the resulting quality of connectedness involve a process of acquiring a membership status in the core institutions of the immigration society (economy and labor market, education, qualification system, housing market, citizenship as membership in the political community) and the learning and socialization necessary for participating in the new society. Thus integration means the acquisition of rights and the access to positions and statuses in the core institutions of the receiving society by the immigrants and their descendants: **structural integration**.

Rights can be used and positions and statuses can be taken only if certain learning and socialization processes take part on the side of the immigrants. In relation to these preconditions of participation integration refers to processes and states of cognitive, cultural, behavioral and attitudinal change of individuals: **cultural integration or acculturation**. Acculturation primarily concerns the immigrants and their descendants, but it is an interactive, mutual process that changes the receiving society as well.

Membership of immigrants in the new society in the private sphere is reflected in peoples’ private relations and group memberships (social intercourse, friendships, marriages, voluntary associations): **social integration**.

Membership in a new society on the subjective level shows in feelings of belonging and identification, particularly in forms of ethnic and/or national identification: **identificational integration**.

Thus integration means an acquisition of rights, access to positions and statuses, a change in individual characteristics, a building of social relations and a formation of feelings of belonging and identification by immigrants towards the immigration society. It is dependent on a number of conditions on the part of the receiving society which could generally be described as its "openness" to the new group of people. A "successful" or progressing integration process could also be characterized as increasing similarity in living conditions and ethnic-cultural orientations between immigrants and natives, and a decrease in ethnic stratification.

We shall not touch upon the question of "transnational migration". Supposing that this type of migration would be a relevant phenomenon in present day’s migration questions of integration will have to be discussed differently for this group.

Integration in modern societies is mostly a market process, the result of individual choices, often with motives that do not seem to be related to integration at all.

"... to discuss assimilation (in the sense of integration, F.H.) prospects intelligently, we need to recognize that assimilation can take place despite the intentions of ethnics to resist it. Assimilation can occur as the often unintended, cumulative by-product of choices made by individuals seeking to take advantage of opportunities to improve their social situations. This sort of assimilation was exemplified when socially mobile European ethnics departed from urban, working-class, ethnic neighborhoods for middle-class and
more ethnically mixed suburbs. As the example suggests, assimilation most often occurs in the form of a series of small shifts that take place over generations …" (Alba 1999).

Besides integration as a kind of market process over generations there is a politically promoted process that sets conditions and gives incentives for individual choices and decisions: integration policies. On the one hand, there are special measures and institutions that are directly devised for immigrants. We shall call these special integration policies. Much more so, however, integration is promoted by the inclusion of immigrants in the general system of nation state integration, in social policy measures and – in case of need – in the welfare system: general or indirect integration policies according to Thomas Hammar (1985, 9).

Integration policies thus consist of special (direct) and general (indirect) integration measures. The concept does not include the effects of "positive" or "negative" external influences, like a change in relations between the immigration and emigration countries or in the state of the economy.

The term "national integration strategy" that is often used in a comparative European discourse seems to be rather problematic. "Strategy" implies planning and consistency. National strategy would imply such conscious planning, consistency, systematic organized and goal minded action on a national scale. In that sense, integration strategy does not seem to exist in any European country. National strategy is unlikely for another reason: migration and integration policies very often are in the center of political battles, are subject to serious political conflict. Content and direction of migration and integration policies are changing according to the political climate in the society and according to power relations.

Still, we work with the hypothesis that there are certain consistencies and common characteristics in integration policies on a national level that derive from basic socio-structural principles ("social order") like "Soziale Marktwirtschaft" in Germany, from French étatism and republicanism, or from Dutch "pillarisation" of society: we assume that the "social order" and a particular "sense of nationhood" determine the general integration policies. "Sense of nationhood" or concept of nation is particularly relevant for inclusion or exclusion toward resident foreigners (naturalization, citizenship). Consistencies and common characteristics on a national level also seem to derive from what I would like to call "the societal definition of the immigration situation" (Examples: The USA are "a nation of immigrants"; "Deutschland ist kein Einwanderungsland"), which is clearly historically rooted.

The complex whole of direct and indirect integration policies as they are related to the social order of the society and to the societal definition of the immigration situation we suggest to call "national mode of integration".

3 How to analyze national mode of integration

On the basis of the preceding conceptual suggestions we can proceed to construct a kind of checklist for integration policy analysis. For that purpose we simply cross tabulate our dimensions of integration with general and special policies of integration (Table 1).
Table 1: Checklist for the analysis of integration policy

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<th>Dimensions of integration</th>
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With general integration policies we refer to the whole of policies of a modern state for the integration of its people as they effect natives and immigrants. We will, of course, lay special emphasis on the effects on immigrants. Besides adapting existing general institutions to needs of a new "clientele" – what we count as general policy – another policy has been to create new institutions exclusively for the integration of immigrants. We call these special integration policies. To give some examples from Germany: "Ausländerbeiräte", immigrant services by welfare organizations or "mother-tongue" afternoon schools. Examples from other European countries would be the creation of an integration administration in Sweden or the institutionalization of obligatory integration courses in the Netherlands for certain groups of "newcomers".

Under the influence of American minority policies affirmative action and anti-discrimination laws are being introduced in some European countries or their introduction is being discussed. Anti-discrimination laws are also foreseen by § 6a of the Amsterdam treaty as a European standard. I will call these policies equality promoting policies and treat them as one form of special integration policy.

On the basis of the preceding arguments we can now suggest three items for the analysis of national mode of integration:

1. Societal definition of the immigration situation
2. Principles of the "social order" and sense of nationhood
3. Checklist for integration policy analysis (Table 1).

We have chosen France, Germany and The Netherlands for country analyses because they stand for sharply different cases of immigrant integration policies in the public discourse. Due to limitations of this paper we cannot go into an analysis of all the categories of Table 1. In addition, we will not be able to discuss the above three items with equal weight in each of the selected countries.

4 Mode of integration in France

4.1 Societal definition of the immigration situation

Due to an early demographic transition in the second half of the 19th century France has a century long tradition of de facto immigration and integration. As to the societal definition of the immigration situation France never understood herself – like the United States – as a country or nation of immigrants. The large recruitment of foreign workers in the 60s and 70s "... was viewed and often felt as work immigration limited in time ..." (Schnapper 1995,99). France halted the recruitment of foreign workers in 1974 af-
ter the "oil shock" of 1973. A political battle developed over the question whether the recruited workers should be allowed to stay in the country. "Would legal migrants be allowed to settle permanently in French territory and society? Indeed for many politicians the question was: can we accept the permanent settlement of undesirable North African immigrants? After a period of hesitation, President Valéry Giscard-d'Estaing attempted, for racist reasons, a forced repatriation of the majority of legal North African immigrants, especially Algerians between 1978 and 1980 … However, due to a strong reaction from the political Left, the labor unions, the RPR and CDS, the initiative failed" (Weil 1997,4). Temporary migration of the 60s and early 70s changed into immigration and settlement.

France has not lifted the recruitment ban since 1974. And, like all other European countries, she believes in the continuation of restricting inflows as a condition for the integration of those who are already in the country (Schnapper, Krief and Peignard 1998,13).

4.2 Social order and sense of nationhood

France is a centralized, modern welfare state with an étatist tradition, that is the state takes an active role in society. France is a welfare state for both citizens and resident (legal) foreigners. If immigrants are still foreigners they are entitled to the same social rights as French people: "They benefit from social security (illness, invalidity, pension, death, unemployment, widowhood …), family allowances and social assistance (medical, for children, old persons, single mothers …) foreigners, immigrants have the same rights as nationals to have access to low rent housing" (ibidem, 14).

The French concept of nation is built upon the political principles of the French Revolution, but particularly upon the social construction of nation by the III. Republic starting in 1875. Ideological, religious, regional, linguistic and strong urban-rural differences had been continuously threatening the political and social integration of French society and state during the 19th century. The concept of nation building by the III. Republic was thus founded upon the establishment of a common national language and culture. Secularism and a unified national school system became major institutions for the project of national integration (Heckmann and Tomei 1997,34/35). The integration of immigrants was only an implicit part of this program. "National integration as a whole is political: members of the national society are being integrated by individual citizenship, following a universalist view of the citizen. This principle, stemming from the founding myth of the French Revolution, is the ideological foundation of the so-called 'assimilation' policy. It is by individual citizenship that this policy tries to transform a population of foreign origin into French people" (Schnapper, Krief and Peignard 1998,27).

4.3 General integration policies

General integration policies are those policies that the modern nation state "normally" applies for the integration of its people as they affect natives and immigrants. It will not be possible in this paper to cover all the dimensions of table 1. We shall look at aspects
of structural and cultural integration policies and briefly touch upon identificational poli-
cies. As to structural integration we shall discuss legal integration (or citizenship poli-
cies) and schooling and briefly comment on the integration into the labor market and the
housing system.

Legal membership in the state community, that is citizenship or legal integration is the
basis for general integration in state and society. We have learned from Marshal (1950)
that in the past the extension and expansion of citizenship and the achievement of civil,
political and social rights has been the major integrating "mechanism" of conflict-ridden
capitalist society. The inclusion into citizenship – at first applied in Europe for working
class integration – thus is a very basic, traditional integrating institution with a long his-
tory of success.

Nationality laws in France have been very open since 1889. Traditionally, ius sanguinis
and ius soli combine so that anyone born in France who wants to become French – even
from foreign parents in an illegal status – can become French. The present Code de la
Nationalité states that children who are born in France from foreign parents not born in
France obtain French nationality automatically when they are 18, on condition that they
have lived in France for at least five years. A child born from foreign parents themselves
born in France is automatically French at birth. Another aspect of the openness of the
naturalization process is that France accepts double nationality. What is specific about
the French model of ius soli is that it founds nationality on socialization and not on eth-
nic origin. Thus it is also different from the American case which might be called a simple
ius soli model (Schnapper, Krief and Peignard 1998, 12).

With many former integrating institutions loosing influence – like factory, working
class organizations, army and church – the school has become the core institution for
the integration of immigrants and their children. "The school may be considered as the
main instrument and the symbol of the French model of integration; l'école républicaine
was supposed to create a cohesive French nation" (ibidem, 15); "Based on the principle
of centralization, educational programs are ... the same in the 36000 French cities and
villages. In this conception, school is to provide apprenticeship of French language, of
calculus, of rights and duties of citizenship. But it is also seen as the very place of so-
cialization to French culture and of social advancement" (ibidem, 14/15). The school's
influence upon socialization has been intensified with the extension of years children
spend in public school or pre-school. Obligatory école maternelle as kindergarten/pre-
school begins at the age of three and obligatory schooling lasts till the age of 16. In
addition, schools are all-day institutions which increases the time children spend there
(Heckmann and Tomei 1997, 40).

Concerning labor market integration as an important aspect of general structural
integration France has a serious problem of transition from a purely scholastic training
system into the job market. Apprenticeships and a dual qualification system are only
marginal phenomena. A very high unemployment rate for youth, and particularly for
immigrant youth, is an indicator of that problem. The French governments have started
many programs to tackle the problem, but without much success. The most recent pro-
gram which is very important for young descendants of immigrants is \"L'Emploi Jeune\";
it is directed, however, towards all young unemployed.
As to **cultural integration** the school again is the major integrating institution. French language, French literature and French history are regarded as important means of creating a culturally homogeneous nation. Nation building traditionally was synonymous with "assimilation". In the mid-seventies, however, "assimilation" increasingly was questioned as a goal of cultural integration. Under the influence of a young Beur generation "insertion" as a minority group oriented concept ("le droit à la différence") gained ground for about 10 years. With the Front National picking up this slogan of difference and increasingly successful reinterpreting it in a racist way the slogan was withdrawn and substituted for with a new demand for "the right not to be different" ("le droit à l'égalité"). This helped to bring forth a new model of "intégration" which has become widely accepted as a political concept of cultural integration since the end of the eighties (Weil and Cowley 1994, 14). "Intégration" is different from "assimilation" in that it recognizes that there is an interaction process between cultures and that French culture is changed as well under the influence of immigrant cultures (Weil 1997, 13). Still, "intégration" is quite assimilationist: There is, for instance, no room in France for programs of bi-lingual education or for head scarfs.

We take **policies toward religion** as an important aspect of cultural integration. Since the III. Republic secularism has been installed as a fundamental principle of the relation between state and society.

"Religious organizations can then only be considered as social actors, such as unions, political parties or associations, with which the state, in an egalitarian way, may negotiate, collaborate or provide financial means to help perform their functions. For instance, Catholic or Jewish schools benefit from grants. Muslim schools would have the same rights – although they have not been created till now. Since the mid-70s the state has encouraged Islamic practice in factories and (F.H.) immigrant residences … in order to favor the establishment of a 'quiet Islam' ('Islam tranquille') …" (Schnapper, Peignard and Krief 1998, 5).

**Identificational integration policies** as part of the general mode of nation state integration include a variety of practices to arrive at subjective feelings of belonging to the nation and nation state. Political socialization, the teaching of history, the internalization of symbols and the development of particular emotions can be given as examples of general nation state practices to achieve identificational integration within the population. As to identificational integration France seems to have a solid tradition of patriotism with an inclusive tendency towards immigrants to identify as French as well. The policies against minority formation or maintenance are consistent with that tradition. The general openness of naturalization or acquisition of citizenship by birth make identification easier.

If this and other aspects of general integration can be seen as tendency toward the goal of "intégration" or acculturation, housing policy seems to totally run counter to this goal. It clearly leads to a marked pattern of segregation (Heckmann und Tomei 1997, 48).

### 4.4 Special integration policies

Integration of immigrants in France traditionally "just happened" as part of the overall process of societal integration and nation building. "The main implicit principle of the French republican model of integration is that the lack of a specific integration policy is
the better way to integrate … migrants, as they are simply considered as French citizens” (Schnapper, Krief and Peignard 1998, 14). In the 1970s, however, with the proclamation of the "le droit à la différence" a trend for migrant specific measures developed, which got weaker again afterwards (Mahnig 1998, 35). Today there are still some specific programs that are directly targeted at the immigrant population.

As to structural integration there are some special integration policies in schooling. For immigrant children who hardly speak French there are special classes ("classes d’accueil") to ease their entrance into the regular school system. The ZEP program ("Zone d'éducation prioritaire") gives extra funds to schools in poor areas, particularly suburbs. This program is not officially designated for immigrant children, but one criterion for receiving such funds and additional staff is the proportion of immigrant children in an area.

Concerning cultural integration the so-called "Langues et Cultures d'Origine" program since 1974 runs counter to the general acculturation philosophy. It permits the teaching of Arabian, Portuguese, Spanish, Turkish and Italian languages in school and can be regarded as an expression of some multicultural tendencies of the mid-70s (le droit à la différence). These courses – which seem to be rather a failure – are financed and organized by the countries of origin with teachers from these countries.

In the area of special integration policies the organization FAS (Le Fonds d'action sociale pour les travailleurs immigrés et leur familles) has to be mentioned as an important body which acts under the authority of the Ministry of Social Affairs. It has a budget of more than one billion francs. Its policies are related to all four dimensions of integration and include social work, housing, education, language training, help for newly arrived immigrants and cultural activities. FAS works through financial grants attributed to associations led by French or foreigners (Lebon 1994, 69/70).

5. Mode of integration in Germany

5.1 Societal defintion of the immigration situation

In relation to the societal definition of the immigration situation in Germany the most often heard phrase is: "Deutschland ist kein Einwanderungsland". And this is thought to be a highly specific characteristic of the German situation. Yet, when comparing "work immigration limited in time" (Schnapper) in France with the guest worker status in Germany, the near simultaneity of the ban on recruitment (1973 in Germany, 1974 in France) and the "surprise" of an ensuing settlement with family reunion and family formation in both countries, the societal definition of the immigration situation in Germany and France are not far apart. In addition, the German authorities hold the same position on the connection between limited entry and successful integration of those who are already in the country. The new government has accepted a position that we formulated already in 1982 as “Einwanderungssituation", meaning that the people who have come are immigrants and that there will be some immigration in the future, but that Germany will not make any conscious effort to recruit new immigrants, for instance via quotas.
5.2 Social order and sense of nationhood

Societies have certain basic ways of securing macro-social integration and of defining and tackling social problems and tensions. These derive from some fundamental principles of the social order. *Soziale Marktwirtschaft* as a system of economic, social and political relations is a basic element of the social order in Germany. The role of the state is understood in that system in an interventionist sense, i.e. to help provide social security, social justice and to improve opportunities for disadvantaged groups. The most important aspect of the welfare system for immigrant integration is that non-citizen residents are generally included in it. To give a few examples that are particularly important for second generation migrants: The right for kindergarten attendance; German and non-German children and youth are entitled for support according to the children and youth support act (KJHG); German and non-German students may receive student loans; the huge programs of vocational and occupational qualification and requalification according to the "Arbeitsförderungsgesetz" do not make a difference between citizens and non-citizens (Staudt 1995, 63).

The system of *Soziale Marktwirtschaft* at present, however, is facing certain challenges that have direct implications for immigrants. An American economist observer, Phillip Martin, has clearly described these challenges by way of a German – American comparison:

"Globalization as well as demographic changes have forced a restructuring of some of the major institutions developed over the past century, including the expectation that many workers would have lifetime jobs with one large company. Many Germans continue to expect such lifetime careers, and they receive an extensive and long term assistance while waiting for 'good jobs' to become available. There are too few such good jobs ... Germany is discussing creating more good jobs by encouraging early retirement and restricting overtime. However, creating good jobs in this manner will not move foreigners forward in the queue ... The alternative is to deregulate the labor market so that employers create more jobs, even though some of the new jobs created may pay lower wages, offer fewer benefits, and not be career options. In the more flexible US labor market unskilled immigrants have little trouble finding jobs or beginning small business, but they may find it hard to earn sufficient wages to achieve above poverty level incomes" (Martin 1999, 11).

**Sense of nationhood:** The traditional nation concept in Germany since the 19th century has been an ethnic nation concept. Ethnic nationalism stands for common ethnicity as a basis for state organization. Ethnic and state borders should be the same. The ethnic nation concept defines nation as a people with its own state. Since nation defines itself as a community of descent with a common culture and history, belonging to the people and legal membership in the political community, that is citizenship, are closely connected to one another. One of the consequences of this principle is that the inclusion into a nation that understands itself as a community of descent and culture is difficult or defined as an exception to the rule.

Nation as a cultural concept (Schulze, 1995) and nationalism as social and political movements are not constant phenomena, but change historically in relation to their contents and goals. The delegitimation and deconstruction of the old concept of nation and nation state became a broader cultural movement in the 60s and 70s: a major influence...
for the deconstruction of the old concept of nation was the intellectual reflection of and reaction to totalitarian naziism with its extreme forms of nationalism.

A second major factor that put pressure on the old concepts of nation and citizenship was Germany's integration into the Western world. Democracy and constitutionalism as political principles of the "West" could be related to the early national and democratic movement at the beginning of the nineteenth century, but were in total opposition to the aggressive nationalism that developed afterwards. To become an integral part of the Western community the concept of nation that had dominated for the past 100 years had to be changed.

Thirdly, a pressure for change resulted from migration. Migration not only evokes the question "Who are they?", but also "Who are we?" In addition, the assertion of being a democracy and at the same time excluding large parts of the population from full political participation questions the legitimacy of citizenship based on descent.

What I have described so far are pressures for change, for deconstructing the old concepts. From the very beginning of the Federal Republic there were attempts at a reconstruction of the nation concept, which coexisted with a position of a refusal to ever again consider nation and nation states as valuable ideas. One of the key words for this reconstruction process was and is Verfassungspatriotismus (constitutional patriotism). It means to identify with nations and nation state because of its constitutional order, because of the rule of law, to feel pride in one's democratic institutions. For an increasing part of the public that believes in the continuing relevance of nation and nation states Verfassungspatriotismus has been expressing a new kind of political identification with Germany. Apart from that new kind of patriotism economic success and the building of good institutions became objects of identification around which a new kind of national consciousness could develop.

The historian Mommsen has described this new national consciousness in the year of German unification: "A new kind of national consciousness has developed in the Federal Republic. It is no longer under the influence of political and legal traditions of imperial Germany. This new national consciousness relates primarily to economic success and to a democratic and liberal political system. It is no longer in conflict with the political cultures of Western Europe and the USA, as has been the case for so many years" (Mommsen 1990, 272).

**5.3 General integration policies**

As a first dimension of structural integration we shall look at citizenship and naturalization. This discussion, of course, is closely related to the previous chapter on sense of nationhood.

A most influential way of defining the so-called integration problem (of immigrants) was (and is) to define it as a problem of a foreigner's status, as a question of citizenship. Political parties, unions, churches, immigrants' organizations, social scientists, jurists, intellectuals, journalists and many other representatives of an intellectual public stimulated a debate on the necessity of changing the citizenship law. Ius soli should be added to the principle of descent, naturalization should be eased and double citizenship should be tolerated. It was a vivid debate in the nineties, but the discussion had already begun in the eighties. The process can be roughly described as one in which the camp of reform-
ers slowly but steadily gained ground. Already in the former Bundestag legislative period from 1994-1998 there was a majority in the parliament for a reform of the citizenship law, only so-called coalition arithmetics hindered the reform to be realized. The Bundestag in 1993 with a conservative majority had passed a reform of the foreigners' law creating a right for naturalization for second generation migrants (16-23 years old) with eight years of stay and six years of schooling in Germany. This was a first major deviation from the ethnic nation and ius sanguinis principles.

This spring Germany's new citizenship law has been passed. It will be coming into effect on January 1, 2000: it has introduced ius soli, it eases naturalization and, to some degree, tolerates double citizenship. This means a new principle of belonging to the nation is introduced: not only descent, but living in the same society and on the same territory are recognized as rules of inclusion. Whereas the ethnic nation concept tends to see ethnic-national belonging as a kind of primordial tie, the new law explicitly understands its regulations as an instrument of integration of immigrants. The old view still propagated by the opposition, viewed naturalization as the concluding act of a successful process of integration.

The big rouse over double citizenship was actually leaving almost unnoticed the truly revolutionary part of the law, namely the introduction of ius soli. Interesting enough, what the opposition was suggesting as an alternative to ius soli was not far away from this territorial principle either. Their concept was called "Einbürgerungszusicherung" which meant to give to newly born children a paper guaranteeing them citizenship at maturity and giving them an unconditional right to live in the country till then.

Next we shall look at integration policies in the educational system. The federal states are the main actors in educational policy. Coordination efforts on the national level are regularly undertaken by the Kultusministerkonferenz. The conference of ministers for culture in 1976 took basic decisions for the educational policy toward the migrants' children. One major decision was that the children of the "guestworkers" were obliged to attend school. There is no such obligation, however, for pre-school attendance. The significance of pre-school or kindergarten attendance for school performance of children of immigrants has been shown in several studies (Esser 1990). It has been the policy of the state on all levels of government to increase the numbers of kindergarten. At the moment Germany is approaching a situation in which statistically every child could attend.

According to the 1976 decisions the children of "guest workers" should be integrated into the regular school system. Preparatory and parallel German language training should be given to them, if necessary. They should be offered training in their mother languages on a voluntary basis in special courses after the regular classes. The understanding of these decisions was to avoid social problems with a population that would temporarily live in Germany.

An exception to the system are the so-called national or bilingual classes in Bavaria and the rather large system of private Greek schools in several German cities. Instruction in these systems is given in the respective national languages: in the bilingual Bavarian system the concept is to start with the mother language and then introduce instruction in German progressively. In relation to the size of the migrant school population of over 1 million only a very small proportion of students does attend these schools. In Bavaria only 4% of the migrant student body is in the bilingual system at present; figures were, however, much higher in the past. While the Greek private school system clearly origi-
nates from forces within the Greek community in Germany – supported by the Greek government – the Bavarian national classes were installed to enable migrant workers’ children to easily return to their “home countries”. The labor market concept lying behind this structure was that of a labor rotation system.

Such a labor rotation system never came into effect. Generally speaking, immigrants have access to and are – with few exceptions – fully integrated into the labor market and labor market policies, for instance according to the so-called Arbeitsförderungsgesetz which, among others, helps to qualify or requalify unemployed people.

Cultural integration: The cultural dimension of integration is a process that encompasses the learning of cognitive abilities and knowledge of the culture of a society. Language is of prime importance here. Cultural integration also includes the internalization of values, norms, attitudes and the formation of belief systems. For the second generation schools are of prime importance in this context. Germany has not understood itself as an immigration society giving schools, like in classical immigration countries, the explicit job of integrating (“assimilating”) the children of immigrants. The basic understanding of these policies in Germany was to avoid social problems. The “latent curriculum” of the schools in terms of what happens in the classroom, however, always has been and is today the same as in classical immigration countries and in France, namely cultural integration or acculturation.

Policies of religion also play a role in the cultural and "ideological" reproduction of society, despite Germany understanding herself as a secular state. The Christian churches and Judaism play a role in public life that is defined legally and by tradition, including a role in the educational system. No such role as yet has been established for the most prominent religion of the immigrants, Islam. A process is under way, however, which could result in an institutionalization of Islam according to the general patterns. Already since 1985 the state of Nordrhein-Westfalen is teaching Islam by Islamic teachers under supervision from the state government. Very recently, a high court in Berlin has ruled that Islam should be treated in analogy to the Christian churches and to Judaism and has allowed an Islamic federation to start organizing the teaching of religion in the public schools of Berlin. In Bavaria, for the first time, Islamic instruction is being offered in schools under similar conditions as in Nordrhein-Westfalen. On the whole, however, it is safe to say that the relation of German state and Islam is still in a conflictual state of search for a clarification and definition. The continuation of a development to treat Islam in analogy to the established religious communities would mean to adopt the traditional general mode of cultural-religious integration in Germany. So far, most religious education among Islamic migrants has been in the hands of private Islamic associations in afternoon classes.

Identificational policies: In Germany the dominant tendency to define national belonging has been via common ethnicity. This, of course, is exclusive toward the foreign migrants. What is more: The continuing official denial of the de facto immigration situation in Germany ("Germany is not an immigration country") has been regarded by the immigrants as a continuous denial of the legitimacy of the "presence of foreigners" in the country. This has not been an invitation for identification. What is lacking is a model of national belonging, a model of becoming and being a German that is based on continuously living and working there and thus could include migrants as well. The general mode of identificative nation state integration has not included the foreign migrants. It
has only included one large group of migrants: those defined as ethnic Germans (Aus-
siedler).

5.4 Special integration policies

As to structural integration transitory classes ("Übergangsklassen") that prepare for par-
ticipation in regular classes have to be mentioned as special institutions in the area of education. On the level of single municipalities as well as federal states (Länder) a multi-
tude of programs exists for the support of immigrant children. The "Regionale Arbeitsstel-
len zur Förderung ausländischer Kinder und Jugendlicher" in Nordrhein-Westfalen can be given as an example. The Bavarian program of national classes and bi-lingual education had some regional importance in the 80s, but has lost attraction continuously in the 90s. It is not pushed forward any more by the Bavarian ministry of education.

Special measures relating to the labor market, and qualification include "Pro-Qualifi-
zierung", a training program for people between 25 and 45 to adopt them to techno-
logical changes, programs for migrant women, incentives for employers of migrant back-
ground to create apprenticeships for second general migrant youth and many regional and local initiatives for the same purpose.

Are there special institutions in the area of cultural integration? "Muttersprachlicher Unterricht" is by far the most relevant institution in this area. It consists of mother-tongue language instruction and cultural studies on a voluntary basis in afternoon classes, fi-
anced by the federal states and organized in cooperation with the respective national consulates. Roughly 30-35% of the migrant children (first and second generation) take part in this instruction (Kupfer-Schreiner 1996).

Policies of social integration refer to measures of newly created institutions and orga-
nizations in relation to the development of "positive" personal social relations between natives and immigrants, "intercultural relations", and to the increase of immigrant mem-
bership in associations. The reduction of prejudice and discrimination in everyday life is part of this work. Newly created organizations in Germany, whose activities are mainly centered in the area of social integration are Ausländerbeiräte (foreigners’ councils) and Ausländerbeauftragte (foreigners’ commissioners). They exist on the local, federal state and federal level. In addition, a lot of NGOs were founded whose activities center around social integration. A lot of organizations, including the federal interior ministry have lead campaigns against xenophobia, ethnic prejudice and racism, particularly after the violence of 1992.

As can be seen from this discussion special integration policies have a much lesser weight in Germany – as in other European countries – compared to the inclusion of mi-
g्रants in the system of general nation state integration.

6 Mode of integration in The Netherlands

6.1 Societal definition of the immigration situation

Though having been a country of immigration in the past The Netherlands started off be-
ing a country of emigration in the 20th century. "Even during the the 1960s and 1970s, when considerable numbers of guest workers arrived, the government tried to stimulate
its citizens to move abroad to countries like Canada, the United States, Australia and New Zealand. Population forecasts made many fear that the country would not be able to accommodate all; in terms of geographical space and in terms of labor market needs. The paradoxical nature of having policies for both importing and exporting labor, at the time appears not to have been noted or publicly discussed" (Doomernik 1998, 54).

In 1974 a ban on recruitment was ordered. In contrast to some other European countries The Netherlands did not install any program for return migration incentives. Due to family reunification or family formation immigration continued similar to France and Germany and a settlement process occurred. Still, like in Germany, the illusion of the temporariness of the immigration continued. In 1979 a scientific advisory committee to the government urged to give up the fiction of the return of the migrants and advised the government to develop an active integration policy. By formulating a program for minority policies in 1981 the government recognized the immigration situation and responded to it (Entzinger 1996, 147/148).

6.2 Social order and sense of nationhood

The Netherlands are a highly organized welfare state that has gone through different processes of modernization in the 1990s. Immigrants, be they citizens or not, generally have access to the main institutions of society and to the system of social security and welfare.

The tradition of a "consociational democracy" and a "pillarisation" of society have been important principles of the social order that have not only influenced "sense of nationhood", but integration policies towards immigrants as well. "Pillarisation" historically means that the main ideological and political camps – Catholics, Protestants, liberals and socialists – have their own institutions like political parties, unions, schools, associations, hospitals, media and welfare organizations. For the pillars to form a temple a "roof" is needed. The common political institutions of the state form this roof where conflict and cooperation are mediated. The main characteristic of this consociational democracy is that conflicts are settled by pacification and compromise, leading to equal access to the state's resources for all groups involved. This principle has been extended to the newcomers and has been conducive to formulating the idea of a Dutch multi-cultural society (Entzinger 1996; Doomernik 1998). One has to add, however, that most observers agree that pillarisation structures are getting weaker in the nineties.

6.3 General integration policies

Similar to the cases of France and Germany we shall begin with structural integration and discuss citizenship and schooling. After the Second World War citizenship law was based mainly on the principle of ius sanguinis. Since then more and more elements of ius soli have been introduced. All four major reforms in the last 50 years aimed at easing conditions for either acquiring citizenship by birth or through naturalization (Groenendijk 1999). Naturalization is possible after five years, very easy for second generation and automatical for third generation. After a very liberal attitude the rules concerning the toleration of dual citizenship have been much restricted.
According to the pillar system it is possible for minorities to form their own, publicly financed schools. But with the changes of the pillarisation system and the state control exercised the schools are very much the same independent of who is organizing it. Only a small minority of the immigrants sends their children to such (elementary) schools anyway. Schools thus are institutions of general socialization and integration and not reinforcing ethnic identities.

Due to its multicultural tradition The Netherlands started off by special programs for immigrants. "... many policies that were put in place in the 1980s that specifically aimed at the integration of immigrants were substituted during the mid-1990s by general integration policies for all disadvantaged persons, natives and immigrants alike" (Doomer 1998, 7). This refers to housing policies as well as to programs of labor market integration. In 1992 a so-called Youth Employment Guarantee Law was enacted which makes work available for every person under 21 who has been unemployed for six months. Not accepting an offer from this program means losing social security benefits for three months. In 1995 a new program for the long-time unemployed was begun. Many of these jobs are created in the public sector and are financed by the reallocation of social security jobs that people would otherwise be entitled to (ibidem). These general programs are of particular importance for migrants since their unemployment rate is more than double as that as that of the native population.

6.4 Special integration policies

The minority policies at the beginning of integration policies correlated much with a tendency for special integration programs. These have not totally disappeared, not even in structural integration. For primary schools with a disproportionate rate of immigrant children special funds allow for additional staffing and a decrease in classroom size. As to labor market integration a special program existed in the 80s when a quota of public sector jobs was reserved for Moluccan immigrants. Since 1987 the government tries to increase the number of employees of immigrant origin in the public sector. Attempts to expand rules of higher immigrant employment in the private sector failed. As a substitute the government enacted a law in 1993 obliging all employers with a workforce of more than 35 to register their employees’ ethnic background (Entzinger 1996, 155).

As to cultural integration the multicultural orientation of the beginning phase has lost much of its force since the 1980s. Funds for social and cultural activities of ethnic minorities have been reduced or canceled. In addition, there is a new discussion about the relevance of mother-tongue language programs that have been cut down already anyway. "There is a change today in the country’s integration philosophy. It seems that the 'minority model' is substituted for by an 'integration model' ... For historic reasons pluralism in education or the mass media is stronger in The Netherlands than in most European countries. Most probably, however, ethnic minorities will have to strive for themselves for the institutionalization of this pluralism, instead of being supported by the state like till now" (Entzinger 1996, 156).

In 1996 The Netherlands installed a special immigrant integration program ("Inburgerings-beleid") which is directed at persons who are accepted as immigrants or refugees. The program is obligatory and has to be taken upon arrival in The Netherlands. It consists of courses in language training, courses on the culture and institutions of the country and
relates to all dimensions of integration. It is a special program, yet its goal is early participation in the general society, not a preparation for life in an ethnic minority culture.

7 Conclusion: The emergence of a European integration policy

There is clear evidence in the three cases presented for a Europeanization of integration policies:

1) Summarizing those conditions that strongly influence integration policies we can say that the societal definitions of the immigration situation in the context of labor migration in France, Germany and The Netherlands have not been as far apart as the image and public discourse of different national integration "strategies" may suggest. "Deutschland ist kein Einwanderungsland" has often been portrayed as a particular German attitude, but nowhere has there been a clear recognition of the immigration situation by governments or societies when the settlement process came under way in the 1970s. Germany has only been (much) slower in recognizing the immigration situation.

2) As to social order and sense of nationhood all three countries are modern welfare states. Their concepts of nation have much approached in the last three decades. Germany has added a strong political component to its sense of nationhood and the Dutch pillarisation structure has been weakening.

3) The inclusion of immigrants in general integration policies is far more important for immigrant integration than any targeted special policies. Since the countries are all modern welfare states who include the immigrants in their systems many basic integration conditions are similar or the same. School, labor market, business, health services or social benefits are all open to immigrants and their descendants.

4) Differences that can be found in degree or quality of integration of immigrants between the countries are more likely to be the result of remaining differences in general integration conditions – like for instance the particular labor market conditions in a country – than the result of any special measures.

5) There is a trend for special policies of integration to decrease. Special policies have never been strong in France and have lost influence in Germany. The Netherlands who had a very marked minority policy orientation has changed that toward a general approach to support potentially marginalized groups in general. New special policies to promote equality (of an affirmative action type) do not (yet?) play a significant role in Europe.

6) There has been a remarkable trend of convergence of citizenship laws on the basis of ius soli. This convergence includes the "philosophy of naturalization" within the integration process, namely to regard it as an instrument of integration, not as a finishing act.

7) There is strong agreement between the countries that a restriction of further immigration is a precondition for the "successful" integration of those immigrants who are already in the country.

Trends of convergence or Europeanization that we identified for integration policies resemble processes of Europeanization in immigration control. The Amsterdam treaty has included the Schengen agreement that was a bilateral accord between single states into
the EU structures. In the Amsterdam treaty as well most items of immigration and asylum policies have been "communalized", though still on the basis of a unanimous vote. The control over access to its territory is one of the core aspects of nation state sovereignty that nation states still cling to.

8 Bibliography


