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Goodman, SB

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Integration Requirements for Integration's Sake? Identifying, Categorising and Comparing Civic Integration Policies

Sara Wallace Goodman[a]

[a] Political Science, University of California, Irvine

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Integration Requirements for Integration's Sake? Identifying, Categorising and Comparing Civic Integration Policies

Sara Wallace Goodman

Several countries in Europe have recently adopted obligatory language and country-knowledge requirements for settlement, naturalisation and immigration. Integration tests, courses and contracts are only a few examples of the new 'civic integration policies' states are using to promote individual autonomy and common values for newcomers. Are these requirements in response to concrete problems of immigrant integration? Do they enable, or actually inhibit, integration? This paper examines the various pressures behind attaching mandatory integration requirements to status acquisition. To systematically examine these policies, I develop a civic integration index (CIVIX) to measure language, country-knowledge and value-commitment requirements across the EU-15. While there is a general shift toward civic requirements across Europe, evidence reveals important differences in the degree of policy change. Finally, I explore how new civic requirements complement or challenge existing citizenship practices, identifying where integration is facilitated and rewarded with citizenship. I also show where civic requirements fill strategic goals, mainly controlling the inflow and impact of immigration. The arguments made here support a critical rethinking of the conventional wisdom about national models of integration and a dynamic understanding of state citizenship strategies, where policies define not only the rules but also the content of national membership.

Keywords: Citizenship; Civic Integration; Immigration; Western Europe

Sarah Wallace Goodman is Assistant Professor of Political Science at the University of California Irvine. Correspondence to: Dr S.W. Goodman, Dept of Political Science, 3151 Social Science Plaza B, Irvine, CA 92697-5100 USA. E-mail: sbw7@s.goodman@uci.eu.

Introduction

Immigrant integration has proved to be a core challenge in liberal democracies. This is especially true in light of recent political discourse in Europe and beyond that suggests a real 'failure of integration' among new and long-established immigrant populations, as indicated by evidence as diverse as socio-economic performance gaps and acts of terrorism. In response to this problem, civic integration has been singled out as an alternative or an altogether new strategy of integration (Green 2007; Joppke 2007a, 2007b), with states shifting away from historical integration models of assimilation, multiculturalism and (paradoxically) exclusionism. Civic integration policies express the idea that successful incorporation into a host society rests not only on employment (economic integration) and civic engagement (political integration), but also on individual commitments to characteristics typifying national citizenship, specifically country knowledge, language proficiency and liberal and social values. And unlike models of cultural integration, which focus 'near[ly] exclusively on the extent and ways in which migrants' attitudes and behaviours approximate to the host society (or sections of it)' (Spencer and Cooper 2006: 57), the objective of civic integration is not transforming culture affinities or assimilationist uniformity but promoting functional, individual autonomy. Civic integration aims to establish, in the words of the then UK Prime Minister, Tony Blair, a 'respect for diversity' that is maintained—not undermined—by commitments to 'common values' (2006).

To promote civic skills and value commitments for newcomers, governments have put into place a variety of requirements or 'civic hardware', including integration contracts, classes, tests and ceremonies. And while these are 'civic' requirements, implying a direct connection to citizenship, the real innovation of this emergent European variant—unlike the North American model[1]—is that it promotes 'citizen' values and skills not only to applicants for citizenship alone, but increasingly across the various strata of membership, including those seeking permanent settlement and even entry. In both comparative and conceptual perspectives, the practice of requiring country knowledge and measuring national commitments for all types of residency and citizenship has considerably expanded.

Although the reforms in Europe are quite recent—the first example of civic integration stemming from the Dutch Newcomers Act of 1998—most scholars agree that mandatory language and country-knowledge requirements are already significant in their scope and substance (Green 2007; Joppke 2007a, 2007b; Joppke and Morawska 2003; Odmalm 2007). Yet despite a flurry of literature based on detailed analysis of individual case studies or a small group of countries, there has been relatively little systematic comparative analysis of civic integration requirements. This makes it difficult to understand the analytic importance and practical consequences of integration tests—either as a trend away from historically inherited national models of integration, or as a mechanism for bonding newcomers to civic values and national membership. Indeed, it first needs to be established *where* and *to what degree* civic integration is taking place.

This paper seeks to overcome this gap by developing civic integration as a theoretical concept, categorising the content and tools of civic integration requirements, and producing a civic integration policy index (CIVIX) that measures requirements both within and across countries with over-time and cross-national data respectively. This index is then used to assess how new requirements complement or challenge existing citizenship policy, and identify where and why policy patterns are taking shape. I develop a new citizenship typology reflecting the intersection of civic integration requirements and existing citizenship policy, producing four categories of citizenship strategy: prohibitive, conditional, insular and enabling.

While convergence claims draw the most-different cases together in terms of shared mechanisms and content of civic integration, the examination of these requirements in the context of other citizenship policies reveals differences in the implementation of otherwise similar policy instruments. The theoretical and empirical contributions made here allow for a more informed understanding of this important policy trend, thus helping to structure a developing research agenda about state responses to ethnic diversity and various pressures on immigration policy-making. Moreover, research on civic integration sheds new light on one of the longest-standing puzzles in political studies: How do states define membership and belonging?

Theoretical Precision: What is Civic Integration?

Citizenship has become a robust area of study, with scholarship focusing on all aspects of the concept—as a legal category, as a membership association and as a norm of democratic participation. And while civic integration is intricately connected to all three of these functions, it has until recently received relatively little attention. There are two main reasons for this belated treatment of civic integration requirements, despite their increasing necessity for securing varying membership statuses from entry to citizenship: the absence of a theoretically precise definition for civic integration with respect to the larger realms of integration and citizenship policy-making; and a general confusion over how to analytically treat civic requirements alongside the other dimensions of citizenship policy itself.

Situating Civic Integration

The very term 'civic integration' presages difficulty in trying to place it in a theoretical context. While it is one of many strategies meant to promote immigrant integration (in addition to proactive housing and education policies, or job training), the 'civic' component is the most closely related to citizenship. These policy areas are interrelated (both are concerned with the incorporation and skill-set of migrants), but they are not synonymous. Immigrant integration is predominantly concerned with the *performance* and *degree of incorporation* of newcomers in a host society, while citizenship is preoccupied with the rules extending *legal status and rights* at the various 'entrance gates' of state membership, identified by Hammar as entry, settlement and citizenship

(1990: 9–25). The conceptual overlap of civic integration has not deterred empirical examinations of policy (European think-tanks and researchers have been prodigious in keeping pace with the times), but consistency remains an issue where the goal for researchers is to categorise change and measure impact.

We see studies examining civic integration in both these contexts. In one of the earliest attempts at the cross-national categorisation of citizenship policies, Patrick Weil includes language and loyalty oaths alongside other requirements of citizenship, like residency and financial minimums (2001). Harald Waldrauch, who compiles and catalogues the impressive European case-studies of the International Migration, Integration, and Social Cohesion (IMISCOE) Network of Excellence, also includes language and civic requirements in terms of how they simplify or complicate the process of naturalisation (Waldrauch 2006). Christian Joppke, however, in his formative studies of civic integration, examines country, language and value obligations as mechanisms of immigrant integration, on a par with anti-discrimination (2007a; 2007b), while Koopmans *et al.* include language requirements as a cultural obligation for citizenship, but alongside other components that affect levels of migrant participation (their dependent variable), like allowance for religious practices and political representation rights (2005: 31–73). These different uses suggest that the concept of civic integration is stretched beyond precision. A language or country-knowledge requirement may be similar in content, but fundamentally different in intent, depending on its application. A requirement promoting integration is positive reinforcement, but a requirement that makes contingent one's legal status is a potentially negative sanction.

Given this distinction, scholars should examine civic integration in both integration and citizenship contexts, but should be analytically precise about that context and the difference between the two. Whether civic integration requirements are, indeed, an effective tool for integration is an assumption in need of testing. Without a clear articulation of the way in which civic integration is used, citizenship requirements may appear unnecessarily cultural, and integration may seem unnecessarily statist.

Locating Civic Requirements in Citizenship Policy

Having distinguished civic requirements as they apply to immigrant integration (performance and equality) and to citizenship (membership and status), the second conceptual task is to understand how they specifically shape national citizenship strategies.[2] The tendency in the literature on citizenship has been to treat civic integration requirements alongside other requirements of citizenship, such as residency duration, dual citizenship and citizenship by birth (*jus soli* and *jus sanguinis*). In addition to Weil's early study and Waldrauch's comparative exploration of the acquisition of nationality, this type of study is also evident in Howard's citizenship policy coding (2010—this issue of *JEMS*). Each treats civic requirements as an equal component to other requirements of naturalisation, where the greater number of requirements indicates a more restrictive policy. This linear view has led

some to conclude that there is a 'backlash' against earlier citizenship liberalisation (Joppke 2008), or even a 'return to assimilation' (Brubaker 2001).

The problem with this interpretation is that it unnecessarily reduces the complexity of citizenship policy. While citizenship is a contract that emphasises rights (for the migrant) in exchange for obligations (to the state), the pendulum metaphor—where moving in one direction necessarily distances policy from the other—is misleading. A state can widen or liberalise the scope of people who are eligible to apply for citizenship while raising the expectations for new citizens. In other words, increasing the obligations of citizenship does not necessarily cancel out historically established or recently won membership rights.

In this sense, civic integration addresses a different aspect of citizenship. It does not answer the eligibility question 'Who has access?' but rather 'Under what conditions does someone with eligibility obtain citizenship?'. Unlike rules for access that shape how inclusive or 'liberal' national citizenship may be, requirements like language proficiency or country knowledge speak to the difficulty of obtaining it. I therefore conceptualise citizenship policy change as taking place on two intersecting vectors, as shown in Figure 1. The vertical axis displays the extent of language, country knowledge and value requirements, which define the depth or membership content of citizenship. The horizontal axis depicts the rules for access to citizenship, which can either widen or narrow the scope of potential members. To describe the extent of expansion, I use the accepted labels from the literature on citizenship: 'liberal' and 'restrictive' (Hansen and Weil 2001; Howard 2006; Joppke 2008). To describe changes to citizenship content or what I describe as a process of deepening, I employ the terms 'thick' and 'thin'. The language for describing access is evocative of economic markets, or even immigration policy (juxtaposing 'openness' and 'closure'); that for
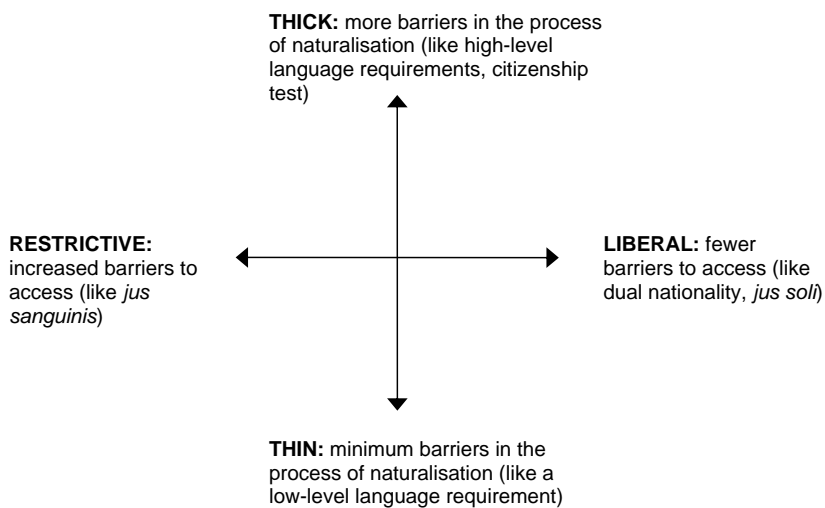

Figure 1. Conceptualising policy change in citizenship

conditions relies on an alternative idea of membership, distinguishing between coherent (dense) and porous (loose), state-articulated versions of citizenship identity.

This conceptualisation of citizenship not only captures the complexity of citizenship policies but also the dynamism of citizenship configurations, where a country with traditionally accessible or liberal (wide) citizenship can also have thick (dense) definitions of citizenship placing conditions on that process of acquisition. It is not, therefore, just 'ethnic' national communities, like Germany, that can have robust or dense concepts of national membership, nor is it only those with traditionally accessible notions of citizenship, such as Ireland, that might have thin articulations of citizenship identity through modest civic requirements.

Empirical Measures of Civic Integration Requirements

Having attained a clearer understanding of civic requirements and policy, this section develops coherent measures to operationalise this concept and score cases along transparent, durable and portable categories.[3] While in-depth and comparative case-studies do a sufficient job at identifying where and to what extent these policies exist, a set of common measures offers the advantage of drawing systematic comparisons across both cases and time.

Existing Approaches

Since the emergence of these new civic requirements, several studies have attempted to categorise and compare integration requirements. These studies—conducted entirely within the European context—have largely been limited to within-case description, without engaging in sustained comparisons to other cases. Such research has provided valuable data about individual cases, including whether integration criteria are voluntary or obligatory (Carrera 2006), details on programme objectives and sanctions (Michalowski 2004), subject populations (Collett 2006), programme content (Bauböck *et al.* 2006), and best practices (ICMPD 2005). But they all lack the comparable baseline standards that are needed in order to locate meaningful patterns and trends.

The studies that have attempted to systemically code citizenship policies across cases can only reach limited conclusions in terms of civic integration. Weil's analysis contains a simple checklist for whether or not loyalty oaths or knowledge of language and history are required, yielding little sense of how much more rigorous naturalisation is in one country versus another (2001: 22–3). Koopmans *et al.*'s two-dimensional conception of citizenship strategies has a similar problem. Scores are assigned for whether language requirements are 'monist-assimilationist' (–1), 'pluralist-multiculturalist' (1) or 'between' (0), rendering the final coding as only relational and typologically derived (2005: 51–4). Howard's revised 'Citizenship Policy Index' takes into account civic integration requirements, but merely as a restrictive 'correction' to his linear measure of the relative inclusiveness of

citizenship policies (2010). Finally, the Migration Policy Group, in conjunction with the British Council (2007), provides probably the most detailed set of indicators measuring integration requirements. The Migrant Integration Policy Index or MIPEX is a 27-country study that systematically codes for requirements at the various entrance gates (residency, family reunion, naturalisation), as well as rights in different integration arenas (labour market, anti-discrimination). The utility of these indicators for objective analysis, however, is significantly diminished by their normative value ascriptions. Indicators do not capture the policies themselves, but rather the extent to which various requirements enable migrant inclusion. Countries with high values are considered more amenable to immigrant integration, but this does not necessarily translate into low or voluntary requirements.

The CIVIX Index

In order to examine the variations in civic integration requirements, I have constructed a new civic integration index (CIVIX) for each of the three target civic knowledge areas (country knowledge, language and values) in the EU-15. This index allows both diachronic (over time) and comparative (across cases) analyses for a thorough examination of *where* and *when* civic requirements have taken shape. Standardised coding also takes into account the *scope* (number and nature of obligatory civic requirements) and *depth* (procedural or onerous) of policy requirements. Only with this type of systematic indicator can we examine the extent of change within, and the breadth of change across, cases.[4]

The scale of the CIVIX is 0 to 6: a high score indicates 'thick' citizenship content, as introduced in Figure 1, which includes multiple onerous barriers to citizenship (e.g. Germany). A low score represents 'thin' citizenship content, with minimal or easy content requirements for obtaining status (e.g. Italy). The coding of requirements takes into account four distinct dimensions: the category of third-country nationals accountable, specifically family unification; whether civic conditions are required for entry, settlement or citizenship; the number of requirements across the civic targets of country knowledge, language and values, including integration courses, tests, contracts, oath ceremonies and interviews; and, finally, the severity of requirements along the path to citizenship (for example, a 'high' level of language proficiency or cost).[5] This dimension is also reflected in point valuation, where more points are assigned to language and knowledge requirements at the settlement stage than at naturalisation, where a longer period of residency engenders greater linguistic and knowledge competence.

Points are assigned as follows: obligatory civic requirements at the first (entry) or second (settlement) gates of state membership receive one point per criterion. Examples include 'integration from abroad' tests (the Netherlands), mandatory language and integration courses (Germany) and integration tests (Denmark). However, when language requirements or country knowledge are tested at the third gate (naturalisation), only half a point is assigned. This reflects the previous point;

language fluency and country knowledge increase over time, therefore a final citizenship test is less arduous than a settlement test. The only exception to this is when the citizenship test is *only* required for naturalisation (Austria) and is not complementary to settlement (UK), in which case one point is added.[6] If there is a mandatory citizenship ceremony or oral oath requirement, this criterion receives half a point. Despite only appearing at the citizenship stage, its low time commitment and skill requirement renders this a modest obligation.

There are compounding factors—particularly in regard to requirements for establishing settlement—which increase a requirement's difficulty. An additional half point is added for each criterion to reflect this dimension, including a high level of required language, course fees, and whether or not family members and spouses are required to meet civic obligations for settlement. If there are requirements *in addition* to the language/integration course, like civic training (France) or an integration test (Denmark, the Netherlands), one point is added. When these requirements are *complementary*, like a language/settlement test *in lieu* of classes (Austria, the UK), only half a point is added.[7] Finally, Austria, Denmark and France use integration contracts to bind an applicant to integration commitments in exchange for assistance and rights. In cases where the contract is a tool of obligation, I do not add a half point. In these cases, it is not an additional requirement but the condition by which an applicant undertakes other requirements. However, France uses the contract not just as a mechanism of commitment but also as a standard of integration. Applicants sign up to the secular, democratic and social values of France, and agree to interviews 'set up in order to monitor the contract' (CAI 2007). In this case, the contract is like a ceremony; it is a standard as well as a tool and, therefore, receives an additional half point.

The CIVIX Scores

In order to understand the 'depth' of current citizenship content and the degree of policy change over time, Tables 1 and 2 display CIVIX values for each of the 17 countries in 1997 and 2009 respectively. Starting with 1997, a time which predates the recent wave of policy changes, we see very little in terms of formal civic requirements at any stage of membership.[8] This has partially to do with the degree to which newcomers had *access* to citizenship. For example, since an applicant for Austrian citizenship needed to have a main, continuous residence in Austria for ten years, the expectation was that such a long period of residency would result in sufficient integration, without needing additional requirements. Second, in stark contrast to contemporary policy, vague requirements of integration and assimilation were based on whether the applicant had a working knowledge of the country's language. The assumption was that knowing a country's language meant an applicant was also familiar with the country itself, and was sufficiently integrated as a result. Finally, where there were integration requirements 'on the books' (e.g. 'sufficient knowledge' of English in the UK, or demonstration of a 'genuine Greek

Table 1. Civic integration requirements in 1997 (CIVIX 97)

	Gate 1: entry	Gate 2: settlement	Gate 3: citizenship		SCORE
	Lang/integ. req.	Integration requirements	Language/civic requirements	Ceremony/ oath	
Points	*1*	*1 for all; 0.5 if limited*	*0.5 language or integration req; 1 if test*	*0.5*	
AUT	N (0)	N (0)	'Sustainable integration' (0.5)	N (0)	0.5
BEL	N (0)	N (0)	'Evidence of integration' (0.5)	N (0)	0.5
DEN	N (0)	N (0)	Speaking (0.5)	N (0)	0.5
FIN	N (0)	N (0)	'Sufficient knowledge' (0.5)	N (0)	0.5
FRA	N (0)	N (0)	'Sufficient knowledge' of lang. meets reqt of assimilation (0.5)	N (0)	0.5
GER	*Ausseidler* (1)	N (0)	'Sufficient knowledge' (0.5)	N (0)	1.5
GRE	N (0)	N (0)	Lang. as evidence of 'genuine Greek consciousness' (0.5)	Y (0.5)	1.0
IRE	N (0)	N (0)	N (0)	Y (0.5)	0.5
ITA	N (0)	N (0)	N (0)	Y (0.5)	0.5
LUX	N (0)	N (0)	'Sufficient assimilation' (0.5)	N (0)	0.5
NET	N (0)	N (0)	'Reasonable knowledge' of lang. meets integration reqt (0.5)	N (0)	0.5
POR	N (0)	N (0)	'Sufficient knowledge' of lang. meets reqt of assimilation (0.5)	N (0)	0.5
SPA	N (0)	N (0)	Civic conduct as sufficient integration (0.5)	Y (0.5)	1.0
SWE	N (0)	N (0)	N (0)	N (0)	0.0
UK	N (0)	N (0)	Sufficient knowledge of lang. (0.5)	N (0)	0.5

consciousness' in Greece), there were no explicit or standardised mechanisms for assessing competence or compliance. Whereas, in one case, a sufficient level in the host-country language might be demonstrated through completion of the naturalisation paperwork, another's 'commitment' might be assessed through an interview. And within a single case, an immigration officer in one office might have a strikingly divergent interview procedure to another.

Turning to contemporary policies, Table 2 shows remarkable changes in a short time span, as the use of integration requirements has become widespread. Civic requirements have extended from naturalisation to settlement and entry, indicating that the expectations of civic integration have likewise expanded to a larger population. Country knowledge has been added as a separate requirement to language, language standards have been raised, haphazard criteria for evaluation have been replaced by standardised courses and tests, and citizenship contracts and ceremonies—meant to establish value commitments between an applicant and the state—have been instituted.

This surface-level comparison of CIVIX totals over time seems to support claims of convergence, but looking more closely at individual scores and change reveals a great deal of differentiation. Figure 2 shows 1997 and 2009 scores alongside one another, ranked in order by the degree of change. While civic integration requirements are generally increasing throughout this set of countries—with 10 out of 15 cases experiencing some type of change—there is a significant gap between states experiencing large and those with minimal amounts of change. These separate clusters are marked by the natural break point between France's change score of 3 and the many countries with scores of 0.5 ('change scores' are presented at the right of each country in Figure 2). Moreover, five countries experienced no cumulative change in this ten-year period.[9]

CIVIX scores reveal variations in the magnitude of change, while previous studies gloss over these differences by producing inherently dichotomous observations through comparison (change or no change). The comparative advantage of having a systematised indicator for civic requirements is that CIVIX reveals convergence in the general movement toward more requirements, but reserves this wholesale judgement with evidence of variation in the degrees of change. Some states have made significant moves toward increasing obligatory civic requirements; others have not. The next section examines this empirical middle-ground to account for different levels and applications of civic integration policies.

Identifying Citizenship Strategies and Explaining Divergent Outcomes

A second analytical contribution of CIVIX scores, having identified the general trends and limitations of convergence claims, is the opportunity to systematically examine policy interactions between civic requirements and existing citizenship practices. Recalling the two dimensions of citizenship illustrated in Figure 1, civic requirements

Table 2. Civic integration requirements in 2009 (CIVIX 2009)

	Gate 1: Entry		Gate 2: Settlement				Gate 3: Citizenship		SCORE
	Language/ integration requirement	Language course	Language level	Fee	Additional integration requirements?	Family	Language/ integration requirement	Ceremony or oral oath	
Points	1	1 (0.5 if limited)	Add 0.5 if above A1	0.5	0.5 if complementary 1 if additional	0.5	0.5 if lang. or complm. 1 if additional	0.5	
AUT	N (0)	Y (1)	A2 (.5)	€ 350 (.5)	language test (.5)	Y (.5)	test (1)	N (.5)	4.5
BEL	N (0)	Flanders (.5)					N (0)	N (0)	0.5
DEN	Y (1)	Y (1)	B1/B2 (.5)	Most exempt (0) §	integration test (1)	Y (.5)	Y (1)	N (0)	5.0
FIN	N (0)	Voluntary (.5)					Y (.5)	N (0)	1.0
FRA	Y (.5)*	Y (1)	A1 (0)	Free (0)	civic training (1)	Y (.5)	Y (.5)	N (0)	3.5
GER	Y (1)	Y (1)	A2/B1 (.5)	€1 per hour (.5)	orientation course (1)	Y (.5)	test (1)	Y (.5)	6.0
GRE	N (0)	N (0)†					Y (.5)	Y (.5)	1.0
IRE	N (0)	N (0)					N (0)	Y (.5)	0.5
ITA	N (0)	N (0)					N (0)	Y (.5)	0.5
LUX	N (0)	N (0)					Y (1)	N (0)	1.0
NET	Y (1)	Y (1)	A1 (0)‡	€ 4038.95 (.5)	integration test (.5)	Y (.5)	test (.5)	Y (.5)	4.5
POR	N (0)	Voluntary (.5)					Y (.5)	N (0)	1.0
SPA	N (0)	Regional (.5)					Y (.5)	N (0)	1.0
SWE	N (0)	N (0)					N (0)	N (0)	0.0
UK	Y (.5)*	Y (1)	Entry 3 ≤B1 (.5)	Yes, limited** (.5)	settlement test (.5)	Y (.5)	test (.5)	Y (.5)	4.5

* France and the UK have passed bills for language assessment, but neither has yet been implemented.

† Greece does not have a permanent residence status. However, there are Greek language requirements to obtain the 'EU long-term resident' status, but I do not include these.

‡ Immigrants have a higher required level of Dutch (A2) than settled migrants (A1). I assign zero points, allowing for 'integration from abroad' to cover for this discrepancy.

§ The course is free for refugees and family reunification. Other foreigners have to pay a subsidised fee. See http://www.horsholm.dk/VoksneAeldre/Integration/danish+ course.htm.

**According to the 'five-year rule', adult education in England is free for residents of five years and EEA residents. Anyone under this residency period must pay. Courses in Scotland and Wales, however, are free.
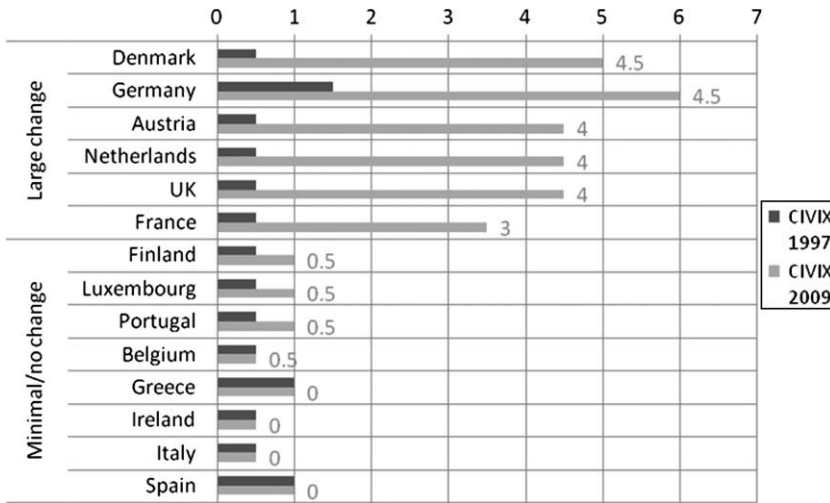
Figure 2. Differences in civic integration requirements, 1997–2009

represent only one component determining the relative inclusiveness or exclusiveness of a country's citizenship policy. The degree to which a state boasts liberal or restrictive rules for acquiring citizenship equally matters for discussing the ultimate impact of civic requirements. Figure 3 locates countries based on both citizenship *access* (using Howard's CPI—see his 2010 article in this issue) and *membership content* (using 2009 CIVIX scores).[10] This scatter plot gives us a more precise impression of overall citizenship configurations or 'strategies' for ascribing membership and conferring status.
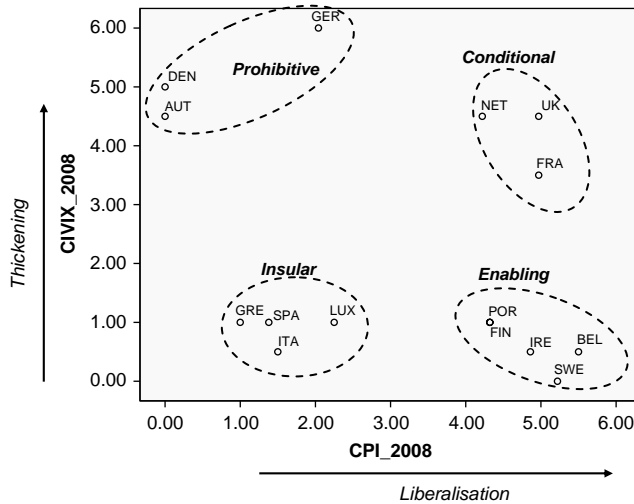

Figure 3. A typology of citizenship strategies through access (X-axis) and content (Y-axis)

In plotting citizenship policies by access and conditions, four definable citizenship strategies, or clusters, emerge: prohibitive, enabling, conditional and insular. This final section looks at the conditions behind each of these 'citizenship strategies' to explain the application of obligatory civic requirements in otherwise very different cases.

The most predictable population of cases are those that occupy the 'prohibitive' property space (Austria, Denmark and Germany), which all share 'differentialist' traditions of nationhood (birth-inherited, ascriptive and exclusive identities). Citizenship is exclusive in terms of access (i.e. high residency requirements, no dual nationality, *jus sanguinis*) but, even if a migrant gains eligibility for citizenship or settlement, the barriers toward full membership are high (i.e. language tests, integration courses). This configuration is the most predictable because it is the least surprising; we would anticipate that a state with a traditionally exclusive citizenship has arduous or even prohibitive conditions for outsiders gaining access to membership. Even where citizenship policy has liberalised—like the modest changes for second- and third-generation migrants in Germany's Nationality Act of 2000 (Howard 2008)—and despite (or perhaps in spite of) the significant role that immigration played in writing these countries' postwar economic recovery stories, civic requirements preserve a concept of citizenship identity largely unaffected by this population change.

An historical-institutional perspective would also identify a lasting influence of civic (in terms of equality of individual access) membership in the inverse cases of enabling citizenship (Belgium, Finland, Ireland etc.). In these cases, citizenship serves as a mechanism for establishing equal status and rights, *enabling* instead of *rewarding* integration. However, citizenship inheritance only gives limited explanatory leverage for identifying patterns of contemporary citizenship strategies. The scatter plot in Figure 3 also shows countries with historically exclusive national identities that *do not* have thick citizenship policies (Greece, Italy) as well as countries with traditionally civic pasts that have adopted thick citizenship (the UK, France). On a similar note, we also see where cases no longer fit with classic 'integration models'. Indeed, 'multicultural' Britain and 'assimilationist' France were once viewed as being so different that Adrian Favell referred to them as a 'reversed mirror image' (2001: 4). Yet they have both pursued civic integration requirements and goals comparable to 'exclusionary' Germany.

In looking at the third cluster of states, Italy, Greece and Spain share a common history of all being late democratisers and historical 'sending' countries, which have only recently become 'receiving' countries. Despite comparatively high averages of migration intake, internal regulations for status and citizenship have not been prioritised—with the exception of descendent-based acquisition—which is why this strategy is labelled as 'insular'. Greece, for example, does not even have a legal category for permanent residence. Furthermore, Luxembourg boasts the largest percentage of foreign residents in Europe—about one third of the total population (Eurostat 2008)—but one of the lowest naturalisation rates in Europe (about 0.4 per cent of the

foreign population; OECD 2007). These cases reveal two important insights for explaining the adoption of mandatory integration requirements: first, where we do not even see first-order immigration policies like border control or legalisation, we are less likely to see policies concerned with the quality or nuances of citizenship; and second, integration requirements do not primarily serve a functional role—to correct for the absence of integration among applicants for naturalisation—where opportunities for citizenship are already low. Greece and Italy are good negative test cases; access to naturalisation for third-country nationals is so limited to begin with that any adoption of requirements for country knowledge or language would seem redundant. It is therefore illuminating to look back to Germany, Denmark and Austria, to suggest that civic integration requirements can be more political-symbolic than corrective-functional.

Finally, the most unexpected cluster is the 'conditional citizenship' strategy, where policy-makers in the Netherlands, France and the UK combine comparatively liberal criteria of citizenship eligibility with arduous civic requirements. Unlike the enabling citizenship, we see citizenship here as a *reward*—not a mechanism—for integration (citizenship is the 'first prize', to use the Dutch expression). This is evident in two respects: first, policy-makers have sought to make the concept of citizenship more coherent and meaningful through civic criteria, and second, requirements serve an important 'vetting' role by limiting the degree of access newcomers have to legal status and rights.

First, the idea of citizenship itself has undergone transformation. Policy-makers have adopted integration criteria to present an updated, unambiguous concept of citizenship identity in light of demographic change over time. Looking at their shared history as former colonial powers is revealing of the pressures underscoring this symbolic shift. Postcolonial migration infused early and unprecedented levels of ethnic diversity into virtually (but not wholly) homogenous societies. This relative, if reluctant, openness allowed for overseas colonial subjects to be admitted *as citizens* with legal status. It also established a precedent for family reunion policies to which states are still obligated. Over time, disparities in the levels of integration between legal immigrants (particularly those who came during the oil crisis of the early 1970s) and native populations underscore what has been interpreted as a bifurcation between legal inclusion and social exclusion.[11] If citizenship is, as Brubaker describes, an 'internally included' community (1992), particularly where there are traditions of civic nationhood, then evidence of non-integration among legally circumscribed populations is problematic. New civic requirements symbolically redress this citizenship 'gap' by 'filling in' the content of citizenship identity, strengthening the bond between new and old citizens and even encouraging permanently settled residents to take up citizenship. We see this explicit definitional objective in Great Britain—where language and country-knowledge requirements seek to 'enhance the significance of British citizenship' (Life in the UK Advisory Group 2003: 3)—and in France, which explicitly defines 'French values' (democracy, secularism etc.) through the 'Welcome and Reception Contract'. The symbolic contribution of civic

requirements confronts the idea that citizenship identity has been de-valued over time and re-orients citizenship in light of immigrant-related diversity over time.

However, the most prominent—and controversial—reason behind the implementation of obligatory civic integration in otherwise 'liberal' citizenship regimes with relatively open immigration pasts, is to limit and control the inflow and settlement of migrants. This is why this strategy is described as 'conditional', and is most notable in the stretching of civic requirements to newcomers at the earliest stages of membership—entry. The Dutch have tested basic linguistic and civic orientation in a migrant's country of origin since the 2005 Act on Integration Abroad, France passed a law for testing basic French knowledge from abroad in 2007, and the British have designed the extension of language assessment from settlement to entry, proposed in the Home Office (2008a) Green Paper, *Path to Citizenship*. While these early investments in language and civic knowledge certainly increase the likelihood that a migrant will be able to access local institutions and hold down a job, they only invest in certain migrant categories, overlooking other immigrant populations who also require integration. The most extreme example of this is the Dutch Civic Integration Exam, which exempts various non-European countries (like the US and Australia) from demonstrating Dutch language and country knowledge from abroad.[12] Also, while France requires anyone over the age of 16 without sufficient knowledge of French to take a year of language classes and civic education before receiving a residency card, this only covers 25 per cent of immigration to France (OECD 2007: 246), with a majority of migrants coming from Francophone countries. Clearly, governments are 'taking it on faith' that some groups of immigrants will sufficiently integrate, while others need to be 'assisted'.

This is where civic integration requirements have the reverse intent of actual integration; obligatory requirements, by definition, vet and exclude applicants. Governments are caught in a maelstrom of pressures with regard to newcomers and diversity, and countries with deep migration histories are necessarily handling more fragile variables. The challenge is in striking a balance between liberalisation pressures that push toward open borders, including economic needs and Europeanisation, and liberal/historical precedents that come out of former colonial relations (like family unification), and contemporary politics of immigration (public attitudes, security agendas) that push borders toward closure and control. Institutional differences like assimilationist or multicultural integration models may yield differences in the mechanisms of integration (e.g. the French contract)—and the politicisation of immigration by the far right in France prioritises integration policies in a way that an insulated civil service in Great Britain could never achieve—but these institutions merely refract and mediate similar strategic pressures on policy-making in liberal citizenship regimes.

The degrees of deterrence that integration requirements have achieved are far more pronounced in the Netherlands and France than they are in the UK; Human Rights Watch (2008) has condemned the Dutch for using civic integration tests as an unjustified device of discrimination. Where this approach is more covert, Nicholas

Sarkozy's desire for France's ratio of *immigration subie* (endured; family unification) and *immigration choisie* (proactive; skilled migrants) is no secret (Bennhold 2006: 3). And evidence suggests that British requirements also play a small 'gatekeeper' role, with 16 per cent of refused applications for British citizenship in 2007 attributed to 'insufficient knowledge of English and/or knowledge of life in the United Kingdom' (Home Office 2008b: 7). If these countries wanted to limit immigration, they could simply change immigration policy or manipulate quotas. Instead, they indirectly use integration requirements to limit the inflow or impact of certain categories of immigration.

In the end, despite inherent institutional and experiential differences between conditional and prohibitive citizenship countries, the use of civic integration requirements to confront issues of immigration and integration predictions is an interesting new policy pattern across states. To conclude, it is important to consider the role that violence has played in infusing civic integration with a new sense of urgency. In Britain, the 'duty to integrate' by requiring applicants for settlement to pass the 'Life in the UK' test directly followed the London bombings of 7 July 2005, and Dutch integration requirements have grown increasingly prohibitive since their earliest incarnation in 1998, fuelled by a seemingly endless stream of events, including the murder of Theo Van Gogh. While other countries may not directly experience violence, they certainly feel its effects and are equally concerned with the impact of migration and diversity on national demographics, economic competitiveness and coherent concepts of membership. If the absence of integration is measured not only in socio-economic performance gaps but also by acts of violence and terrorism, then it is a priority to understand policies seeking or claiming to promote integration—civic or otherwise.

Conclusion

Though civic integration policies are still evolving across Europe, they have already proven to be both consequential and controversial. Not only can they set exceptionally high barriers to obtaining various legal statuses, impeding the secure settlement of migrants in a variety of states, but they also tell us something about the confluence of pressures surrounding immigration and membership in those countries that adopt stringent conditions for entry, settlement and citizenship. Regardless of whether policies are primarily functional, symbolic or strategic, civic integration is generating new debates about membership and national identity that challenge both the commitment of newcomers and the coherence of the national community into which they are required to integrate.

This paper had two objectives in analysing civic integration requirements: to critically look at convergence arguments that claim widespread adoption of language, country-knowledge and value requirements; and to examine requirements as a dimension of citizenship policy, looking at the different consequences of mandatory integration policies in different citizenship configurations. By creating a set of CIVIX scores to standardise requirements across cases and time, I was able to examine these

questions from a new, empirical baseline that goes beyond paired comparisons. First, though scholars have observed widespread convergence in civic integration policy-making, this paper has shown that convergence is variegated, limited to some countries and not others. Second, I examined the different citizenship policy contexts into which requirements are placed, in order to reveal the varying pressures and priorities behind policy adoption. A prohibitive citizenship strategy puts obligatory integration requirements into place for historical, symbolic and strategic reasons: to mitigate the impact of migration given the eventual acceptance of newcomers as a 'fact of life'. Conditional citizenship, on the other hand, seeks to limit the inflow of certain migrant categories and groups, given a context, history and impression of openness. Although Germany and Great Britain look a lot alike, these different approaches to civic integration as a strategy temper the prediction that 'convergence appears to be very much the order of the day' (Green 2007: 111). And finally, insular and enabling citizenship do not implement arduous integration requirements because they respectively do not recognise immigration as playing a consequential role in contemporary policy-making, and view mandatory integration requirements for status as counterproductive to the actual goal of obtaining status—integration.

Immigrant integration is without doubt one of the most pressing policy and social challenges that liberal nation-states currently face, and civic integration is an important and revealing response to this problem. By attaching requirements to the varying gates of membership, states are asking much of newcomers. Tying the extension of rights to sizeable linguistic and country-knowledge obligations means that citizenship for newcomers is now, more than ever, a contract relationship. On a practical level, civic requirements essentially raise the stakes of this contract by making it harder for an applicant to comply with the state's terms and conditions. While one trend in citizenship policy change has been advances in the direction of liberalisation, widening the scope of potential membership and making eligibility possible, it has also become increasingly difficult for those newly eligible members to fulfil their end of the bargain where there are obligatory integration requirements. On a symbolic level, the impact of civic integration requirements on the substance of national membership is perhaps even more striking. Civic integration requirements are new guidelines for what a 'successfully integrated' member of the nation-state looks like, and that can be a particularly alienating notion in countries with half a century of immigrant-related ethnic heterogeneity behind them. It raises the possibility that diversity in liberal nation-states and the content of national identity, despite modernising forces like globalisation and transnationalism, are not as complementary as we assumed, or as compatible as we had hoped.

Notes

[1] For a rough comparison of citizenship tests in Europe and the United States, see Etzioni (2007).

[2]   For these purposes, I group Hammar's (1990) three 'entrance gates' as part of 'citizenship,' defining the prior steps on the path to citizenship as dictated by end goals.

[3]   This strategy draws on Adcock and Collier's (2001) guidelines for achieving measurement validity.

[4]   One can debate whether integration requirements promote nationally distinct, 'ethnic' (cultural, historical etc.) aspects of membership or general, liberal-democratic values (i.e. proceduralism, liberalism). However, this is a distinction between *motivations*, not *mechanisms*, and is not, therefore, reflected in CIVIX scoring. I thank an anonymous reviewer for this point.

[5]   Note that I am only coding for third-country nationals, not intra-EEA movement or asylum-seekers. Intra-EEA or other identified 'privileged' countries of immigration are exempt from requirements, and there are many variations within countries to distinguish refugees and asylum-seekers from workers or family unification migrants (including level of language proficiency, residency etc.).

[6]   Luxembourg also receives 1 point at the citizenship stage, because the state requires two language requirements—Luxembourgish and German or French (see Horner and Weber 2008: 48)—as well as attendance at three citizenship courses.

[7]   In these cases, where a third-country national has the option of completing a language/settlement test *or* a language course, they receive a score of 1.5 for this combination, instead of 2.

[8]   The data for this coding were gathered from studies by Nascimbene (1996), Bauböck *et al.* (2006) and Weil (2001).

[9]   Since policy was measured in two snapshot years, it does not reflect changes that were adopted or repealed in the interim. In the case of Sweden and Belgium, for example, adoptions and reversals in requirements took place. Sweden discontinued optional integration programmes for settlement in 2007 (Swedish Integration Website, available at http://www.integrationsverket.se/, accessed 2 October 2007), but has since expanded mandatory citizenship ceremonies (Bernitz and Bernitz 2006: 534). Belgium removed a national-language requirement for citizenship in 2001 but, because Flanders adopted mandatory integration training programmes in the years between measurements (Foblets and Loones 2006: 86), zero change is reflected in its CIVIX score.

[10]   Though Howard includes a penalty weight for civic integration requirements (0.25 or 0.5 points), it is either applied to naturalisation requirements that are already at or close to zero (Austria, Denmark, Greece) or only minimally distorts higher scores (France, the UK) which concentrate toward the most liberal end of the CPI spectrum in any case. Thanks to Marc Howard for access to the raw data.

[11]   This observation underscores the entire postnational literature (Hammar 1990; Soysal 1994). For more on difference in levels of integration for Britain and France, see Favell (2001: 150–239); for the Netherlands, Vermeulen and Penninx (2000).

[12]   For a comprehensive list, see the Dutch Immigration and Naturalisation Services' website at http://www.ind.nl/en/inbedrijf/actueel/basisexamenvervolg.asp (accessed 20 May 2008).

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