CIVIC INTEGRATION REQUIREMENTS AND THE TRANSFORMATION OF CITIZENSHIP

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ABSTRACT

Since 1998, several European countries have attached obligatory civic integration requirements to the process of becoming a citizen, which include language proficiency, country knowledge, and value commitments. Why have some European states adopted new membership criteria while others have not? In this study, I make the argument that civic integration requirements are a response to both real and popular pressures of immigration. In explaining civic integration policy change, I emphasize three conditions in which these pressures manifest: 1) prior experience with immigration; 2) a high number of non-European foreign residents today; and 3) public/electoral pressure to “do something” about immigration and diversity-related problems. In response to these historical and contemporary factors, political elites implement civic integration requirements with the dual goal of promoting integration and controlling immigration.

In order to explain new membership requirements, I first develop measures to systematically identify and compare civic integration policies across cases and time. I construct an original index—the Civic Integration Policy Index (CIVIX)—for measuring and comparing these changes in the “EU-15” over a ten-year period (1997-2007). This study also uses a combination of cross-national, medium-n analysis with a single case
examination of Great Britain to show where and how real and popular pressures of immigrant-related diversity matter for adopting new membership requirements. This study draws on extensive in-depth interviews conducted in 2006 and 2007 with high-level policymakers and elected officials.

As a result of new civic integration requirements, the institution of citizenship in liberal democracies is undergoing fundamental transformation. New requirements balance out previous liberalization of citizenship policy that has given more people access to citizenship without accompanying obligations of membership. Requirements also infuse new content into traditional national membership, emphasizing a universal not particularistic set of skills and values. Finally, civic integration requirements modify citizenship from an exclusionary device to an instrument of inclusion. In the context of continued mass migration and globalization, these transformations make national citizenship more relevant now than ever before.
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Introduction

Naturalization is a transformative process where someone outside of a national political community “becomes natural,” by becoming a full citizen of the state. However, it is a paradox of expression; there is nothing “natural” about this process. Citizenship laws are the explicit and inorganic rules that instruct potential citizens how to naturalize. These rules vary from state to state; some have long residency requirements, while others automatically grant citizenship to second-generation migrants. The point, though, is that if one successfully navigates these hurdles and becomes a national citizen in a liberal democracy, then that person has access to citizenship rights and a sense of belonging that are indistinguishable from native born citizens. Of course, the principle is different from the practice. A naturalized citizen may gain access to the full menu of rights that conveys with the status of citizenship, but may always feel or be perceived as an outsider to the larger community of citizens.

Europe is more heterogeneous than ever before, with more immigrants, permanent residents, and ethnically diverse communities. This demographic transformation, when combined with an overall decline in birthrates, struggling domestic economies, and new security threats, has led policymakers to identify the competing benefits and costs of immigration. One of the results of increased immigration is a significant infusion of young labor that works in areas where their skills are needed, and thus fulfills labor
market demands. On the other hand, there are significant social and political costs. These are found among immigrants who have unequal experiences to natives across the many socioeconomic measurements of integration. Also, there are citizens that are frustrated with what they perceive as the lack of integration, the unending inflow of new migration, and impact on public services caused by immigration. The starkest source of these frustrations is the recent riots and violence perpetrated by Muslim fundamentalists who are legal residents—or worse—citizens. This indicates to both the public and policymakers that there are severe and endemic problems of cohesion and integration.

What can be done in liberal democratic states to mitigate these competing costs? States have tried a variety of integration strategies, but for all the opportunity, recognition, and protection these policies provide, significant challenges of cohesion, prosperity, and belonging still remain. As an alternative, states have started to reexamine citizenship as a mechanism of integration. This return to the original designator of state belonging is unique in Europe. Traditional countries of immigration, like the United States, have found it necessary from time to time to tweak membership requirements for citizenship, and recognize that naturalization can play an integral role in creating common bonds. By comparison, until this recent reexamination of citizenship, many European nation-states had not altered the membership content of naturalization requirements in over 100 years.
This dissertation is about these new membership requirements for citizenship. I contend that there are significant differences between historical membership requirements—such as the “sufficient integration” and allegiance oaths that have existed since the heyday of nationalism—and newer integration requirements like those of today. First, they are dissimilar in their assessment methodology. Old membership requirements were often subjective and inconsistent; new membership requirements have much clearer evaluation standards that include tests or a requisite number of course hours. Second, they are dissimilar in content. Old membership requirements were primarily limited to allegiance and cultural integration. However, new membership requirements emphasize not just country loyalty, history, and culture, but also civic knowledge of government, functional linguistic skills, and even how to find a job. Finally, they are dissimilar in audience. Old membership requirements were exclusively directed towards persons naturalizing as citizens; new membership requirements of citizenship—ironically—are now implemented at stages before citizenship, including settlement and entry. Not only do applicants for citizenship need to demonstrate the knowledge and skills of national citizenship, but several states have now extended these requirements to third-country nationals upon immigration,¹ or on the basis of family reunion. This horizontal

expansion of the expectations of citizenship obligations and behaviors is unique to Europe.

These new membership requirements are formally defined as “civic integration.” Coined in the 1998 Dutch Newcomers Integration Act (Wet Inburgering Nieuwkomers), variants of civic integration programs have started to appear across Europe. France introduced a “Reception and Integration Contract” (Contrats d’accueil et de l’intégration) where newcomers pledge in writing to learn French and assimilate to the French values of Republicanism and secularism. Germany passed a new Immigration Law in 2004 (Zuwanderungsgesetz) that established integration requirements for citizens and residents, including 600 hours of German language training and 30 hours of civic orientation classes. The Netherlands and Great Britain created new citizenship ceremonies. And new citizenship tests were adopted in Denmark and Austria, while Finland, Portugal, and Luxembourg adopted more difficult language requirements. These membership requirements significantly impact the relative ease or difficulty in obtaining citizenship, and in some cases, residence and entry.

I define civic integration as a set of legal rules that define the skill and knowledge requirements for citizenship. They cover a tripartite core of civic content that includes language proficiency, country knowledge, and value commitments. States can assert more or less of each of these dimensions, but they are all joined by the common objective

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2 These are just a sample of the wide amount of civic integration policy change taking place. For a full overview, see chapter 2 and Appendix A: Civic Integration Policy Case Studies.
of promoting a skill and knowledge-based core of citizenship. States can make elements of civic integration obligatory through several different instruments of assessment. This “citizenship hardware” includes: courses, orientations, tests, interviews, ceremonies, oaths, and contracts.

Civic integration requirements are significant for a number of reasons. Not only do they convey state imputations of what comprises citizenship content, but also political elites choose to make that content specific and explicit. Newcomers do not meander through ambiguous expectations; the terms of membership are clear. Moreover, states define these expectations of full membership in consequential ways. Non-compliance or failure can result in rejected citizenship applications, fines, or even denial of entry to the state. Finally, civic integration requirements create new avenues for the state to stay involved with immigrants when they enter society. This makes more points of contact between newcomers and the state, and thus allows for state officials to assume a greater managerial role in integration.

As the empirical examples above indicate, these changes to naturalization requirements are taking place in a number of European countries. This cross-national change has garnered the attention of several scholars who have described this seemingly phenomenal change in membership requirements as a “repoliticization of nationality.”

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“restrictive turn” in citizenship,⁴ “straightforward assimilation,”⁵ and even, to employ similar terminology, “civic re-balancing.”⁶ However, none—to echo an observation by Rainer Bauböck—offers “policy analyses that explain this significant shift and new orientation”⁷ (emphasis added).

This study aims to fill this lacuna by defining, locating, and explaining new civic integration requirements. It is organized around two general puzzles. First, what explains this general change across European states? Civic integration requirements are new in European states, compared to traditional countries of immigration that have had language and civic knowledge as a part of naturalization for much longer. Addressing this puzzle requires the examination of the full and lasting impact that immigration has on citizenship and European societies.

The second puzzle is one of cross-national variations. There is a broad interest in language competency and functional integration strategies, but there are some states that have enacted more changes than others. Why do some states adopt rigorous civic integration requirements, while others do not? To address this question, I examine the

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role of domestic political pressure that arises in response to significant non-European migration. The answers to both of these puzzles have important implications for understanding the utility and relevance of citizenship today. They also provide significant insight into how European nation-states conceive feasible strategies to manage immigration and diversity challenges given the equally constraining and enriching context of liberal democracy.

Outline of the Dissertation

This study is organized into five chapters. This comparative and theoretical examination of civic integration requirements is the first of its kind. Therefore, a significant amount of background clarification and conceptual orientation is provided before cross-nation comparisons are made. Chapter 1 attends to these conceptual concerns. I begin by examining the two meanings of citizenship: a status of enjoying full rights, and a membership category. While the former definition of citizenship has been expansive and central to European policy change, the latter component of citizenship has been sorely neglected. I continue by identifying the instruments, content, and origins of civic integration.

These civic integration requirements represent a renewed emphasis on membership, and juxtapose policies of civic integration to policies of citizenship eligibility. Eligibility requirements include residency duration, allowance for dual
citizenship, and conferring citizenship for second-generation immigrants through *jus soli*. These rules determine whether someone can *apply* for citizenship. Civic integration requirements, on the other hand, define how easy or difficult the process of naturalization is for eligible immigrants. A state could have very easy eligibility requirements (five years residency requirement or allowance for dual citizenship), but if the accompanying membership requirements are rigorous (such as a difficult citizenship test), then it would be inaccurate to describe the citizenship policy as wholly inclusive. In addition to distinguishing civic integration requirements from complementary citizenship requirements, I also make important distinctions between citizenship and integration policies.

With this articulation of civic integration requirements, Chapter 2 develops coherent measures for civic integration requirements, and scores cases along transparent, durable, and portable categories. I develop a Civic Integration Policy Index (CIVIX) that measures civic integration instruments at the three stages of status (entry, settlement, and citizenship). This index allows for policy measurements across a variety of cases, and across time. I measure civic integration requirements in the EU-15 (a relatively coherent set of states that experience common immigration pressures) during two “snapshot” years (1997 and 2007). In analyzing the variation of CIVIX scores, I draw two important conclusions. First, there is a general convergence in European states toward the adoption

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of additional requirements, but there are important variations in the magnitude of policy change. I term this pattern “variegated convergence.” Second, considering the complementary nature of a civic integration requirement to existing citizenship policy, I examine CIVIX scores alongside Howard’s Citizenship Policy Index (CPI), and develop a new typology for different types of citizenship strategies. These are labeled as prohibitive (Germany, Denmark, and Austria), conditional (Britain, France, and the Netherlands), insular (Greece, Italy, Spain, and Luxembourg), and enabling (Sweden, Ireland, Finland, Belgium, and Portugal).

Chapter 3 accounts for cross-national civic integration policy change (the dependent variable). I argue that civic integration requirements are policy responses to real and popular pressures of non-European migrants. I emphasize three conditions in which these pressures manifest: 1) prior experience with immigration; 2) a high number of non-European foreign residents; and 3) public/electoral pressure to “do something” about immigration and diversity-related problems. Prior experience allows for the establishment of migratory settlement over time and for experimentation with different migration policies. High levels of non-European foreign residents expose to policymakers the importance of promoting integration skills (such as language and country knowledge) that will foster economic integration and social cohesion. Finally, popular pressure can be observed both during and outside of election campaigns.
Since pressure for change are both real (integration problems) and popular (public opinion and politics), civic integration requirements have dual objectives. First, requirements are a functional response to integration problems through skills and knowledge opportunities. Second, requirements are a strategic response to public and electoral pressure through immigration control and defining common values. I test this argument about popular pressure and immigrant diversity, along with other explanations for policy change that include immigration volume, social costs of immigration, resource competition, and naturalization rates.

Chapter 4 presents a case study of Great Britain to demonstrate how contemporary levels of immigrant-related diversity and prior experiences create a condition in which incumbent political elites respond to integration needs and public pressure for immigration control. I examine new civic integration requirements in detail, including the “Life in the UK” citizenship and settlement tests, English Speakers of Other Languages (ESOL) citizenship lessons and language training, and citizenship ceremonies. To study the constellation of factors creating political and functional pressure for new integration requirements, I look specifically at the settlement of New Commonwealth (non-European) migrants over time and the currently high levels of non-European migration that result from family reunion, continued migration, and asylum seekers. I show how civic integration requirements are a functional response to endemic integration
problems with these minorities, as well as a symbolic response to gain public confidence in Labour party migration policies.

Finally, Chapter 5 presents conclusions and discusses the significance of civic integration policy change. I argue that membership changes represent a fundamental transformation to citizenship in three distinct ways. First, new civic integration requirements re-balance citizenship as a status comprising both rights and membership. States are returning to the notion of contract citizenship, where the extension of rights and access are counterbalanced by membership obligations. British Home Secretary Jacqui Smith summarizes this sentiment, though it could originate from any liberal democracy that experiences diverse immigration today: “There is a deal for citizenship. This is a country of liberty and tolerance, opportunity and diversity – and these values are reinforced by the expectation that all who live here should learn our language, play by the rules, obey the law and contribute to the community.”

Membership requirements re-balance citizenship by emphasizing Ms. Smith’s “contributions” and “expectations” in exchange for the panoply of rights that have typified citizenship policy change in the post-war period.

Second, civic integration requirements transform citizenship because they provide a new content of citizenship identity that enshrines membership not in culture or ethnicity, but in liberal democratic values. I describe this as the re-constitution of

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citizenship. If states impute a universalistic definition of citizenship, as opposed to national-particularistic tones of ethnicity or assimilation, then possibilities for inclusion increase.

Finally, civic integration requirements re-orient citizenship. I challenge the notion that citizenship is “an instrument and object of social closure.” Instead, I consider how new civic integration requirements can transform naturalization and citizenship, respectively, into an instrument and an object of social inclusion. Civic integration requirements are still used by some countries to exclude outsiders. In this function, citizenship is a prominent device of immigration control. However, there is the concomitant opportunity to use citizenship as a device of integration.

This study makes important contributions to understanding the relevance of national citizenship, state responses to immigration, and the management of diversity in liberal democracies. First, as a result of these significant transformations, national citizenship maintains a politically and socially relevant identity. Citizenship may mean less, but it does more. Second, states demonstrate that they are highly responsive to immigration in mutually beneficial ways. Civic integration requirements both promote integration and manage migration. This improves the life chances of migrants and protects political elites from suffering the political costs associated with failing to respond to public pressure. Finally, along with the benefits of immigration come the

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costs of attending to the very real problems that can arise within diversity. And it is no secret that this principally means radicalization of Muslims.

Liberal democratic states are still trying to discover the balance between impelling and compelling integration. The politics of immigration and diversity will dominate European societies for the foreseeable future. Therefore, changes to citizenship through civic integration requirements are meaningful not only for understanding changing societies but also for considering the implication this change has on the nation-state.
Chapter 1
Finding and Defining Civic Integration

Introduction

Civic integration is both old and new. As a set of behavioral and value expectations, it represents a set of membership attributes that have always comprised a definitional part of citizenship. At the same time, integration policies emphasize these citizenship dimensions through a relatively new—and some might say aggressive—method of mandatory programs and requirements. In its mildest form, civic integration promotes a concept of membership based on proficiency, and that lacks cultural attributes. In a more severe manifestation, civic integration requirements reinforce ethnic boundaries of national identity. In both cases, civic integration requirements represent state imputations of membership through citizenship criteria. Understanding the extent and variety of these requirements explains these different imputations of membership, and describes the meaning of citizenship in an era of post-nationalism that is comprised of migration, movement, and increased interconnections.

This first chapter proceeds in three parts. To understand the role of civic integration and why it is a significant part of citizenship, it is important to first understand citizenship itself. Citizenship is a complex topic to navigate, with its manifold definitions, overlapping contexts, and sometimes contradictory connotations. I first
examine these different definitions of citizenship, primarily distinguishing between citizenship as a legal status, and as a membership category. For persons born into citizenship (inheritance), these may not seem like distinct concepts. However, for naturalized citizens, these differences can be deeply meaningful.

The second part of this chapter addresses how civic integration requirements articulate ideas of membership. These requirements reflect the content of civic integration, including country knowledge, language acquisition and value commitments. I also address the unique instruments or “hardware” of civic integration, including tests, courses, contracts, and oaths. I identify these features by examining the origins of civic integration policy, showing empirical induction from the Dutch Newcomers Act of 1998 and historical American citizenship procedures.

Third, after defining the concept, content, and origins of civic integration, I conceptually situate it within the scholarly literature of citizenship and integration. I resolve two problems that arise in the categorization of civic integration requirements, which are increasingly necessary to secure membership statuses that range from entry to citizenship: (1) the absence of a theoretically precise definition for civic integration with respect to the larger realms of integration and citizenship policymaking; and (2) general confusion over how to analytically treat civic requirements alongside the other dimensions of citizenship policy itself. I firmly establish civic integration as policies of citizenship, and as a second dimension to eligibility criteria. Eligibility criteria are
requirements of citizenship that are inactively fulfilled. These include meeting residency minimums, allowance of multiple citizenship holding, and birthright to citizenship. Civic requirements represent a second dimension of active obligations. These are actions that do not demonstrate that you qualify, but that you desire citizenship.

Defining Citizenship

The confusing and inconsistent treatment of citizenship is a continuous source of frustration among the wide and interdisciplinary community of citizenship and immigration scholars. As Judith Shklar notes, “There is no notion more central in politics than citizenship, and none more variable in history, or contested in theory.” Like a chameleon, citizenship takes on different meanings in different contexts. Scholars see varying theoretical implications depending on the angle or school from which they examine it. Legal scholars compare rights associated with processes and rules that determine citizenship, and comparative political scientists and sociologists consider the origin of these laws, as well as ask questions about whether citizenship rights guarantee

1 To clarify, residency is inactive because it only requires that a person lives in a country for a given period of time. It requires endurance and patience, but not modification of knowledge or skill. It is inactive in regard to behavior, not significance.
membership, while normative political theorists relate citizenship to the attributes of civic engagement and understandings of justice. Meanwhile, the empirical experience of those trying to obtain citizenship portrays citizenship policy as something altogether more functional and less symbolic than scholars envisage.

With respect to these differences, citizenship can be distinguished as: (1) a legal category bestowing rights; (2) a designation of membership indicative of inclusion and community; and, (3) a behavior norm of democratic participation. While this tripartite is

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6 Christian Joppke sees further separation between citizenship as “as a status, which denotes formal state membership and the rules of access to it; citizenship as rights, which is about the formal capacities and immunities connected with such status,” in “Transformation of Citizenship: Status, Rights, and Identity,” *Citizenship Studies*, Vol. 11, No. 1 (2007), p. 38. I avoid this distinction because decoupling status from rights veers too closely to the concept of social citizenship, where rights without status create “denizenship” (Hammar, *Democracy and the Nation State*, p. 18). This is an important but alternative concept to citizenship. The widest conceptualization of the dimensions of citizenship can be seen in Irene Bloemraad, Anna Korteweg, and Gökçe Yurdakul, “Citizenship and Immigration: Multiculturalism, Assimilation, and Challenges to the Nation-State,” in *Annual Review of Sociology*, vol. 34 (2008), p. 154, where they define four aspects of citizenship: (1) legal status; (2) rights; (3) political and other forms of participation in society; and, (4) a sense of belonging.
important for conceptual orientation, I set this third definition of citizenship aside from further analysis, because the concern here is not the normative concerns of using citizenship, but the empirical rules and policies that define acquisition.”

Looking at these definitions illustrates that while status and membership are both constitutive parts of citizenship, they are not always coterminous. There are several instances where real-life differences between membership and status can be identified: Arab-Israelis hold a passport to the state but may feel excluded from the national political identity, while Jewish-Americans may feel intrinsically tied to and a part of the Jewish state without carrying the rights of citizenship. Admittedly, it is much more difficult in democratic societies to find instances of citizens who experience membership without rights than those who experience rights without membership. This is because citizenship is—first and foremost—a legal device that designates the population under the auspices of state protection.

**Citizenship as Status**

As a legal category, the status of citizenship entitles the holder to certain rights and protections under laws that are conferred to full members of a national political community. There are typically two routes to citizenship under this definition: (1)

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7 Essentially, scholars using citizenship in this third definition treat the concept as an independent variable, whereas my analytical focus is concerned with what factors go into shaping citizenship policies as a dependent variable.

through birth or inheritance, and (2) naturalization. Within these routes, there are additional mechanisms for defining inheritance or naturalization criteria. For example, some states grant citizenship based on the principle of *jus sanuginis*, or citizenship through “blood.” Every state confers citizenship through this rule when both parents are nationals. Others countries, most notably the United States, also confer citizenship through a principle of *jus soli*, or birth on the “land.” Citizenship is conferred by naturalization through a series of additional principles that include, but are not limited to: residency, positive affirmation of citizenship at majority age, and renunciation of prior nationality.

Apart from the cumulative and legal codification of citizenship criteria over time, there is an expanded concept of citizenship as a rights-holding status that is largely derived from T. H. Marshall’s influential study of the gradual and evolving rights associated with British citizenship. In his influential definition, T.H. Marshall views citizenship as “a status bestowed on those who are full members of a community,” and are therefore “equal with respect to the rights and duties with which the status is endowed.” Equality through rights, according to Marshall, occurs through an

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10 Ireland is a notable instance of a modern state reversing this relatively inclusive citizenship rule. See John Handoll, “Ireland,” in Bauböck et.al.,eds., *Acquisition and Loss of Nationality, Vol 2.*, p. 503.

evolutionary unfolding of civil, political, and social rights. Though the order of Marshall’s theory is no longer accurate, it conveys a sense of what citizenship means with respect to the types of guarantees and protections (like anti-discrimination protections) conferred through status.

There are two significant but related problems with Marshall’s definition. First, it assumes “full membership of a community.” How does this prior condition come into place? If citizenship is conferred through the extension of rights, what is the base identity or criteria that define to whom these rights are extended? This relates to the second problem of applying Marshall’s theory to contemporary citizenship: he was not talking about citizenship in the context of immigration. Writing in 1950, he was thinking instead about a confined, delineated population of postwar Britons, not anticipating mass immigration after the breakdown of the empire. Among a relatively homogenous, if inherently multinational, population, the definition of “community” is simple. With immigration, citizenship in Britain undulates between periods of expansion and inclusion (1948-1962) and periods of restriction and exclusion (post-1962). This makes the “community” baseline more difficult to identify. Furthermore, we can see the extension

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12 Joppke describes a re-ordering where civil and social rights are no longer reserved for the citizen, but “as rights of the person residing in the territory of the state – denizens” in Immigration and the Nation-State, p. 271. And in terms of citizenship as an evolutionary institution, the extension of political, not social, rights is typical to the final unfolding.

of civil and social rights away from the privileges of citizenship and instead toward permanent residence.\textsuperscript{14}

These problems show the important interconnections between citizenship as a status and legal category with rights, and the other definition of citizenship, where citizenship signifies membership and sense of identity. In an age of declining national identity, it may not seem obvious that citizenship is just as much an indicator of membership or community as it is a status granting rights and protections. This is largely because the majority of people who obtain citizenship are born into it. In this case, when citizenship is inherited, community has a “taken-for-granted” quality. However, the differences between denotations of rights and connotations of membership are far more salient in naturalization. When an immigrant undergoes naturalization to gain citizenship, he or she not only obtains the passport and rights guaranteed by a citizenship status but also joins a political community.

\textit{Citizenship as Membership}

Membership and community have historically comprised important elements within citizenship status. The idea of allegiances and obligations to bind oneself to that community is also as old as the idea of citizenship itself, where even feudal loyalty was rewarded with military protection. When intra-European movement began to rise in the

\textsuperscript{14} Joppke, \textit{Immigration and the Nation}, p. 271.
late 19th century, the acquisition of nationality became contingent on loyalty pledges and oaths of fidelity. Amidst fears of “fifth columns,” where Frenchmen became British subjects and vice versa, symbolic commitments were crucial components to the naturalization process.

Given this longitudinal view, contemporary integration requirements may not seem novel. However, the content and instruments of civic integration are unique; while oaths are an obvious carry-over from earlier naturalization processes, the courses, programs, tests, and contracts are all new. The context of modern-day integration requirements is also unique. On the one hand, continually rising and ethnically diverse immigration are constant pressures on receiving states, and renew the importance of integration and community. On the other hand, the high level of supranational European integration and extant international human rights norms de-emphasizes the importance of national distinction.

A state’s citizenship laws will often mirror an inherited sense of national belonging, or membership. According to Brubaker’s conception of citizenship as an “instrument and object of social closure,” the foundations of territorial membership (who can enter and leave a state) are defined by the nation-state (who is an insider and who is an outsider). Types of political membership are traced to cultural definitions of the nation, as evident in comparing the “civic” (assimilationist) and “ethnic” (differentialist)

16 Brubaker, *Citizenship and Nationhood in Germany and France*, Ch. 1.
forms of belonging in France and Germany.\textsuperscript{17} When the concept of national belonging does not predate the state, the membership dimension of citizenship can grow out of the legal definition of citizenship, as is typical in traditional countries of immigration (like the United States) or states that create value-based (as opposed to culture-based) definitions of membership (like civic-assimilationist France).

From this discussion, one can surmise that citizenship as status and citizenship as membership are not mutually exclusive, but interdependent and overlapping categories. I contend that it is when differences are apparent between these two categories that scholars can positively identify citizenship problems. This is exemplified in the debate over nation-state citizenship in the 1990s. Brubaker accounts for the impact of immigration on citizenship in his comparison of France and Germany, but does not consider the altering impact of denizenship and immigration on bifurcating citizenship rights from citizenship identity. He merely acknowledges this population who lives in a

\textsuperscript{17} One of the most significant divisions in this debate is over whether or not it even makes sense to treat these terms understanding of nations and membership as dichotomous, with a number of scholars employing (Rogers Brubaker, \textit{Citizenship and Nationhood in Germany and France}; Michael Ignatieff, \textit{Blood and Belonging: Journeys into the New Nationalism} [New York: Farrar, Strauss and Giroux, 1993]; Ernest Gellner, \textit{Nations and Nationalism} [Ithaca, NY: Cornell University Press, 1983]) and critiquing (Will Kymlicka, “Misunderstanding Nationalism,” \textit{Dissent} [1995], pp. 130-5; Anthony Smith, \textit{National Identity} (Reno: University of Nevada Press, 1991]; ) this dyad. Since this debate is tangential to exploring civic integration requirements, I bracket it by acknowledging that “civic” and “ethnic” memberships are ideal-types. Recognizing that “all civic states, whether in the West or the East, are based on ethno-cultural cores...[and each] nation has elements and dimensions that include both types of nationalism” (Taras Kuzio, “The myth of the civic state: a critical survey of Hans Kohn's framework for understanding nationalism,” in \textit{Ethnic and Racial Studies}, Vol. 25, No. 1 (2002), p. 20), I find this distinction useful for discussing broad patterns of citizenship policy and philosophy.
territory, but is excluded from full citizenship, as an aberration. This oversight underscores the post-national literature that followed in Brubaker’s wake, where Yasemin Soysal, among others, consider the denizenship problem (where permanently residing, non-nationals enjoy a host of social and civil rights once reserved for citizenship), as the source for a new citizenship based not on national traditions but universal rights of personhood. In fact, Brubaker even states that the “citizenship status of potential immigrants” matters “a great deal [more] to the state [than] the citizenship status of actual immigrants,” but he does not probe this theory any further.

While Soysal concedes that national citizenship is still very much “with us for some time,” there remains much ambiguity over what comprises the content of citizenship as membership. The classic tension between ethnic and civic concepts of nationhood (borrowed directly from the nationalism literature) is still very much present, but there is a strand of studies that posits citizenship identity can be predicated on values, not national cultural differences. Despite the faults of post-nationalism, its theoretical framework serves as the foundation for this new view of membership,

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21 See footnote 17.
22 Postnational studies have undergone significant criticism for what amounts to a non-empirical, unsubstantiated enthusiasm. Joppke especially makes the point that human rights don’t “hover” from above, but that states constitute rights in Immigration and the Nation-State. For a more recent analysis, see Maarten Vink, *Limits of European Citizenship: European Integration and Domestic Immigration Policies* (Houndmills, Basingstoke, Hampshire; New York: Palgrave Macmillan, 2005).
highlighting the significance or possibility of creating a new non-national foundation for citizenship identity.

What remains is a type of hyper-civicism, where even traditionally ethnic states can create new citizenship bonds through rights and obligations without characteristic or trait-based exclusion. Joppke, for example, notes that simultaneous with the “decoupling of citizenship from nation and identity, states have tried to load citizenship with new meaning.” Specifically, he is referring to the incorporation of immigrants and ethnic minorities through methods rooted in the principles of liberalism. Likewise, Ruth Rubio-Marín identifies liberal-democratic values as the engine of policy liberalization; Rogers Smith contends that contemporary political communities should not be “termed a nation;” and Dominique Schnapper raises a similar possibility with respect to non-nation-based communities by defining a modern, inclusive understanding of the nation as a “community of citizens.”

Though this perspective might forecast in the “decline of the nation-state” a minimization or disappearance of citizenship as a type of membership, diversity politics and contemporary challenges of immigrant integration show otherwise. The grand wager

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is not really whether we are in a national or post-national age, but whether a state can impute a meaningful and shared political identity in citizenship that does not rely on its historical “nationness.” It requires enough inclusiveness to properly accommodate “outsiders” who seek naturalization, while remaining exclusive enough to motivate “outsiders” to desire naturalization.

These important debates over the sources and longevity of citizenship as a membership category are the context into which civic integration is born. The root words of “civic integration” suggest a policy that brings newcomers—either willingly or begrudgingly—into the framework of citizenship. It also suggests that “civic” refers to something more specific than Bloomraad’s diluted definition of civic citizenship as one that “allows for foreign membership,””27 or Michael Ignatieff’s definition of civic nationalism as a nation “composed of all those—regardless of race, colour, creed, gender, language or ethnicity—who subscribe to the nation’s political creed.””28

Civic integration appears to comprise more than the sum of its parts; it is necessary to obtain citizenship status and rights and it defines the parameters of citizenship as membership. At the very least, civic integration further complicates the process of naturalization by introducing more requirements for citizenship. On the other hand, by suggesting what the “end point” of naturalization comprises and repositioning

the rights and recognition of citizenship as a “reward” for successful integration, civic integration could very well reconcile divergences between citizenship as a status and citizenship as a membership. The next section turns directly to this new policy.

What is Civic Integration?

The Oxford English Dictionary defines “civic” as “of, pertaining, or proper to citizens.” How do states define what is “of, pertaining, or proper” to citizenship? Civic integration requirements set forth criteria that policymakers deem critical for gaining citizenship, and in some cases, permanent residence and entry. Civic integration requirements include knowledge about a country’s history, culture, and institutions, competency in a country’s language, and commitments to a country’s core values. The mechanisms for promoting and assessing these traits include citizenship tests, integration classes, language interviews, and oath ceremonies. The difficulty of these requirements significantly diverges across states. For example, France has a one-day civic orientation, while Germany requires 30 hours of civic education. Difficulty is also tied to civic stratification and whether requirements are applied early at the time of entry, at the penultimate stage of settlement and permanent residence, or at the time an application for citizenship is filed. Furthermore, while it is possible to debate whether civic requirements of language and history are ambiguous to ethnicity, especially when it

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29 The Oxford English Dictionary. Online Database. Available at www.oed.com. The secondary definition relates to the civic locality, specifically the “city, borough, or municipality.”
involves the turn “from the neglect to the affirmation of one’s own culture”, the point is that civic requirements promote the attributes of citizenship that distinguishes members from non-members. Essentially, civic integration requirements promote the skills and attributes that a state defines as important and expects of its citizens as members of a national political community.\textsuperscript{31}

The “obligatory character” of civic integration is what differentiates it from other types of integration (e.g., social, political) or concepts of “good citizenship.”\textsuperscript{32} In linking civic integration back to a more fundamental notion of citizenship as a social contract, Eleanore Kofman describes the “acceptance of obligations and a contract of settlement” as the counterpart to receiving the opportunity to immigrate.\textsuperscript{33} Full status and rights are increasingly dependent on completing civic integration requirements that introduce a sanctions dimension to an otherwise positive, individual-proficiency objective.

Regardless of whether belonging is defined through civic roots of “shared political


\textsuperscript{31} The idea that states expect something of citizens is consistent with the idea that citizenship is a contract, where the state gives rights in exchange for citizen obligations. For more on this, see Elaine Thomas, “Who Belongs?: Competing Conceptions of Political Membership,” in \textit{European Journal of Social Theory}, Vol. 5, No. 3 (2002) pp. 323-49.

\textsuperscript{32} Joppke, “Transformation of Immigrant Integration,” p. 248.

culture”\(^{34}\) or ethnic roots of ascriptive features,\(^{35}\) the obligatory nature of civic integration requirements enforce modern-day parameters of citizenship as membership.

A second feature of civic integration that distinguishes it from political or cultural integration is its unique emphasis on individual self-sufficiency and autonomy. “Common bonds” underscore “civic conceptions of national unity”\(^{36}\) and transcend differences between civic-territorial and ethnic-differentialist citizenship backgrounds. This is because civic integration is focused not on conforming to a nation community, but primarily on promoting individual autonomy. In other words, the obligation to “adopt a shared standard of language and values”\(^{37}\) places the onus of integration on the individual, where “everyone is responsible for his own integration.”\(^{38}\) Civic integration is not for the sake of native or already naturalized domestic populations, but aimed squarely at individual potential members or *would-be* citizens. This core feature is primarily derived from and modeled on the Dutch case, where the aim of civic integration is to “increase individuals’ self-reliance and thus reduce the chances that a newcomer will become or remain welfare-dependent.”\(^{39}\)


\(^{35}\) For a more in-depth comparison, see Smith, *National Identity*, especially pp. 82-118.


These dimensions of obligation and autonomy for newcomers are significant in two respects. First, new and strategic connections are forged between immigration policy and citizenship. By connecting integration to entry barriers of immigration and residence, integration requirements uniquely achieve objectives of managing migration. I discuss this point at length in chapter three and five. There is surprisingly little research on these policy intersections, especially given Hammar’s longstanding observation that citizenship is not a separate policy sphere from immigration, but rather it is the final stage that a newcomer passes through when entering a state (the first being immigration, the second as settlement). Second, obligatory requirements for the purpose of promoting self-sufficiency raises an interesting, if paradoxical, situation (one that Joppke describes as “illiberal liberalism,”) where national policymakers rely on the challenges of potential members and citizens to shape a state-imputed version of civic or citizenship identity. Again, Brubaker acknowledges the disproportionate impact of potential immigrants versus actual immigrants, and civic integration requirements present some real empirical evidence to this fact.

Given these new dimensions of membership that are defined through civic integration requirements, and the clear orientation of civic integration toward newcomers, the next section examines the roots—or first models—of civic integration requirements.

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41 Joppke, “Transformation of Immigrant Integration.”
Situating these policies in space and time is particularly important, since the scholarship addressing civic integration is limited.

The Origins of Civic Integration

Despite the manifold intersections between migration scholars, sociologists, political philosophers, practitioners, and legal experts, there are few analytical studies that examine civic integration. Therefore, scholars examining this under-theorized area lean inductively on empirical examples to develop a concept of civic integration.

Christian Joppke is the most prolific writer on this topic, and draws his analytical framework from the Dutch practice of civic integration. He refers to civic integration as an “instance of repressive liberalism,” later modified to “illiberal liberalism” because of the emphasis on self-sufficiency and autonomy through mandatory measures.

Though Joppke looks to the Netherlands as a pacesetter for civic integration, and defines the 1998 Wet Inburgering Nieuwkomers (subsequently referred to as WIN) as the birth of civic integration policy in the Netherlands, the origins of the concept of inburgering (civic integration) were initially identified by Dutch academic Han Entzinger. As early as 1994, Entzinger describes Dutch policymakers as seeing the need “for migrants to identify with the political community and to become part of it.”

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44 Joppke, “Transformation of Immigrant Integration,” p. 268
45 Han Entzinger, “The Rise and Fall of Multiculturalism: The Case of the Netherlands,” in Joppke and Morawska, Toward Assimilation and Citizenship, p. 75.
observation was made in the context of rising naturalization and in the wake of a 1992 ruling permitting the option of dual nationality. Entzinger, along with Arie van der Zwan, developed a set of proposals designed to improve the skills of immigrants entering the labor market. Among several recommendations, their proposal “to organize mandatory language and social skills training for new arrivals”46 gained the most traction, and ultimately underscored the civic integration proposals in WIN.

By the time civic integration was fully developed in WIN legislation, obligations for newcomers included the completion of a significant number of hours of Dutch language and civic education classes. As late as 2007, these policies have evolved into a comprehensive integration course and naturalization exam that test potential immigrants and family unification applicants on the Dutch language and knowledge of Dutch society. 47 Dutch policymakers identified that their primary motivation for new civic requirements was to make citizenship the “first prize” for successful integration. 48 These changes have not gone without controversy; the Dutch received significant condemnation from Human

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46 Entzinger, “The Rise and Fall of Multiculturalism, p. 76. Also see Arie van der Zwan and Han B. Entzinger, Beleidsopvolging minderhedendebat. (Den Haag: Ministerie van Binnenlandse Zaken, 1994).
47 Asylum seekers and members of the EU-community are exempt, as well as a handful of migrants of privileged nationalities. For a comprehensive list, see the Dutch Immigration and Naturalization Service’s website at http://www.ind.nl/en/inbedrijf/actueel/basisexamenvervolg.asp (accessed 20 May 2008).
48 Ricky Van Oers, Betty de Hart, and Kees Groenendijk further note that “naturalisation is the crown on the completed integration process,” in “The Netherlands,” in Bauböck et. al.s, eds., Acquisition and Loss of Nationality, Vol 2, p. 403.
Rights Watch for their selective application of “civic integration from abroad” exams, targeting imams and migrants from less-developed country.\(^{49}\)

The Dutch case is the first instance where the term “civic integration” is attached to country knowledge, language, and value requirements. It is also the first case of mandatory integration policies for newcomers. However, it is not the first instance of civic requirements in the context of citizenship acquisition.

The United States is rightly acknowledged as the initial model of civic integration. It has exhibited policies that have promoted citizen skills since the early 20th century, though American policymakers did not describe it as “civic integration” until the 21st century.\(^{50}\) As a settler country, America had to construct a concept of citizenship to legitimize a contract between the individual and the state. This is unlike the European experience, where Western Europe developed governments that drew legitimacy from nationalism.\(^{51}\) Historian James Kettner even writes that, even in the earliest days of nationhood when security and loyalty were ever-present concerns, “they were not strong


\(^{50}\) One of the earliest examples includes the statement of Alfonso Aguilar, *Regarding a Hearing On “H.R. 3191 Oath of Renunciation and Allegiance*, “Subcommittee on Immigration, Border Security and Claims, House Committee on the Judiciary. 1 April 2004. The words used to describe integration in America are very important and heavily contested. The idea of assimilation was initially described as Americanization. This, however, was co-opted by nativists in the 1920s. [See Phillip Gleason, “American Identity and Americanization,” in *Harvard Encyclopedia of Ethnic Groups*, ed. Stephan Thernstrom (Cambridge, MA: Belknap Press of Harvard University Press, 1980), pp. 39-40] It was not until the U.S. Commission on Immigration Reform (in the mid-1990s) expressed a concerted effort to re-capture the term “Americanization” as a positive expression of naturalization and integration. Likewise, the term “assimilation” is also subject to assault where liberal norms have weighted this term as a negative process of cultural replacement.

enough to override the sense that citizenship should ultimately depend not on some magical result of birth along, but on belief, will, consent, and choice.”

Linguistic concerns originated in the early days of America, where there was a meaningful degree of linguistic diversity, particularly in regard to German Americans in Pennsylvania, who maintained the use of German as their primary language through much of the 18th century. By the late 19th century, the rising diversity of immigration accompanied a growing nativist movement. As a response to this growing diversity, “the issues of language and literacy were intertwined in an attempt to establish a new basis of citizenship.” In 1906, Congress enacted a naturalization act that, among streamlining the entire application process, required applicants for citizenship to be able to speak and understand English. By the 1950s, this requirement was extended to include the ability to read and write.

These requirements preceded European change by more than a century. Even in a more contemporary view, American policymakers began discussions to reconceptualize citizenship as a meaningful and civic process before their European counterparts. The new Americanization campaign, proposed by the U.S. Commission on Immigration

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Reform in the mid-1990s, called on Congress to “initiate an immigrant policy, a national effort to cultivate a shared commitment to the American values of liberty, democracy, and equal opportunity.”\textsuperscript{56} There were three prongs of carrying out an Americanization agenda, including: (1) “developing greater capacities to orient both newcomers and the communities that receive them,” (2) “educating newcomers in English language skills and our core civic values,” and (3) “revisiting the meaning and conferral of citizenship to ensure the integrity of the naturalization process.”\textsuperscript{57} In this vein, the Commission suggested revising the content of the citizenship test, which made its debut in 1986, and proposed changes to the citizenship oath. In 2007, Congress implemented the Commission’s suggestions regarding the citizenship test (put into effect in October 2008), but to date has not adopted the proposed revisions to the oath.

This short review of criteria for Dutch and American citizenship demonstrates that while civic integration is a fashionable term for obligatory requirements for citizenship in Europe today, it is hardly a new idea. The novelty of Dutch policy lies in its extension to newcomers (e.g. settlement and entry), and in the heavy-handed approach taken by the state in designating a specific program. However, the notion that knowledge and language acquisition creates membership opportunities for newcomers within a


national political community is not novel. In fact, one of the problems of studying immigration in Europe is that there are an abundant number of blind spots with regard to transatlantic comparisons.58

**Theoretical Precision: Locating Civic Integration**

Finally, after defining civic integration, and discussing its empirical origins and content, as well as its place in bridging citizenship ideas of status and membership, I examine the analytic imperative of conceptually grounding civic integration within existing policy discussions. This process of conceptualization follows Robert Adcock and David Collier’s instructions for establishing measurement validity.59 This approach states that operationalization or measurement of a variable (civic integration requirements) must be preceded by establishing an adequate understanding of the concept to be measured. Moving from a background concept (“broad constellations of meanings and understandings associated with a given concept”) to a systematized concept (“a specific formulation of a concept used by a scholar”) requires what they describe as a task of conceptualization.60 This is where a researcher formulates a “systematized

60 Adcock and Collier, “Measurement Validity,” p. 531.
concept through reasoning about the background concept, in light of the goals of the research.\textsuperscript{61}

The overlaps between citizenship and integration are quite large, and civic integration has evolved into a rather significant, consequential barrier that is increasingly necessary for securing varying membership statuses from entry to citizenship. Yet, civic integration remains an understudied and confusing topic. Aside from the previously discussed interdisciplinary nature of citizenship and integration, where research by normative theorists, legal scholars, and political scientists rarely intersect, there are two conceptual reasons for the inadequate and belated treatment of civic integration requirements: (1) theoretical imprecision in treating civic integration requirements as a component of citizenship acquisition versus one of a myriad immigrant integration strategies; and (2) a general confusion over how to analytically treat civic requirements alongside the other dimensions of citizenship policy itself.

\textit{Situating Civic Integration}

The very term “civic integration” presages difficulty in trying to place it in theoretical context. While it is one of many strategies meant to promote immigrant integration, like housing arrangements, social assistance, or job training, the “civic” component is most closely related to citizenship. All of these different integration

\textsuperscript{61} Adcock and Collier, “Measurement Validity,” p. 531.
policies are complementary (concerned with the incorporation and skill-set of migrants), but they are not synonymous.

Recall that citizenship is a legal category that defines the formal rights and obligations for citizenship, including the requirements for naturalization. Citizenship is also a membership association, where status confers a sense of belonging. Scholars can look to citizenship law as indicators of and preferences for national identity because, as Hansen and Weil state, citizenship policies give “institutional expression to the state’s prerogative of inclusion and exclusion.”

Another way to think about citizenship is as a social contract, in the tradition of Rousseau and Locke. The individual binds himself or herself to the state by assuming obligations and duties and, in exchange for those commitments, the state binds itself to the individual by offering rights and protection. Over time, citizenship can be conceived of as an oscillating pendulum of rights and obligations. At various points in history the state has demanded more obligations (e.g., compulsory military service, mandatory voting); while at other points individuals have demanded more rights (e.g., dual citizenship). The 1990s are a good example of this imbalance, where several states

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expanded rights of access for second- and third-generation migrants, without articulating accompanying obligations.

While citizenship is preoccupied with the rules extending legal status and membership at the various “entrance gates” of state membership, immigrant integration is predominantly concerned with the performance and degree of incorporation of newcomers in a host society. Just as citizenship takes on labels to describe the degree to which policies reflect “civic” or “ethnic” definitions of membership, immigrant integration policies also reflect a variety of “philosophies” for organizing diverse societies. “Assimilation,” “multicultural” and, paradoxically, “exclusion” are some common names of integration policies. Countries with longer experiences with immigration have developed formal policy strategies to manage diversity, such as race relations or anti-discrimination. Oftentimes, however, immigrant integration strategies are accidental and the result of the intersection between migration policy and regulatory frameworks. Some examples include welfare policies and access to the labor market.

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63 See Hansen and Weil, Towards a European Nationality, p. 10. ; Also see Aleinikoff and Klusmeyer, Citizenship Policies in an Age of Migration, where recommendations for European state policy change mirror this trajectory towards liberalization.

64 The idea that immigrant integration is a “philosophy” comes from Adrian Favell, who defines philosophies of integration as “understandings of core concepts” underscoring a political system that seeks to “achieve stability and legitimacy by rebuilding communal bonds of civility and tolerance—a moral social order—across the conflicts and divisions cause by the plurality of values and individual interests,” in Philosophies of Integration, p. 2.

As a result of this overlapping attention on new migrants, there is significant conceptual blurring of citizenship and integration. Castles and Miller employ terminology from both to describe “ideal types of citizenships,” including imperial, folk/ethnic, republican, multicultural, and transnational.66 Adrian Favell identifies “formal naturalization and citizenship (or residence-based rights)” as part of “a series of provisions, policies, and social interventions that together might constitute an integration policy.”67

Citizenship rules and access clearly impact the incorporation of newcomers.68 Unrelated integration policies can be separated out from citizenship (antidiscrimination laws, housing access, policies tolerating cultural practices), but how can citizenship be distinguished from integration? It is not the analytical division of these two concepts that matters, but rather identifying when integration can foster citizenship and not just when citizenship access can foster integration.

Finally, we see this type of confusing treatment carrying over into the limited literature on civic requirements. Country knowledge, language, and value requirements are treated unevenly across scholarship as either part of integration policy or as a requirement for citizenship. In one of the earliest attempts at cross-national

68 For an example, see Soysal, *Limits of Citizenship*; Koopmans et. al., *Contested Citizenship*. 
categorization of citizenship policies, Patrick Weil includes language and loyalty oaths alongside other requirements of citizenship, like residency and financial minimums.69 Harald Waldrauch, who compiles and catalogues the European case studies of the International Migration, Integration, and Social Cohesion (IMISCOE) research, also includes language and civic requirements in terms of how they simplify or complicate the process of naturalization.70 Thus, citizenship studies frequently account for civic requirements.71

Christian Joppke, however, in his formative studies of civic integration, examines country, language, and value obligations as mechanisms of immigrant integration, and on par with anti-discrimination.72 Furthermore, civic integration is teleologically defined as the inevitable consequence of multiculturalism: recognizing minorities as “distinct groups” unnecessarily focuses on culture at the possible expense of “more important source[s] of minority discrimination, most notably socio-economic inequities”73 and

72 Joppke, “Transformation of Immigrant Integration”
feeds ‘‘separatism’ and the ‘ghettoization of minorities’.’’\textsuperscript{74} In discussing the Dutch model, Joppke describes how the ‘‘new ‘integration’ policy, which came to replace the ‘ethnic minorities’ policy…[takes] immigrants as ‘individuals’ who had to be funneled into mainstream society rather than to be kept separate as ‘groups’ in parallel institutions.’’\textsuperscript{75} Irene Bloemraad also examines civic citizenship from a sociological perspective, and finds new political and civic integration “central to contemporary nation-building,” where multiculturalism has experienced resounding failure.\textsuperscript{76} Finally, Koopmans et al. also 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.\textsuperscript{77}

These different usages 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 one’s legal status contingent is a potentially negative sanction. Not only is civic integration consequential for acquiring permanent residence, citizenship, and sometimes entry, but the evidence of integration it yields can be symbolic. While civic integration

\textsuperscript{75} Joppke, “The Retreat of Multiculturalism in the Liberal State,” p. 248.  
\textsuperscript{76} Irene Bloemraad, “Unity in Diversity,” p. 332.  
\textsuperscript{77} Koopmans et. al. \textit{Contested Citizenship}, pp. 31-73.
encourages newcomers to learn the host language—which is a tangible outcome—it promotes “symbolic gestures of belonging” through oath ceremonies and country knowledge.\textsuperscript{78} Just as contemporary problems of integration reveal citizenship is an insufficient condition for integration (see the discussion below), there is nothing determinative about accumulating country knowledge and being integrated.

Given this distinction, scholars should examine civic integration in both contexts, but they need to be analytically precise about each context and the difference between the two. Whether civic integration requirements are, indeed, tools for integration is a proposition in need of testing, and is not a foregone conclusion. The conceptual overlap of civic integration has not deterred empirical examinations of policy (indeed, European think tanks and researchers have been prodigious in keeping pace with the times), but data consistency remains an issue where the goal for researchers is to categorize change and measure impact. Without a clear articulation of the way in which civic integration is used, and where civic integration ultimately matters, citizenship requirements may appear unnecessarily cultural and integration may seem unnecessarily statist.

\textit{Locating Civic Requirements in Citizenship Policy}

With this distinction of civic requirements as they apply to immigrant integration (performance and equality) and citizenship (membership and status), the final conceptual

task is to understand how they specifically shape national citizenship strategies. This brings the chapter full circle, back to the distinct definitions of citizenship and the problems inherent to examining a cross-disciplinary subject. Indeed, Martin Heisler laments that “the concept of citizenship has become less clear as its relevance and prominence have increased.” He attributes this lack of clarity to “conceptual stretching brought on by the proliferation of its use and the multiplication of the perspectives of its users.”

Literature on citizenship has treated civic integration requirements alongside other requirements of citizenship, such as residency durations, 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. Each treats civic requirements as an equal component to other requirements of naturalization, where a greater number of requirements indicates a more exclusive citizenship policy. This linear view has led some to conclude that there is a “restrictive backlash” against earlier citizenship liberalization, or even a “return to assimilation.”

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The problem with this interpretation is that it unnecessarily reduces the complexity of citizenship policy. While citizenship is a contract that emphasizes 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 liberalize 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 an eligibility question of: “Who has access?” Instead, it answers the question of: “Under what conditions does someone with eligibility obtain citizenship?” Unlike rules for access that shape how inclusive or “liberal” national citizenship may be, condition requirements like language proficiency or country knowledge speak to the difficulty of obtaining it. I therefore conceptualize policy change as taking place on two intersecting vectors of citizenship, as shown on Figure 1.1. The vertical axis displays the extent of language, country knowledge, and value requirements, which defines the depth or membership of citizenship. This is the “identity” dimension of citizenship. The horizontal axis depicts the rules for access to citizenship, which can either widen or

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narrow the scope of potential members. This is the “eligibility” dimension of citizenship. To describe the extent of expansion, I use the accepted labels from the literature on citizenship: “liberal” and “restrictive.” To describe changes to citizenship content, 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”). The language for describing conditions relies on an alternative idea of membership, distinguishing between coherent (dense) and porous (loosely bound) state-articulated versions of citizenship identity.

This conceptualization of citizenship not only captures the complexity of citizenship policies, where citizenship as status and citizenship as membership coexist in a complementary fashion, but also the dynamism of citizenship configurations, where a country with traditionally accessible or liberal (wide) citizenship can also have thick definitions of citizenship. It is not, therefore, just “ethnic” national communities, like Germany, that can have thick articulations of national membership obligations. And it is not only countries with traditionally accessible notions of citizenship, such as Ireland,

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85 Rainer Bauböck makes use of this vocabulary in “Recombinant Citizenship,” in *Inclusions and Exclusions in European Societies*, eds. Martin Kohli and Alison Woodward (Routledge: London, 2001), pp. 38-58, though he uses it in a normative sense to describe philosophical perspectives on citizenship. Thick citizenship promotes membership as a cultural identity, drawing legitimacy from nationalism and communitarianism. Thin citizenship, on the other hand, refers to the legal status of membership supported by legal positivism and libertarianism. Naturalization is also described as being a “thick” or “thin” process by Kostakopoulou, “Why Naturalization.”
that might have thin articulations through modest civic requirements. Civic requirements articulate state-imputed conceptions of membership obligations that intersect to undermine or support existing citizenship laws that determine legal status, such as eligibility criteria.

**Figure 1.1: Conceptualizing Policy Change in Citizenship**

- **THICK**: more barriers in the process of naturalization (like high-level language requirements, citizenship test)
- **RESTRICTIVE**: increased barriers to access (like *jus sanguinis*)
- **THIN**: minimum barriers in the process of naturalization (like a low-level language requirement)
- **LIBERAL**: fewer barriers to access (like dual nationality, *jus soli*)

Having developed a systematized concept of civic integration, the next chapter moves from conceptualization to operationalization by identifying a comparative baseline for examining and measuring civic integration policies in the EU-15. Civic integration is revealed as a beguiling but inevitably identifiable policy component of citizenship, a means of promoting self-sufficiency among new and potential citizens, and a
contemporary device for articulating civic identity and state membership. But to what extent are states adopting this policy? Is civic integration happening across immigrant-receiving states in Europe, suggesting a widespread policy convergence and the “end of national models”? Or, like citizenship liberalization in the 1990s, do we see continued difference between northern and southern Europe? With the foundation of civic integration established in this chapter, these and other questions can now be adequately and accurately addressed.
Chapter 2

A Civic Integration Policy Index (CIVIX) for Identifying and Comparing Policy

Introduction

After articulating a clearer conception of civic integration requirements in chapter one, this chapter develops coherent measures to operationalize civic integration requirements, and score cases along transparent, durable, and portable categories. This next step in measurement validity maintains Adcock and Collier’s progress by moving from a systematized concept of civic integration to operationalizing the indicator in order to take valid scores of policy.\(^1\) By predicing the scoring of civic integration requirements with these guidelines, the aim is to create a systematic, comparative indicator that is transportable beyond the cases of the study. I exclusively examine the “EU-15,” because it is a geographically and historically coherent group of cases subject to similar external pressures of migration and Europeanization. However, establishing valid measures of civic integration does not rely on case-specific details.

\(^1\) Robert Adcock and David Collier define operationalization as “developing, on the basis of a systematized concept, one of more indicators for scoring/classifying cases,” while scoring involves applying the operationalized measures or indicators “to produce scores for the cases being analyzed,” in “Measurement Validity: A Shared Standard for Qualitative and Quantitative Research,” *American Political Science Review*, vol. 95, no. 3 (2001), p. 531.
Several studies have attempted to analyze and compare integration requirements, and have suggested that a convergence of civic integration policy is taking place,\(^2\) which has resulted in a restrictive backlash in overall citizenship policy.\(^3\) These studies – conducted entirely within the European academic and private research communities – 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,\(^4\) details on program objectives and sanctions,\(^5\) as well as individual costs, program content,\(^6\) and best practices.\(^7\) However, these endeavors speak past one another, and lack a comparable baseline of measurement to locate meaningful patterns and trends. A civic requirement within one country does not necessarily add up to civic requirements everywhere. And


\(^4\) See Sergio Carrera, A Comparison of Integration Programmes in the EU, Challenge Papers No. 1 (Brussels: Centre for European Policy Studies (CEPS), March 2006).

\(^5\) See Ines Michalowski, An Overview on Introduction Programmes for Immigrants in Seven European Member States (Amsterdam: Adviescommissie voor Vreemdelingenzaken, 2004).

\(^6\) See the case studies in Rainer Bauböck, Eva Erbsoll, Kees Groenendijk, and Harald Waldrauch, eds. Acquisition and Loss of Nationality, Vol 2: Country Analyses (Amsterdam: Amsterdam University Press, 2006).

\(^7\) See International Centre for Migration Policy Development (ICMPD), Integration Agreements and Voluntary Measures (Vienna, 2005).
on what grounds might we say that Dutch and British civic integration policies are similar? In terms of shared mechanisms? Does this equate to shared goals? While in-depth and comparative case studies sufficiently identify where and to what extent these policies exist, a set of common measures offers the advantage of drawing systematic comparisons both across cases and time.

To gain a general picture of what cases fall on the “trend line” of civic integration, and evaluate claims of convergence in national citizenship policy, and compare remaining policy variation, this chapter builds a Civic Integration Policy Index (CIVIX) for categorizing and comparing civic integration requirements. By collecting cross-national data along common policy dimensions, the index establishes a coherent standard for measuring and comparing integration requirements. Only on a conceptually level plane can the degree and magnitude of policy change be adequately conveyed.

Chapter one conceptualized civic integration by “formulating a systematized concept” out of the “broad constellation of meanings and understandings associated with the concept.” 8 This chapter begins by identifying valid measures for the indicators of civic integration through indexing policy across cases. In social science terminology, this is the task of operationalizing the dependent variable through the development of a coherent, durable measure for civic requirements. 9 I consider previous attempts at coding

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8 Adcock and Collier, “Measurement Validity,” p. 531, also see pp. 529-546.
and policy indexing in order to promote the comparative advantages of using CIVIX as an empirical baseline for civic integration requirements (the dependent variable).

The second step of developing a civic integration index involves defining a *scoring* system. In examining where the indicators of civic integration (mandatory country knowledge, language, and values) cluster across the EU-15 (in terms of the varying “hardware,” including citizenship tests, courses, contracts), I inductively identify a set of measures that reflect policies across a number of criteria. These measures include the various gates of state membership (entry, settlement, and citizenship), mechanisms of civic integration, and degree of difficulty.

With these categories, I score the cases of the EU-15 to create an index of civic integration policy. Measurement through indexing is appropriate where “multiple attributes ‘express essential the same underlying characteristic or have their effects in the same direction.’”¹⁰ This results in a compressed variable that treats “equal totals of additive causal variables as equivalent.”¹¹ Though there always remains the possibility of measurement errors (where scores are incorrectly collected), the goal is that these categories accurately represent civic integration in a way that is durable across cases, regions, and time.

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¹¹ Colin Elman, “Explanatory Typologies in Qualitative Analysis.”
Finally, once CIVIX scores are determined for each country in each of the two snapshot years (1997 and 2007), I analyze evidence and evaluate the significance of civic integration within the context of existing citizenship policy. First, I test claims of convergence across a number of cases and identify that instead of large-scale—or even general—convergence of civic requirements, there are important variations in the magnitude of policy change. I term this pattern “variegated convergence.” Second, I present CIVIX scores, which represent the membership dimension of citizenship, in the context of access criteria, which represent the status dimension of citizenship. From this view, civic integration requirements emerge in different policy contexts, and demonstrate that countries may, and often do, adopt similar policy mechanisms, but do so for different purposes. From this new view of citizenship strategies, I create a typology for classifying cases based on the interrelationship between access and membership criteria. I describe the four possible strategy outcomes as: prohibitive (restrictive access, thick membership), conditional (liberal access, thick membership), enabling (liberal access, thin membership), and insular (restrictive access, thin membership).

The analyses of convergence and citizenship strategies positions CIVIX as an innovative and important facet for studying citizenship change across cases and time. Also, these analyses demonstrate the need for a critical rethinking of the conventional wisdom about national models and state strategies for incorporating newcomers into national membership communities.
A Civic Integration Policy Index (CIVIX)

Operationalizing Civic Integration

An important component in understanding what civic integration requirements mean or hope to achieve (chapter 1) is to fully define where they exist, and compare them accordingly. Moving beyond conceptualization or semantics of civic integration, the task of operationalization, or articulating research procedures for representing concepts as variables, is vital in order to identify categories of policy and make comparisons across cases. Gary Goertz summarizes this progression in concept formation as moving from the “basic level” of theory propositions to the “secondary level” of defining the constitutive dimension of the basic level, and culminating in the “indicator/data level,” alternatively called the operationalization level, where the concept is specific enough that data can be successfully gathered.12 And because civic integration is a relatively new policy objective, other measures that capture some resembling mechanisms (like language requirement) do not do an adequate job of representing the concept of civic integration. This creates the risk of what Giovanni Sartori warns can occur when a concept is stretched beyond recognition by extending it to more cases and situations.13

Therefore, the first priority when moving from conceptualization to operationalization is to identify those indicators that accurately and fully reflect the larger concept. Drawing from the secondary level of concept definition, civic integration is unique in its emphasis on civic tools that aid a newcomer or aspiring citizen to act as a citizen. Whether newcomers grasp these tools and participate in the political system is a secondary concern to whether or not they are capable of doing so.\(^\text{14}\) To review, the necessary tools promoted through to successfully participate in life of that country include:

- language acquisition,
- knowledge of the country, such as history or culture, and
- commitment to the value system and rules underscoring a country’s history and political system.

Examine the Empirical Landscape

Comparing complex information over a number of cases can be difficult and laborious. Fifteen cases present an overwhelming amount of information on and variation across civic integration requirements, including the various gates of state membership, degrees of difficulty, and two years of measurement. Furthermore, the tripartite core of language, country knowledge and values are promoted through a variety

\(^{14}\) The actual use of these skills and level of participation of the immigrant is more accurately described as political integration.
of instruments. These devices, or “civic hardware,” include: integration and language classes, tests, interviews, contracts, and oath ceremonies. Table 2.1 displays a list of which countries promote objectives of civic integration requirements, and conveys a sense of the empirical landscape through 2007.¹⁵

However, mere comparison of these policy goals or instruments only conveys a sense of how much “more” or “less” the requirements for settlement and citizenship are in one country versus another, thus overlooking potentially important gradations of policy. This touches on a perennial methodological debate between dichotomous and graded approaches to concept measurement. Graded approaches have been particularly popular among studies of democracy,¹⁶ but not in immigration studies.

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¹⁵ Civic integration requirements have continued to evolve after the cut-off point, increasing in severity within cases and cropping up in new cases, like language requirements in Ireland.

### Table 2.1: Cataloging Civic Integration Content

<table>
<thead>
<tr>
<th>Country</th>
<th>Language</th>
<th>Country knowledge</th>
<th>Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>AUST</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>BELG</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DNK</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>FIN</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>FRN</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>GER</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>GRE</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>IRE</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ITL</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LUX</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NETH</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>PORT</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SPN</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SWD</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>U.K.</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

Two problems arise when creating a check-list of civic requirements. First, this rough cataloging of civic objectives does not lend any real analytic leverage across cases. It shows where civic goals are promoted in each country, but does not convey much about the comparative difficulty in each case. For example, this table indicates that nearly all countries promote language proficiency as an important value for potential members. But what kind of language requirements are these? Are they easy or difficult? According to the table, values are also a priority in several countries, but there is no indication as to what that means or how such values are promoted. And to whom do these rules apply, anyway? Does it mean something different when a country asks a
person to fulfill a language requirement as a condition for an entry visa, versus a condition for obtaining citizenship?

**Existing Approaches**

Since the appearance of these new civic requirements, several analysts have attempted to describe, categorize, and compare integration requirements. These studies—conducted entirely within the European academic and private research communities—have largely been limited to within-case description, without engaging in sustained comparisons to other cases. First, descriptive research has provided valuable data about individual cases. This includes: whether integration criteria are voluntary or obligatory,\(^{17}\) and details on program objectives and sanctions,\(^{18}\) subject populations,\(^{19}\) individual costs, program content,\(^{20}\) and best practices.\(^{21}\) However, they all lack the comparable baseline standards that are needed in order to locate meaningful patterns and trends.

A second approach to examining civic integration requirements has been to distill voluminous case studies and present a catalogue or list of integration content, similar to

\(^{17}\) Carrera, *A Comparison of Integration Programmes in the EU.*  
\(^{18}\) Michalowski, *An Overview on Introduction Programmes for Immigrants.*  
\(^{20}\) Bauböck et al., *Acquisition and Loss of Nationality, Vol. 2: Country Analyses*  
\(^{21}\) ICMPD, *Integration Agreements and Voluntary Measures.*
what appears in Table 2.1. This type of policy “cataloging” is what we see in Patrick Weil’s 2001 study. His analysis contains a simple checklist for whether or not loyalty oaths and knowledge of language or history are required. However, such analysis does not reveal how much more rigorous naturalization is in one country versus another. 22 Gerard-René de Groot and Maarten Vink also present an analysis similar to what appears in Table 2.1. 23 In both examples, the objective of presenting information of civic content is primarily descriptive and not analytical. Cataloguing for the purpose of description is appropriate. However, distilling a sense of “more or less” from these side-by-side comparisons is misleading. Cataloging requirements without consideration of degree of difficulty, for example, misrepresents the baseline for comparison.

Finally, there have been attempts to operationalize integration requirements into quantitative indicators for the purposes of variable-oriented analysis. These include the two-dimensional conception of citizenship strategies by Koopmans et al., 24 Howard’s revised “Citizenship Policy Index,” 25 and the Migrant Integration Policy Index, or “MIPEX,” which was developed by the Migration Policy Group and the British

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Council.\(^{26}\) Each of these indicators makes important strides in examining language and civic requirements, but have specific problems that limit wider application.

Koopmans et al. examine “cultural requirements for naturalization” as one of seven policy dimension constituting citizenship configurations. These configurations, they argue, are crucial to explaining variation in levels of migrant participation. Citizenship configurations are comprised by a two-dimensional interaction between (1) equality of individual access and (2) cultural differences and group rights. The individual equality dimension is comprised of indicators that include: requirements for nationality acquisition (residency requirements, allowance of dual nationality, and privileged access to nationality for co-ethnics),\(^{27}\) citizenship rights for foreign nationals (voting, protection against expulsion),\(^{28}\) and anti-discrimination rights.

The second dimension to citizenship is “cultural difference.” This is where Koopmans et al. locate cultural requirements as a precondition for naturalization, like language acquisition. Scores are assigned for whether language requirements are “monist-assimilatist” (-1), “pluralist-multiculturalist” (1) or “between” (0). This renders the final coding as only relational and typologically derived.\(^{29}\) Second, they combine these scores with other cultural criteria, including allowances for religious

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\(^{27}\) Koopmans et. al., *Contested Citizenship*, p. 35. Also measured to determine this dimension are welfare and social security dependence as an obstacle to naturalization, naturalization rates, and whether or not there is automatic attribution of citizenship for second generation migrants.

\(^{28}\) Koopmans et al., *Contested Citizenship*, p. 46.

\(^{29}\) Koopmans et al., *Contested Citizenship*, pp. 51-54.
practices (Islam) outside of public institutions, cultural rights in public institutions (recognition and funding of Islamic school, headscarves, etc.), and political representation rights. All of these are important in determining migrant participation, but use an expanded definition of citizenship that is tangential to the process of naturalization. Finally, this study is limited to five cases: Netherlands, Britain, France, Germany, and Switzerland.

In Howard’s revised “Citizenship Policy Index,” civic integration requirements are taken into account, but merely as a restrictive “correction” to his linear measure of the relative inclusiveness of citizenship policies. Policies are coded as articulating moderate (-.25) or onerous (-.50) civic requirements. In the context of other policy requirements, where overall CPI scores are limited to a scale of 0 to 6, this small penalty is really minimal when, in fact, civic requirements can be extremely consequential in determining whether or not an applicant receives citizenship. A good example of this can be found in an examination of civic integration in Germany. Factoring in the significant language and country knowledge requirements (630 hours) conveys an overall restrictive citizenship strategy. This obfuscates important changes of liberalization in the 2000 Nationality Act. At the same time, however, Germany receives the same “corrective” as France. However, the commitments of signing a French integration contract are hardly comparable to the integration and language courses and tests in Germany.

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Finally, the Migration Policy Group, in conjunction with the British Council, provides the most detailed set of indicators measuring integration requirements. The Migrant Integration Policy Index (MIPEX) is a 28-country study that systematically codes for requirements at the various entrance gates (residency, family reunion, naturalization). MIPEX also accounts for, and codes, rights in different integration arenas (labor 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.

A policy requirement (citizenship test) or another civic requirement (availability of a study guide) that is most inclusive of migrants earns a score of 3, while the least inclusive policies earn a score of 1. Countries with high values are considered more amenable to immigrant integration, but this does not necessarily translate into fewer or voluntary requirements. MIPEX coding does not provide a clear sense of what the policies are—only whether or not they inhibit or facilitate the inclusion of migrants.

This normative framework is useful for conveying the effects of policy, but not specific policies themselves. This problem is evident within the scoring for Italy. Italian policy is deemed exclusive and restrictive toward migrants with “the third worst score of
the 28 MIPEX countries.” Yet, the absence of integration requirements for citizenship earns them a score of 3 in the integration requirements dimension. This significantly skews the comparability of MIPEX score totals. In this case, a low score is the product not just of restrictive policies (of which there are abundant), but also of absent policy.

**Measuring CIVIX scores**

In contrast to these dichotomous or normative studies, I constructed a new civic integration index (“CIVIX”) for the EU-15 that examines variations in civic integration requirements for each of the three target civic knowledge areas (country knowledge, language, and values). There are several advantages to building a comprehensive index. First, it enables comparisons beyond the “big cases” (Britain, France, Germany), and considers European-wide change. Second, this index allows for both diachronic (over time) and comparative (across cases) analyses, which yields a thorough examination of where and when civic requirements have taken shape. Third, standardized coding also takes into account the scope (number and nature of obligatory civic requirements) and depth (procedural or onerous) of policy requirements in a manner just as accurate as the more-detailed case-study comparisons. Finally, in creating a coherent measure for civic integration,


32 Measurements are also transportable to transatlantic (United States, Canada) and international cases (Australia, Israel).
integration policy (the dependent variable), inherently nominal/categorical descriptions of policy can be transformed into ordinal (therefore, inherently comparable) measures.\textsuperscript{33} Only with this type of systematic indicator is it possible to examine the extent of change within and across cases.\textsuperscript{34}

The scale on the CIVIX ranges from 0 to 6. A high score indicates “thick” citizenship content, which includes multiple onerous barriers to citizenship. A low score represents “thin” citizenship content, with minimal or easy requirements for obtaining status. Figure 2.1 shows the scale of scores with respect to my assigned labels of thick and thin.

\textbf{Figure 2.1: Labeling the CIVIX Scale}

\textsuperscript{33} Condensing complex and variegated policies into a systematic variable involves a necessary, calculated tradeoff between richness and parsimony.

\textsuperscript{34} 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, therefore, not reflected in CIVIX scoring. I thank an anonymous reader for this point.
The range of empirical scores spans from 5.5 (Germany) to 0.5 (Italy). Falling just shy of a maximum score of 6 indicates that it was still possible for Germany to increase restrictions past the 2007 measurement cut-off point. In fact, Germany increased restrictions though the adoption of a national citizenship test that was implemented in September 2008. Italy’s low score reflects an otherwise perfunctory, administrative oath. The coding of requirements takes into account four distinct dimensions: (1) immigration categories, specifically family unification; (2) whether civic conditions are required for entry, settlement, or citizenship; (3) the number of requirements addressing country knowledge, language, and values (examples include: integration courses, tests, contracts, oath ceremonies, and interviews); and finally, (4) the severity of requirements along the path to citizenship (for example, a “high” level of language proficiency or cost). This dimension is also reflected in point valuation, where more points are assigned to language and knowledge requirements at the settlement stage than at naturalization. This is because 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

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35 Note that I am only coding for third country nationals, not movement among the European Economic Area (EEA) migrants or asylum seekers. Intra-EEA or other identified “privileged” countries of immigration are exempt from requirements. Also, there are many variations within countries to distinguish refugee and asylum seekers from workers or family unification migrants (including level of language proficiency, residency, etc).
include “integration from abroad” tests (the Netherlands), mandatory language and integration courses (Germany), and integration exams (Denmark). However, when language requirements or country knowledge are tested at the third gate (naturalization), only one-half 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 the only test required for naturalization (Austria), in which case one point is added. If it is mandatory to attend a citizenship ceremony, swear an oath or pledge in front of a magistrate, or sign a declaration of loyalty, this value criteria receives one-half point. Despite appearing only at the citizenship stage, the minimal time commitment and skill requirement renders this a modest obligation.

There are compounding factors, particularly in regard to requirements for establishing settlement, that increase a requirement’s difficulty. An additional one-half point is added to each criterion to reflect this dimension. These criteria include heightened language proficiency requirements, course fees, and whether family members and spouses must fulfill civic obligations for settlement. If there are requirements in addition to the language/integration course, such as civic training (France) or integration

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36 France adopted a language-from-abroad requirement in November 2007, but has yet to implement it. Therefore, it only receives half a point in the “entry” column.

tests (Denmark, Netherlands), then one point is added. When these requirements are complementary, like a language/settlement test in lieu of classes (Austria, UK), only one-half point is added. Finally in exchange for assistance and rights, three countries—Austria, Denmark and France—use integration contracts to bind an applicant to integration commitments. In cases where the contract is a tool of obligation, I do not add one-half point. In these cases, it is not an additional requirement, but is 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 affirm the secular, democratic, and social values of France, and agree to interviews “set up in order to monitor the contract.” In this case, the contract is like a ceremony; it is a standard and a tool, and therefore receives an additional one-half point.

The following table is a rubric for scoring cases based on these rules. Note that the total possible score is six.

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38 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.
Table 2.2: Rubric for Scoring Civic Integration Requirements

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Point Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Integration Requirement at various gates:</td>
<td></td>
</tr>
<tr>
<td>Entry</td>
<td>1</td>
</tr>
<tr>
<td>Settlement</td>
<td>1</td>
</tr>
<tr>
<td>Citizenship</td>
<td>.5 (1 if no prior test)</td>
</tr>
<tr>
<td>Difficulty of Integration Courses</td>
<td></td>
</tr>
<tr>
<td>High language level</td>
<td>.5</td>
</tr>
<tr>
<td>Fee for courses</td>
<td>.5</td>
</tr>
<tr>
<td>Family unification requirement</td>
<td>.5</td>
</tr>
<tr>
<td>Additional requirements (e.g., test, contract)</td>
<td>1 (.5 if complementary)</td>
</tr>
<tr>
<td>Citizenship Ceremony, oath</td>
<td>.5</td>
</tr>
</tbody>
</table>

The CIVIX Scores

In order to understand the depth of current citizenship content, as well as the degree of policy change over time, the following two charts display CIVIX values for each of the 15 countries in both 1997 (Table 2.3) and 2007 (Table 2.4).

[Table 2.3 about here]

Starting in 1997—an arbitrary cut-point that immediately predates the recent wave of policy changes—we see very little in terms of formal civic requirements at any stage of membership. This was partially related to the degree to which newcomers had access to citizenship. For example, since an applicant for Austrian citizenship had to maintain continuous residence in Austria for ten years, the expectation was that such a

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40 The data for this coding was gathered from Bruno Nascimbene, *Nationality Laws in the European Union (Le Droit De La Nationalité Dans L'union Européenne)* (Milano [London]: A. Giuffrè; Butterworths, 1996) ; Bauböck et al., *Acquisition and Loss of Nationality, Vol 2* ; Weil, “Access to Nationality.”
long period of residency would result in sufficient integration, and negate the need for additional requirements.

Also, in stark contrast to contemporary policy, the vague requirements of integration and assimilation that did exist were based on whether an applicant had a working knowledge of the country’s language. The assumption was that knowing a country’s language meant that an applicant was also familiar with the country itself, and thus was sufficiently integrated. These requirements of “sufficient knowledge,” “sufficient integration,” or even demonstration of a “genuine Greek consciousness” are historical relics of when nationalism played a determining role in the creation of nationality laws. These definitions of national citizenship were codified as early as the late 19th century, when naturalization rates were low and mostly reflected intra-European movement. The emphasis of these early requirements was geared toward émigrés returning home in connection with *jus sanguinis*, not integration as a process of incorporation.\(^{41}\)

Most important for measurement and comparison purposes, there were vague integration requirements “on the books,” but they did not contain explicit or standardized mechanisms for assessing competence or compliance. In one case, a sufficient proficiency of the host country’s language might be demonstrated through completion of the naturalization paperwork, whereas “commitment” might be assessed through an

interview in another part of that same country. Furthermore, within a single case, an
immigration officer in one office might have a strikingly divergent interview procedure
than another.
Table 2.3: Civic Integration Requirements in 1997 (CIVIX 97)

<table>
<thead>
<tr>
<th>Points</th>
<th>Gate 1: Entry</th>
<th>Gate 2: Settlement</th>
<th>Gate 3: Citizenship</th>
<th>SCORE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>lng/integ req</td>
<td>Integration</td>
<td>language/civic reqs</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Requirements?</td>
<td>ceremony/oath</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>points</td>
<td>1</td>
<td>0.5 language or integration req, 1 if test</td>
<td>0.5</td>
</tr>
<tr>
<td>AUST</td>
<td>N (0)</td>
<td>N (0)</td>
<td>“sustainable integration” (.5)</td>
<td>N (0)</td>
</tr>
<tr>
<td>BELG</td>
<td>N (0)</td>
<td>N (0)</td>
<td>“evidence of integration” (.5)</td>
<td>N (0)</td>
</tr>
<tr>
<td>DNK</td>
<td>N (0)</td>
<td>N (0)</td>
<td>speaking (.5)</td>
<td>N (0)</td>
</tr>
<tr>
<td>FIN</td>
<td>N (0)</td>
<td>N (0)</td>
<td>“sufficient knowledge” (.5)</td>
<td>N (0)</td>
</tr>
<tr>
<td>FRN</td>
<td>N (0)</td>
<td>N (0)</td>
<td>“sufficient knowledge” of lng meets req of assimilation (.5)</td>
<td>N (0)</td>
</tr>
<tr>
<td>GER</td>
<td>Ausseidler (1)</td>
<td>N (0)</td>
<td>“sufficient knowledge” (.5)</td>
<td>N (0)</td>
</tr>
<tr>
<td>GRE</td>
<td>N (0)</td>
<td>N (0)</td>
<td>lng as evidence of “genuine Greek consciousness” (.5)</td>
<td>Y (.5)</td>
</tr>
<tr>
<td>IRE</td>
<td>N (0)</td>
<td>N (0)</td>
<td>N (0)</td>
<td>Y (.5)</td>
</tr>
<tr>
<td>ITL</td>
<td>N (0)</td>
<td>N (0)</td>
<td>N (0)</td>
<td>Y (.5)</td>
</tr>
<tr>
<td>LUX</td>
<td>N (0)</td>
<td>N (0)</td>
<td>“sufficient assimilation” (.5)</td>
<td>N (0)</td>
</tr>
<tr>
<td>NETH</td>
<td>N (0)</td>
<td>N (0)</td>
<td>“reasonable knowledge” of lng meets req of integration (.5)</td>
<td>N (0)</td>
</tr>
<tr>
<td>PORT</td>
<td>N (0)</td>
<td>N (0)</td>
<td>“sufficient knowledge” of lng meets req of assimilation (.5)</td>
<td>N (0)</td>
</tr>
<tr>
<td>SPN</td>
<td>N (0)</td>
<td>N (0)</td>
<td>civic conduct as sufficient integration (.5)</td>
<td>Y (.5)</td>
</tr>
<tr>
<td>SWD</td>
<td>N (0)</td>
<td>N (0)</td>
<td>N (0)</td>
<td>N (0)</td>
</tr>
<tr>
<td>U.K.</td>
<td>N (0)</td>
<td>N (0)</td>
<td>sufficient knowledge of lng (.5)</td>
<td>N (0)</td>
</tr>
</tbody>
</table>
Turning to contemporary policies, Table 2.4 shows remarkable changes in a short period of time. The use of civic integration requirements has become widespread. They show extension from naturalization to settlement and entry. This indicates that the expectations of civic integration have likewise expanded to a larger population. Proving a “sufficient” degree of assimilation or integration is no longer synonymous with demonstrating proficiency in the host language; country knowledge has been added as a separate requirement to language. Language standards have increased and haphazard criteria for evaluation have been replaced by standardized courses and tests. Citizenship contracts and ceremonies—meant to establish value commitments between an applicant and the state—have been instituted. Finally, and perhaps most consequential, mandatory integration requirements have been expanded to family members, including spouses, which seek unification with previous immigrants.

[Table 2.4 about here]

The most robust examples of civic integration are in countries that place rigorous criteria at the three gates of state membership. Most notably, this includes the Dutch “civic integration from abroad exam,” which assesses country knowledge and language proficiency as a criterion to immigrate to the Netherlands. Denmark and Germany also have language requirements for entry. Several of these countries, in addition to the UK and Austria, also have requirements for settlement. To obtain permanent residence, non-citizen residents must complete a certain number of integration course hours, a civic
orientation, and pass integration exams. In Great Britain, the “Life in the UK” test, once reserved for citizenship, was extended in 2007 as a requirement for permanent residence (“indefinite leave to remain”). Austria has a language test for settlement and Denmark administers what they describe as a “cultural test.”

In contrast, there are also countries that maintain voluntary integration programs, reserve mandatory integration for refugees only, or have no national integration policies whatsoever. This last category includes countries like Italy and Greece, where any oath or country knowledge requirements reflect ethnic and émigré connections, and not criteria that promotes civic attachment. We also see countries like Spain and Belgium in this category. In Spain, each city practices different incorporation strategies because integration is controlled by regional and local authorities. In Belgium, the factional nature of national politics has resulted in immigrant integration emerging as an important regional issue.\footnote{See Fiona Barker, “Building the Sub-State Nation? Sub-State Nationalism and Immigrant Integration.” Paper presented at the Midwest Political Science Association, Chicago, IL 2007.} Flanders, the Flemish-speaking northern region of Belgium, mandates mandatory integration, while residents of French-speaking Wallonia and Brussels-Capital Region do not face such requirements. Belgium actually had a national language requirement, but it was revoked in 2001 because of the national divisiveness caused by the requirement.
Finally, Luxembourg and Ireland are also countries that have low CIVIX scores in 2007. Luxembourg recently added proficiency of a second language as a prerequisite for citizenship. Applicants must now demonstrate proficiency in Luxembourgish, in addition to knowledge of French or German. Ireland added an English requirement in 2008. Neither of these countries has knowledge-based exams of requirements at early civic stratifications.
Table 2.4: Civic Integration Requirements in 2007 (CIVIX 2007)

<table>
<thead>
<tr>
<th></th>
<th>Gate 1: Entry</th>
<th>Gate 2: Settlement</th>
<th>Gate 3: Citizenship</th>
<th>SCORE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>points</td>
<td>lng/integ req</td>
<td>Lang course</td>
<td>Lang level</td>
</tr>
<tr>
<td></td>
<td>lng/integ req</td>
<td>1</td>
<td>1</td>
<td>0.5</td>
</tr>
<tr>
<td></td>
<td>lng/integ req</td>
<td>(0. 5 if limited)</td>
<td>(0. 5 if limited)</td>
<td>(0. 5 if limited)</td>
</tr>
<tr>
<td>AUST</td>
<td>N (0)</td>
<td>Y (1)</td>
<td>A2 (.5)</td>
<td>€ 350 (.5)</td>
</tr>
<tr>
<td>BELG</td>
<td>N (0)</td>
<td>Flanders (.5)</td>
<td>B1/B2 (.5)</td>
<td>Most exempt (0) §§</td>
</tr>
<tr>
<td>DNK</td>
<td>Y (1)</td>
<td>Y (1)</td>
<td>A1 (0)</td>
<td>Free (0)</td>
</tr>
<tr>
<td>FIN</td>
<td>N (0)</td>
<td>Voluntary (.5)</td>
<td>A2/B1 (.5)</td>
<td>€1 per hour (.5)</td>
</tr>
<tr>
<td>FRN</td>
<td>Y (.5)*</td>
<td>Y (1)</td>
<td>A1 (0)</td>
<td>Free (0)</td>
</tr>
<tr>
<td>GER</td>
<td>Y (1)</td>
<td>Y (1)</td>
<td>A2/B1 (.5)</td>
<td>€1 per hour (.5)</td>
</tr>
<tr>
<td>GRE</td>
<td>N (0)</td>
<td>N (0)†</td>
<td>A1 (0)</td>
<td>Free (0)</td>
</tr>
<tr>
<td>IRE</td>
<td>N (0)</td>
<td>N (0)</td>
<td>A1 (0)</td>
<td>Free (0)</td>
</tr>
<tr>
<td>ITL</td>
<td>N (0)</td>
<td>N (0)</td>
<td>A1 (0)</td>
<td>Free (0)</td>
</tr>
<tr>
<td>LUX</td>
<td>N (0)</td>
<td>N (0)</td>
<td>A1 (0)</td>
<td>Free (0)</td>
</tr>
<tr>
<td>NETH</td>
<td>Y (1)</td>
<td>Y (1)</td>
<td>A1 (0)‡</td>
<td>€ 4038. 95 (.5)</td>
</tr>
<tr>
<td>PORT</td>
<td>N (0)</td>
<td>Voluntary (.5)</td>
<td>A1 (0)</td>
<td>Free (0)</td>
</tr>
<tr>
<td>SPN</td>
<td>N (0)</td>
<td>Regional (.5)</td>
<td>A1 (0)</td>
<td>Free (0)</td>
</tr>
<tr>
<td>SWD</td>
<td>N (0)</td>
<td>N (0)</td>
<td>A1 (0)</td>
<td>Free (0)</td>
</tr>
<tr>
<td>U.K.</td>
<td>N (0)</td>
<td>Y (1)</td>
<td>Entry 3 ≤ B1 (.5)</td>
<td>Yes, limited** (.5)</td>
</tr>
</tbody>
</table>

* France passed the bill for this requirement in late 2007. It has not, however, been implemented yet.
† 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 “immigration from abroad” to cover this discrepancy.
§ The course is free for refugees and family reunification. Other foreigners have to pay a subsidized fee. See 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.
†† Language proficiency is a national requirement, but (as of the end of 2007) only Baden-Württemberg and Hesse have applied this through a citizenship test.
Analysis

Having scored and comparatively examined civic integration requirements, we can now analyze important questions of patterns and significance. In this final section, I consider two major questions on civic integration. First, does the cross-national adoption of requirements represent European policy convergence away from national models of integration and citizenship? Second, how do new integration requirements relate to existing citizenship policy? I develop a new typology of citizenship strategies consistent with the systematized concept of citizenship presented in chapter 1. This typology positions civic requirements (membership obligations) against access requirements (status criteria).

Evidence of Variegated Convergence

A superficial comparison of civic integration policies in Europe has led several scholars to declare an “end of national models” because of the convergence of integration models. On one level, the comparison of CIVIX totals over time supports this claim. There was a dearth of civic integration requirements in 1997. Even the mechanisms that resembled civic integration (loyalty oaths, “sufficient integration” criteria) were vestiges of the days of nationalism. They tested allegiance, but not integration. In contrast, 2007

is the epitome of difference. Nearly all EU-15 states adopt some form of integration, whether it is mandatory civic integration programs or voluntary integration schemes. Figure 2.2, portrays 1997 and 2007 CIVIX scores side-by-side. Ten of the 15 countries experienced large (Austria, Denmark, Germany, France, Netherlands, and the UK) or minimal (Finland, Luxembourg, Portugal, Spain, Sweden, and Italy) amounts of change.

However, a closer examination of individual scores reveals a great deal of differentiation. Figure 2.2 shows that civic integration requirements are generally increasing throughout this set of countries, but there is a significant gap between states experiencing large changes in civic integration policies versus those experiencing minimal changes. 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 to the right of each country’s name in Figure 2.2). Moreover, five countries experienced no cumulative change during this ten-year period—Sweden, Belgium, Greece, Ireland, and Italy.  

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 programs for settlement in 2007 (Swedish Integration Website, available at http://www. integrationsverket. se/ (accessed 2 October 2007), but has since expanded mandatory citizenship ceremonies. See Hedvig Lokrantz Bernitz and Henrik Bernitz, “Sweden,” in Acquisition and Loss of Nationality, Vol 2: Country Analyses, edited by Rainer Bauböck, Eva Erbsöll, Kees Groenendijk and Harald Waldrauch (Amsterdam: Amsterdam University Press, 2006), p. 534. Belgium removed a national language requirement for citizenship in 2001, but because Flanders adopted mandatory integration training programs in the years between measurements.
CIVIX scores reveal variations in the magnitude of change, while previous studies glossed over these differences by producing dichotomous observations through comparison (change or no change). Therefore, a more accurate term describing this change in Europe is “variegated convergence.” A general trend of change in the direction of thick citizenship is taking place, but the degree of progression varies. The comparative advantage of having a systematized indicator for civic requirements is that CIVIX reveals convergence in the general movement toward more requirements, but reserves this wholesale judgment with evidence of variation in the degrees of change. Some states have made significant moves toward increasing obligatory civic requirements, while others have not. This supports the maintenance of healthy skepticism with regard to arguments on behalf of European-wide convergence.

See Marie-Claire Foblets and Sander Loones. “Belgium,” in Acquisition and Loss of Nationality, Vol 2: Country Analyses, p. 86. Therefore zero change is reflected in its CIVIX score.
Figure 2.2: Differences in Civic Integration Requirements, 1997 - 2007

<table>
<thead>
<tr>
<th>Country</th>
<th>1997 Level</th>
<th>2007 Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Netherlands</td>
<td>0</td>
<td>4.5</td>
</tr>
<tr>
<td>Denmark</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Germany</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Austria</td>
<td>3.5</td>
<td>3.5</td>
</tr>
<tr>
<td>UK</td>
<td>3.5</td>
<td>3.5</td>
</tr>
<tr>
<td>France</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Finland</td>
<td>0</td>
<td>.5</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>0</td>
<td>.5</td>
</tr>
<tr>
<td>Portugal</td>
<td>0</td>
<td>.5</td>
</tr>
<tr>
<td>Spain</td>
<td>0</td>
<td>.5</td>
</tr>
<tr>
<td>Sweden</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Belgium</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Greece</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Ireland</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Italy</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
A New Citizenship Typology

A second comparative advantage of a single measure for civic integration policy is that it is possible to examine the interaction of membership requirements with existing citizenship policies of access. Though several countries have high CIVIX scores, it would be presumptive to conclude they serve a similar function without an analysis of the effects requirements have when plugged into existing policies. Civic integration requirements represent a second, complementary dimension to citizenship policies that determine eligibility. Therefore, the degree to which a state maintains inclusive (liberal) or exclusive (restrictive) citizenship acquisition rules is crucial to understanding how civic requirements impact naturalization.

Drawing on the systematized concept of citizenship in chapter 1, Figure 2.3 locates countries based on citizenship access and membership content. This scatter plot provides a more precise and accurate impression of overall citizenship configurations, or “strategies,” for conferring citizenship. CIVIX scores are plotted along the y-axis, because they represent the membership conditions under which persons eligible to apply for citizenship can obtain citizenship. Significant and arduous integration requirements (thick citizenship) are represented with high CIVIX scores, while few or no requirements (thin citizenship) have low CIVIX scores.
To represent the access criteria along the x-axis, I use scores from Howard’s Citizenship Policy Index (CPI).\textsuperscript{140} CPI scores is an additive index that scores national policies along the following dimensions: (1) whether a state grants citizenship at birth (\textit{jus soli}) for second generation migrants; (2) whether a state allows dual citizenship, and; (3) the residency requirements for acquisition.\textsuperscript{141} CPI is also scaled from 0 to 6, where more inclusive/liberal policies are scored at the high end, and more restrictive/exclusive policies are scored at the low end.\textsuperscript{142}

[Figure 2.3 about here]

By plotting membership requirements alongside access criteria, I identify four definable strategies, or clusters. I label these as “prohibitive” (low possibilities to access citizenship and thick civic requirements), “insular” (low access possibilities and thin, or minimal, civic requirements), “enabling” (high possibilities to access citizenship and thin, or minimal, civic requirements), and “conditional” (high possibilities to access

\textsuperscript{140}I use the most recent iteration, available in Howard, “The Impact of the Far Right on Citizenship Policy.” These scores are also available in Howard, \textit{The Politics of Citizenship in Europe.}

\textsuperscript{141}Thanks to Marc Howard for access to the raw data. Howard includes integration requirements in this latest CPI version, which essentially “double counts” integration requirements by plugging it into the naturalization dimension of citizenship criteria. However, Howard’s use of integration scores (weighted as .25 for “light,” .5 for “onerous” requirements on a 6 point scale, and double counted when required both for an immigrant and spouse) are added to naturalization requirements that are already at or close to zero (Austria, Denmark, Greece) or scores at the highest end of the spectrum (France, UK), yielding only a minimal distortion away from the center. Also, since my interest lies in identifying constellations and groupings, not in the exact numerical values of coordinates, this does not pose a significant problem for identifying policy patterns. See Appendix B for a more detailed account of how integration requirements are factored into CPI scoring.

\textsuperscript{142}Note that this logic is the reverse to CIVIX, where restrictive or arduous integration requirements have high scores and liberal or easy integration requirements have low scores.
citizenship and thick civic requirements). This new view of CIVIX in context, unlike other studies that interpret integration requirements as only one more restriction barring access, underscores a dimensional view of citizenship strategies. The creation of four possible citizenship strategy outcomes suggests that similar policies can operate in different contexts. Integration may not always mean restriction, and this is why examination of CIVIX in context is important and illuminating.\(^{143}\)

Figure 2.3: A Dynamic Typology for Describing Citizenship Strategies

\(^{143}\) A further discussion of citizenship typologies would be tangential to the goal of this study by converting civic integration policies from a dependent to an independent variable. For more information, see Sara Wallace Goodman, “Integration Requirements for Integration’s Sake? Identifying, Categorizing, and Comparing Civic Integration Policies,” in *Journal of Ethnic and Migration Studies* (forthcoming).
Conclusion

Developing a comparative, systematic index for measuring civic integration requirements is an important empirical contribution to the study and comparison of citizenship policies across Europe and beyond. First, an index for civic integration policies allows for the identification of new patterns and strategies, and enables scholars and practitioners to better understand comparative state responses to social change. Second, it creates the opportunity to examine the degree to which civic integration is similar across cases. It also permits analysis of whether shared civic instruments represent shared civic integration goals. For example, while Germany and the UK both have arduous civic requirements, policy design and implementation has been quite different.144

Third, the dynamic view of citizenship that CIVIX engenders accounts for both the breadth and depth of citizenship policy. This contrasts with previous studies which only used linear (liberal or restrictive) or dichotomous (civic or ethnic) categories. Furthermore, by inductively building a classification scheme and measures for civic policy, the resulting typology is not “curve-fitted” to historically-limited and empirically-limiting “ideal-types,” such as integration models (multicultural, assimilationist, exclusion). Finally, the development of a single measure to capture civic integration

144 For more, see Green “Divergent Traditions, Converging Responses.”
policymaking creates the possibility of wider comparisons of citizenship strategies in a myriad of case studies, both within and outside of Europe.

The next chapter identifies the factors shaping civic integration policy outcomes, and describes the conditions under which states choose to add civic integration requirements to the various membership stratification of migration. Concluding that in the context of non-European diversity and prior immigration experiences, civic integration instruments are used to address the politics and pressures of immigrant-related diversity. Building upward, chapter 1 located civic integration requirements within the framework of citizenship, and chapter 2 measured and identified where civic integration requirements are taking place. Chapter 3 identifies the explanatory conditions behind this policy change.
Chapter 3
Explaining Thick Civic Integration Requirements

Introduction

Why do states add obligatory integration requirements to national citizenship acquisition? After identifying significant variation in civic integration policy adoption across the EU-15 in chapter 2, this chapter evaluates theoretical arguments that could account for the variety of change. A handful of countries have made significant strides toward comprehensive civic integration programs, while an even greater number of countries remain more reserved in their approach.

To account for this variation, I explore and test several explanations for civic integration policy change. Civic integration requirements are obviously in response to immigration, but what kind of impact is immigration having? Do requirements address flagging naturalization rates by promoting values of citizenship? Do requirements address high immigration rates by prohibiting further immigration? Can one policy do both? I develop an explanation that considers the historical and contemporary impact of immigrant-related diversity to describe the functions of civic integration requirements. I identify and explain three important conditions that make civic integration outcomes likely: (1) volume of non-European Union foreign populations within the context of (2)
tr**aditional immigrant receiving states** and activated by (3) **popular pressures to “to something” about immigration problems.**

Civic integration requirements have dual purposes. First, they address current real problems of integration among ethnic minorities, generated by continued migration and the settlement of minorities over time. Second, requirements represent a symbolic response to “do something” about immigration when there are popular and electoral costs associated with inaction, even if there is very little they are able to do. Civic requirements for entry and settlement makes the elected political elite look “tough” on immigration. Civic requirements also address perceived “value gaps” among large non-European—especially Muslim—populations. States promote common bonds and the re-definition the civic identity as response to its perceived absence of integration.

This chapter begins with a more detailed description of this argument, exploring the causes of civic integration policies. I discuss these variables (prior experience, diverse immigration today, and popular pressure) in more detail. Following this, the second part of the chapter provides alternative explanations for thick civic integration requirements. Since there is limited research and little consensus on the causes—or even the nature—of civic integration, I look to the complex body of literature on immigration policymaking. These hypotheses all take into account the different pressures of immigration. These include: demographic (percent of inflow, percent of foreigners, percent change in Muslim population), socio-economic (unemployment, stock of foreign
labor, impact of immigration on social program spending), and institutional (naturalization rate) explanations.

The third part of this chapter tests the relationship between these arguments and changes in civic integration policy. Since the sample size of countries is limited (N=15), I evaluate bivariate relationships between hypotheses and change in Civic Integration Policy Index (CIVIX) scores between 1997 and 2007. The results indicate that none of the actual pressures of immigration are significant until the volume and variety of immigration within old receiving states are taken into account. I relate this conclusion to the main argument that this is not because immigration is insignificant itself, but because the pressure of immigration is political and contextual.

The Context, Diversity, and Politics of Immigration

Why do states attach mandatory civic integration requirements to citizenship? In chapter 2, I assigned numerical values to various civic integration policies—including language requirements, integration courses, citizenship tests, and oath ceremonies/loyalty statements—to develop an index for civic integration (CIVIX). On a scale of 0 to 6, where a score of six indicates the maximum number and difficulty of civic integration requirement, there was what I described as “variegated convergence,” where just over

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1 Since N=15, there are sample size and degrees of freedom limitations for testing. Bivariate correlations point out strong relationships, but not causation. That is why I pay considerable attention to qualitative data, and how real pressure of immigration are filtered through politics.
one-third of European countries exhibited high CIVIX scores (“thick”) and the rest exhibited low CIVIX scores (“thin”). The following table reviews the empirical landscape of civic integration requirements, and illustrates the differences between the two scores in the change column (far right):

Table 3.1: Thick and Thin Citizenship in the EU-15

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Thick (high)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Netherlands</td>
<td>5</td>
<td>4.5</td>
</tr>
<tr>
<td>Germany</td>
<td>5.5</td>
<td>4</td>
</tr>
<tr>
<td>Denmark</td>
<td>4.5</td>
<td>4</td>
</tr>
<tr>
<td>Austria</td>
<td>4</td>
<td>3.5</td>
</tr>
<tr>
<td>U.K.</td>
<td>4</td>
<td>3.5</td>
</tr>
<tr>
<td>France</td>
<td>3.5</td>
<td>3</td>
</tr>
<tr>
<td>Thin (low)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spain</td>
<td>1.5</td>
<td>.5</td>
</tr>
<tr>
<td>Finland</td>
<td>1</td>
<td>.5</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>1</td>
<td>.5</td>
</tr>
<tr>
<td>Portugal</td>
<td>1</td>
<td>.5</td>
</tr>
<tr>
<td>Greece</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Belgium</td>
<td>.5</td>
<td>0</td>
</tr>
<tr>
<td>Ireland</td>
<td>.5</td>
<td>0</td>
</tr>
<tr>
<td>Italy</td>
<td>.5</td>
<td>0</td>
</tr>
<tr>
<td>Sweden</td>
<td>.5</td>
<td>0</td>
</tr>
</tbody>
</table>

Six European states (Great Britain, France, Netherlands, Germany, Austria, and Denmark) present thick imputations of civic integration requirements for immigrants at entry, settlement, and citizenship. We see this common policy pattern despite differences

2 The natural “break point” between France (3) and Spain (1.5) makes a dichotomous comparison between “thick” and “thin” CIVIX values more logical than artificial, tripartite barriers of “thin/low,” “medium,” and “thick/high.”
in national citizenship traditions, and ethnic diversity, as well as variations in
demographic, socioeconomic, and institutional effects of immigration. For example,
“multicultural” Britain and “assimilationist” France are traditionally viewed as so
different that Adrian Favell refers to them as a “reversed mirror image.” Yet both have
pursued requirements and goals comparable to one another, and to “exclusionary”
Germany. This is where convergence is particularly difficult to explain. Why these states
and not others? Is there an all-purpose explanation that could account for change in
membership criteria despite this diversity of background factors?

Explaining civic integration policy—or the promotion of citizen-like behavior and
values—requires examination of a concept that, in principle, is outside of citizenship
itself: immigration. It chronologically precedes and is conceptually distinct from
citizenship. Yet, it is the major influence on contemporary citizenship policy change.

Today, states face an enormity of problems and pressures related to immigration.
Several scholars have discussed these pressures as the choice between openness and
closure. However, contemporary pressures are not really about policy design, but about
balancing the necessity and reality of immigration against its associated costs. To keep
up with the costs of maintaining a welfare state and preserving programs like retirement
pensions or subsidized healthcare, states need young people working and paying into the

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system. To maintain competitive market economies, states must fulfill the demand for skilled and unskilled workers. Where public opinion conveys high anti-immigrant attitudes, but maintains historically low birthrates, states have no choice but to balance the costs of immigration against the need for immigrants.

Within this macro-problem of competing immigrant pressures, I argue that civic integration requirements represent both functional and symbolic policy response to the very real pressures and problems of immigrant-related diversity. Civic integration requirements are a strategy for addressing increased diversity when cohesion is desired but where globalization and movement are erosive. The specific pressure for membership criteria is not sheer intake, or the strain of immigration on social assistance, or even the interest in citizenship itself (naturalization). States build civic integration policy to address popular pressure of immigrant-related diversity given the context of prior migration experiences.

All European countries are high-volume recipients of immigration, but not all draw significant migration from outside the 27 states of the European Union. It is this non-European source of immigration that introduces cultural and religious diversity into receiving societies. The second important dimension to describing civic integration policy outcomes takes into account prior migration experiences. This is a control variable that factors out diversity experiences in states which only experienced positive

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net migration in the past three decades. These “new receiving states” (Portugal, Spain, Greece, and Italy) are still coping with issues of regularization among first generation immigrants. In contrast, “old receiving states” (the states of Northern and Western Europe) have had almost 60 years of experience with settlement, diminishing welfare coffers, generational access, and the trial and errors of integration.

Finally, where both of these variables are constant structural conditions for policy change, nationally-specific political pressures are an important, third component of identifying civic integration outcomes. These triggers include: national elections, far-right and populist politics, social unrest, and increasing costs of public opposition. The common trait between these different triggers is that they each raise the profile of integration by placing direct pressure on governments to “do something.” Triggers make diversity into a political issue, and parties in power that desire to stay in power (and to keep an oppositional party from gaining traction on immigration issues) address diversity through civic integration requirements. This causal argument is illustrated in Figure 3.1 below:

Figure 3.1: Explaining Civic Integration Outcomes
Experiences with immigration:

A lengthy experience with immigration is the first important component to identifying whether states are inclined toward civic integration policies. This condition takes into account the considerable history some European states have built up with immigrant-related diversity; it also serves to explain why there are not rigorous civic integration policies in new receiving states. While contemporary migration to Europe is wide-reaching, countries in southern Europe only became positive net receivers in the early 1980s. These late-receiving and late-democratizing states (Greece, Portugal, Spain, and Italy) lack experience with second and third generation settlement. One of the unique dimensions of civic integration is in targeting settled migrants who, despite long durations or birth in the host society, lack skills and common values. Furthermore, the primary concern with immigration policymaking in new-receiving states is regularization, and not integration. We see the absence of a normalized relationship with immigrants in several places. Southern European countries have the lowest naturalization rates in Europe. Despite comparatively higher averages of migration intake, internal regulations for status and citizenship have not been prioritized, with the exception of descendent-based acquisition. This regional pattern is anomalous in the context of European-wide change. Greece, for example, does not even have a legal category for permanent residence.⁶

⁶Permanent residence is granted through the European Union, not nationality law.
On the other hand, countries with significant and lengthy experiences with immigrant reception and settlement are familiar with the problems of integration and challenges of diversity. In the post-war period, there were two significant migration waves into Europe which “contributed decisively to the formation of ethnic minorities”: guest workers and colonial workers.\(^7\) Colonial migrants, such as those from India to Britain, Algeria to France, and Indonesia to the Netherlands, had an automatic “right to abode” or settlement in the host country, and entered either as citizens or on a presumptive track to citizenship.

Guest workers, on the other hand, came to receiver-states on temporary work permits from struggling European economies (like Italy and Greece) and Mediterranean countries (primarily Morocco to Turkey). They had no initial claims to permanent residence or presumptive citizenship because immigration was provisional. However, they established rights of settlement and family unification that underscored the expansion of rights to denizens through “facts on the ground.” States extended welfare benefits and social assistance, particularly in highly coordinated market economies like Austria, Denmark, and Germany, even in the absence of opportunities to access citizenship.\(^8\) Long-term residents (regularized guest workers) have also, at times, gained

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\(^8\) Austria and Germany, for example, have very limited avenues for migrants to obtain legal inclusion and political rights (voting, citizenship). However, they have very inclusive social rights for legal migrants. Looking at scores of social security and insurance benefits, where scores closest to 0 indicates “no discrimination” and closest to 1 indicates full discrimination, Austria (.16) and Germany (.12) are more
eventual qualification for citizenship, either through policy change (Germany’s Citizenship Act of 2000 extended access to second and third generations) or the passage of time. This, for example, is the primary reason Austria began to see naturalization rates increase in the 1990s despite continually difficult citizenship requirements.\(^9\)

Despite these categories of immigration, both types of migrants, and their children, have experienced integration difficulties. Instead of generational assimilation over time, integration problems persist from pockets of Moroccans in Rotterdam, to Pakistanis in Manchester, and Turks in Cologne.\(^10\) In this context, contemporary pressures of immigrant integration are not new, but rather join into a pre-existing and endemic cycle of integration problems. Therefore, the “fall” of multiculturalism\(^11\) is not what produces civic integration outcomes, as Joppke\(^12\) and others contend.\(^13\) States

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without multicultural experiences, such as France and Germany, also adopt mandatory integration requirements. It is that states have had prior experiences at all that educates policymakers of the availability of viable policy strategies and necessity for response.

The experience of immigration exposes states to domestic immigration problems over time. Conversely, when we do not see even first-order immigration policies, like border control or legalization, we are less likely to witness policies concerned with the quality or nuances of citizenship. Therefore, civic integration is a strategic management policy, not a direct instrument for problem-solving. Managing immigration control or repair integration problems through the “revaluation of citizenship” and promotion of “common values” may not just be the latest option, but it may also be the last option.

The theoretical expectation is that when countries have longer experiences with immigration, they face greater pressures and fewer policy options to address problems of immigrant integration. I account for whether countries are “older” or “newer” receiving countries by using the classification employed by Andrew Geddes. I also include Ireland as a new recipient. To reflect these different experiences, I create a dummy


15 Immigration to Ireland was so negligible that Geddes does not even include Ireland as a case study. Ireland’s big migration boom was concomitant to the economic boom in the late 1990s, and with the 2004 accession of Poland to the EU, Ireland willingly opened its labor market to keep the “Celtic tiger” roaring.
variable in Table 3.2 to control for “new” (x=0) and “old” (x=1) experiences with immigration.

Table 3.2: Variation in the EU-15 of “New” and “Old” Immigrant Experiences

<table>
<thead>
<tr>
<th>New Receiving States</th>
<th>Old Receiving States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greece</td>
<td>Austria</td>
</tr>
<tr>
<td>Ireland</td>
<td>Belgium</td>
</tr>
<tr>
<td>Italy</td>
<td>Denmark</td>
</tr>
<tr>
<td>Portugal</td>
<td>Finland</td>
</tr>
<tr>
<td>Spain</td>
<td>France</td>
</tr>
<tr>
<td></td>
<td>Germany</td>
</tr>
<tr>
<td></td>
<td>Luxembourg</td>
</tr>
<tr>
<td></td>
<td>Netherlands</td>
</tr>
<tr>
<td></td>
<td>Sweden</td>
</tr>
<tr>
<td></td>
<td>U.K.</td>
</tr>
</tbody>
</table>

Foreigners of Non-European Origin

The second important condition behind “thick” citizenship requirements are the political and actual pressures generated by high levels of immigrant-related diversity. Unlike hypotheses that explain civic integration policies as a product of rising immigration, or the pressure of immigration on welfare spending, there is instead a significant explanatory role in differentiating “threatening” and culturally incompatible migration from non-European origins. It is an argument about the real integration

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Ireland’s migration was one of emigration, but in only ten short years Ireland’s foreign population has reached about 10% of the total population. For one of the first examinations of immigration in Ireland, see Bryan Fanning, ed. *Immigration and Social Change in the Republic of Ireland* (Manchester: Manchester University Press, 2007).
problems non-European migrants experience in host societies and about cultural anxieties generated by ethnically diverse immigrants, and Muslim immigrants in particular.

A significant portion of contemporary immigration comes from traditional sending countries, like former colonies (e.g., Algeria) or guest worker states (e.g., Turkey), but some is also the result of the rise in asylum applications in the late 1990s from new countries in Africa. Unlike the immediate postwar period, this new injection of diversity does not disrupt otherwise homogeneous societies, but exacerbates existing tensions of diversity and immigration politics by linking into pre-settled communities. Both of these dimensions can be seen in the pie-chart (Figure 3.2) below.\textsuperscript{16}

**Figure 3.2: Foreign Immigrants in the EU by Region of Citizenship, 2006**

It is worthwhile to address here the difference in describing this condition as non-European instead of directly targeting Muslim migrants, as per the narrower conventional wisdom. The recent arc of integration problems and violence stemming from European Muslim populations generates a vague sense of “clashing cultures” between Muslim immigrant-citizens and democratic host communities. Significant Muslim populations indicate which states are “fertile ground” for publics and policymakers to identify integration incompatibilities. However, this alone does not provide an explanation as to why some states respond with mandatory integration requirements. First, as I pointed out, culturally and ethnically diverse immigration is not new to Europe. The same rhetoric about “large and problematic” immigrant groups existed during older immigration periods, including the “religious threat” of the Irish in Britain or the national threats of Italians in France and Poles in Germany. It is when diversity matters that determines its importance, not the nature of diversity in of itself. France and Germany have received significant Muslim migration since the 1960s. It is not Islam but the extremism of Islam that makes integration untenable.

Second, there is no direct correlation between Muslim populations and integration problems across cases. Sweden, for example, experienced the second-largest percentage change in the size of its Muslim population among the EU-15, but has not identified

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18 See Leo Lucassen, The Immigrant Threat: The Integration of Old and New Migrants in Western Europe since 1850 (Urbana; Chicago: University of Illinois Press, 2005), p. 74; chapters 1-3.
significant problems of incompatible values that need resolution with civic integration requirements. Similarly, Belgium actually experienced a recent decline in Muslim population.\textsuperscript{19} Muslims are one population targeted by civic integration requirements, but they are not the only one.\textsuperscript{20} It is more accurate to identify civic integration requirements as addressing the skill and value gaps between national communities and non-European ethnic minorities in general, ranging from the Arab world to African-Muslims and including migrants from the former Yugoslavia.

Policymakers design civic integration requirements to address functional and symbolic problems of immigrant-related diversity (both newcomers and settled migrants). Some of these problems are vague (“value gaps” or country knowledge) and new requirements symbolically redress cultural difference. A two-minute oath or the perfunctory signing of a contract is hardly a transformative experience, but provides a way for policymakers to respond when other strategies seem inappropriate, unfeasible, or illegal (like arbitrarily limiting family unification). For example, French President Nicolas Sarkozy’s colorfully describes family unification as unwanted immigration

\textsuperscript{19} Moreover, Sweden and Belgium both had debates about implementing language requirements in the context of growing diversity, but both regarded requirements as unnecessarily arduous and counterproductive to the goal of integration. See Foberts and Loones, “Belgium” (pp. 78-86) and Bernitz and Bernitz, “Sweden” (pp. 530-536), in Rainer Bauböck, Eva Erbsöll, Kees Groenendijk, and Harald Waldrauch, eds., \textit{Acquisition and Loss of Nationality, Vol. I: Comparative Analyses} (Amsterdam, NL: Amsterdam University Press, 2006).

\textsuperscript{20} Even when the Muslim population is high in comparison to the total population, like France, it is important to further distinguish between cultural and religious Muslim identities. In France, only 36\% of Muslims identify themselves as practicing. See U.S. Department of State, “France,” \textit{Annual Report on International Religious Freedom} (2007).
Instead of limiting intake directly with changes to immigration policy, French policymakers designed linguistic and assimilationist requirements to indirectly obtain desired outcomes of control. However, some of the problems resulting from diversity are specific, like language proficiency. In this case, when policymakers seek to improve immigrant mobility and compatibility in the labor market, civic integration requirements are functional, not symbolic.

To identify where diversity is significant, I examine two measures of non-European foreign residents. The first presents the change in the percent of Muslims in each European country between 1982 and 2003, and replicates data reported by Timothy Savage. The second measure shows the most recent percentage of foreigners within each country that are from outside the European Union. Germany and Austria have been measuring the number of “non-national European Union member state citizens” (in other words, Europeans living outside their country of citizenship) since 2003. However, similar measurements in the other EU-15 nations did not become available until 2006. I subtract the percentage of “non-national EU citizens” within each country from the total

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23 This figure excludes migrants from Romania and Bulgaria. These countries did not join the EU until 2007.

24 With available data, I would have otherwise calculated the difference between 1997 and year of policy change. However, I have to assume these numbers are a rough reflection of the highs and lows of a ten-year average.
pool of foreigners (100%) to produce the percentage of non-European foreign residents in the respective states of the EU-15. Essentially, this is a calculation of “third country nationals” (TCNs) in respective European countries. These two figures are displayed in bold in Table 3.3.

Table 3.3: Non-European Populations Today and Over Time

<table>
<thead>
<tr>
<th></th>
<th>Muslims as a % of Total Population</th>
<th>Percent increase/decrease in Muslim population</th>
<th>Total Percent of Foreigners (2006 only)</th>
<th>Percent of Foreigners from the EU</th>
<th>Percent of non-EU foreigners</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>1.1 4.2</td>
<td>3.1</td>
<td>9.85</td>
<td>27.93</td>
<td>72.07</td>
</tr>
<tr>
<td>Belgium</td>
<td>3.6 3.5</td>
<td>-0.1</td>
<td>8.57</td>
<td>67.96</td>
<td>32.04</td>
</tr>
<tr>
<td>Denmark</td>
<td>0.7 3</td>
<td>2.3</td>
<td>4.98</td>
<td>26.66</td>
<td>73.34</td>
</tr>
<tr>
<td>Finland</td>
<td>n/a 0.4</td>
<td>0.4</td>
<td>2.17</td>
<td>33.31</td>
<td>66.69</td>
</tr>
<tr>
<td>France</td>
<td>4.6 8.3</td>
<td>3.7</td>
<td>5.57</td>
<td>31.62</td>
<td>68.38</td>
</tr>
<tr>
<td>Germany</td>
<td>2.9 4.9</td>
<td>2</td>
<td>8.84</td>
<td>29.42</td>
<td>70.58</td>
</tr>
<tr>
<td>Greece</td>
<td>2.9 4.9</td>
<td>2</td>
<td>7.95</td>
<td>9.95</td>
<td>90.05</td>
</tr>
<tr>
<td>Ireland</td>
<td>n/a 0.5</td>
<td>0.5</td>
<td>7.42</td>
<td>67.75</td>
<td>32.25</td>
</tr>
<tr>
<td>Italy</td>
<td>0.2 1.8</td>
<td>1.6</td>
<td>4.55</td>
<td>8.37</td>
<td>91.63</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>n/a 1.4</td>
<td>1.4</td>
<td>39.56</td>
<td>85.26</td>
<td>14.74</td>
</tr>
<tr>
<td>Netherlands</td>
<td>2.8 5.5</td>
<td>2.7</td>
<td>4.23</td>
<td>33.83</td>
<td>66.17</td>
</tr>
<tr>
<td>Portugal</td>
<td>n/a 0.4</td>
<td>0.4</td>
<td>2.61</td>
<td>29.35</td>
<td>70.65</td>
</tr>
<tr>
<td>Spain</td>
<td>0.3 2.4</td>
<td>2.1</td>
<td>9.15</td>
<td>20.88</td>
<td>79.12</td>
</tr>
<tr>
<td>Sweden</td>
<td>0.3 3.9</td>
<td>3.6</td>
<td>5.3</td>
<td>44.42</td>
<td>55.58</td>
</tr>
<tr>
<td>U.K.</td>
<td>2.2 2.7</td>
<td>0.5</td>
<td>5.67</td>
<td>37.37</td>
<td>62.63</td>
</tr>
</tbody>
</table>

25 Data is available from Eurostat, Migration Statistics
Popular Pressure

Finally, there are nationally-specific triggers that indicate to policymakers the urgency of “repairing value gaps” among immigrant populations and “controlling immigration.” There is no uniform catalyst across the various cases, however there are similar conditions where nationally-specific events (from elections to riots) that pressure policymakers and governments in power to re-examine existing citizenship policy. First, there is some failure or problem of integration that raises public awareness over the issue. Again, these events could vary from a committee report that directly identifies integration problems to the assassination of a political figure by an immigrant, like the murder of Theo Van Gogh by Mohammad Bouyeri, which implies integration problems. Second, this event and related public awareness generates pressure for political elites to take action. This is the popular pressure to “do something,” whether the problem generating the pressure is real (immigrant-related violence) or symbolic (“too much immigration”). Finally, political elites identify costs in not responding to these pressures. This cost can manifest in several ways, including: low popularity ratings, further integration problems, electoral outcomes, and the possibility of an oppositional party (especially the far right) taking advantage of a majority party’s unpopularity. Parties in power are always running for re-election, and losing public confidence is a significant cost of government inaction.
For example, the 2002 French Presidential election served as the defining trigger for changing a previously voluntary civic orientation and language training day into a mandatory requirement for residency and citizenship. The success of Jean Marie Le Pen in the first round of the election indicated to the center-right party, UMP (*Union pour un Mouvement Populaire*), and to the election’s incumbent winner, President Jacques Chirac, that the government was losing popularity with respect to immigration issues. Similar stories of integration problems resonating in political costs could also be told about Germany, Denmark, Austria, and the Netherlands. Each of these stories identify an excessive popular pressure on policymakers to “do something” about immigration, whether to placate native majorities in response to “on-the-ground” events or to balance out liberal changes in citizenship policy. In chapter 4, I look more closely at this process by examining causal mechanisms, or how these pressures interplay with high levels of diversity and prior experiences. The statistical correlations presented here show whether the relationship between conditions of prior experience and non-European migration with civic integration change are significant, but does not tell us why or how.

In conclusion, mandatory civic integration requirements, or thick citizenship, comprise a significant response to the context, diversity, and politics of immigration.

27 See Green, “Divergent Traditions, Converging Responses”
28 Entzinger, “The Rise and Fall of Multiculturalism”
29 Moreover, this multi-method approach negates the need to artificially create quantitative indicators that would inevitably reduce richness and complexity or electoral competition.
Political elites encounter domestically-generated pressures to “do something” about immigration and/or integration where there are high levels of diversity and experiences with prior entry and settlement. These two conditions of past and present immigrant-related diversity reveal civic integration requirements to have functional objectives of addressing real integration problems, including a lack of language proficiency. The immediate, popular pressure compelling policymakers to “do something” about immigration reveals civic integration requirements to also have a strategic objective. Civic integration requirements are weak instruments for actually controlling immigration or resolving integration problems. It is doubtful that policymakers actually expect a behavioral or performance change among immigrants as the result of signing a contract or swearing an oath to Queen and country. However, these measures indicate that they are “doing something” about migration when the problem is vague but the costs are real.

**Alternative Hypotheses for Policy Change**

I already alluded to some of the alternative explanations for civic integration policy, but it is important to examine these within the context of my central argument. There is a plethora of comparative citizenship and immigration policy literature that explains closure, restriction, and exclusion, but these are not replaceable terms for “thickness.” On the one hand, civic integration requirements exclude immigrants and third country nationals at various civic stratifications, from entry to citizenship; on the
other hand, they are devices (albeit obligatory ones) for inclusion because they mandate integration minimums. These other terms denote limitations to access, but thickness denotes depth of membership.

This difference raises several problems in taking existing explanations of citizenship policy change and importing them into the context of civic integration. Political party hypotheses are one such example. Christian Joppke defines divergent citizenship strategies of re- and de-ethnicization, where rightist governments are typically in favor of citizenship grounded in descent, while leftist governments typically favor expansionist and pro-immigrant positions.\(^{30}\) By looking at change in the EU-15, we see governments both on the left and on the right adopting civic integration requirements. Jacques Chirac co-opted Lionel Jospin’s (of the Socialist party) voluntary integration criteria, while the “purple coalition” comprised of social-democratic (D66) and liberal (PvdA) parties in the Netherlands were responsible for passing the Newcomers Integration Law in 1998.

A second problem arises when the thickness of membership (more requirements) is confused with the content of membership. More requirements do not equate to more “ethnic” or particularistic versions of membership. Civic requirements are principally dedicated to universalistic values of a liberal democratic society (like human rights or appropriate interpretations of the Holocaust) and skills of autonomous citizens, and to

lesser extent on cultural attributes of nation-states (like history and trivia). It is distinguished by a new emphasis on language acquisition, country knowledge, and liberal democratic values, but it matters little whether those value commitments are written in German or French. Therefore, it seems appropriate to depart from the civic/ethnic dichotomy of nationalism, and instead use “universalistic” and “particularistic” labels for requirement content.

A final problem in identifying likely hypotheses for change is finding explanations that address the diversity of cases. For example, it is widely assumed that obligatory civic integration requirements are a response to domestic terrorism, like the assassination of Pim Fortuyn and Theo Van Gogh (the Netherlands) or the suicide bombings on London Transport on 7/7 by British nationals. Not only does this type of explanation not cover all cases (Why did Spain not adopt civic integration requirements in response to 3/11?), but the timing does not fit. British policymakers had a citizenship agenda for immigrants in place before 7/7, and discussed it even before 9/11. Dutch policy also existed before the assassinations of Theo Van Gogh and Pim Fortuyn. Terrorism and violence shape public attitudes about immigration and play a key role in accelerating national debates about values and control. However, these catalyzing events matter in the context of existing diversity and high levels of immigration. This explains why response is about values and integration in addition to security. Likewise, if

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European countries were responding to an ever-encroaching, European post-nationalism, or an economic globalization that diminished the value of national distinction, we would see re-nationalization across the EU-15.

As a result of these types of problems, the alternative hypotheses address three types of pressures for explaining civic integration policy change. Instead of experience and politics, these hypotheses consider at the demographic (volume), socioeconomic (costs), and institutional (opportunity) impact of immigration.

**Demographic Change**

Many scholars have observed the significant effects of immigration on citizenship policy, particularly where access requirements have been liberalized, and rights and status have been extended to second and third generation migrants. But this change has also forced questions of accommodation and integration to the top of policy agendas. All states in Europe are now in a position where they acknowledge the necessity of


34 On liberalization, see Hansen and Weil, Towards a European Nationality. Also see Tomas Hammar, Democracy and the Nation State: Aliens, Denizens, and Citizens in a World of International Migration (Brookfield, VT: Gower, 1990).
immigration as a method to counter the effects that low birthrate and an aging workforce have on demographic trends.\textsuperscript{35} But how would increased immigration account for thickening citizenship change?

An immigration pressure hypothesis suggests that states promote thick civic requirements in response to high levels of immigration, without specification of origin like my argument posits. The theoretical expectation would therefore be that as immigration figures climb, policymakers enact or increase existing mandatory civic integration requirements. This response serves either to control or legitimize intake. In the first scenario, civic requirements functionally limit the intake of immigrants by erecting high barriers. Requirements are a means for vetting newcomers that are not deemed “civic-like.” In the second scenario, civic requirements do not limit, but justify, the large intake of immigrants. Policymakers can account for perceivably large numbers of immigrants by demonstrating that the government is taking an active role in the integration and assimilation of newcomers. The expansion of opportunities for immigrants to access national membership through integration programs is a gesture of inclusion, because through citizenship exams and oaths, “naturalization is thus a nationalizing practice.”\textsuperscript{36}

\textsuperscript{35} For detailed descriptions of the waves of migration, see Anthony Messina, \textit{The Logics and Politics of Post-WWII Migration to Western Europe} (Cambridge: Cambridge University Press, 2007), chapter 2; Castles and Miller, \textit{The Age of Migration}.

Table 3.4 reflects two different measures of immigration change in the EU-15. First, I examine the average inflow of migration. Instead of comparing sheer intake, where “economies of scale” would show larger countries necessarily experiencing larger intake, I examine inflow as a percent of the total population. This shows that some of the largest intake countries are also the newest receivers.

The second measure of demographic change from immigration does not examine intake. Instead, it examines the average stock of foreigners as a percent of the total population. Unlike my argument, this hypothesis considers foreigners in aggregate. Luxembourg possesses a disproportionately large foreign population (as high as 37% of the total population!), while some of the largest net-receivers still have low percentages of permanent foreign populations. Both figures are drawn from OECD data, and reflect self-calculated averages taken between 1997 and either 2006 or the year of primary policy change (necessarily varying across cases).

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Table 3.4: Average Inflow and Foreigner Populations

<table>
<thead>
<tr>
<th></th>
<th>Inflow of Foreign Population</th>
<th>Stock of Foreign Population</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1997 2000 2003</td>
<td>Average as % of total</td>
</tr>
<tr>
<td>Austria</td>
<td>65954 97164</td>
<td>1.03</td>
</tr>
<tr>
<td>Belgium</td>
<td>49240 57295 68800</td>
<td>0.60</td>
</tr>
<tr>
<td>Denmark</td>
<td>20436 22903 18742</td>
<td>0.40</td>
</tr>
<tr>
<td>Finland</td>
<td>8147 9108 9432</td>
<td>0.18</td>
</tr>
<tr>
<td>France</td>
<td>74455 92241 135056</td>
<td>0.18</td>
</tr>
<tr>
<td>Germany</td>
<td>615298 648846 601759</td>
<td>0.78</td>
</tr>
<tr>
<td>Greece</td>
<td>38151*</td>
<td>0.35</td>
</tr>
<tr>
<td>Ireland</td>
<td>23700 27800 33000</td>
<td>0.79</td>
</tr>
<tr>
<td>Italy</td>
<td>.. 271517 ..</td>
<td>0.46</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>9376 10792 11511</td>
<td>2.53</td>
</tr>
<tr>
<td>Netherlands</td>
<td>76736 91383 73566</td>
<td>0.49</td>
</tr>
<tr>
<td>Portugal</td>
<td>3298 15932 31754</td>
<td>0.35</td>
</tr>
<tr>
<td>Spain</td>
<td>.. 330881 429524</td>
<td>0.92</td>
</tr>
<tr>
<td>Sweden</td>
<td>33443 42629 47988</td>
<td>0.46</td>
</tr>
<tr>
<td>U.K.</td>
<td>237200 379300 406800</td>
<td>0.61</td>
</tr>
</tbody>
</table>

*Not recorded in 2007, represented score taken in 1998.

**Socioeconomic Pressure**

A second alternative explanation incorporates the socioeconomic costs of immigration, and responses to the impact of immigration. Immigration is a significant factor in a country’s national political economy. This is particularly the case in contemporary Europe, where aging populations and generous welfare schemes are singularly reliant on continued migration. Socioeconomic hypotheses acknowledge that one of the consequences of increased immigration is increased pressure on labor market
opportunities as well as social and welfare provisions. According to this theoretical prediction, a rise in resource pressure, like unemployment or decreasing social expenditures, would impel policymakers to justify or limit migrant inclusion. Inversely, where there is more spending on social programs and unemployment decreases, we would see less pressure on resource protectionism.

I examine three indicators that reasonably represent these different socioeconomic predictors. All are presented on Table 3.5. First, unemployment is a useful proxy for identifying the extent of competition over resources, and consequently, attitudes toward immigration. When unemployment increases, the politics of immigration become more virulent. Therefore, the theoretical prediction is that when unemployment increases, policymakers respond to rising xenophobic and resource pressure by enacting arbitrary and prohibitive integration requirements. Unemployment is represented by taking the average of OECD data between 1997 and either 2006 or the date of the major policy change.

The second socioeconomic indicator considers the pressure specifically generated by rising foreign labor. Unemployment rates reflect an abstract frustration; the general public perceives the lack of job availability as related to increased intake. However, a rising number of foreigners in the labor market create a significant and direct demand for

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skills training. The idea that new laborers require immediate language training was an important factor that underscored the initial debate on civic integration in countries like France\textsuperscript{39} and the Netherlands.\textsuperscript{40} This functional hypothesis predicts that when the number of foreigners in a domestic labor market increases, this results in a greater need for skills training. With a greater percentage of foreigners in the labor force, we should expect the presence of increased public pressure to implement mandatory language and civic training for persons in the labor market. The pressure created by additional migrant workers is thus alleviated with increased training. The average percent of foreigners within the labor force of each of the EU-15 states is calculated by taking an average of the OECD data from 1997 and 2006.

Finally, building on the symbolic pressure of unemployment and the functional pressure of foreign laborers, I consider the effects that rising foreign populations have on social expenditure. The amount governments spend on social programs varies from year to year, as does the population which draws on it. If spending remains static, but a population grows (from migration, birth rate, etc), there is theoretically less money available for social programs and assistance on a per person level. This argument also

\textsuperscript{39} Patrick Weil, Interview with author. 1 August 2007. Paris, France.
\textsuperscript{40} Han Entzinger, “The Rise and Fall of Multiculturalism,” pp. 75-76. He states that the “central argument” behind the debate for civic integration is that “many immigrants arriving in the Netherlands were not sufficiently qualified to enter the labor market on the requirements set by a highly developed economy.”
draws on the anecdotally prevalent, if incorrect, belief that immigration as a whole receives a disproportionate, even exhaustive, amount of social benefits.\textsuperscript{41}

To represent this idea, I calculate an indicator that divides annual social expenditure by the stock of foreigners and present it in Table 3.5. Social expenditure spending is available in a composite indicator from OECD named SOCX. It captures group benefits with respect to nine policy areas: old-age, survivors, incapacity-related benefits, health, family, active labor market policies, unemployment, housing, and other (like food subsidies). OECD reports this composite score as a percentage of GDP.\textsuperscript{42}


\textsuperscript{42} OECD, \textit{SOPEMI 2008}
Table 3.5: Socioeconomic Indicators

<table>
<thead>
<tr>
<th>Country</th>
<th>Unemployment Average (1997-2006)</th>
<th>Average Foreign Labor (1997-2006)</th>
<th>Social Expenditure as a percent of Total GDP</th>
<th>Impact of Immigration on Social Expenditure (social expenditure divided by stock of foreign populations in Table 3.4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>4.34</td>
<td>10.98</td>
<td>27.01</td>
<td>0.16</td>
</tr>
<tr>
<td>Belgium</td>
<td>8.14</td>
<td>8.77</td>
<td>26.14</td>
<td>0.31</td>
</tr>
<tr>
<td>Denmark</td>
<td>4.82</td>
<td>3.62</td>
<td>27.33</td>
<td>0.18</td>
</tr>
<tr>
<td>Finland</td>
<td>9.63</td>
<td>1.86</td>
<td>26.27</td>
<td>0.37</td>
</tr>
<tr>
<td>France</td>
<td>9.55</td>
<td>5.88</td>
<td>28.72</td>
<td>0.33</td>
</tr>
<tr>
<td>Germany</td>
<td>8.97</td>
<td>8.97</td>
<td>26.68</td>
<td>0.34</td>
</tr>
<tr>
<td>Greece</td>
<td>10.4</td>
<td>5.16</td>
<td>19.37</td>
<td>0.54</td>
</tr>
<tr>
<td>Ireland</td>
<td>5.41</td>
<td>4</td>
<td>14.79</td>
<td>0.37</td>
</tr>
<tr>
<td>Italy</td>
<td>9.26</td>
<td>4.51</td>
<td>23.58</td>
<td>0.39</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>3.25</td>
<td>60.5</td>
<td>21.64</td>
<td>0.15</td>
</tr>
<tr>
<td>Netherlands</td>
<td>3.66</td>
<td>3.67</td>
<td>20.95</td>
<td>0.17</td>
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<tr>
<td>Portugal</td>
<td>5.8</td>
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<td>19.79</td>
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</tr>
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<td>Spain</td>
<td>11.62</td>
<td>4.08</td>
<td>20.97</td>
<td>0.55</td>
</tr>
<tr>
<td>Sweden</td>
<td>6.65</td>
<td>4.84</td>
<td>30.15</td>
<td>0.22</td>
</tr>
<tr>
<td>U.K.</td>
<td>5.42</td>
<td>4.59</td>
<td>19.97</td>
<td>0.27</td>
</tr>
</tbody>
</table>

Institutional Influences

A final explanation for civic integration requirements incorporates the extent of naturalization as an explanatory factor. I describe naturalization as an institutional hypothesis because it is the best indicator of whether citizenship policies encourage or discourage naturalization, in other words, how citizenship rules dictate citizenship take-up. However, the number of people obtaining citizenship each year—described interchangeably as acquisition or naturalization rates—can be a misleading figure. On
the one hand, high naturalization rates may indicate that citizenship is too easy to obtain. This type of critique is especially potent in states with traditionally restrictive idea of citizenship, where increases in naturalization may be justified, but are seen as unwanted. On the other hand, high naturalization rates may also indicate that citizenship is popular and desirable. This perspective is more typical in cases that seek to promote citizenship and distinguish the identity of citizenship from that of permanent residence. Finally, acquisition rates may not really be revealing anything about the desirability or feasibility of citizenship from the perspective of migrants. For example, naturalization rates in the UK over time are typically lower than comparative European states because many migrants already acquired citizenship not through naturalization procedures, but through Commonwealth status. Therefore, the interpretation of the meaning of naturalization rates is just as important as the figures themselves.

In sum, there are two theoretical expectations for this hypothesis. In response to rising naturalization, states may want to reverse this uptick by limiting eligibility or access to citizenship. In response to decreasing naturalization, states may want to reverse this trend by fashioning citizenship as something meaningful and distinct. Table 3.6 shows the percentage of foreign population within each of the EU-15 nations that are
naturalized citizens. This data is derived from OECD and Eurostat and corresponds to each year between 1997 and either 2006 or the policy change date.\footnote{OECD, \textit{SOPEMI} 2008 (Paris: OECD). Ireland and Greece, which come from Eurostat, \textit{Migration Statistics} (own calculations)}

<table>
<thead>
<tr>
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<th></th>
<th></th>
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<tbody>
<tr>
<td>Austria</td>
<td>2.31</td>
<td>2.59</td>
<td>3.56</td>
<td>3.47</td>
<td>4.42</td>
<td>4.85</td>
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<td>4.35</td>
<td>3.20</td>
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<tr>
<td>Belgium</td>
<td>3.47</td>
<td>3.76</td>
<td>2.72</td>
<td>6.92</td>
<td>7.31</td>
<td>5.48</td>
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<td>3.99</td>
<td>3.50</td>
<td>3.54</td>
<td>4.22</td>
</tr>
<tr>
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<td>4.11</td>
<td>4.84</td>
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<td>4.60</td>
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<td>5.52</td>
<td>3.78</td>
<td>2.95</td>
<td>4.93</td>
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<td>5.39</td>
<td>3.27</td>
<td>2.76</td>
<td>2.94</td>
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<td>6.48</td>
<td>5.10</td>
<td>3.89</td>
<td>4.06</td>
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<td>..</td>
<td>4.60</td>
<td>..</td>
<td>..</td>
<td>..</td>
<td>..</td>
<td>..</td>
<td>4.22</td>
<td>4.60</td>
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<td>Germany</td>
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<td>1.45</td>
<td>1.96</td>
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<td>2.44</td>
<td>2.11</td>
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<td>1.89</td>
<td>1.74</td>
<td>1.85</td>
<td>1.94</td>
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<td>..</td>
<td>..</td>
<td>..</td>
<td>..</td>
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<td>0.002</td>
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<td>1.50</td>
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<td>..</td>
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<td>0.80</td>
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<td>Luxembourg</td>
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<td>0.43</td>
<td>0.36</td>
<td>0.41</td>
<td>0.30</td>
<td>0.45</td>
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<td>0.47</td>
<td>0.54</td>
<td>0.61</td>
<td>0.44</td>
</tr>
<tr>
<td>Netherlands</td>
<td>8.80</td>
<td>8.73</td>
<td>9.37</td>
<td>7.67</td>
<td>6.99</td>
<td>6.56</td>
<td>4.11</td>
<td>3.73</td>
<td>4.07</td>
<td>4.21</td>
<td>7.77</td>
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<td>0.38</td>
<td>0.41</td>
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<td>0.20</td>
<td>0.84</td>
<td>0.42</td>
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<tr>
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<td>1.91</td>
<td>2.20</td>
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<td>2.28</td>
<td>2.02</td>
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<td>8.91</td>
<td>7.56</td>
<td>8.92</td>
<td>7.63</td>
<td>7.94</td>
<td>6.96</td>
<td>5.85</td>
<td>8.22</td>
<td>10.68</td>
<td>7.50</td>
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<tr>
<td>U.K.</td>
<td>1.91</td>
<td>2.59</td>
<td>2.49</td>
<td>3.72</td>
<td>3.86</td>
<td>4.64</td>
<td>4.86</td>
<td>5.13</td>
<td>5.66</td>
<td>5.08</td>
<td>3.20</td>
</tr>
</tbody>
</table>

**Testing Hypotheses**

Having introduced alternative demographic, socioeconomic, and institutional explanations for the adoption of civic integration requirements, I am able to examine the
relationship between each variable and the predicted outcome of CIVIX change. Table 3.7 displays the predicted direction of civic integration requirements, correlation values, and the significance of each of the alternative hypotheses. It immediately becomes clear that none of these indicators achieve minimum significance (below \(p=0.01\)).\(^{44}\) The nearest indicators to significance include naturalization (.052), Muslim population change (.071), and unemployment (.089).

[Table 3.7 about here]

Beginning with the demographic hypotheses, the increases in immigration—both inflow and stock—do not shed any explanatory light on thick citizenship change. Also, the correlation values are both negative against the predicted direction. This suggests that immigration has the opposite effect than predicted on civic integration. In fact, when examining the percent of net migration in the 2000s, the correlation is stronger and significant \((r= -0.48; p=0.035)\).\(^{45}\) In other words, the highest, contemporary receivers of net migration have thinner civic integration requirements. This reiterates the point that civic integration policies are not first-order strategies for immigration control. Rather, they are nuanced strategies where states have prior experiences with migration and

\(^{44}\) Since change is unidirectional (policy only becomes more restrictive or thick between these two snapshot years), I rely on one-tailed \(p\)-values for significance on Pearson’s \(r\) (rho).

\(^{45}\) Calculation based on correlating CIVIX change with the following values: Austria (5.8), Belgium (3.8), Denmark (1.4), Finland (1.2), France (2.4), Germany (2.0), Greece (3.6), Ireland (10.9), Italy (6.6), Luxembourg (5.4), Netherlands (0.8), Portugal (5.4), Spain (14.2), Sweden (3.2), UK (3.0), from Michael Minkenberg, “Religious legacies and the politics of multiculturalism: a comparative analysis of integration policies in Western democracies,” in Immigration, Integration, and Security: America and Europe in Comparative Perspective, eds. Ariane Chebel d’Appollonia and Simon Reich (Pittsburgh: University of Pittsburg Press, 2008), pp. 44-67.
settlement. The percent of Muslim population change is also insignificant because of the distortion of “new” receiving states.

Turning to socioeconomic indicators, there is a similar absence of significance and patterns. The correlation statistic of unemployment is opposite to the predicted direction, and foreign labor and impact of immigration on social expenditure are highly insignificant. This does not negate the importance to policymakers of unemployment or welfare access concerns. Instead, it suggests that the problems that civic integration requirements address are not immediate or significant to people’s pocketbooks. If immigration presented significant problems for social assistance, we would see more significant policy responses than civic integration strategies.

Finally, naturalization rates show the tightest correlation outside of the central argument. One reason for this response that there are too many people obtaining citizenship (high naturalization rates), and policymakers feel public and electoral pressure to curb this trend. A second reason for adding requirements might be because too few people are obtaining citizenship. This would be a response to what Peter Schuck calls the “devaluation of citizenship,” where rights are extended to persons based on residence in

state territory, instead of membership.\textsuperscript{47} If a denizen can hold the rights and privileges of citizenship without the status of citizen itself, than citizenship itself has become “inventively irrelevant.”\textsuperscript{48} Civic integration requirements revalue citizenship in this context. Accepting this theory does not diminish my central argument, rather it extends it. Naturalization is only one dimension of how policymakers define immigration problems.

Finally, the percentage change in Muslim population and the number of non-European foreign residents are both extremely significant when controlling for experience with migration. I locate these population variables alongside other demographic hypotheses because they are essential volume issues multiplied by an experiential control. However, unlike other hypotheses, there is a strong correlation between diversity and experience of immigration, and changes in CIVIX scores. Non-European diversity is much stronger than changes in Muslim population. To reiterate a previous point, Muslims make up an important and visible component of ethnic diversity, but they are not the only minority population of concern. Second, this variable captures the change in Muslim populations in the past two decades, not absolute numbers. Many “old” receiving states have had sizable Muslim populations for decades. Contemporary


political competition and pressures to “do something” about immigration are what makes this diversity matter, not the mere fact of it.

Table 3.7: Relationships between Immigration Pressures and CIVIX Change

<table>
<thead>
<tr>
<th>Variable</th>
<th>Predicted Direction</th>
<th>Correlation</th>
<th>Significance (one-tailed)</th>
<th>N</th>
</tr>
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<tbody>
<tr>
<td><strong>Demographic:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Inflow as a Percent of Total Population</td>
<td>+</td>
<td>-.093</td>
<td>.372</td>
<td>15</td>
</tr>
<tr>
<td>Average Foreign Population</td>
<td>+</td>
<td>-.087</td>
<td>.379</td>
<td>15</td>
</tr>
<tr>
<td>Muslims population change</td>
<td>+</td>
<td>.398</td>
<td>.071</td>
<td>15</td>
</tr>
<tr>
<td>Muslim population change in “Old” Receiving States</td>
<td>+</td>
<td>.589</td>
<td>.01*</td>
<td>10</td>
</tr>
<tr>
<td>Non-European Foreign Population</td>
<td>+</td>
<td>.219</td>
<td>.216</td>
<td>15</td>
</tr>
<tr>
<td>Non-European Foreign Population in “Old” Receiving States</td>
<td>+</td>
<td>.772</td>
<td>.000*</td>
<td>10</td>
</tr>
<tr>
<td><strong>Socioeconomic:</strong></td>
<td></td>
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<td></td>
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<tr>
<td>Unemployment</td>
<td>+</td>
<td>-.366</td>
<td>.089</td>
<td>15</td>
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<tr>
<td>Stock of Foreigners in Labor Force</td>
<td>+</td>
<td>-.126</td>
<td>.327</td>
<td>15</td>
</tr>
<tr>
<td>Impact of Immigration on Social Expenditures</td>
<td>+</td>
<td>-.157</td>
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<td>15</td>
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<tr>
<td><strong>Institutional:</strong></td>
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<td></td>
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<td></td>
</tr>
<tr>
<td>Naturalization Rate</td>
<td>+</td>
<td>.436</td>
<td>.052</td>
<td>15</td>
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</tbody>
</table>

*significance at p=.01
Research Strategy

Building on these insights, the next two chapters explore process and significance. Chapter 4 is an in-depth process tracing of civic integration policy development in Great Britain. The purpose of this detailed examination is to “investigate and explain the decision process by which various initial conditions are translated into outcomes.” This case represents what John Gerring describes as a “pathway case,” where single cases “serve to elucidate causal mechanisms.” By providing detailed connections of how the immigration diversity and experiential contexts impact civic integration outcomes, the pathway case approach reveals how the variables of my argument (prior immigration history, high levels of diversity, and political competition) matter in explaining civic integration policy outcomes.

Finally, in chapter 5, I consider the broader significance of these changes.

Citizenship is traditionally defined by its internal regulatory capacity (i.e., who has rights or who is a member). However, there is also an emergent external regulatory capacity in

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51 John Gerring, “Is There a (Viable) Crucial-Case Method?” *Comparative Political Studies*, Vol. 40, No. 3 (2007), p. 238. He continues, “The pathway case exists only in circumstances in which crosscase covariational patterns are well studied and in which the mechanism linking X1 and Y remains dim. Because the pathway case builds on prior cross-case analysis, the problem of case-selection must be situated within that sample. There is no stand-alone pathway case.” (p. 239).
the form of civic requirements, where policymakers set rules and expectations for
*potential* members, such as immigrants and settlers. Policymakers have defined a new,
regulatory role for citizenship to manage migration in the face of an inevitable and
continuing cycle of international migration, as well as justify the inclusion of diversity
through the promotion of “common values.” Finally, by promoting liberal democratic
skills and values and not narratives of *national* belonging, states are employing new
scripts to consolidate political authority.
Chapter 4

Becoming British: The Role of Diversity in Defining a New Citizenship

Introduction

Despite the extraordinary amount of interest and research on the meaning of Britishness and obtaining British citizenship, there is little consensus on what it means to become British. Of course, the eligibility criteria for naturalization are clear: five years residency (three for spouses), allowance for dual citizenship, jus soli for second-generation migrants, as well as meeting “good character” standards.¹ But the membership dimension of citizenship—what it means to become British—is frustratingly vague. British identity is quintessentially inchoate and regularly re-defined.² The United Kingdom is, by definition, the unification of multiple national communities. And as a subset, Great Britain sews together the different nations of England, Scotland, Wales, and Northern Ireland. Multiculturalism (and multiracialism) may have

¹ “Good character” standards are defined by the Home Office and refer to police record checks.
“officially” begun with the arrival of Jamaican immigrants on the Empire Windrush ship in 1948,³ but Britain has been multinational for much longer.

This makes questions of national definition particularly interesting. Why did policymakers suddenly move toward articulating a coherent set of British membership criteria? Britain has been bound together since the Act of Union of 1707, but only in this decade are political elites taking measures to define what that “British” means. And, if immigration is so important for defining Britishness in the 21st century, what makes this moment in time unique in the context of a 60 year history of receiving and incorporating immigrants?

This chapter examines the process of defining British membership through the articulation and design of civic integration requirements. Immigration presents a number of real and symbolic pressures on political elites. However, it is the public pressure to “do something” about immigration that impels policymakers to dovetail the naturalization process with civic requirements. This pressure is particularly salient in the context of high degree of immigrant-related diversity in the historical context of settlement. This functional and symbolic response to immigrant-related diversity contrasts with existing accounts of new citizenship strategies. One explanation naively (or at least superficially)

³ The reality is that Britain received non-European migrants before this much-publicized event. In fact, many of the migrants on the Empire Windrush were “returnees,” having fought with the Royal Air Force during World War II. See Leo Lucassen, The Immigrant Threat: The Integration of Old and New Migrants in Western Europe since 1850 (Urbana, IL: University of Illinois Press, 2005), p. 113.
limits new requirement functions to benevolently improving the integration “journey.”4 Another depicts policymakers as overbearing and cultural instrumentalists, where “ideas of…citizenship…are increasingly dependent on a reassertion of the need for cultural homogeneity and the demand for assimilation.”5 The reality is less stark. Civic integration requirements are designed to meet both of these aforementioned goals. Simultaneously, civic integration requirements define common values to promote immigrant integration among new and settled populations and also limit potential immigration as a gesture of immigration control. And, as I illustrate in this chapter, both goals come about from popular pressure to “do something” about immigration.

This study of the British citizenship comprises what Gerring refers to as a “pathway case.”6 It is a means of case selection where correlations suggest there is a strong relationship between the independent and dependent variables, but causal mechanisms are unclear. Causal mechanisms are “an unobservable entity that—when

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6 John Gerring, Case Study Research: Principles and Practices (Cambridge: Cambridge University Press, 2007), pp. 122-126. Gerring explains pathway cases by making comparisons to crucial cases. “Because we already know from our cross-case examination what the general causal relationships are, we know (prior to the case investigation) what constitutes a correct or incorrect prediction. In the crucial-case method, by contrast, these expectations are deductive rather than empirical. This is what differentiates the two methods. And this is why the causal-pathway case is useful principally for elucidating causal mechanisms rather than for verifying or falsifying general propositions (which are already apparent from the cross-case evidence),” p. 125.
activated—generates an outcome of interest.” Chapter 3 illustrated that prior experience and high levels of diversity are important conditions for defining likely civic integration outcomes. However, political pressure tells us why these conditions matter. Diversity is not problematic in of itself; but public pressure about immigration or catalyst events can make it matter. A single case study is appropriate for examining these variables and mechanisms, because it provides sufficient internal observations to test competing explanations. It is also less prone to measurement error because it can “intensively assess a few variables along several qualitative dimensions.”

I select the British case because it offers exceptional descriptive richness for this task. I also examine Great Britain because it defies some typical classifications of other European cases, including the assumptions of cultural homogeneity and the significant role assumed by populist and far-right movements. Furthermore, the extent to which coherent “national cultural idioms” underline British citizenship is highly debatable.

Bernard Crick, in rejecting a culturally unitary version of Britishness, goes so far as to

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9 Brubaker does not include Britain in his 1992 study. In an earlier work, he does acknowledge this exception: “The concept of citizenship as membership of a legal and political community was foreign to British thinking. Legal and political status were conceived instead in terms of allegiance – in terms of the vertical ties between individual subjects and the king. The ties of allegiance knit together the British empire, not the British nation.” See William Rogers Brubaker, ed. Immigration and the Politics of Citizenship (Lanham, MD: University Press of America, 1989), p. 10. Joppke also notes a national difference among postcolonial states, where nation-state centered concepts of immigration have been eclipsed by liberal-state ones. Citizenship policies, therefore, “no longer can explicitly and directly reproduce and reinvigorate particular nationhood” in Selecting By Origin: Ethnic Migration in the Liberal State (Cambridge: Harvard University Press, 2005), p. 2.
explain how national differences reinforce and balance each other. Given this inherent vagueness, the adoption of citizenship requirements and the articulation of membership criteria in Britain are even more remarkable, surprising, and important.

This chapter proceeds in three parts. First, I outline the new civic integration requirements for British citizenship and indefinite leave to remain (settlement) that were enacted in the Nationality, Immigration and Asylum Act (NIA) of 2002. I discuss the development and details of the “knowledge of life in the UK” criteria, English language requirement, and citizenship ceremony. In comparison to other European citizenships, British citizenship policy is liberal, inclusive, and young (having only been formalized with the 1981 British Nationality Act). Thus, these new requirements represent a significant change to the pre-existing policy.

Second, I turn to the conditions that contributed to the creation of this new civic integration platform. I begin by discussing past and present immigrant-related diversity in modern day Britain. This discussion examines prior experiences with post-colonial immigration and settlement, as well as more recent asylum policies and high-skilled migrant programs. Immigration is a necessary, but costly reality for policymakers. I use alternative explanations of influx, costs, and naturalization rates to show the importance of diverse foreign populations.

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10 In one musing, Bernard Crick goes so far as to urge that “London journalists today who think Britishness completely overrides and subsumes national identities should complain to FIFA that the United Kingdom alone among all other states is allowed to field four different football teams,” in “The Four Nations: Interrelations,” in *The Political Quarterly*, Vol. 79, No. 1 (2008), p. 73.
The third part of this case study examines popular pressures that signals to policymakers that they must “do something” about immigration. Unlike French, Dutch, or Austrian examples, public pressure was not a product of elections; Labour was overwhelmingly successful in its first incumbency election (June 7, 2001). Still, political elites identified immense pressures for maintaining public confidence over immigration. Instead of directly limiting family unification or overhauling race relations policies, political elites made the unique turn toward British citizenship and membership requirements. This change is especially novel given Britain’s historical minimization of citizenship as both an institutional category and an integration tool.

To identify what these pressures were and how they mattered, I describe the politics and policies of civic integration that started with early discussions in the Home Office in 2001, and continue through the 2002 White Paper “Secure Borders, Safe Haven: Integration with Diversity in Britain” and the final legislation (NIA). This discussion then chronologically proceeds through the 2008 Green paper “Path to Citizenship,” proposing even further changes to civic integration requirements. Policymakers address the complexities and politics of immigrant-related diversity by swiftly defining citizenship as a common and inclusive denominator of British core values. In the end, policymakers find two roles for this one definition of membership: civic integration requirements are both functional and strategic. Requirements promote
integration for those migrants already in the UK and limits access for additional and potentially incompatible immigration.

Civic Integration Requirements: From Vague Criteria to “Active Citizenship”

It is not surprising that British citizenship is a complex idea, and that diversity is a key challenge to its meaning. Until 1962, British colonial subjects enjoyed equal citizenship with those born in Britain. Moreover, because the only common unifier among Britons is subjecthood to the Crown, not citizenship, defining a set of common values in an age of migration is a unique challenge.

The first legal step in defining British citizenship was the British Nationality Act of 1948. Randall Hansen describes how this Act did not so much positively define a category of British membership, but instead preserved connections of subjecthood with other Commonwealth states as they were breaking off to define their own categories of citizenship. BNA 1948 did not define a category of “British citizen.” Rather, it preserved different categories of membership based on subjecthood. Hansen fashions

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12 Hansen draws this argument out by looking at Canadian citizenship. The Canadian government introduced a citizenship act that “would define Canadian citizens and declare that they possessed British subjecthood in consequence of their status as Canadian citizens” (emphasis added). It reversed the logic of allegiance. See Randall Hansen, Citizenship and Immigration in Post-war Britain: The Institutional Origins of a Multicultural Nation (Oxford: Oxford University Press, 2000), pp. 37-45.
13 Persons with British nationality were divided into three categories: “Citizen of the United Kingdom and Colonies” (CUKCs), “Citizen of Independent Commonwealth Countries” (CICCs), and Irish Citizens with British subjecthood.
this difference as very important to the understanding of early institutional decisions in British policy.

‘Allegiance’ implies two conditions: first, that the bond is a direct, unmediated relationship between king and subject and, second, that any privileges attaching to one’s status as subject are granted by the sovereign and are exercised at his pleasure; they are not claimed by the subject against his sovereign. These features distinguish ‘subject’ from ‘citizen’; the latter enjoys its status through membership in a community enjoying the same status and makes claims against the state based on this membership. (emphasis added)\footnote{Hansen, \textit{Citizenship and Immigration in Post-war Britain}, p. 38.}

Since the conversion of a subject status to a citizen status occurred so belatedly, migrating to Britain from any of the Commonwealth countries did not result in a distinct transformation of a migrant’s status. Rights conferred by the state were equal and relatively expansive. Overseas subjects and Commonwealth citizens were even more removed from the concept of citizenship than European migrants to Britain were, because they were exempt from the oath of allegiance to the monarch.\footnote{From the Nationality and Status of Aliens Act, 1914, reprinted in Richard W. Flourney, Jr. and Manley O. Hudson, eds. \textit{A Collection of Nationality Laws of Various Countries as Contained in Constitutions, Statutes and Treaties} (New York: Oxford University Press, 1930), pp. 61-72.} And even this requirement for naturalization, the closest citizenship requirement to resemble membership criteria, was perfunctory. It was not a ceremony; rather it was sworn in front of a magistrate or declared on naturalization paperwork.

Classifications of subjecthood significantly changed in the approximately three decades between 1948 and the next significant British Nationality Act (1981). The most significant of these changes appeared in the Commonwealth Immigrant’s Act (CIA) of
1962 and the Immigration Act of 1971. However, it was not until the BNA 1981 that the first definition of “British citizenship” appeared. This represented a new stage in membership requirements. Applicants for citizenship through naturalization were required to possess “sufficient knowledge of the English, Welsh or Scottish Gaelic language.” However, the practice of assessing this criterion was ad hoc. Successful completion of naturalization paperwork was often sufficient evidence of proficiency. One can imagine the variation in assessment techniques from one immigration officer to another. Also, this language requirement did not apply to naturalizing spouses of British citizens.

There are great differences between this definition of British citizenship, and the civic integration criteria that today define the contours of contemporary British citizenship. The 2002 Nationality, Immigration and Asylum Act (NIA) stipulated that in addition to the language requirement, applicants for citizenship must now demonstrate “sufficient knowledge about life in the United Kingdom.” Originally, this was separate

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16 These two laws served to limit immigration from the Commonwealth through classification. The 1962 Act made non-residing CUKCs subject to migration controls and the 1971 Act effectively limited migration from New Commonwealth countries by adding a provision of partiality. For right to abode, a parent or grandparent had to be born in the UK. On the racial consequences of partiality, see Christian Joppke, *Selecting by Origin: Ethnic Migration in the Liberal State*, pp. 96-103.

17 This was a change to existing citizenship policy. The language requirement was codified earlier in the Nationality and Status of Aliens Act (1914) as an “adequate knowledge of the English language.” See Flournoy and Hudson, eds., *A Collection of Nationality Laws*, p. 63. The law changed not only the language of the requirement (from “adequate” to “sufficient”) but also the requirement of the languages (extending knowledge opportunities to Scottish Gaelic and Welsh).


from the language requirement, though policy would later fuse the two together. The NIA did not articulate how such knowledge would be demonstrated or assessed. Instead, the act stated that “a person designated by the Secretary of State” was empowered to “determine sufficiency of knowledge” and “accept a qualification” of sufficient knowledge of a language.\(^\text{20}\) Also, the Act states that the laws which “makes provision about citizenship ceremonies, oaths and pledges shall have effect.”\(^\text{21}\)

This is a circuitous way of stating that integration requirements were significantly extended from an ambiguously measured language requirement, to a precise language requirement, with the addition of a country knowledge requirement and a citizenship ceremony. While this law did not design how these were to be implemented or measured, guidance is drawn from the Government’s White Paper “Secure Borders, Safe Haven: Integration with Diversity in Modern Britain.” In this proposal paper for the NIA legislation, the Government stated its intention to “develop a stronger understanding of what citizenship really means,”\(^\text{22}\) and “strengthen the ability of new citizens to participate in society and to engage actively in our democracy.”\(^\text{23}\) An independent group was established “[t]o advise the Home Secretary on the method, conduct and implementation of a ‘Life in the United Kingdom’ naturalisation test.” Thus, the Life in the UK Advisory group was tasked with creating the language tests, specifying the required proficiency

\(^{20}\) NIA 2002
\(^{21}\) NIA 2002
\(^{23}\) Home Office, Secure Borders, Safe Haven, p.11.
levels, shaping country knowledge requirements, and composing the citizenship ceremony.

Chaired by Sir Bernard Crick, the Advisory Group worked with the Home Office (specifically the Social Policy Unit of the then-named Immigration and Nationality Directorate) on designing the material for citizenship. Two routes to citizenship were established by the end of 2005, following two years of consultations, testing, and other preparations.

These naturalization paths were as follows:

(1) Applicants with sufficient English proficiency could take the computerized, multiple choice “Life in the UK” citizenship test.

(2) Applicants with insufficient English proficiency (defined as being below ESOL Entry Level 3, described below) could take an English course with citizenship content, using the “Citizenship Materials for ESOL learners” study pack.

Before examining each route to citizenship in more detail, it is necessary to mention three important changes that took place alongside citizenship policy development. First, instead of maintaining the English requirement and Life in the UK requirement as separate assessments, English proficiency was jointed with Life in the UK requirements, determining which routes of citizenship is suitable for each applicant. This was not the initial formulation. After a year of planning the Life in the UK
requirements, Jonathan Duke-Evans, Head of Social Policy Unit at the Home Office, wrote the Advisory group about “creating the possibility that we could provide, when the new regulations are made, that a person who passes the test of knowledge of life in the United Kingdom shall be automatically accepted as having a knowledge of the English language to ESOL Entry 3 level.” 24 Second, the language and country knowledge requirements were extended to spouses naturalizing as British citizens. And, finally, the citizenship ceremony was implemented in February 2004; almost a full year and a half before the citizenship tests were first administered.

Knowledge of “Life in the United Kingdom Exam” for Citizenship and Settlement

The Life in the UK citizenship test is a multiple choice exam consisting of 24 questions that was introduced in November 2005. Applicants are given 45 minutes to complete the test, and must correctly answer at least 75% of the questions to receive a passing score. The test is administered in more than 90 testing centers across England, Wales, Scotland, and Northern Ireland. 25 It costs £34 and can be taken an unlimited number of times. The test is administered in three languages: English, Welsh, and Scottish Gaelic. 26

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26 However, the website is only in English and Welsh.
Until April 2007, the substance of the exam was derived from chapters 2, 3, and 4 in the first edition of the *Life in the UK Handbook*. These chapters correspond to lessons on “A Changing Society,” “Britain Today: A Profile,” and “How Britain is Governed.” The exam assessed an applicant’s knowledge of devolution, parliamentary democracy, population of the UK, and even an area of knowledge described as the “changing role of women.”

It was, in the fullest meaning, a civics test. Notably absent from this exam were questions about British history. The logic for excluding history is two-fold. First, *native* Britons would be unable to answer questions on historical content. Second, the aim of the test is to assess *practical* knowledge, not analysis or “problematic” interpretations of history.

The Historical Association, in particular, noted many inaccuracies in the first *Handbook*, including a misquoting of Winston Churchill and an incorrect definition of Great Britain that included Northern Ireland. The first *Handbook* also received criticism because it was written at a level that exceeded ESOL Entry Level 3 proficiency.

Effective April 2007, the test was changed to reflect content of the revised *Life in the UK Handbook* that was composed for those with more limited proficiency in English. This new exam asks questions on material that appears between chapters 2 and 6. This extends the potential test subject matter to include everyday needs (like education and

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30 Taylor, Interview with author.
housing) and employment.\textsuperscript{31} The history chapter was revised, but still was not included in the battery of potential citizenship test questions. Finally, this revised exam includes questions that test knowledge about an applicant’s local and regional residence (including the Channel Islands).

The introduction of the revised citizenship test was timed to coincide with a new requirement mandating that applicants seeking permanent settlement demonstrate proficiency on the Life in the UK exam. The catalyst in extending the language requirement to permanent residence is typically attributed to Tony Blair’s reaction to the 7/7 bombings and increased public attention to radical Islam. To quote Blair:

\begin{quote}
We should share a common language. Equal opportunity for all groups requires that they be conversant in that common language. It is a matter both of cohesion and of justice that we should set the use of English as a condition of citizenship. In addition, for those who wish to take up residence permanently in the UK, we will include a requirement to pass an English test before such permanent residency is granted.\textsuperscript{32}
\end{quote}

However, the groundwork for a settlement test appeared as early as the 2002 White Paper:

\begin{quote}
We believe it is necessary for all those who are seeking long term resident status to be provided with the opportunity (where they do not already have the capacity) to receive language training and to receive an easy to understand and practical guide in the form of both print and video, about Britain and its institutions relevant to an understanding of the society they are entering.”\textsuperscript{33}
\end{quote}


\textsuperscript{33} Home Office, \textit{Secure Borders, Safe Haven}, p. 31.
**ESOL Language course**

For applicants with limited or no English proficiency, the Advisory group designed a second route to citizenship that contains English language education. In England, this proficiency level is defined as Entry Level 3 on the English Speakers of Other Languages national standards. ESOL education is part of the “Skills for Life” curriculum and certification program for Adult Learners. This program is administered through the Department for Innovation, Universities, and Skills. In lieu of a test, applicants gain English skills within the context of at least 16 hours of citizenship lessons.

These classes teach “English language in a citizenship context” based on content from the “Citizenship Materials for ESOL Learners” pack. Upon completion, students obtain an accredited qualification. The distinction here of teaching language in a civic context—and not the reverse—is important. There was great concern by ESOL teachers that they were becoming “extensions of the Home Office” by integrating citizenship material into existing English-language classes. The concern of primarily serving the

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34 ESOL Entry Levels are characterized by levels of proficiency across assessment areas, including speaking and listening, reading, and writing. Persons proficient at Entry Level 1 can listen and speak in simple narrative statements and engage in discussion on familiar topics. Proficiency at Entry Level 3 is defined by the ability to express opinions in speaking and writing, as well as understand everyday sources for information. See the Appendix B in Life in the UK Advisory Group, *The New and the Old: The Report of the ‘Life in the UK Advisory Group,‘* (London: Home Office, 2003), pp. 42-46. Wales, Scotland, and Northern Ireland standards vary.

needs of the students was made explicit by describing these courses as “language with civic content.”

The course covers twelve topics of civic knowledge. These topics include: What is Citizenship?, Parliamentary Democracy, Britain in Europe and the Commonwealth, Human Rights, Opportunities for Participation, Britain as a Multicultural Society, Employment, Health, Housing, Education, the Regions of the UK, and Knowing the Law. These pillars, essentially, of what it means to be British, are “menus not prescriptions” where ESOL teachers can choose to teach material from any of these topics, so long as they fulfill the recommended number of hours of citizenship lessons. Upon completion of the course, the student receives certification of proficiency in the language and Life in the UK requirements.

Refugees, legal residents that have been present in the UK for a minimum of three years, and European Union/European Economic Area (EU/EEA) workers are eligible for free tuition. Newcomers, on the other hand, must pay. The Advisory Board for Naturalization and Integration (ABNI)—a permanent body established at the recommendation of the Life in the UK Advisory Group to advise on the implementation of citizenship and integration requirements—has maintained that the three-year rule is a

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38 Taylor, Interview with author.
troubling barrier to integrating those most in need. Counterintuitive to the goal of beginning integration at “the earliest possible moment,” the three-year rule (applicable in England, Wales, and Northern Ireland) “plainly works heavily against integration and avoidance of social segregation.”

Citizenship Ceremonies

Finally, to capstone each naturalization route, the new citizenship process provides for an American-style citizenship ceremony where new citizens pledge to uphold British *qua* “democratic values” and swear an oath of allegiance to the monarchy. While an affirmation of allegiance was privately made by each new citizen prior to 2004, the move to make citizenship “meaningful” and “celebratory” resulted in the transformation of this commitment into a public ceremony alongside other new citizens. And, to hearken back to the goal of promoting cohesion, ceremonies are conducted in local councils by magistrates, politicians, and other community figures. New citizens are presented with a certificate of naturalization and a welcome pack, which contains information on voting. Since citizenship ceremonies are organized by county councils and local authorities, and because applicants tend to register for ceremonies in

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their council of residence, the result was that “over half of all ceremonies in 2005…and in 2006…were held within Greater London. The South East region was the next highest.”

When juxtaposing these new civic integration requirements against early imputations of British citizenship, the stark change becomes apparent. The attachment of integration requirements to naturalization and the promotion of newly defined “British values,” have summarily been described as part of a “quiet citizenship revolution.” But what motivated this swift policy change? Clearly immigration is an important explanation behind the new naturalization routes, but how does immigration matter? The next part of this chapter explores these competing explanations.

**Examining the Impact of Immigration**

Immigration to Britain has had an unparalleled impact on race relations, domestic labor markets, and immigration and citizenship policies. There have been a

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multitude of detailed studies covering each and every aspect of these issues. However, a review of these issues is important for the sake of understanding the pressures of immigrant-related diversity that emanate from Britain’s experience with prior immigration and high levels of non-European foreign residents. Recall that these two variables are interactive. Therefore, I focus particularly on how early migration created pockets of settlement that encouraged later immigration. Painting these historical and demographic pictures identifies which migrants matter for defining diversity problems and how they matter. It also services to distinguish symbolic pressures of immigrant-related diversity from the other functional dimensions of immigration.

The Context of Diversity: Settlement and Early Migration

Great Britain was one of the first receivers of non-European migration in the post-World War II period. Colonial migrants were subjects of the British Empire, and had full rights to entry, citizenship, and work. As states began to gain independence in the late 1940s, post-colonial migrants retained these rights by virtue of British subjecthood. By 1953, there were an estimated 40,000 non-white people living in Britain. This figure

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46 See Footnotes 38-40.
only increased over time. Table 4.1 shows the incremental increase of non-European migration in the early days of the post-war recovery period.\textsuperscript{48}

\begin{table}[h]
\centering
\begin{tabular}{|c|c|c|c|c|c|}
\hline
Year & West Indies & India & Pakistan & Others & Total \\
\hline
1953 & 2,000 & -- & -- & -- & 2,000 \\
1954 & 11,000 & -- & -- & -- & 11,000 \\
1955 & 27,500 & 5,800 & 1,850 & 7,500 & 42,650 \\
1956 & 29,800 & 5,600 & 2,050 & 9,350 & 46,800 \\
1957 & 23,000 & 6,600 & 5,200 & 7,600 & 42,400 \\
1958 & 15,000 & 6,200 & 4,700 & 3,950 & 29,850 \\
1959 & 16,400 & 2,950 & 850 & 1,400 & 21,600 \\
1960 & 49,650 & 5,900 & 2,500 & -350 & 57,700 \\
1961 & 66,300 & 23,750 & 25,100 & 21,250 & 136,400 \\
1962 & 31,800 & 19,050 & 25,080 & 18,970 & 94,900 \\
\hline
\end{tabular}
\caption{Estimated annual net immigration from the New Commonwealth}
\end{table}

The noticeable spike in 1961 and 1962 (recorded in the first six-months before the controls of the Commonwealth Immigrants Act) were from citizens of independent Commonwealth countries trying to “beat the ban.” Upon implementation of the CIA, all citizens of independent Commonwealth countries became subject to immigration controls for the first time and primarily through the issuance of employment vouchers.\textsuperscript{49}

Early immigration from New Commonwealth countries was important in several respects. Access was made possible by virtue of the unpredicted consequences of British policies, and not because of lack of control or active recruitment. In fact, “only London

\textsuperscript{49} For more, see Patterson, \textit{Immigration and Race Relations in Britain}, pp. 23-34.
Transport, British Rail, and National Health Service hospitals explicitly targeted Caribbean men and women when they were short of manpower. Second, while post-colonial migration was “ethnically or racially unwanted immigration,” it was tolerated “for the sake of other (political or economic) interests, such as the maintenance of imperial power status or the meeting of shortage on war-ravaged labor markets.” Finally, even though new migration became regulated after the enactment of the 1962 CIA, the act did not stop immigration on the basis of family reunion for those with relatives that immigrated before 1962. Table 4.2 shows the number of migrants entering as family dependents after the CIA took effect. The disproportionate number of women and children brought to Great Britain signifies the predominance of young men with families among the early migrants.

Table 4.2: Number of Dependents Entering Great Britain, 1962-1966

<table>
<thead>
<tr>
<th></th>
<th>Male</th>
<th>Female</th>
<th>Children</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Indian</td>
<td>1,183</td>
<td>10,120</td>
<td>32,779</td>
<td>44,082</td>
</tr>
<tr>
<td>Indian</td>
<td>1,968</td>
<td>17,122</td>
<td>24,016</td>
<td>43,106</td>
</tr>
<tr>
<td>Pakistani</td>
<td>761</td>
<td>8,999</td>
<td>17,177</td>
<td>26,937</td>
</tr>
<tr>
<td>Total</td>
<td>3,912</td>
<td>36,241</td>
<td>73,972</td>
<td>114,125</td>
</tr>
</tbody>
</table>

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51 Joppke, *Selecting by Origin*, p. 94. Lucassen also adds that “it soon became clear that colored migration was totally unexpected and on the whole deemed undesirable by large parts of metropolitan society after World War II,” in *The Immigrant Threat*, p. 119.
52 Patterson, *Immigration and Race Relations in Britain*, p. 7.
The point here is that non-European migration occurred early and often. Migrant labor was imperative for rebuilding Britain’s post-war economy, despite the accompanying racism (as evident in the white-initiated riots in Birmingham in 1958) and other social costs. Similar to today’s new recipient countries, the aim of early migration policy was normalization. This included ensuring successful links between immigrants and jobs, and developing proactive immigration controls.

During this first period of regulated immigration, debates on integration, particularly the transition from assimilatory to pluralistic models of belonging, were beginning to enter discussions in the corridors of Whitehall and Westminster. Integration was the realization that there were social factors at play in the process of settlement. Patterson acknowledged that integration is—by definition—an unobtainable if inappropriate goal for first generation migrants: “absorption does not proceed at the same pace in all spheres of association…and it is unlikely to be complete before the second generation, or even later.”53 The policy implications of promoting integration involved “support for the existing network of voluntary liaisons committees and for the creation of additional committees in other areas where substantial numbers of Commonwealth immigrants have settled.”54 This led to the establishment of the Race Relations Board in

53 Patterson, *Immigration and Race Relations in Britain*, p. 108.
54 Patterson, *Immigration and Race Relations in Britain*, p. 118.
1967 by the Labour government.\(^{55}\) Patterson describes that supporting “the efforts of local authorities and voluntary bodies” along with “stricter controls and the introduction of an anti-discrimination and anti-incitement Bill,” was then-Prime Minister Harold Wilson’s “three-pronged plan to deal with immigration problems.”\(^{56}\) This comprehensive immigration policy only came fifteen years after the fact.

Of course, it should be mentioned that concomitant to this influx of non-white migration (“coloured” migration was actually the parlance of the day) was intra-European migration.\(^{57}\) The largest group of white migration originated from Ireland. There was also migration from Old Commonwealth countries, including Canada, Australia, and South Africa. Table 4.3 shows the number of migrants from New and Old Commonwealth countries present in England and Wales at four different points in time.\(^{58}\) However, these populations were clearly not the impetus behind integration agendas.

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\(^{55}\) See National Committee for Commonwealth Immigrants, *NCCI Report for 1966* (London: NCCI, 1966). This was the precursor legislation to the Race Relations Act (1976) and the Commission for Racial Equality.

\(^{56}\) Patterson, *Immigration and Race Relations in Britain*, pp. 115-6.

\(^{57}\) Note that the term “intra” is misleading. Movement was not technically taking place “within Europe” as freedom of movement was not established until the 1992 Treaty of the European Union in Maastricht.

Table 4.3: Population of England and Wales by place of birth (in thousands)

<table>
<thead>
<tr>
<th></th>
<th>1951</th>
<th>1961</th>
<th>1971</th>
<th>1981</th>
</tr>
</thead>
<tbody>
<tr>
<td>UK</td>
<td>41,971</td>
<td>43,830</td>
<td>45,801</td>
<td>45,512</td>
</tr>
<tr>
<td>Ireland (South)</td>
<td>492</td>
<td>683</td>
<td>676</td>
<td>580</td>
</tr>
<tr>
<td>Old Commonwealth</td>
<td>88</td>
<td>89</td>
<td>129</td>
<td>137</td>
</tr>
<tr>
<td>New Commonwealth</td>
<td>202</td>
<td>571</td>
<td>1,121</td>
<td>1,292</td>
</tr>
<tr>
<td><em>West Indies</em></td>
<td>16</td>
<td>172</td>
<td>302</td>
<td>294</td>
</tr>
<tr>
<td><em>India</em></td>
<td>111</td>
<td>157</td>
<td>313</td>
<td>383</td>
</tr>
<tr>
<td><em>Pakistan, Bangladesh</em></td>
<td>11</td>
<td>31</td>
<td>136</td>
<td>230</td>
</tr>
<tr>
<td>Foreign born</td>
<td>914</td>
<td>760</td>
<td>929</td>
<td>1,209</td>
</tr>
</tbody>
</table>

While there was a significant amount of white migration—including Ireland, Old Commonwealth countries, and foreign born (which includes European migration among non-Commonwealth African, Asian, and North American countries)—the overwhelming source of early migration originated from New Commonwealth countries. There were certainly significant push factors, particularly in the cases of the Indian expulsion from Uganda. However, pull factors of “economic betterment” are dominant, particularly in the case of migration from the Caribbean.

New Commonwealth migration was the overwhelming source of immigration “problems,” in terms of diversity, volume, and populist opportunism. First framed as a problem of race, punctuated by race riots in the 1950s, the problem would soon transform into a discourse about criminality. This change was not just one that took place over

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60 Jones and Smith, *The Economic Impact of Commonwealth Immigration*, p. 10.
61 Peach, *West Indian Migration to Britain*, p. 44.
time, but also between first and second generation migrants: “second-generation youngsters, especially males, were increasingly regarded as a criminal problem.”

How does this history of extensive non-European migration impact the understanding of contemporary, diverse migration? First, as demonstrated in Table 4.2, early settlement created avenues for continued migration. Today, family unification accounts for approximately 18% of immigration. However, this number is low in comparison to other European countries like France (65%) and Sweden (68%). Second, early migration exposes future policymakers to settlement challenges of second- and third-generation migration alongside continuing immigration. Immediate challenges of immigration include obtaining a job, finding housing, or learning a language acquisition. The problems of settled ethnic minorities include combating discrimination, racism, and segregation. These are not new but endemic problems that manifest over time. When policymakers see these immediate needs, such as language acquisition, among settled immigrants, then integration problems are more severe.

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62 Lucassen, *The Immigrant Threat*, p. 127. He also notes that while crime rates among Irish migrants were higher than those of West Indians in the 1960s, policymakers became increasingly concerned with criminality among second-generation black adolescents, who—by the end of the 1970s—were fifteen times more likely to be arrested as a “suspicious person” than white youth. See pp. 127-8.


64 OECD, *SOPEMI 2008*

65 This idea is derived from Joppke’s discussion in “Transformation of Citizenship.”
Finally, this historical view of early immigration to Britain reveals that civic integration is only the latest iteration of policy strategy aimed at repairing immigration problems. For “old” receiving states, civic integration is by no means the first policy of immigration control or integration. This policy “trial and error” shows either the inefficiency or failure of earlier policies, such as Harold Wilson’s “three-pronged strategy,” since immigration and integration continue to create an evolving set of policy problems. What, then, provokes another round of integration policy?

Diversity Today and Popular Pressures for a New Citizenship Agenda

Given this historical context of immigration and settlement, what is it about immigration today that pressures political elites to promote civic integration? The argument I make in chapter 3 emphasizes immigrant-related diversity—specifically high levels of non-European foreign residents. Civic requirements are political responses to manage problems of diversity and culture. Diversity problems exists among new immigrants, among long-term residents who have not taken up citizenship, as well as among immigrant progeny who are born with British citizenship, but do not identify with Britishness.

Not only is the UK one of the top receivers of immigration today, but since Labour was first elected in 1997, policymakers have been actively engaged in redefining

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the immigration policy landscape. There have been five Parliamentary Acts since 1997, and a sixth is expected to receive Royal Assent in 2009. In addition to this new citizenship agenda, Tony Blair and Gordon Brown have led a massive overhaul of visa reform (moving from over 80 categories to a points-based system like the one used in Canada and Australia), and have severely curbed case appeals by asylum seekers.

There is more inflow to the UK today than ever before, particularly after accounting for intra-European movement (particularly Polish and Lithuania workers from the A-8 EU accession countries) and increased mobility for highly-skilled migrants. However, the “problem of immigration” is not related to the volume of newcomers. The most prevalent countries of origin for migrants to the UK—outside of Europe and the Old Commonwealth—are China and the United States. Yet these groups are the least visible if one measured by the politics of immigration.

A second possible explanation is that the new citizenship agenda is a response to the costs of immigration, rather than immigration itself. Immigration certainly contributes

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to a domestic economy, especially in the short-term.\textsuperscript{70} What, though, are the societal and economic costs of this immigration? According to a House of Lords report, “immigration has had a small, negative impact on the lowest-paid workers in the UK and a small positive impact on the earnings of higher-paid workers.”\textsuperscript{71} The same report also shows an enormous mix of conclusions, as a result of the paucity of British data. Integration requirements are not always matched to the costs that immigration has on social services, employment, or welfare. Insufficient knowledge about “Life in the UK” does not limit a resident’s access to these social services. Also, the most visible source of migration since 2004 has been Eastern Europe, where migrants have unmitigated access to settlement and jobs alongside an exemption from integration requirements.

Finally, the “problem of immigration” in Britain today is not related to the rate of citizenship acquisition by legal residents. New integration requirements are meant to “incentivize” citizenship and encourage more people to acquire citizenship. Members of the Life in the UK Advisory group initially cited a desire to “encourage people to apply for British citizenship at an earlier stage” because naturalization evidence showed flagging rates.\textsuperscript{72} Using their own data, though, the group states that applicants from New Commonwealth countries, the Middle East, and the rest of Asia are one-third more likely

\textsuperscript{72} Life in the UK Advisory Group, \textit{The New and the Old}, p. 7.
to naturalize than Old Commonwealth applicants. Specifically, applicants from New Commonwealth countries are twice as likely to naturalize as Europeans after 6 years of residence. A “wider citizenship agenda” may “enhance the significance of citizenship,” but the goal is not to seek wholesale increase in naturalization rates.

Rather, to quote David Blunkett, promoting a value and skill dimension through requirements “promotes the acceptable absorption of the uptake.” With this admission, Blunkett is blatant in identifying that the impetus to new civic integration requirements is not more naturalization but “acceptable” or qualified naturalization. Citizenship should be more than a passport. “Becoming a British citizen is a significant step” based on a “sense of civic identity and shared values.”

The fact is that Britain today is a lot more diverse than it was 50 years ago, and civic integration requirements are a political response to this change. The composition in ethnic diversity (non-white population) in 1991 and 2001, are displayed in Figures 4.1 and 4.2, respectively. Comparing side by side, it appears that in a ten year period, the size of the non-white population increased by almost half, from 5.5% to 8.1%. Both of

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75 Life in the UK Advisory Group, The New and the Old, p. 3.
78 Home Office, Secure Borders, Safe Haven, p. 32.
these figures can be contrasted to 1961, when the census showed the non-white population comprising about 1.5% of the population in England and Wales.  

Figure 4.1: Ethnic Minority (Non-white) Population, 1991

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80 “The West Indian-born population of England and Wales was 171,796; that Indian nationals numbered 46,575, and Pakistanis 19,250,” in Peach, West Indian Migration to Britain, p. xv.
The largest change in the population of ethnic minority groups is the increase in the “Black African category,” which changed from 7% of the non-white population in 1991 to 10% in 2001. This was caused largely by the high volume of Somali asylum-seekers in the 1990s. Asylum was also significant in the summer of 2001 as pictures and stories of asylum seekers trying to reach Britain through the Channel Tunnel were splashed across the news. Newspapers ran headlines like “Stop the Invasion,” “We can’t take any more asylum seekers,” “Asylum invasion reaches 12,000 a month,” and “Asylum: we’re being invaded.” Consequently, “the category of ‘bogus asylum seeker’

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82 Liza Schuster, “Asylum Seekers: Sangatte and the Tunnel,” in Parliamentary Affairs, Vol. 56, No. 3 (2003), p. 511. Schuster continues: “the numbers coming into Britain in 2001 did not warrant the hysterical reaction of the press or policymakers…In spite of an article in the Guardian where Blunkett said the agenda
has acquired particular resonance in British public debate.”

Family migration may be comparatively modest, but humanitarian intake in Britain staggering. In 2004, second only to the Netherlands (22%), the UK accepted 19% of its immigration from humanitarian claims and accompanying family members. In contrast, France, Denmark, and Germany all accept around 7% of their immigration from humanitarian categories.

While family unification and asylum are sources for contemporary political debates about diversity, the most troubling cause of the rise of diversity problems in the UK is the resurgence of cultural particularism by second- and third-generation migrants. Only tangentially related to immigration, this problem draws instead on the religious and cultural affiliations of the settled progeny of prior immigrants. This return to identity is counterintuitive to a model of assimilation that posits increased interaction with cross-community networks. The most deleterious version of this extremism is that of fundamentalist Islam, where radical leaders prey on disadvantaged youth in immigrant communities.

This brings us full circle to the modern period and the earliest external signifier of the changing citizenship agenda: the Northern Riots in 2001. In July 2001, violent
clashes between erupted between the police, and white and Asian youth in the towns of Oldham, Burnley, and Bradford. As a response to these riots, the Community Cohesion Review Team was convened to investigate the causes of the violence. The team’s report (known as the Cantle Report) concluded that despite—or perhaps because of—the difference-friendly reception of newcomers and diversity under multiculturalism, “many communities operate on the basis of a series of parallel lives.”86 These events were soon followed by 9/11, which further pushed immigrant integration and Muslim extremism to the top of policymaking agendas. Not only did this signify to some the death of multiculturalism,87 but it created immediate public pressure to “do something” to control immigration. Without the context of prior immigration and diversity, the response to 9/11 might have just been security-related. But, as Meer and Modood note, the “net outcome” of Islam’s “radical ‘otherness’” alongside the “post-9/11 and 7/7 climate” is a “coupling of diversity and anti-terrorism agendas. That has implicated contemporary British multiculturalism as the culprit of Britain’s security woes.”88

An examination of Lucassen’s progression of immigrant-related problems indicates that where race and criminality were the first two discourses for discussing immigration problems, then culture is the present day discourse. Lucassen identifies The

Satanic Verses controversy as the definitive turning point. “This event showed Muslim migrants (from Pakistan and Bangladesh) in a bad light and shifted the debate on integration…from the racial to the cultural domain.” Of course, racial inequality did not disappear. Laws and anti-discrimination strategies merely expanded to encapsulate both groups.

But the lingering question is fairly obvious: How is Britain’s long history of immigration and contemporary diversity related to citizenship and policy reform? If the context of prior migration reveals anything, it is that there is always opposition to diversity through immigration, and that policymakers typically respond to public pressure through management strategies. As Greenwood and Robins point out, “The suggestion that notions of citizenship should provide a panacea for social ills is not new in Britain. Indeed it has been something of a recurrent theme of British politics in recent decades. Its importance on today’s political agenda, however, suggests that previous initiatives

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90 The tragic death of Stephen Lawrence, a black teenager stabbed to death in South London and whose murderers were never convicted, produced several legal responses, one of which was the Race Equality Duty and Race Relations Amendment Act (RRAA) in 2000. The Race Equality Duty placed “a duty on specified public authorities to work towards the elimination of unlawful discrimination,” and in reference to Lawrence’s death, “make chief officers of police vicariously liable for acts of race discrimination by police officers.” Available at http://www.opsi.gov.uk/ACTS/acts2000/en/ukpgaen_20000034_en_1 (accessed 10 January 2009).
91 One example includes the Employment Directive. In 2001, the European Union required all member states to implement anti-discrimination legislation in employment. According to Sarah Spencer, “Britain already had race, gender, and disability covered, but faith was new.” Sarah Spencer, Interview with author. London, UK. 7 August 2007. The most visible manifestation of this sea change was institutional. There was the combination of the Race Equality Unit and Faith and Cohesion Units in the Home Office (which eventually moved to the Department for Communities and Local Government) and the name change of the Commission for Racial Equality to the more ambiguous Equality and Human Rights Commission.
have borne little fruit”⁹² (emphasis added). Civic integration requirements are only the latest iteration of this pressure-response cycle. The requirements promote citizenship as a way to mend integration schisms, and address the indistinct, but palpable, forces that maintain separate “parallel lives.”

Politics, Pressures, and “Doing Something”

Elections are the most obvious times when popular support is important, but politicians—especially incumbents—are always running for office. Public opinion is still important outside of an election-cycle. It is a mandate that can either strengthen the ruling party, or strengthen political alternatives.⁹³ Also, when immigration becomes an important political issue, the traditional distinction between left-of-center parties supporting openness and right-of-center parties supporting closure are not always consistent.⁹⁴ Immigration is a mobilizing, oftentimes populist issue, and candidates rarely win on pro-immigrant platforms.⁹⁵

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⁹³ This is even more the case in parliamentary systems with proportional representation, when governing coalitions consistently depend on renewed confidences and cross-party commitments.
⁹⁴ Geddes uses the case of asylum to make the point: “While in opposition prior to their 1997 election landslide, the Labour party had opposed the Conservative government’s toughening of asylum legislation. In government, Labour pursued with equal if not greater vigor measures designed to reduce the numbers of asylum seekers entering the UK.” The Politics of Migration and Immigration in Europe, p. 43.
⁹⁵ The public holds expresses generally high levels of xenophobia. See John Sides and Jack Citrin, “European Opinion About Immigration: The Role of Identities, Interests and Information,” in British Journal of Political Science, Vol. 37, No. 3 (2007). Therefore, the constituency who supports pro-migrant rights would therefore be migrants themselves, and they are traditionally excluded from the right to vote.
Studying the effects of British public opinion on integration and diversity is difficult precisely because immigration was not a core feature of the 2001 election. The Labour Party Manifesto briefly mentioned family unification (putting into place the right of appeal), and only addressed the asylum problem within the context of security and policing. There is no mention of citizenship or integration. The Conservative manifesto makes no mention whatsoever about immigration. There were significant debates surrounding controversial asylum intake as the Tories tried to make Sangatte an issue late in the game, but the electoral-political competition in this context relies on the “daily plebiscite” of political opinion.

Political pressure to “do something” about immigration increases when more people believe that the issue is important. Figure 4.3 contains MORI poll results that show an exponential increase in the number of respondents that identified “Race relations/ immigration/ immigrants” as “the most important issue facing Britain today.” According to this poll, the public at large did not believe that this issue was very important in the mid-1990s. This number changed dramatically after the intake of asylum-seekers in the late 1990s, the success of the far-right British National Party (BNP) in the 2002 local council elections, and the terrorist attacks of 7/7.

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98 Schuster, “Asylum Seekers”
At the same time that immigration is becoming increasingly important, the general public is less confident that any major party is capable of managing it. Table 4.4 contains the results of another MORI poll that shows that both of the major parties suffer from a decline in public confidence regarding immigration and asylum policies.\textsuperscript{100} The only outlier to this pattern is the Conservative rating in 2005. Leading up to the May 5th election, Tory party leader Michael Howard deliberately and consistently “played the immigration card,” capitalizing on the perception that Britain has become a “soft

\textsuperscript{100} MORI/Sunday Times, “Political Polls.” August 2006. These are percent responses to the question, “Do you think that the Conservatives, Labour, the Liberal Democrats or some other party has the best policies on asylum and immigration?”
touch." Each of the four polls also indicates that Labour underperforms the Conservatives on this issue.

| Table 4.4: Percent Confidence in Major Parties on Immigration |
|---------------------------------|----------------|-----------------|-----------------|-------------------|
| Conservatives                  | 26        | 21        | 36          | 16          |
| Labour                         | 14        | 14        | 18          | 11          |
| Lib Dems                       | 8         | 8         | 10          | 8           |
| Other                          | 49        | 52        | 6           | 52          |
| None                           |           |           | 3           | 5           |
| Don’t Know                     |           |           | 27          | 9           |

Policies of New Labour between 2002 and 2007 that promote immigration reform and the new “citizenship agenda” were created with slogans designed to generate and maintain public support. References to “restoring public confidence in the immigration system” appear throughout the White Paper and Five-year departmental strategy, Controlling Our Borders (2005). These qualifications convey the sense of accepting immigration and diversity, alongside the obligations to maintain control and order. The frustration of attending to the political and symbolic pressures of immigration, while accepting the reality of continued migration, was most succinctly stated by David

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102 Home Office, Controlling our Borders: Making migration work for Britain (London: Home Office, 2005), p. 7. Other examples from Secure Borders, Safe Haven include “build[ing] the security and trust that is needed,” (p. 3), “provid[ing] turst, confidence, reassurance and understanding within our community” (p. 28), and an itemized lists of “what we are doing now” (p. 107). There was even an Immigration and Nationality Directorate paper released in 2006 with the explicit title “Rebuilding Confidence in Our Immigration System.” See IND, Rebuilding Confidence in Our Rebuilding Confidence in Our Immigration System (London: Home Office, 2006).
Blunkett: “Unless people feel secure and trust [the government], there’s no way we can have integration with diversity.”\footnote{David Blunkett, \textit{The Blunkett Tapes: My Life in the Bear Pit} (London: Bloomsbury, 2006), p. 339.}

Indeed, “having integration with diversity” became the cornerstone of subsequent policy. It required balancing objectives for continued migration, and attending to the social costs associated with economic openness. But, as I mentioned in chapter 3, there are a myriad of triggers and background conditions that can raise the pressure on policymakers to ensure that diversity is balanced with control.

When David Blunkett was promoted from Education to Home Secretary in May 2001, he brought with him an ideological inclination toward communitarianism,\footnote{Blunkett later reflected on this, speaking specifically about the implementation of citizenship ceremonies: “Rare as these occasions may be, I think I can say, hand on heart, that this was one of those policies that certainly would not have happened when it happened if I had not been Home Secretary,” in \textit{The Blunkett Tapes}, p. 601.} and previous success in implementing a citizenship curriculum in schools.\footnote{See Kiwan, \textit{A Journey to Citizenship in the United Kingdom}, pp. 61-4.} The landslide victory in the May 2001 generated political confidence for bold policy, and also provided support for Blunkett to pursue policies of interest. This made the creation of a new citizenship agenda for immigrants likely, but not inevitable. Short of an entirely actor-centered argument, there are conditions that make policy responses appropriate or likely (i.e., functional integration assistance where there are integration problems). There are also conditions that make policy responses unavoidable, including the Northern Riots and 9/11.
These two tragedies were obviously very different. The common link is that they both involved Muslims and created a keen sense of public anger. Subsequently, a maelstrom of concerns began to overlap: integration, cohesion, extremism, segregation, security, and identity. A response from the Government was so inescapable that separate policy agendas actually blurred together.

A discussion about citizenship skills for immigrants began in May 2001, before the disturbances up North, and just as Blunkett was entering the Home Office. The Research, Development and Statistics directorate of the Home Office had published a report called “Migration: an economic and social analysis.”\(^{106}\) It noted the deep connection between a lack of English proficiency and social exclusion.\(^{107}\) Also, the report stressed the importance of citizenship in “strengthen[ing] good race and community relations.”\(^{108}\) Blunkett’s self-declared “first task” was to “get to grips with problems that affect social cohesion.”\(^{109}\) Thus, he and his policy advisor, Nick Pearce, began to devise plans to promote English language skills and common citizenship.\(^{110}\)

Shortly thereafter, the Northern Riots occurred, and created an impetus to propose integration solutions. The Community Cohesion Review Team identified local practices and policy strategies that promoted cohesion. Responding to the riots in this capacity,


\(^{108}\) Glover et. al., *Migration: an economic and social analysis*, p. 31.


\(^{110}\) Spencer. Interview with author.
this panel concluded in the Cantle report that there had been “little attempt to develop clear values which focus on what it means to be a citizen of a modern multi-racial Britain.” Though there was a thematic and population overlap, Cantle and Blunkett were talking about very different things. Cantle’s report addressed policies on community cohesion, which was defined as connecting existing ethnic minority communities to other groups in society. Blunkett’s agenda focused on skills for immigrant integration, or in other words, incorporating newcomers into society. However, Blunkett came to speak on his “English for passports plan” only a few weeks after the Northern Riots, obfuscating from then on the different integration challenges of new immigrants and settled immigrants. While the paths of new and settled immigrants eventually experienced an institutional bifurcation (community cohesion went to the Department for Communities and Local Government while citizenship and integration stayed in the Home Office), there was this period of what Sarah Spencer describes as “regrettable overlap.”

Blunkett himself was adamant in making this distinction clear: “We really needed to win people over that naturalization and integration was the obvious thing to do…We want integration and cohesion in its own right, because it is right for our society.”

112 See Somerville and Wallace Goodman, “The Role of Networks in the Development of UK Migration Policy.”
114 Spencer, Interview with author.
115 Blunkett. Interview with author.
While a response to an event like the Northern Riots or 9/11 would be widely accepted, Blunkett had some serious convincing to do, especially to the Liberal Left in his own party, that citizenship values and integration were important. And as integration became more and more linked to Muslim extremism in the post-9/11 climate, Blunkett stated that “I used to say, ‘Rooting out terrorism is not the same thing as prioritizing integration and cohesion’.”

September 11th only catalyzed these early proposals on the imperative of common values and cohesion. In a speech a couple weeks later, Blunkett promoted the connection between citizenship and immigration as a viable and popular strategy to combat cultural integration problems:

We must….do more to articulate and secure the common values that underpin our democracy. We have allowed parts of our society to become effectively segregated. Mutual understanding and respect have weakened, particularly among the young. We have done too little in the past to articulate our common values and democratic commitments, or to promote positive induction into citizenship for those settling here.

The debate in late Spring of 2002 involving the adoption of the NIA Bill was relatively benign. Simon Hughes, a Liberal Democrat MP from North Southwark and Bermondsey, said that the debate was characterized by “moderate language,” further noting that this tone was imperative if Britain did not want “to risk in the near future

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116 Blunkett, Interview with author.
provoking extreme political reactions like those they have provoked across the channel. We all have an interest in making sure that that does not happen here.”

Hughes is, of course, referencing the success of Jean Marie Le Pen in the first-round of the French Presidential election that occurred only three days prior, on April 21, 2002. In the 2002 local elections, the British National Party (Britain’s most prominent far-right party) gained three council seats in Burnley by capitalizing on racism only a year after that city’s three-day riot. The following year, the BNP became the second-largest party in the city, and the official opposition, by winning eight council seats. The ability of the far-right to gain electoral popularity by exploiting problems with integration created a significant shadow over the tenor and gravity of citizenship reform.

Keith Vaz, a Labour MP from East Leicester stated:

We should note what has happened in France and deal with it in the right way. We need to do several things, including confronting the far right openly and positively. … …We have a particular responsibility as we have the largest settled black and Asian population in Europe, and need to continue our leadership role.

Some pro-immigrant groups opposed the NIA bill. Compulsory English lessons were decried as “linguistic colonialism” by the Joint Council for the Welfare of Immigrants (JCWI), and Blunkett even risked a potential “backlash from MPs in his own

party.°°° The citizenship test was attacked “as a brainwashing exercise motivated by populist politics.” Yet, the debates in the parliamentary houses largely focused on the content, like what “life in the UK,” “British,” and “sufficient” really meant, rather than the instruments of civic integration requirements. For example, Lord Navnit Dholakia recommended getting rid of the “knowledge of life in the UK” requirement because “[t]here are legitimate concerns that such knowledge cannot be tested. Moreover, the Government have nowhere provided their definition of the term, ‘life in the United Kingdom.’”

The task of defining the content and requirements would be taken up by the Life in the UK Advisory group, which was chaired by Sir Bernard Crick. Transitioning British citizenship from a bureaucratic process to a “significant life event” that is “meaningful and celebratory” required a specific, but inclusive, definition of common values. The group’s recommendation report began by establishing a common, de-racialized meaning of British identity and belonging:

To be British … mean[s] that we respect the laws, the elected parliamentary and democratic political structures, traditional values of mutual tolerance, respect for equal rights and mutual concern; and that we give our allegiance to the state (as commonly symbolized in the Crown) in return for its protection. To be British is to respect those over-arching specific institutions, values, beliefs and traditions

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that bind us all, the different nations and cultures together in peace and in a legal order.\textsuperscript{125}

Heavily stripped of cultural and historical cues (other than the centrifugal role of British royalty), this has become the government’s commonly accepted definition of Britishness. “Common values” meant “how we behave towards each other collectively and that is what binds us together, rather than assertions of national, ethnic or religious priorities or particular interpretations of history.”\textsuperscript{126}

Ambiguous enough to be non-controversial, the implementation of the various requirements of civic integration was largely unopposed. By February 2004, the first citizenship ceremony occurred at the Town Hall in Brent, and was attended by Prince Charles. By October 2005, the administration of citizenship tests had started. Debates that did arise typically revolved around fiscal commitments from the Department for Education and Skills for ESOL classes. These classes were “grievously overstretched,”\textsuperscript{127} largely by their popularity among Polish workers that wanted to improve their English skills.\textsuperscript{128} There was also frustration over the ill-timed rollout of citizenship teaching guides for Wales, Scotland, and Northern Ireland, as this appeared to be an afterthought to the policymakers in the Home Office.\textsuperscript{129}

\textsuperscript{125} Life in the UK Advisory Group, \textit{The New and the Old}, p. 11.
\textsuperscript{126} Life in the UK Advisory Group, \textit{The New and the Old}, p. 12.
\textsuperscript{127} ABNI, \textit{Progress Towards Integration}, p. ii.
\textsuperscript{129} Taylor, Interview with Author.
Subsequent to the initial launch of the citizenship test, ceremony, and language requirement, the “knowledge of Life in the UK” requirement was extended from the citizenship to settlement stage after the terrorist attack on London of July 7, 2005. Policymakers propose going even further with citizenship requirements. In early 2008, the idea of “earned citizenship” was proposed, extending the English language requirement to a status of probationary citizenship. This median stage between temporary and permanent residence/citizenship requires those who wish to stay in the UK to demonstrate commitments to integration and obeying the law. This is Home Secretary Jacqui Smith’s continuation of the push for “active citizenship,” where people earn British citizenship by “being active rather than passive participants in UK life.” There was also a proposal to move the language proficiency requirement for spouses to their time of entry to Britain, so that wives—in the words of Ms. Smith—will be “less tied to the home.”

Conclusion

This case study examines three important dimensions to popular pressure in the context of immigrant-related diversity. Recalling chapter 3, the first criteria for identifying significant popular pressure is that an immigrant-related issue makes its way

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131 BIA, Path to Citizenship, p. 29.
to the top of the public agenda. In Britain, this was triggered by a combination of the rising asylum crisis, the Northern riots, and 9/11. Second, key political actors call for political action in response to this pressure. The immense public pressure for control and cohesion, in turn feeding unpopularity ratings for the Labour party, was evident. Both David Blunkett and Ted Cantle proposed strategies for dealing with integration where the imperative to “do something” was recognized at the top. Finally, action was motivated by two elements: the need to maintain public confidence, and the fear that an opposition party might capitalize on the issue. Labour political elites believed that is was imperative to attend to real and popular immigration pressure to ensure their own political survival. Also, recalling the results of the 2001 French elections, Labour was aware how immigration frustrations could be redirected to populist parties like the British National Party. Furthermore, Labour was also fearful of the Conservative Right gaining support, since that party maintained a better public record on immigration control.

The evolution of citizenship requirements can be viewed as a functional and strategic policy for addressing immigration problems and promoting integration where there is real diversity. Changes to citizenship should be examined not in terms of access or eligibility (residency is still at five years, one can still maintain dual nationality, and birthright for second-generation immigrants remains unchanged), but in terms of

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133 For recent details on the community cohesion agenda, see the report from the Commission on Integration & Cohesion, *Our Shared Future* (Wetherby, West Yorkshire, UK: Commission on Integration and Cohesion, 2007).

134 See Table 4.4.
promoting a wider citizenship strategy where Britishness aspires to accomplish more and inspire a greater meaning.

What does Britishness aspire to do? First, through citizenship tests, ceremonies, and language requirements, Britishness seeks to promote common values that reverse the “diminution of citizenship.” Ceremonies are perfunctory, but can yield intangible levels of public confidence. Second, Britishness mandates a series of functional citizen skills for successful democratic (and labor market) participation. It is a functional instrument to improve integration among prior and potential immigrants. Finally, Britishness imposes integration expectations and requirements that make citizenship harder to obtain, especially for those who lack the skills or desire to meet these standards. Thus, immigrants and family members who would otherwise have access to entry are denied not because of economic demands or quotas, but because they are unwilling or unable to integrate. This strategic migration policy places the onus of integration on the individual, and protects the state against accusations of engaging in subjective rejection of immigrants.

As a consequence, civic integration requirements are an “all-purpose” policy. Governments address perceived inaction or incompetence over immigration by acting forcefully against new immigration, while simultaneously repairing existing citizenship

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135 This phrase comes from Lord Goldsmith’s review of citizenship. Available at www.justice.gov.uk/reviews/citizenship.
136 Far from a procedural or bureaucratic barrier, the test has proven to be sufficiently robust. In the initial, first round (from November 2005 – February 2006), the pass rate plateaued at about 70%, in Hansard, House of Commons Written Question for 18 April 2006.
deficiencies within minority communities. The government’s ability to mollify public consternation about immigrant-related diversity is limited. How does one redress problems of culture in a liberal democratic society? However, the political leverage gained from trying to do so is great.

In the end, it is still unclear what exactly the meaning of Britishness is. The act of being British means “to embrace positively the diversity of background, culture, and faiths that living in modern Britain involves.”\textsuperscript{137} It means recognizing the “right to be different,” alongside the “duty to integrate” into “shared, common unifying British values.”\textsuperscript{138} These “British” values include “social participation[,]…individual freedom and tolerance of diversity.”\textsuperscript{139} British citizens speak English, obey the laws, and adhere to liberal democratic principles. Aside from the accent and the language it’s spoken in, the process of becoming British resembles the process of becoming a member of any other liberal democracy today.\textsuperscript{140} If there is, as Kostakopoulou argues, a “constitutive

\textsuperscript{139} Home Office, Controlling Our Borders, pp. 22-3.
character of naturalization for nationhood and collective identity, it remains as ambiguous as ever.

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Chapter 5

The Transformation of Citizenship

Introduction

This goal of this dissertation was to identify, compare, and explain the addition of new civic integration requirements in a number of European states. Citizenship tests, integration courses, language requirements, and citizenship ceremonies all represent political responses to the pressure of immigrant-related diversity. In chapter 1, I defined civic integration, and argued that it was important to recognize it as a change to citizenship policy, rather than a new integration phenomenon. In chapter 2, I created a cross-national and cross-temporal civic integration policy index (CIVIX) that systematically compared different policies. Chapter 3 presented an argument explaining why some states adopt civic integration requirements, while others do not. I stressed the importance of historical experiences with immigration, high levels of diverse immigration today, and political pressure to “do something” about the problems that arise from that diversity. I tested this argument against alternative explanations addressing immigration volume, cost, and opportunity. In chapter 4, I provided a detailed examination of these factors in Great Britain. This case study was a “hard case,” for several reasons. First, there was an absence of significant political opposition or far-right parties at the time policy was initiated. Second, because Britain had an inherently
problematic definition of national membership, new membership requirements are significant for native and newcomer alike. I looked at its history of diverse immigration, and the present-day nature of immigrant-related diversity. This study also examined the political incentives and pressures that confronted the Labour party as it addressed functional integration problems and strategic immigration politics through civic integration requirements.

In this conclusion, I complete this discussion by considering the significance of civic integration policies. I have argued that civic integration policies are important because they actively define the contours of the modern-day citizen. The content, target audience, and unique objectives to promote integration alongside immigration control suggest a significant transformation to the concept of citizenship.

This chapter expands on this important transformation in three parts. First, I argue that these additional membership criteria represent a fundamental “rebalancing” of citizenship. The addition of civic obligation requirements (at both the citizenship and settlement stages), balances out what was previously an excessive extension of rights where ample opportunities to obtain citizenship or citizenship rights existed during periods of mass immigration. This expansion of rights and status was deliberate by the state. However, the expected levels of civic incorporation that long-term residency was thought to produce never materialized. Civic integration requirements recalibrate
citizenship to something akin to a contract, where rights and status are conferred *in exchange* for obligations and commitments.

Second, the terms of this contract—obligatory language acquisition, country knowledge, and value commitments—are decidedly non-national. The content of these requirements are not ethnic or particularistic. Instead, they are universal to the principals of liberal democracies. They can be *used* for national purposes, but they do not intrinsically contain national content.

Third, this explicit imputation of citizenship obligations not only re-balances and re-constitutes citizenship; it also *re-orients* citizenship outward toward *potential* citizens. Civic integration requirements promote the integration of immigrants through a highly-articulated set of requirements. Upon the completion of these requirements, the applicant is nominally integrated pursuant to the state’s definition of a national citizen. With the exception of language, the country knowledge and value requirements are only asked of newcomers. It is assumed or taken-for-granted that native citizens should have the same knowledge. States define “Britishness,” and “Dutchness,” and “Frenchness” for *outsiders*. These terms are not defined with the intent of assisting natives in understanding their own national community. This is deeply problematic for Brubaker’s definition of citizenship as an “internally inclusive, externally exclusive” community.¹

Citizenship remains internally inclusive, but the boundary of citizenship is not a fortress

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wall. Instead, citizenship in the 21st century is a long road. It takes the wayfarer a significant amount of time to get to his or her destination, but the route is paved and well-marked with signposts.

**Re-balancing Citizenship**

The rise of civic integration requirements is important because membership has been a sorely neglected component of national citizenship. The principle of citizenship is enshrined in the notion that there is a reciprocal relationship between an individual and the state. Derek Heater succinctly describes this point: “A citizen needs to understand that his role entails status, a sense of loyalty, the discharge of duties and the enjoyment of rights not primarily in relation to another human being, but in relation to an abstract concept, the state.”² By fulfilling certain conditions and criteria, the state extends to newcomers the opportunities and rights of citizenship.

The post-war period of mass immigration to Europe has experienced extensive changes to the “enjoyment of rights” dimension of citizenship. However, this has not been accompanied with the requisite emphasis on the “sense of loyalty” and “discharge of duties.” Vague requirements existed for “sufficient assimilation,” which was typically fulfilled through extended residency. Inconsistent and unpredictable measurements of language sufficiency also existed. The expansion of rights in the absence of defined

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obligations is what I term the “imbalance” of citizenship. This imbalance is not inherently problematic. People who naturalize may not, at first, define themselves as members of the state, but over time may identify with their host community. The problem arises when this transition does not take place. In this case, the state has expanded rights and opportunities, but it never created a bond between the naturalized citizen and the larger community.

Expansion of eligibility, which was described in chapter two as citizenship widening, was the most common form of citizenship policy change until the turn of the century. Hansen and Weil note “the almost complete convergence on extending a citizenship entitlement to second-generation migrants. This is combined with a more limited, but nonetheless clear, convergence in northern Europe on an inclusive definition of nationality law for first-generation immigrants.”

Several states expanded access to citizenship by reducing existing barriers. The Dutch allowed for dual nationality during a significant portion of the 1990s, and France fully extended rights of dual citizenship. Also, Germany reformed the *jus soli* principle for 2nd and 3rd generation migrants in the 2000 Citizenship Act. Changes also occurred in Sweden, Finland, Luxembourg, Portugal, and other countries. The underlying notion was that by including more people in citizenship, migrants would enjoy the full expanse of rights and opportunities, so that

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4 Marc Morjé Howard shows that 10 out of the original 15 EU Member states underwent citizenship liberalization in the 1990s in *The Politics of Citizenship in Europe* (Cambridge: Cambridge University Press, forthcoming).
they could pursue further and fuller integration. The extension of opportunities for citizenship across European states, Hansen and Weil state, are “responses to a common imperative, namely the need to integrate large (and sometimes growing) populations of third-country nationals.”

In addition to changes to acquisition rules, expansion of citizenship has also taken place with respect to the social, civil, and political rights granted to non-citizens, which T.H. Marshall described as citizen rights. Some states even allow non-citizens to vote and run for office in local elections. Essentially, citizenship rights, such as residency and free movement, have expanded beyond the boundaries of citizenship itself. This creates the meta-membership of “denizenship,” or foreign citizens with the legal status of permanent residence. These denizens enjoy the same social, civil, and welfare rights as citizens, but lack political representation and national voting rights.

Citizenship widening (expansion of eligibility and rights) at the expense of membership deepening (citizenship obligations) is not inherently problematic. Some argue that rights create a type of social citizenship, where “membership is first, and above

all, a social fact, determined by social factors such as living, working or raising a family and participating in the social and cultural life of a community.”

But what happens when these processes do not create community? What happens when there is evidence of, what Fraser and Gordon describe as, “the erosion of communal responsibility?”

Despite the expansion of rights and the widening of citizenship, there remains—to repeat Hansen and Weil—“the need to integrate large (and sometimes growing) populations of third-country nationals.”

Integration problems have not been resolved through the expansion of rights. Moreover, integration problems seem to stem not only from new immigrants, but also from prior immigrants in long-settled communities. States have unsuccessfully compensated for these challenges through piecemeal integration strategies like multiculturalism, and not by changing citizenship policy.

In balancing civic integration requirements against rights in citizenship law, states are addressing problems of diversity by promoting integration and placating native majorities. Moreover, states are “recoupling” the concept of citizenship as a set of rights (a social citizenship) with a membership identity component. This does not compromise

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or reverse advances in acquiring rights or status of immigrants. However, it does condition the process of settlement and citizenship on the fulfillment of integration obligations. A national community is deliberately being built through naturalization, and as a result the importance of citizenship has significantly increased.

This significant change to contemporary citizenship policy shows the nation-state to be malleable and—in reversing Soysal’s description—inventively relevant. This is good news for the nation-state, as the extant prognoses for national citizenship were bleak. If Brubaker’s analysis was true, immigrants were losing out because states were cleaving to cultural-historical notions of nationhood that precluded opportunities for expansion. If Soysal’s analysis was accurate, states were losing out because citizenship was devalued as immigrants were gaining rights even without formal status or membership. The conventional wisdom was that citizenship was either immovably exclusive or inevitably inclusive. This did not leave a middle ground for a flexible concept of citizenship that could adapt and expand, while also maintaining similar contours of community. Joppke’s reconciliation of these debates even raises more questions than answers when he writes that “citizenship for immigrants matters” and “comes without the expectation of assimilation…as long as [ethnic identities] do not clash with the basic procedural rules of liberal states.”

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14 Joppke, Immigration and the Nation-State, p. 262-3.
clashes occur? Nation-states are indeed “resilient,“ but not because they recognize difference through multicultural citizenship. They survive because states provide a clear foundation upon which differences can be recognized—namely liberal democratic principles and practices promoted by civic integration programs.

Re-constituting Citizenship

Related to the “recoupling” of membership and rights, there is now new content that can potentially reconstitute the meaning of national membership. One might conclude that defining new rules of membership to the polity signals the return of the nation-state. This is not so far-fetched if the nation-state is already resilient. However, civic integration requirements are not a wholesale repackaging of “nationness.” Joppke makes the distinction between civic integration requirements and cultural assimilation, where “Integration as ‘social inclusion’ is a world apart from classic nation-building as cultural homogenisation.” Of course, integration requirements also have an assimilatory edge. Jacobs and Rea acknowledge “linguistic assimilation” and a “goal of

acculturation articulated in the content of the integration courses, when stress is equally placed on knowledge of the history and culture of the receiving society.”

Empirical comparisons in chapter 2 show that neither of these opinions is entirely correct, because there is significant variation with respect to how rigorously integration requirements are applied and where states apply them. The important element in distinguishing civic from national identity is content, not purpose. When civic integration is geared towards potential citizens, i.e., how to obtain employment or where to collect benefits, then the purpose is inclusive. Committing oneself to “respect the laws, the elected parliamentary and democratic political structures, traditional values of mutual tolerance, respect of equal rights and mutual concern; and that we give our allegiance to the state…in return for its protection,” could be the vow of citizenship that any person takes in a liberal democracy, with the only variation being the language used to take that vow. Moreover, language acquisition is not an expression of nationalism; it allows a newcomer “to undertake administrative procedures, to register your children at school, to find work and to take part fully in life in your area.” If this skill creates national unity, it is as an outgrowth of interconnection, and not for the sake of identity.

Though the content of civic integration is based on functional skills for integration and bends in the direction of universalistic and liberal democratic, it can also be used for decidedly non-inclusive, particularistic, and even ethnic purposes. There are several examples of citizenship tests that are explicitly used as devices to limit non-European migration, such as the Dutch “Civic integration from abroad” exam or the Danish culture test. States are clearly motivated by national, protectionist, and populist interests when shaping their future domestic population. This is rightly distinguished from an integration objective. As I discuss below, and as I stated in the British case study and throughout, civic integration requirements are used for both integration and control.

Perhaps most troubling is that we see states use the guise of inclusion to achieve patently exclusive aims, like the Dutch “Civic Integration from Abroad” criteria. It transfers the burden of blame from the state’s rejectionism to the immigrant’s inability, or worse, “the association of certain groups with traditional practices deemed to be inimical to standard practices and core cultural values.22 Citizenship tests could be administered at the time of immigration, if such exams were paired with extensive test preparation opportunities.23 But this is not the case; the Dutch embassy in Jakarta does not offer language lessons. The fact that states are using civic content to clandestinely achieve

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national goals is only evidence of the unacceptable exclusivity of nationalism. If the nation-state has staged a comeback, it wears an ornate mask.

Re-Orienting Citizenship

Finally, I argue that civic integration requirements are important because they fundamentally alter the nature of citizenship. As mentioned above, civic integration policies are used to achieve two goals: (1) actual, functional integration objectives among hard-to-integrate populations, and (2) immigration control, with particular focus on non-European family reunion. Re-directing the focus of citizenship content and rules to people outside of citizenship—both residents and immigrants—transfers the core objective of citizenship to be an instrument of social inclusion, in addition to “social closure.”

Citizenship has always been an instrument of migration control; passports are a device to regulate who enters and leaves physical territories. But there is nothing intrinsic about citizenship being an instrument of integration. It is the assumption that naturalization is an integrating process that creates the imbalance of citizenship. This assumption has also produced multicultural societies in European countries where there is

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24 Brubaker, *Citizenship and Nationhood in France and Germany*, p. 21-34.
not any “glue” holding people together.²⁶ Naturalization connotes a process of becoming “natural” or similar to existing members of a political community, but this outcome is indeterminate.

This is primarily a critique of Brubaker’s definition of citizenship. While examining citizenship in the “most different” cases of France and Germany, he notes a similarly stark duality between citizenship’s “internally inclusive” and “externally exclusive” dimensions. There are insiders (citizens), and the “noncitizen is a residually defined outsider” who is “excluded not because of what [he is] but because of what [he is] not”—an insider.²⁷ The state can maintain these distinctions because citizenship is characterized by closure. As an instrument of closure, citizenship is an “international filing system, a mechanism for allocating persons to states.”²⁸ As an object of closure, the state maintains concepts of membership based on inherited national and cultural idioms. Naturalization does not change this core membership identity, because in this scenario the migrant changes in order to gain membership to the internally inclusive community.

This theoretical dichotomy was lauded for opening up the view of otherwise arcane, legalistic citizenship rules to interpret a meaningful impact for immigration, but it actually just ends up negating immigration’s impact. This whole dissertation has set out

²⁶ To quote David Blunkett on this point, “Without the glue of integration, [the United States] wouldn’t have a nation, and we [in the UK] have taken it for granted. We need the glue after all.” David Blunkett. Interview with author. London, UK. 3 August 2007.
²⁷ Brubaker, Citizenship and Nationhood in France and Germany, p. 29.
²⁸ Brubaker, Citizenship and Nationhood in France and Germany, p. 31.
to show that changes in citizenship policy are changes to citizenship itself. Migrants can “naturalize” without a membership transformation taking place. Moreover, the addition of civic integration requirements shows that states are inching closer to a middle ground, where immigrant integration is a two-way process and where both the migrant and receiving society makes small amounts of change. For states, the very notion of articulating explicit membership requirements represents the need for recognizable guidelines. Immigration may not be desirable and diversity may reveal deep incompatibilities between culture and liberal democracies, but these are realities that modern-day European states need to deal with.

As a consequence, citizenship has evolved into an instrument and object of social inclusion. There are still dimensions of citizenship that make it a status of exclusion, but the overall trend is to use civic integration requirements to address the real problems of integration. The hardest barrier to cross today is not citizenship, but entry. With the expansion of residency rights for nearly every category of migrant—except students, denied asylum claimants, temporary workers, and illegals—the formal establishment of residence in society begins the process toward full integration as a citizen. This is especially the case where states expand the civic values and skills required for acquiring permanent residence, such as the UK and other states with “thick” imputations of civic integration requirements. A migrant may choose whether or not to become a citizen or remain a permanent resident, and these decisions are informed by opportunities to hold
multiple nationalities, or the difficulty and costs of naturalization itself. The overarching point is that citizenship is not only a reward for full integration; it is also an instrument that assists a migrant in reaching that goal.

As an object of social inclusion, this notion of citizenship relates back to the previous point about re-constituting citizenship. Regarding French citizenship, Brubaker notes that an “inclusive, assimilationist law” can also be “restrictive.”

Regarding German citizenship, he writes that the “ethnocultural inflection of Germany self-understanding and Germany citizenship law makes it difficult to reconcile—in the political imagination of Germans and immigrants alike—the preservation of Turkish cultural identity and autonomy, for example, with the acquisition of German citizenship.” Both of these scenarios maintain that the transformation from outsider to insider is hard even to “imagine,” much less successfully complete. This is a much starker view of reality than that reported by immigrants.

Does this render an immigrant in perpetual citizenship purgatory, where that person enjoys rights, but is still excluded from the national political community?

The answer is no. By adopting civic integration requirements to promote a citizenship based on knowledge and skills, states shape the contours of a civic identity...

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31 See, for example, the many first-person accounts of Germanness and multiculturalism in the chapter titled “Writing Back: Literature and Multilingualism,” in *Germany in Transit: Nation and Migration*, eds. Deniz Göktürk, David Gramling, Anton Kaes (Berkeley: University of California Press, 2007), pp. 385-424.
where differences can co-exist with common values. It does not minimize differences like assimilation or emphasize differences like multiculturalism. Instead, civic integration balances differences against fundamental principles of liberal democracies. This may be the most realistic solution of all. As the British Chief Rabbi, Jonathan Sacks, astutely notes:

Liberal democracy is the single best solution yet devised for a problem as old as mankind: how different groups with different beliefs may live graciously together within an overarching political framework that respects the integrity of each and ensures the equal rights of all under the impartial rule of law.  

Conclusion

I have set forth three changes to citizenship that have occurred as a result of new civic integration requirements. These changes signal the fundamental transformation of citizenship. First, it re-balances the extension of rights and access that had proceeded without membership, and pulls these rights-bearers into a common community. Second, I argue that the content of civic integration reconstitutes citizenship identity. This creates a civic citizen as an alternative to the national citizen. This is consequential because a state needs citizens to actively provide legitimacy for its actions so as to maintain political authority. Alternatives to national identity create new lines of legitimacy. Finally, I point out that civic integration requirements re-orient citizenship, so that it

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serves as an instrument and object of social inclusion. This is not always the case, and sometimes language requirements, contract commitments, or citizenship tests serve as decisive barriers of immigration control. But the explicit and consequential articulation of national membership contours that are, in principle, accessible to outsiders, is a far cry from the culturally-determined and homogenous notion of membership that once typified European citizenship.

This does not mean that the national citizenship has disappeared, or that post-national or universal principles of membership are inevitable. On the contrary, actors within a state are decisive in creating citizenship rules that placate political pressures for control, and address real domestic concerns of immigrant integration. Citizenship can expand and contract to address challenges of diversity without compromising core values. Also, the content of national membership can be uniquely non-national. There is still a place in the modern polity for citizenship. And its function may now prove more important than ever before.
Appendix A: Civic Integration Policy Case Studies

This appendix provides an overview of changes in civic integration policies in 14 European countries. I exclude Great Britain because of the substantial coverage provided in Chapter 4.

Austria

The first legislation outlining Austria’s integration program for newcomers dates back to the reforms of the Nationality Law of 1998 (*Staatsbürgerschaftsgesetz*). As a compromise between the two ruling parties in the coalition government (SPÖ-ÖVP), a requirement for sufficient knowledge of German was added alongside and increase in residency criteria for third-country nationals.¹

Conditions were further tightened with amendments in 2005. According to the government, the reason behind this new integration measure was that “earlier integration measures had proved insufficient.”² The new Settlement and Residence Act (entered into force in March 2006) establishes the integration contract (*integrationsvereinbarung*), whose purpose was to promote “knowledge of the German language, particularly the ability of reading and writing, and obtain the qualifications to participate in the social,

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economic and cultural life in Austria.” In practice, this entails several stages of assessment.

The contract promotes integration through two modules, one focusing on reading and writing and the other focusing on language training and cultural knowledge. Civic education consists of about 75 hours of the program. Applicants for naturalization and permanent settlement must either attend a German integration course of at least 300 hours (raised from 100 hours) or take a German proficiency test at the A-2 level, according to the Common European Framework of Reference. The new reform also adds a general integration clause that evaluates an applicant’s “orientation towards social, economic, and cultural life in Austria and towards the basic values of a European democratic state and its society.” A foreigner who can prove sufficient knowledge of the German language does not have to participate in the civic education component. Finally, an applicant for citizenship has to pass a basic knowledge, multiple-choice test of Austrian history and their respective province of residence.

Programs are obligatory for all legal newcomers, and part of the requirements for receiving permanent residence. For every year after entry that the criteria of the Integration Agreement are not fulfilled, a financial sanction is imposed and increases

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5 Çınar and Waldrauch, “Austria” in Bauböck et. al, p. 53.
6 See, for an example, Vienna: http://www.magwien.gv.at/english/administration/civilstatus/citizenship/obtain.html
with each year. If an applicant has not produced proof of completing the German Integration Course in four year, then granting the “subsequent residence permit is not possible and a deportation order is filed.”\textsuperscript{7} The migrant incurs the cost of language and civic education courses, but the federal government might compensate part of the fee based on course completion, up to 50% reimbursement or approximately 182 euros.\textsuperscript{8}

**Belgium**

Belgium is the only country where a lessening in citizenship membership criteria took place. During citizenship law reforms in 2000, the Belgian parliament removed its nationwide strategy for integration by repealing an “evidence for integration” requirement from the naturalization process.\textsuperscript{9} This initial requirement was historical, not a recent incarnation of civic integration.

The Belgian state regulates immigration and citizenship from the national level, but it relegates integration requirements to regional governments. As a result, Wallonia and Flanders have pursued different integration strategies consistent with their factitious sub-national struggles. Wallonia has maintained a voluntary integration program since 1997, where a non-Belgian national has access to French language and literacy courses,

\textsuperscript{7} International Centre for Migration Policy Development (ICMPD). *Integration Agreements and Voluntary Measures* (Vienna: ICMPD, 2005), p. 43.

\textsuperscript{8} ICMPD, *Integration Agreements and Voluntary Measures*, p. 40.

as well as advice on various social, legal and political rights. Brussels also has an optional integration scheme. Flanders, on the other hand, has designed a mandatory program for newcomers. The Civic Integration Decree of 2003, modeled after the Dutch program, set up a citizenship trajectory so newcomers would learn the Dutch language as well as lessons of Flemish/Belgian society. Following an audit at the reception center, a newcomer undergoes a two-staged integration program. First, they partake of a “training/education program” consisting of Dutch language lessons. Second, they participate in “one-on-one study path guidance.” The education program lasts for about a year, and is free for participants. Noncompliance does not result in suspension or denial of residence permits or citizenship, as those issues are federal prerogatives, but in access to social and welfare services.

**Denmark**

New Danish language and country knowledge requirements were motivated by a two-fold desire. First, Danish citizenship is reconfigured to be a “carrot for foreigners to adapt to Danish society, be independent, learn Danish and be able to socialize with

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Second, like Austria, there was a very explicit motive to limit the number of foreigners from applying for naturalization and, according to Michalowski, “drastically reduce immigration.” This perfectly illustrates the dual functional and strategic logics of civic integration.

The Liberal and Conservative coalition government, with support from the Danish People’s Party, seized the opportunity in 2002 to strengthen the long-established language requirement with the Act on Integration of Aliens in Denmark. This act raised residency requirements, added a loyalty oath, and made language criteria more rigorous.

When it became clear that the 2002 requirements “did not prevent an increasing number of applicants from applying for naturalization,” policymakers moved to make naturalization and settlement more restrictive. The new Danish Integration Law (2005) establishes an Integration Contract that obliges foreigners to participate in an “integration program” to obtain a permanent residence card and benefits of citizenship. The integration program consists of a language course that includes cultural orientation, as well as an “active involvement” component, like vocational training. The level of required language proficiency is raised to Danish Level 3 (from Level 2 set in 2002), a

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17 Michalowski, An Overview on Introduction Programmes for Immigrants, p. 15.
19 Ersbøll, “Denmark,” in Bauböck et. al., p. 131.
considerably higher level of difficulty. The program is 30 hours a week for three years (approximating 2000 hours).\textsuperscript{20} Fees are covered for refugees and immigrants of family unification by a local council entitlement,\textsuperscript{21} but “[the municipality] may chose to collect a fee (500 - 1000 DK per language module) from self-supporting students who are not covered by the Integration Act.”\textsuperscript{22} Other foreigners have to pay part of the expense, with the remainder subsidized by the municipality.\textsuperscript{23} Nonparticipation can result in the withholding of an “introduction allowance,” which resembles welfare assistance stipends.\textsuperscript{24} Finally, the path to citizenship is completed with a 40-question multiple-choice citizenship test, requiring applicants to “demonstrate their knowledge of Danish culture, history and society.”\textsuperscript{25} There is a culminating citizenship ceremony held annually, but it is not mandatory.

Finally, a third round of civic integration amendments took place in 2007. Building on the 2005 citizenship test for naturalization, amendments effective April 2007 extend the test requirement for permanent residence and admission for family unification. For permanent residence and migrants on social benefits, applicants need to complete an integration “test” on top of the integration course and contract requirements. This test is really an assessment that consists of having a job, and showing evidence of Danish Level

\begin{thebibliography}{9}
\bibitem{Carrera20} Carrera, “Typology of Different Integration Programmes in the EU,” p. 4.
\bibitem{Michalowski20} Michalowski, An Overview on Introduction Programmes for Immigrants, p. 18.
\bibitem{Ersboll20} Correspondence with Eva Ersbøll, 21 May 2008.
\bibitem{Horsholm20} See the Danish Immigration Service website at http://www.horsholm.dk/VoksneAeldre/Integration/danish+course.htm (accessed 21 January 2009).
\bibitem{Carrera25} Carrera, “Typology of Different Integration Programmes in the EU,” p. 15.
\bibitem{Ersboll25} Ersbøll, “Denmark,” in Bauböck et. al., p. 132.
\end{thebibliography}
While this does not mandate country knowledge, it emphasizes a base level of national language and evidence of economic integration through participation in the labor market. For family/spousal unification and religious preachers applying for a residence permit, this “test” includes knowledge about Danish society.  

**Finland**

Though civic integration was not introduced until the Nationality Act of 2003, Finnish policymakers have had their eye fixed on integration of immigrants since the late 1990s. The Act on Integration of Immigrations and Reception of Asylum Seekers entered into force in 1999, whereby the “Finnish parliament asked the Government to monitor the progress made with the implementation of the reform and to deliver a report within 3 years time.” This tracking of immigrant integration underscored the eventual requirements for satisfactory oral and written skills in Finnish or Swedish for citizenship.

There had been a requirement of sufficient language knowledge since 1985, but there were not clear rules or documentations for proving language skills. Finnish Migration Services explains that meeting this current requirement can be shown through

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28 Michalowski, An Overview on Introduction Programmes for Immigrants, p. 21.
a basic education certificate or general language exam at level three.\textsuperscript{30} A second civic requirement, this one focused on unemployed newcomers or immigrants on social benefits schemes, mandates a training module for language and Finnish studies.\textsuperscript{31} Lasting for an average of 15-18 training weeks,\textsuperscript{32} the penalty in nonattendance or non-completion is the withholding of an integration allowance (consisting of a labor market subsidy and subsistence benefits).\textsuperscript{33}

The targeted evidence of requirements underscores a distinct objective of civic integration: to “function independently in the Finnish society in order to quality for Finnish nationality.”\textsuperscript{34}

**France**

Assimilation has been a condition for naturalization in France long before the current trend of civic integration. Applicants had to demonstrate French fluency as a requirement of assimilation as early as 1945.\textsuperscript{35} There have also been individual integration services in place since the national “welcome” network was set up in the

\begin{itemize}
\item \textsuperscript{31} Jacobs and Rea, “The End of National Models?,” p. 6.
\item \textsuperscript{32} Michalowski, *An Overview on Introduction Programmes for Immigrants*, p. 22.
\item \textsuperscript{33} Michalowski, *An Overview on Introduction Programmes for Immigrants*, p. 24.
\item \textsuperscript{34} Jessica Fagerlund, “Finland,” in Bauböck et. al., p. 168.
\end{itemize}
1970s, independent efforts were led by organizations like *Le Service social d’aide aux émigrants* (SSAE) and *l’Association de service social et familial aux migrants* (ASSFAM). In 1998, however, the Socialist-led government introduced a state-facilitated, voluntary, half-day reception (*plates-formes d’accueil*) for newcomers. This platform included an obligatory medical review, voluntary audit by a social worker, and introduction to French life and language. These one-on-one assessments, as well as the introductory session, were explicitly designed to be opportunities for newcomers to learn French and access social services on individual needs. While it was non-obligatory, “over 80% of newcomers invited came to the platform.”

However, after Jacques Chirac’s electoral victory over Jean-Marie Le Pen in the 2002 Presidential election, the center-right government co-opted this voluntary mechanism for facilitating integration and transformed it into a mandatory obligation for residence in the attempt to “restrict foreigners’ access to French visas, as well as their access to French nationality.” The 2003 Law on the Control of Immigration and Residence of Foreigners in France, also referred to by the name of its creator - the *Loi Sarkozy*, makes two important changes to the existing integration platform. First, it binds newcomer (particularly spousal migrants and family unification) to the previously voluntary integration program through a Welcome and Integration Contract (*Contrat*...
In exchange for free language courses of approximately 200-500 hours (if a newcomer is not already fluent), which is renewable once, an applicant for residence agrees “to adapt to French society, and accepting the fundamental values of the Republic,” participate in a “day of civic training presenting the fundamental rights principles and values of the Republic, as well as the institutions of France,” and attend any interviews “set up in order to monitor the contract.”

Second, the CAI makes integration consequential for obtaining residence, where entitlement to a 10-year residence card becomes contingent on completing the integration program and obtaining a sufficient level of French (defined at the A1 level of the Common European Framework). The contract is monitored by the newly created Agence Nationale d'Accueil des Etrangers et des Migrations (ANAEM).

Since this major change, requirements have gone even further. A 2005 degree established new formal procedures for evaluating the “linguistic assimilation” of applicants for citizenship. This is a 20-30 minute oral interview in an office designed as an “Assimilation Evaluation Office.” Finally, in the amendments to the French Immigration Act (approved by the Conseil Constitutionnel in November 2007), the

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40 This was originally proposed back in 2001 by the High Council for Integration (Haut Conseil à l’intégration, or HCI) as a positive, not punitive, mechanism for integration. See Haut Conseil à l’intégration. Les parcours d’intégration (Paris: La Documentation Française, 2001), p. 40.
41 Integration and Welcome Contract (Contrat d’accueil et d’intégration). Ministry for Employment, Social Cohesion, and Housing (France). Available at http://www.anaem.fr/
43 Weil and Spire, “France,” in Bauböck et al., p. 203.
French government adopted a requirement that family migrants must demonstrate French competence at their point of origin. The implementation details of this new law are still pending. The target, however, is quite obvious: limiting family unification, which has been a hallmark objective of Sarkozy’s presidency. Finally, France does not have a mandatory ceremony or a citizenship test.

Germany

Despite Germany’s long tradition of ethnicity-based citizenship, policy only began to positively reflect these exclusive demands of membership in the past decade. With the belated recognition that Germany was, in fact, a “country of immigration,” legal changes allowing for extensions of stay for third-country nationals and modest opening of eligibility to citizenship in 2000 were balanced with civic integration requirements. These initially included a declaration of loyalty to the principles of the Basic Law and command of the German language. Germany has had language courses

45 See Katrin Bennhold, “Sarkozy turns France to talk of immigration,” International Herald Tribune, April 28, 2006, p. 3
46 Joppke even notes that “this discrepancy between de facto immigration and its political denial is the single most enduring puzzle in the German immigration debate” in Immigration and the Nation-State: The United States, Germany, and Great Britain (Oxford, Oxford University Press, 1999), p. 62.
48 Simon Green, “Beyond Ethnoculturalism? German Citizenship in the New Millennium,” in German Politics Vol. 9, No. 3 (2000), p. 114. Green adds that “the addition of language skills and constitutional loyalty to the catalogue of requirements for naturalization does not constitute a reinforcement of cultural
and requirements for *Aussiedler* (co-ethnic migrants from Eastern Europe and Russia) since the late 1980s. But, as Christian Joppke points out, new integration programs (*Integrationkurse*) “simply extend to non-EU, non-ethnic migrants a program that had been in place already for ethnic Germans.”

Building upon the foundations laid in the Citizenship Act of 2000, the 2004 Immigration Law (*Zuwanderungsgesetz*) establishes, among other policy measures, integration requirements for permanent residence. The Ordinance on Integration Courses requires 600 hours of German language instruction (up to the B1 level) and 30 additional hours on German history and culture, supplemented by a system of social counseling.

An applicant can gain exemption from the language requirement if they can prove sufficient knowledge of German (up to the A2 level), but all newcomers have to complete the integration course, regardless of language skill. This integration program is targeted toward all foreign nationals seeking permanent residence, including spouses and family members. The federal government carries the costs of the integration course, but individuals may be asked to pay for the language courses (approximately one euro per
language unit) depending on their financial situation. Failure to comply results in an applicant being denied a “residence permit (that might finally lead to deportation), and the employment agency may curtail the jobseekers’ assistance.”

The final phase of civic integration policy is the design of a standardized, national citizenship test. Simon Green notes a peculiar trajectory of civic integration policy in Germany; it targeted permanent residence before citizenship itself. Civic requirements for citizenship are the final stage of Germany’s civic integration policy reform. Federal rules have given Länder a large scope of administrative and discretionary power on assessing how the 2000 language requirement is met (e.g., written, oral). As a result, the content of citizenship tests, fees, and other conditions for naturalization has varied across states. For example, Baden-Württemberg and Hesse initially designed citizenship tests to gauge an applicant’s knowledge of German culture and history as well as the Federal Republic's laws and constitution. Baden-Württemberg’s 30-question exam was specifically criticized as a “Muslim list,” asking applicants questions on terrorism and

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53 ICMPD, Integration Agreements and Voluntary Measures, p. 40.
attitudes toward women while heavily targeting Muslim applicants. \textsuperscript{57} Citizenship tests were federally-standardized and implemented in September 2008. \textsuperscript{58}

\section*{Greece}

In a country that does not have permanent residence or avenues for naturalization for any group other than spouses and descendents (non-Greek citizens of Greek origin) of Greek citizens,\textsuperscript{59} civic integration requirements are not a major feature in Greece’s immigration policy framework. The only integration requirement for citizenship is that an applicant demonstrates “Greek national consciousness,” which is measured in terms of common language, religion and traditions.\textsuperscript{60} For children of Greek descenents, this subjective requirement is fulfilled by proof of lineage. For a naturalizing applicant, in other words, spouses of Greek citizens, an officer interviews them at a basic level of Greek where they file their applicant (e.g., consulate abroad, in Greece).\textsuperscript{61} Naturalizing applicants are then called in to take an oath.

\textsuperscript{58} “Germany to Introduce Controversial New Citizenship Test,” in \textit{Spiegel Online} (English), 11 June 2008. Available at http://www.spiegel.de/international/germany/0,1518,559021,00.html.
\textsuperscript{59} Instead of legal channels for establishing permanent residence, policymakers regularly conduct regularization programs where they extend one-year, renewable residence permits to migrant workers. \textsuperscript{\textsuperscript{60}} Dimitris Christopoulos, “Greece,” in \textit{Acquisition and Loss of Nationality, Vol 2: Country Analyses}, edited by Rainer Bauböck, Eva Erbsöll, Kees Groenendijk and Harald Waldrauch (Amsterdam: Amsterdam University Press, 2006), p. 254.
\textsuperscript{61} Sophia Chryssanthacopoulou, Embassy of Greece, Washington, DC. Interview with author. 8 May 2008.
There is a loophole, however, to obtaining long-term residence status in Greece. Under the EU Council Directive 2003/109/EC, a third country national can obtain a Long-Term Residency card in any European country (except the United Kingdom, Ireland, and Denmark), to receive rights nearly equal to those of EU citizens (like welfare rights, social assistance, and education). For this, an applicant must be legally living and working in Greece for five years. They must sit an integration test after attending Greek language classes (175 hours) if they do not have an educational equivalent, and the cost of an EU-long term residence status is 900 euros. However, there is an important distinction between European and national residence. These requirements enable long-term residence in Greece through European rules, not national recognition of long-term residence.

**Ireland**

Ireland still has one of the most liberal citizenship policies in terms of access in Europe, even when you take into account the results of the 2004 referendum where a

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64 While MIPEX includes these requirements in their coding of conditions for settlement, they do not reflect national policy (where there is no category for permanent residence). Therefore, I do not include them in CIVIX, which looks explicitly at national policy.
majority of the Irish population (almost 80%) voted to remove the automatic right to citizenship by birth from the constitution. The only evidence of integration or civic commitment required for Irish citizenship is an oath. Adopted in 1956, applicants for citizenship must “make a declaration of fidelity to the national and loyalty to the State.” Since citizenship is declaratory in Ireland, the oath is an important aspect of naturalization.

However, since the opening of the Irish labor market to A-8 Accession countries in 2004, immigrants and diversity has become a visible feature in everyday life, from schools to the work place. Politics are only beginning to catch up to this reality. In May 2008, Integration Minister Conor Lenihan announced new integration proposals that would make proficiency in spoken English a requirement for permanent residency and citizenship. This new measure is in response to claims that the Government was “doing nothing to prevent ‘ghettoization’” and to “deal with the estimated 420,000 non-Irish born people living [in Ireland] who make up about 10% of the population.” The more immigration becomes a fixture of Irish society, the more foreseeable it is that policymakers adopt civic requirements.

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67 For a diverse treatment, see Bryan Fanning, ed. *Immigration and Social Change in the Republic of Ireland* (Manchester: Manchester University Press, 2007).
Italy

Like other Southern European countries, Italy has resisted the “trend” of civic integration requirements for entry, settlement, or citizenship. This is not very surprising, because only recently has Italy transformed from an historical “sending” country of migration to a net “receiver” of migration. Citizenship policies are still largely oriented toward re-acquisition by co-ethnics abroad. Given the targeting of filial members, there are no integration requirements for citizenship, much less settlement. Descendents need to show proof of Italian lineage (like a grandparent’s birth certificate). There is no language requirement for either co-ethnics or resident applicants. And there is a simple, oath-taking ceremony to finish the citizenship process.

Therefore, resources dedicated to the integration of immigrants have related predominately to employment. This is evident in the first legislative emphasis on integration – Law 40/1998, which identifies integration in the form of “guaranteeing and supporting immigrants looking for a job” (article 21), as one of three main pillars to comprehensive immigration reform. As Jonathan Chaloff describes, “The broad assumption underlying the legislation is that labor market integration – employment – is a

necessary and sufficient condition to guarantee social integration, when coupled with
parity of right of access to public services.”

While citizenship policies and an economic approach toward migrants have
managed to prevent a real social penetration of immigration on Italian political and social
space, the tide is beginning to shift. On one end of the spectrum, far right populist parties,
like the Lega Nord, have politicized the exclusion of immigrants to their electoral
benefit. On the other end, it became apparent through the volume of immigration, and
the increasing demands of economic competition, that a “new administrative and cultural
framework, especially in urban areas, was necessary to deal with the foreign presence.”
In 2005, the government released a National Action Plan on Social Inclusion (Piano di
azione nazionale contro la povertà e l’esclusione sociale), noting that the “growth of the
non-EU population makes it ever more important to rethink social integration policies,
also in light of numerous demands made by [European] Community legislation.” This
plan includes several strategies to promote integration of immigrants, including access to

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71 For example, the right-wing Northern League Party got a measure passed in the lower house of parliament that would require foreign children to pass a special test before being admitted into schools. See “Italy Proposes Immigrant Classes,” BBC News, 15 October 2008.
72 Veikou and Triandafyllidou, Immigration Policy and Its Implementation in Italy, p. 4.
73 Jonathan Chaloff, “Italy,” in Niessen et. al., p. 7.
rights, health care, vocational training, and fighting exploitation, trafficking and illegal migration.\textsuperscript{74}

\textbf{Luxembourg}

Being a trilingual nation, sandwiched between France, Germany, and Belgium, minority language policy is an important national issue. In 1984, Luxembourgish was officially recognized as “the langue nationale (national language)…[designating] French as the acting langue de la legislation (legislative language)…[and] German, French and Luxembourgish are all langues administratives et judiciaires (administrative and judicial languages).”\textsuperscript{75} When this recognition took place, language was not yet an explicit requirement for citizenship. The 1968 citizenship law retained a clause from 1940 that stipulated “naturalization will be refused to the foreigner [….] if he [sic] does not demonstrate sufficient assimilation,\textsuperscript{76} but the connection between assimilation and language proficiency was not made explicit until the Luxembourg Nationality Law (\textit{Loi sur la Nationalité Luxembourgeoise}, or LNL) of 2001.

The Nationality Law of 2001, reminiscent of Germany’s citizenship law in 2000, simultaneously liberalizes citizenship access (lowering the residency requirement from ten to five years) while raising the barriers or conditions of naturalization, primarily


through language requirements. “The law refuses naturalization or option if the applicant
does not show proof of ‘sufficient integration, particularly if he or she cannot prove to
have sufficiently active and passive knowledge of one of the languages stated in the law
of 24 February 1984 [French, Germany, Luxembourgish] and a basic knowledge
supported by certificates of the Luxembourgish language.”  

There are two important changes here: (1) the word “assimilation” is replaced by
“integration,” and, more consequential for applicants, (2) applicants are required to
demonstrate a basic level of Luxembourgish, regardless of their proficiency in French
and/or German. Changing the language of the law to emphasize integration instead of
assimilation is a largely symbolic move, in step with an emphasis of social cohesion.
However, the use of Luxembourgish language proficiency is populist. Described as
“nationalist restrictiveness” and the “battle horse” of the newly elected Conservative
party (Social-Christian Party, CSV), policymakers could simultaneously position
Luxembourgish “as a resource that enables successful ‘integration’ while “embed[ing]
cultural criteria in the discourse without being obvious about it.” The language
requirement, which migrants do not have everyday access to because it is not prominent
in the business or economy of the Grand Dutchy, is an “effective and subtle

77 Loi sur la Nationalité Luxembourgeoise (LNL, 24 July 2001), Art.7.4º; 22.3º, cited in Françoise Moyse,
Pierre Brasseur, and Denis Scuto, “Luxembourg,” in Acquisition and Loss of Nationality, Vol 2: Country
Analyses, edited by Rainer Bauböck, Eva Ersbøll, Kees Groenendijk and Harald Waldrauch (Amsterdam:
threshold…to reduce access to the Luxembourgish nationality and to prevent immigrants having recourse to public services.”

A new law on nationality, submitted to Parliament on October 13, 2006, not only reverses a previous liberalization of residency (by raising the requirement from five to seven years) but also formalizes the testing of Luxembourgish (not French or German) through an oral language exam at the A2 level. In addition, applicants will be required to complete a “civic instruction” course. Foreigners who wish to learn Luxembourgish will be entitled to 200 hours of class, compensated by the State.

The Netherlands

The Dutch are credited with the first civic integration program in Europe. Since the 1998 Civic Integration of Newcomers Act (Wet Inburgering Nieuwkomers, or WIN), an applicant has had to demonstrate that they are sufficiently integrated into Dutch society. This has gotten progressively more difficult over time.

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81 Active knowledge of French or German is defined in the new law at the B1 level according to the Common Framework. Email Correspondence with Kristine Horner, 9 May 2008. On file with author.
Integration and language have historically been requirements for naturalization; the 1985 Nationality Act only codified a long-existing requirement that applicants should have “a reasonable knowledge of the Dutch language” and “be assimilated into Dutch society.”\textsuperscript{85} In practice, however, only a language test was used to judge the sufficient integration, and was not assessed uniformly in all municipalities.\textsuperscript{86} The WIN is the first step in making explicit, definable standards for evaluating integration. These include 600 hours of Dutch language classes and courses on “social orientation” and vocational training, financed by the government and municipalities.\textsuperscript{87} At the completion of this integration course, a participant takes a language test. Van Oers marks this language test as the first iteration of the eventual Dutch citizenship exam: “even though the test was meant as a mere measurement of the level of Dutch language that had been attained, the first step in presenting formalised integration tests to immigrants had been taken.”\textsuperscript{88} But in this initial iteration, the “coercive side was still subordinate to the service aspect.”\textsuperscript{89}

As early as 2000, it became clear that a majority of parliament was in favor of stricter integration requirements. The new Dutch Nationality Act, passed in 2000 and put into force in 2003, adds a citizenship test to expand on the existing language exam and

\textsuperscript{86} Van Oers, De Hart and Groenendijk, “Netherlands,” in Bauböck et. al., p. 413.
\textsuperscript{87} ICMPD, Integration Agreements and Voluntary Measures, p.32.
\textsuperscript{89} Joppke, “Transformation of Immigrant Integration,” p. 249
integration course requirement. The naturalization exam consists of two parts: a societal knowledge test and a language test assessing the applicant’s ability to read, write, understand, and speak the Dutch language.\textsuperscript{90} The country knowledge portion requires a passing score of 28/40 and is written at the A2 level. A person who can prove they have a sufficient knowledge of Dutch language can gain exemption from the exam.\textsuperscript{91}

With the addition of this citizenship test to the civic integration program, Dutch citizenship was transformed from a tool for improving an immigrant’s legal and social integration to the crown or “first prize” of a completed integration process.\textsuperscript{92} In March 2005, the government approved the Civic Integration Abroad Act to strengthen civic integration by fostering “pre-arrival integration” or “integration of immigrants from abroad.”\textsuperscript{93} Submitted by the famous hardliner, Integration Minister Rita Verdonk, the new law obliges migrants, specifically family members of Dutch nationals and religious leaders, to participate in an integration test at their point of origin. In addition to deterritorializing the linguistic and civic orientation test, the civic requirements were also “retroactively” applied to settled immigrants who have been legally residing in the Netherlands since 1998, a population estimated at 450,000.\textsuperscript{94}

\textsuperscript{90} Van Oers, De Hart and Groenendijk, “Netherlands,” in Bauböck et. al., p. 414.
\textsuperscript{91} Van Oers, “Justifying Citizenship Tests in the Netherlands and the UK,” p. 22.
\textsuperscript{92} Van Oers, De Hart and Groenendijk, “Netherlands,” in Bauböck et. al., p. 403
\textsuperscript{93} Carrera, “Typology of Different Integration Programmes in the EU,” p. 5.
“Civic Integration from abroad” introduces two new exams to supersede the naturalization exam: (1) an integration exam administered in the Netherlands that must be taken by foreign residents and select, previously-settled migrants; and, (2) an immigration exam that would-be family migrants must take to join family members in the Netherlands. The integration (or settlement) exam has a different format to the citizenship test. However, “the level of difficulty has not changed and the fees have remained about the same.” It is composed of a central component, testing Dutch language competence (up to A2 proficiency) and country knowledge, and a practice component, where an applicant presents a portfolio consisting of “evidence of 30 situations that an individual has experienced in practice, such as registering a birth or a discussion with a teacher at a child's school.”

The Immigration Exam is a condition for admission for family unification and a migrant obtaining an authorization for temporary stay. This first barrier from abroad is a little different than the integration exam, consisting of a language test (at the A1 level) and questions on Dutch society. If a migrant successfully completes the abroad exam, they still need to complete the integration requirements, including the integration test and other conditions, like five years residence. Foreigners from “Western” countries are exempt from this test, including the EU and EEA states, Australia, Canada, and the

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96 IND website.
Human Rights Watch has criticized Dutch policy on this exemption, decrying it as an unjustified device of discrimination.  

The individual incurs all the costs of these tests. The state initially provided tuition for the integration and language program, but it has since shifted to the migrant’s responsibility. If the course and test are not completed within a certain time period (i.e., three years for immigrants who took the abroad exam; five years who did not) sanctions include a financial penalty or refusal of settlement. Van Oers estimates that the average fee for the integration course is €4038, and if an applicant completes the course and passes the exam within the required time the government will reimburse up to 70% of this cost. Finally, a compulsory citizenship ceremony takes place on August 24th (National Naturalization Day) every year.

The effects of this incremental “thickening” of Dutch integration requirements for entry, settlement, and citizenship have been profound. First, the introduction of the Integration from Abroad test has “resulted in a significant reduction in the number of applicants … for the purposes of family formation and reunification. This effect was
anticipated by the government.” In addition to limiting immigration from abroad, it has signified a decisive departure from prior accommodative practices.

**Portugal**

Integration has emerged as an important if practical issue, given that the country’s labor market is “continually filled with new irregular workers, regardless of the [restrictive] policy of the day.” This includes strategies for achieving successful participation in the labor market, as well as access to housing and education. With the formation of the High Commissariat for Immigration and Ethnic Minorities (ACIME) in 2002, policymakers identify “the promotion of the knowledge and acceptance of the Portuguese language, laws, and also of the cultural and moral values of the Portuguese Nation as conditions for a complete integration,” while respecting the immigrants’ cultural identity.

However, this emphasis on integration for legal newcomers has not translated into an obligatory integration program or civic requirements for naturalization. For naturalization, applicants need to proof of (basic) knowledge of the Portuguese language as well as a vague “proof of integration in the national community.” Applicants who

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apply for naturalization through marriage only need proof of integration. Proving a “true link to the national community” can be achieved through documentary evidence or testimony. Finally, language requirements are exempt for descendants of Portuguese citizens.

Changes in 2005 to the 1994 Nationality Act did not alter these requirements, missing an opportunity to promote civic integration alongside other European countries. Policy has been criticized for still overlooking the inclusion of second-generation immigrants (who have been largely shut out because of “soft jus sanguinis”) and the integration of first-generation migrants. There are programs for integration, like the Institute of Employment and Professional Training’s (IEFP) voluntary language training course called Portugal Hosts, but “the debate around the compulsory character (or not), the meaning and the contents of integration programmes currently debated in Northern European countries is absent in Portugal.”

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109 Baganha and de Sousa, “Portugal,” in Bauböck et. al., p. 442.
111 Fonseca, Malheiros, and Silva, “Portugal,” in Niessen, et. al., p. 18.
112 Fonseca, Malheiros, and Silva, “Portugal,” in Niessen, et. al., p. 18.
Spain

Like other European nation-states, Spain has had a general integration requirement as a condition for naturalization long before it became a country of immigration. This has traditionally included an “oath of loyalty to the King and obedience to the Constitution and laws… proof of good civic conduct, and sufficient integration into Spanish society.”\textsuperscript{113} Also consistent with other countries, the law does not specify what “sufficient social integration into Spanish society” means,\textsuperscript{114} or identify the mechanisms used to measure integration levels.

Alberta Serra et. al. suggest that a focus on integration has been sidelined, unlike in Northern Europe, because the “Spanish government has focused almost exclusively on the control and management of migration flows… [As a result], the debate is often narrow: Integration has largely been seen as a need to obtain ‘papers’ - regularizing the legal status of irregular immigrants and granting access to welfare.”\textsuperscript{115}

While civic integration is not a priority, immigrant integration is quickly moving up on the agenda. Like Belgium, “autonomous communities (e.g., Cataluña, Madrid, Andalucia) hold main competence for social integration of immigrants.”\textsuperscript{116} The

\begin{footnotesize}
\begin{itemize}
\item \textsuperscript{114} Rubio Marín, “Spain,” in Bauböck et. al, p. 499.
\item \textsuperscript{115} Albert Serra, Pau Mas, Alicia Xalabarder and Gemma Pinyol, “Spain,” in Jan Niessen, Yongmi Schibel, and Cressida Thompson, eds., \textit{Current Immigration Debates in Europe: A Publication of the European Migration Dialogue}. (Brussels: Migration Policy Group, 2005), p. 15.
\item \textsuperscript{116} Carrera, “Typology of Different Integration Programmes in the EU,” p. 3.
\end{itemize}
\end{footnotesize}
government has created a 120 million euro fund, for municipal governments to use in “implement[ing] immigrant reception policies,” but municipal governments can use this money as they choose. As a result of this dispersed and uncoordinated approach, immigrant reception programs and immigrant integration is generally weak.

Spain issued its first “Strategic Plan for Citizenship and Integration” (Plan Estratégico de Ciudadanía e Integración) in 2007 aimed at “strengthening social cohesion through the promotion of public policies based on equal rights and duties.” While these programs have not mandated consequential requirements for citizenship, they do include access to education, fighting discrimination, combating illegal hiring, and “providing immigrants with the tools necessary to achieve a sufficient degree of autonomy to access goods and services, exercise rights, and fulfill duties on an equal footing with regard to the indigenous population.”

Sweden

There are no integration requirements for obtaining Swedish citizenship by naturalization, with the exception of a special citizenship ceremonies performed in

117 Albert Serra et. al., “Spain,” in Niessen, et. al., p. 17.
120 See the Swedish Migration Board website for a full list of requirements. Available at http://www.migrationsverket.se/english.html (accessed 4 June 2008).
limited municipalities.\textsuperscript{121} Therefore, integration requirements in Sweden might be the most exemplary use of integration programs to assist in the accommodation of immigrants through incentives, not sanctions. The target of language courses and work-oriented, introductory programs are refugees, though “in theory introductory programs are open to all.”\textsuperscript{122} While integration programs are generally non-obligatory, it is only compulsory for non-Swedish social benefit recipients.\textsuperscript{123} Through this policy, Michaelowski describes the Swedish approach as “oriented toward equal rights and equal treatment…that the policy is not only addressed to newcomers but that it includes immigrants who are not recent immigrants but who nevertheless require support to achieve self-support.”\textsuperscript{124}

Integration programs are based on individual assessments of a migrant’s needs and skills. Migrants then attend individualized introduction programs and approximately 525 hours of language class, whereupon completion they “shall have knowledge of Swedish conditions, as well as general proficiency in Swedish and specific linguistic knowledge related to his/her area of competence.”\textsuperscript{125} Local authorities are responsible for this running the integration program, and the state covers the costs.

\textsuperscript{123} Michalowski, An Overview on Introduction Programmes for Immigrants, p. 36.
\textsuperscript{124} Michalowski, An Overview on Introduction Programmes for Immigrants, p. 36.
\textsuperscript{125} Michalowski, An Overview on Introduction Programmes for Immigrants, p. 37.
However, the Swedish Integration Board in charge of monitoring the implementation of this integration policy at the local level has been closed since 2007.\textsuperscript{126} The government decided that the Board should be “mainstreamed and carried out by other authorities within fields, such as labour market and education.”\textsuperscript{127} Aside from an attempt by the government to encourage its municipalities to hold more citizenship ceremonies for new citizens,\textsuperscript{128} there is no sign of significant changes in civic integration policy. The government recently commissioned a “special committee on globalisation and its effects, to consider the issue [of integration]….\textsuperscript{[but]}, there is no politically significant discussion on other changes concerning the acquisition/granting of Swedish citizenship.\textsuperscript{129}

\begin{flushleft}
\textsuperscript{126} The website for the Swedish Integration Board (www.integrationsverket.se) is now defunct. \\
\textsuperscript{127} European Migration Network, \textit{Annual Policy Report 2006} (Brussels: EMN, 2007), p. 28 \\
\textsuperscript{129} European Migration Network, \textit{Annual Policy Report 2006}, p. 29
\end{flushleft}
Appendix B: The Citizenship Policy Index

For the reader’s benefit, I have included the coding criteria for the Citizenship Policy Index.¹ These measures serve as the x-axis for the citizenship typology in Figure 2.3, labeled as “CPI today.” Thank you to Marc Howard for this data.

Table B.1 reflects the cumulative scores along the three main components of citizenship policy: (1) the granting of *jus soli* for second-generation migrants (at or after birth); (2) naturalization requirements (residency, integration requirements), and (3) dual citizenship. Table B.2 is a more detailed view of naturalization requirements that reflect how and where civic integration requirements are factored in to CPI scores. Countries have total naturalization scores reduced by either 0.25 or 0.5, depending on the degree of difficulty.

¹ Table B.1 and B.2 are from Howard’s forthcoming book *The Politics of Citizenship in Europe* (Cambridge: Cambridge University Press).
Table B.1: The Three Main Components of Citizenship Policies Today

<table>
<thead>
<tr>
<th>Country</th>
<th>Jus Soli (0-2)</th>
<th>Naturalization Requirements (0-2)</th>
<th>Dual Citizenship for Immigrants (0-2)</th>
<th>CPI SCORE (0-6)</th>
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<td>0.00</td>
<td>0.00</td>
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<td>1.00</td>
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<td>1.25</td>
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Table B.2: Naturalization Requirements Today

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<th>Country</th>
<th>Immigrant Residence¹</th>
<th>Civic Integration Requirement (immigrants)</th>
<th>Spousal Residence²</th>
<th>Civic Integration Requirement (spouses)</th>
<th>Average Naturalization Score (0-2)</th>
<th>Average Naturalization Rate³ (in percent)</th>
<th>Naturalization “Correction”⁴</th>
<th>FINAL NATURALIZATION SCORE (0-2)</th>
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<td>-0.5</td>
<td>2</td>
<td>-0.5</td>
<td>1.22</td>
<td>4.20</td>
<td></td>
<td>1.22</td>
</tr>
</tbody>
</table>

¹ For immigrants, minimum residence requirements of 3 years yields a score of 2; 4 years = 1.71; 5 years = 1.43; 6 years = 1.14; 7 years = .86; 8 years = .57; 9 years = .29; 10 years or more = 0.
² For spouses, 3 years or fewer = 2 points; 4 years = 1.5; 5 years = 1; 6 years = 0.5; 7 years or more = 0.
³ Based on an average of the available 2000-2005 figures, mainly from Eurostat data.
⁴ If the naturalization rate was less than .25, the final naturalization score was reduced by 1 point; if the rate was between .25 and .75, the score was reduced by .75 pts; rates between .75 and 1.5 reduced scores by .50 points; and rates of 1.5 to 2.5 brought down the final naturalization scores by .25 pts. Note also that if the “correction” leads to a negative final score, it was changed to 0.
⁵ Portugal was only reduced by .50 (rather than .75) since the 2006 law has yet to have an impact on the naturalization rates considered here.
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Interviews

Given the tradition of anonymity among the British civil service, many interviewees must go unnamed. However, the following list represents those interviewees in the UK who were willing to go on record, both in and out of government.

David Anderson, Cohesion and Faiths, Department for Communities and Local Government (DCLG)
David Blunkett, former Home Secretary
Sir Bernard Crick, Chair, Life in the UK Advisory Group, Advisory Board for Naturalization and Integration board (ABNI)
Mike Gallagher, Managed Migration Strategy and Review, Home Office
Chris Hedges, Social Policy Unit, Home Office
Adeela Jaiswal, caseworker, Brent Council
Nick Johnson, Commission for Racial Equality (CRE)
Dina Kiwan, Secretariat, ABNI
June Mason, Cohesion and Faiths, DCLG
Martin Norfield, Department for Education and Skills
Beryl Randall, Employability Forum
Mark Rimmer, Director, Brent Council
Will Somerville, CRE
Sarah Spencer, Deputy Director of CRE
Helen Sunderland, Head of ESOL Division, LLU+
Chris Taylor, NIACE
Adele Townsend, Immigration and Nationality Directorate, Home Office
Patrick Wintour, Employability Forum, ABNI