

*Immigrant Incorporation in Western Democracies*¹

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How much variation is there in immigrant incorporation policies and practices across the Western democracies? Concluding that the effort to capture variation in typologies of incorporation schemes is likely to prove both futile and misleading, I propose a radically dis-aggregated perspective that conceives of incorporation as the product of the intersection of migrant aspirations and strategies with regulatory frameworks in four domains – state, market, welfare, and culture. Because some but not all of the regulatory institutions in these domains were created with immigrant incorporation in mind, national incorporation frameworks are not fully cohesive, are constantly changing, and at best can be described as belonging to a handful of loosely connected syndromes.

The Western democracies exhibit strong tendencies to accept the permanent presence of ethnically and religiously diverse immigrants and their descendants and are groping toward mutually agreeable modes of accommodation. This represents a surprising turn of events, especially for those Western European countries that resisted coming to terms with permanent settlement that was transforming them into multiethnic societies. Efforts at accommodation have run the gamut from apparent willingness to see immigrant minorities permanently excluded from full membership in the host society, insistence on more or less complete assimilation into a presumed national cultural norm, to more or less enthusiastic capitulation to multiculturalism. None of these impulses appears to be sustainable, and there is now a clear trend toward a middling form of incorporation – call it integration – that rejects permanent exclusion but neither demands assimilation nor embraces formal multiculturalism.

The emerging pattern of convergence on broad goals among the democracies implies but does not ensure common incorporation outcomes. For one thing, the immigrant populations in various countries differ significantly along national origin, religion, and other dimensions. More pertinent for my

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purposes, states still vary markedly in the policies, programs, and institutions that shape incorporation outcomes. No state possesses a truly coherent incorporation regime. Instead, one finds ramshackle, multifaceted, loosely connected sets of regulatory rules, institutions, and practices in various domains of society that together make up the frameworks within which migrants and natives work out their differences. Divergent outcomes are likely if some of these institutional patterns are more effective, influential, or durable than others.

The partly deliberate, partly accidental character of incorporation frameworks defeats efforts to identify national models or to construct abstract typologies of incorporation regimes. Although one may find idiosyncratic incorporation mechanisms in particular countries, these cannot be labeled national models because they do not represent self-conscious, deliberate choices so much as the unintended consequences of subsystem frameworks that are weakly, if at all, coordinated. Attempts to stipulate more general and abstract typologies of incorporation regimes that produce cells into which particular states may more or less easily fit oversimplify an extremely messy reality. Instead, I will argue, particular states possess a patchwork of multidimensional frameworks that hardly merit the appellation 'regime' or 'type.' Some elements of these frameworks are similar across states, some are not; some are consistent with stated government goals with respect to immigrant incorporation, others are not. The best we might hope for is that collectively some or all of these elements may fit together in what Engelen (2003) has called "syndromes" that may characterize clusters of countries.

Incorporation and cognate terms used to discuss it are unavoidably value-laden. They imply direction and intentionality, that immigrants should be incorporated into the societies to which they move, that this is a one-way process, and that the host society remains relatively unchanged if incorporation is successful (DeWind and Kasinitz, 1997; Schmitter Heisler, 2000). Post-1960s scholarship delegitimated assimilation as either a policy goal or analytical concept (Rumbaut, 1997; Zolberg, 1997:150), but there is growing concern this critique went too far. Alba and Nee (1997) have bravely called for the resurrection of the assimilation model, properly modified. Others detect evidence of a return to assimilationist policies in Western democracies (Brubaker, 2003). This contentious intellectual history demonstrates that discussions of incorporation are never neutral, and the line between description and prescription is exceptionally thin.

Work on incorporation often assumes an integrated and bounded host

society to which immigrants can or must adapt. Joppke and Morawska (2003) observe that integration “assumes a society composed of domestic individuals and groups (as the antipode to ‘immigrants’) which are integrated normatively by a consensus and organizationally by a state” (p. 3). Such a society does not exist in their view. A better way of thinking about modern society is as multiple autonomous and interdependent fields or systems, which engage actors only partially, never completely. Because politics and the state are only one such field or system, from this perspective the idea of integration, or of the immigrant who is to be integrated, “disappears” (p. 3). Rather, immigrants “are conceptually assimilated to other individuals and groupings with similar positions on some critical indices or indicators...” (p. 3). The nonintegrated immigrant also becomes an impossibility as all immigrants are necessarily integrated in certain fields or systems. If the ‘society’ into which migrants are incorporated is itself fragmented and de-centered, then the incorporation process must also be fragmented. The editors of a recent collection report, “Most of the authors in this volume start with the assumption that the economic, social, political and cultural processes of ‘incorporation’ are fundamentally interactive” (DeWind and Kasinitz, 1997:1098). Interactive, yes, but not necessarily highly correlated as part of a more cohesive process.

THINKING ABOUT INCORPORATION REGIMES

Numerous scholars have tried to identify national and crossnational patterns of incorporation regimes. One approach tries to build typologies from the ground up. Categories of states based on the mix of policies and practices they pursue vis à vis the integration of foreigners are analytically meaningful, this perspective suggests, even if the fit between category and state is often rough (Hammar, 1985; Hein, 1993; Hoskins, 1991; Reitz, 1998, 2003). Castles and Miller (2003:249–252) exploit an extensive review of policies across the democracies to identify three broad approaches to ethnic diversity: differential exclusion (Germany, Austria, and Switzerland), assimilation (France, Britain, and the Netherlands), and multiculturalism (the United States, Canada, Australia, and Sweden). Their scheme is problematic because some countries fit into more than one category, the classification of particular countries is open for debate and they are unable to place a few key cases, and no theoretical basis for establishing the criteria for inclusion is advanced. Nor do the authors provide a convincing account of the origins of the different approaches to the challenges posed by immigration.

A related approach focuses on national models, idioms, or traditions of citizenship and nationhood. The most influential effort of this sort is Brubaker's study of France and Germany (1992). Certainly Brubaker's methods were inductive, based, as they were, on close readings of the histories of his two cases. Nonetheless, his description of two models – the 'ethno-cultural' and the 'civic territorial' – provided a template for the study of additional countries and in this sense constituted an incorporation typology (*cf.* Favell, 1998a). Brubaker's path-breaking research convinced many readers that the preferences of states for particular modes of incorporation were not easily modified; indeed, they were deeply rooted in cultural and historical traditions highly resistant to change. Although he dealt more or less exclusively with immigration and citizenship law, his perspective implied that ethnocultural nations would differ from those with civic-territorial traditions across a range of policies and sociopolitical sectors. As Germany moves, albeit slowly, toward embracing immigration and liberalizing citizenship law and France convenes national commissions to think-through the meaning of French citizenship, the staying power of these national models looks more and more dubious.

A few typologies draw on more abstract concepts, although they are not usually derived deductively (Portes and Borocz, 1989; Portes and Rumbaut, 1990). They search for critical dimensions of incorporation alternatives and, by cross-referencing them, produce distinctive types of incorporation frameworks. According to Soysal (1994), "incorporation regime" refers to "the patterns of policy discourse and organization around which a system of incorporation is constructed" (p. 32). In her view, each European host country has a complex state system for the management of the membership of the native population that has been adapted and extended to deal with immigrants (pp. 3–4). This is an appealing framework because it recognizes that immigrants are mostly managed via institutions created for other purposes, but insists that the pertinent institutions are those concerned with the terms of membership. If correct, Soysal's approach implies a good deal more coherence within a given national approach and more divergence among them than I am postulating.

Koopmans and Statham (2000) wed Brubaker's ethnocultural and civic-territorial distinction to a conception of the cultural obligations of citizenship that can be based on cultural monism or pluralism. They drop the effort to stipulate types or regimes, opting instead for identifying a two-dimensional space bounded by ethnic assimilationism and ethnic segregation on one dimension and civic republicanism and civic pluralism on

the other. This model captures variations in stances towards the integration of minority groups. For my purposes, however, it places too great an emphasis on citizenship proper. Nonetheless, the stress on the institutional features of the opportunity structures in which migrants operate is well-considered (pp. 29–39; *cf.* Ireland, 1994).

Entzinger (2000) identifies three domains of integration policies: legal-political (state), cultural (nation), and socioeconomic (market). The first includes primarily citizenship rules, especially distinguishing between *jus sanguinis* and *jus soli*. The cultural dimension refers to whether a society expects assimilation or accepts the formation of ethnic minorities. Finally, socioeconomic variation is depicted as the difference in the market rights of temporary versus permanent immigrants. Within each domain, expectations may be directed at individuals or groups (pp.101–106), yielding a six-cell typology including equal rights or group rights, liberal pluralism or multiculturalism, and equal opportunity or equity. This model is consistent with the idea that an integrated host society is a fiction. It also focuses on “publicly stated objectives of integration policies, and the existing options for the implementation of these policies. . . .The basic assumption . . . is that integration is actively pursued at the level of policy-making, even though the actual outcome of the integration process may not always be a fuller integration” (p. 105). Entzinger places more emphasis than I would on official policy goals. Where they can be identified, researchers should ask whether goals are realized. My presumption is that explicit integration policies are typically absent in some domains.

A MULTISECTORAL FRAMEWORK

I present a multisectoral framework for understanding incorporation processes and outcomes in Western democracies that builds on the efforts of the scholars just reviewed and extends work I initially did with Ögelman (Freeman and Ögelman, 2000). Following Soysal, I focus on the terms by which membership is accessed not just in the political system, but across the various domains of society stressed by Entzinger. Following Entzinger and Favell (1998a), I concentrate on policies and regulations and the ideas that underlie them and that constitute the main elements of the political opportunity structures highlighted by Koopmans and Statham.

This approach is inspired by the new institutional economics that gives to institutions an independent role in shaping economic behavior by establishing and protecting rights, allocating privileges, and creating penalty

structures that encourage adherence to the rules (North, 1990). Incorporation is conceived as the result of the intersection of institutional incentive structures and the strategic decisions of migrants themselves. This article deals almost exclusively with incentive structures, the specification of which is logically prior to analyzing migrant strategic choices in specific contexts. Which of the multiple sets of institutions in societies are most likely to affect the incorporation process? I argue that the four key sets of regulatory institutions are the state, market, welfare, and cultural sectors. Generally, only the policies discussed under the state and cultural sectors are directed specifically at immigrants.

States

Hardly anything can be more important for the eventual status of immigrants than the legal circumstances of their first entry. As a result of proximity, salience, and directness, immigration and citizenship policies should be important sources of the incorporative experience of migrants. Immigration laws, observed or violated, necessarily precede and often constrain the migrant's interaction with market, welfare, and cultural regulations (*see* Hollifield, 2000, 1994; *see also* Castles, 1988; Zolberg, 1999). Among the aspects of a country's immigration policy that bear on incorporation are the methods and purposes in recruiting, accepting, and deterring immigrants, enforcement of immigration rules regarding illegal entry and unauthorized work, and rules regulating acquisition and rights of citizenship.

Castles and Miller (2003) argue that there is a strong but imperfect relation between a country's historical experience of immigration and the kinds of policies they develop towards migrants at home. The traditional countries of immigration (the United States, Canada, Australia) operate annual immigration quotas and support family reunion, permanent settlement, and ready acquisition of citizenship. Guestworker countries (Germany, Switzerland, Austria) have tried to prevent family reunion, were reluctant to grant secure residence status, and adopted restrictive naturalization rules. On the other hand, former colonial migrants to countries like France, the Netherlands, and Britain often enjoyed citizenship at entry and were generally allowed to bring in close family members, whereas immigrants from countries with no colonial ties were usually treated less favorably.

Immigrants of different legal origin are treated substantially differently. Permanent residence visas create a class of immigrants with rights and privileges distinct from those holding temporary work visas. Skilled migrants may

be better positioned than the unskilled to control the terms of their integration. Refugees selected from abroad enter under terms highly distinct from on-shore asylum seekers. Countries that go to the trouble of recruiting immigrants may presume that they would be able to get on by themselves and need fewer direct government services and guidance in the settlement process. Perhaps the most fundamental consideration is that some immigrants are wanted and others are not. As Joppke (1999) argues in the cases of Germany and Britain, migrants who are formally recruited may enjoy advantages because policymakers feel moral obligations to them that they lack toward the uninvited.

While differences in immigration programs across the liberal democracies are substantial, they appear to be declining. All are now countries of destination and have developed immigration control apparatuses and moved toward formalizing policies towards resident aliens. Forgoing the immigration halt of 25 years ago, they are now engaged in fierce competition for highly-skilled temporary workers. Within the European Union, considerable energy has been devoted to the harmonization of immigration and asylum policies, a key force behind convergence. The Amsterdam Treaty (1997) put immigration, asylum, and visa policy into the 'community' pillar and initiated a five-year period for giving the Commission exclusive right of initiative in these areas. In 1999, the Tampere Council mandated the development of a framework for a common asylum policy, and the Commission has issued communications on common policies on asylum and legal and illegal immigration (Commission, 2000a, b; 2001a, b). Despite all this effort, however, the Council has approved few of the Commission's proposals in the immigration area. The traditional countries of immigration, on the other hand, continue to promote substantial annual admissions for permanent settlement. Only Australia shows signs of going its own way on issues of family reunion and asylum policy, but has followed her peers in opening her doors to highly-skilled temporary entrants (Freeman, 1999; Freeman and Birrell, 2001).

Citizenship policy directly shapes the ability of migrants to acquire full legal and constitutional rights. The extension of many of the rights of citizens to denizens is a notable development in the liberal democracies (Soysal, 1994; Plascencia *et al.*, 2003). Nonetheless, in the ubiquitous locution of social science "citizenship still matters," as a growing comparative literature attests (Bauböck, 1994; Hansen, 2003; Hansen and Weil, 2000, 2001; Feldblum, 1998, 2000; Guiraudon, 1998; Feldblum and Klusmeyer, 1999).

How much variation is there across countries, and is it sufficient to contribute to distinctive national citizenship models? Is there a trend toward liberalization of naturalization requirements among the liberal democracies? Our ability to answer these questions is limited by the complexity of national citizenship regimes and the absence of readily comparable indicators, but a number of scholars have begun to tackle this problem (Bauböck and Çınar, 1994; Çınar, 1999). Çınar *et al.* (1999) develop indicators of seven dimensions of legal integration of noncitizens in eight European countries: security of residence, labor market access, family reunification, social security rights and welfare benefits, civil rights, political rights, and conditions of the acquisition and loss of citizenship. Money (2002) collected data on citizenship policies for 62–84 countries in the period from 1929 to 1954. She focuses on acquisition of citizenship for three categories: children, adults, and women. Between 1929 and 1954, rules for children remained relatively stable, access of adults to citizenship grew more difficult, but treatment of women became more equal to that of men. In other words, trends differ among the three dimensions of citizenship policy. Furthermore, the various dimensions of citizenship policy are only weakly correlated so that “we need to dis-aggregate the dimensions of citizenship into the component parts and move away from understanding citizenship as a dichotomous variable or an ordinal variable on a single scale” (p. 12).

Howard (2003) creates an index out of four components of citizenship laws in fifteen EU States – 1) *jus soli* or *jus sanguinis*; 2) difficulty of naturalization; 3) availability of dual nationality for naturalized immigrants; and 4) rates of naturalization. He finds considerable variation along all four dimensions and few differences in the index scores of countries in the 1980s and twenty years later. Arguing that “it is still too early to speak of a convergence process within the countries of the EU” (p. 22), he sees a pattern of durable divergence.

Hansen’s (1998) review of citizenship in EU member states provides a slightly different take on these questions. He concludes, “there is no clear direction to policy change in Europe, and that one can at most speak confidently of a liberal harmonization of naturalization in North-Western Europe” (p. 760). He places a good deal more stress, however, on another development – the fact that “with the exception of Austria, Luxembourg, and Greece, all second-generation migrants have a right to acquire citizenship either at birth or by the age of 21” (p. 760). Hansen also explores the effects of the creation of an EU citizenship (CEU). Considering the obstacles to extending CEU to third-country nationals, he concludes that their best

avenue for achieving a more liberal citizenship status is through national-level decisions to accept dual nationality that would remove one major obstacle to naturalization (p. 761).

These preliminary studies suggest significant residual variation across the Western democracies in the content of citizenship rules. Weak correlations among the various dimensions of these rules, and the clear need to disaggregate putative types into their components, imply that the identification of national models of citizenship policy may do violence to reality. The creation of a CEU does not appear to be leading to a common EU citizenship policy (citizenship and nationality remain intergovernmental prerogatives). Despite the absence of consistent patterns of liberalization, however, one prototypical case – Germany – has made decisive strides in opening up naturalization. There is general movement toward entitlement for the second-generation, and greater, if grudging, acceptance of dual nationality.

Market

Markets and the welfare sector form integral parts of national political economies. Migrant participation in labor markets and business and the characteristics of political economies that impinge on their success are central to incorporation. I argued above that immigration and citizenship formats were among the most pertinent characteristics of receiving societies from the point of view of immigrant incorporation. Nevertheless, research designs that pay attention to political economy may yield more results than those that proceed from case selection based on immigration experiences or cultural traditions. This would require the combination of the two research enterprises that have, to date, had little intercourse.

The identification of changing patterns of political economy in capitalist countries has preoccupied scholars in recent years. Hardly any of this work explicitly addresses the pertinence of these models for migrant fortunes (for a notable exception, *see* Engelen, 2003). Hall and Soskice (2001) do not broach the subject in their agenda-setting essay on varieties of capitalism, nor do any of the contributors to their volume. Nonetheless, it may be possible to build on their and other frameworks (Shonfield, 1965; Lehmbruch, 1984; Katzenstein, 1985; Piore and Sabel, 1984) to identify linkages between particular forms of political economy and the fate of migrants in markets and welfare systems.

Hall and Soskice focus on how firms coordinate their activities. In the liberal market economies (LMEs) that include such countries as the United

States, Britain, Australia, Canada, New Zealand, and Ireland, coordination takes place through competitive market arrangements. In the coordinated market economies (CMEs), such as Germany, Japan, Switzerland, the Netherlands, Belgium, Sweden, Norway, Denmark, Finland, and Austria, coordination is achieved through nonmarket relationships. They cannot classify six countries (France, Italy, Spain, Portugal, Greece, and Turkey). Rueda and Pontusson (2000), referring to CMEs as 'social market economies,' argue they are distinguished from LMEs to the extent that they have comprehensive, publicly-funded social welfare systems; regulations that standardize employment security, increasing costs for employers who shed labor and achieving greater parity of employment conditions across sectors and categories of labor; and institutionalization of collective bargaining and coordination of wage formation (pp. 364–365). There is a close but imperfect fit between CMEs and what Esping-Andersen (1990) calls social democratic and corporatist welfare states.

As Engelen (2003) has argued, these typologies suffer from "methodological nationalism" and probably overstate the degree of fit even for those countries that can be placed in one or the other category (for an alternative schema that admits intranational variations, *see* Whitley, 1992, 1999). These models may provide a starting point for seeking out linkages between structures of political economy and incorporation. They should be pertinent to answering such questions as 1) how effectively states and their firms adapt to changing labor market trajectories, especially to shifts in skill requirements, and how migrants figure into these plans; 2) whether migrants are primarily located in the formal or informal sectors; 3) whether they are protected by the same rules that protect national workers; 4) the extent to which migrants are self-employed and whether this represents entrepreneurial initiative or failure in the labor market; 5) how effectively states combat unauthorized work; and 6) how seriously states attempt to prevent ethnic and racial discrimination in the marketplace (on the latter, *see* Bleich, 2002; Chopin and Neissen, 2002; MacEwan, 1995).

CMEs, for example, can be expected to pursue stricter enforcement of labor market regulations and the development of ambitious and activist labor market policies. These, in turn, should reduce the likelihood of the development of dual labor markets and large informal sectors with significant immigrant participation. LMEs, on the other hand, would be expected to tolerate higher levels of illegal immigration, more unauthorized labor, and more pervasive business activity on the borders of legality.

There is no space to canvass the available evidence on these proposi-

tions. I have argued elsewhere that there is an observable but imperfect relationship between modes of political economy and the estimated size of informal economies (Freeman and Ögelman, 2000:119–120). Rath (2002) and his colleagues' study of the clothing industry in cities in France, Britain, the United States, and the Netherlands found that only Amsterdam belatedly took steps to repress sweatshops and illegal work, suggesting a link between corporatist institutions and efforts to combat informality.

Welfare

Social benefit programs affect the marginal utility of work for those who are eligible. For employers, on the other hand, they are a chief element of the cost of doing business while at the same time they may increase the productivity of active workers through training, education, and improved healthcare. Social benefits, the taxes that support them, and the regulations associated with them constitute a major incentive structure for the economic behavior of migrants, their employers, and those who formulate state immigration policies. One of the most striking peculiarities of contemporary migration to the rich democracies is that they are all welfare states, possessing social protection schemes that were absent during mass migrations at the turn of the century and that are absent in the Third World cities to which millions have migrated in recent decades.

What difference does the existence of welfare institutions and the incentive structures they produce make for migration and incorporation patterns? The welfare state, I argue, has been a force for the inclusion of migrants, providing surprisingly open access for them to participate in benefits programs. While this may be desirable from humanitarian and economic perspectives, it has, nonetheless, heightened tensions over welfare politics. Backlash fueled by perceptions of migrant welfare abuse threatens to erode both consensus over welfare provision and tolerance of continued mass immigration.

That most types of welfare state benefits have been made available to immigrants, regardless of their citizenship, is puzzling in a number of respects. The territorial character of the nation-state suggests that welfare systems would be closed to nonmembers. Persons who belong to other states are foreigners and, therefore, ineligible in theory to enjoy the benefits of membership (Ryner, 2003). Migrants receiving benefits, therefore, pose a threat to the logic of the welfare state (Halfmann, 2002:35; Freeman, 1986). Yet territoriality turns out to be a double-edged sword and becomes a mechanism by which migrants acquire welfare rights.

The constitutions and laws of the democracies typically accord protections to persons, not citizens, and even if citizenship is required, courts and administrators have stretched the terms of eligibility. Presence in the territory – residency and simple participation – have emerged as legally enforceable bases for claiming benefits. Welfare benefits have been distributed to denizens on terms not unlike those for citizens (Hammar, 1985, 1990). Welfare bureaucrats and independent courts foiled the plans of immigration policymakers to deny benefits to guestworkers in order to encourage return. Access to social protection schemes for workers, in turn, made family migration more feasible and, again, courts intervened to derail government efforts to prevent it.

Why bureaucrats and judges chose to interpret residence as implying rights is subject to debate. Inclusive social policies for migrants, as Joppke (1999) notes in the case of Germany, could be the correlate and compensation for an externally exclusive immigration policy (*cf.* Geddes, 2000b) as well as a morally-driven sense of obligation to workers who had been actively recruited. Guiraudon's close studies of Germany, the Netherlands, and France (1998, 2000) find evidence that popular opposition to welfare benefits for migrants was sidestepped in bureaucratic and judicial venues where there was a bias toward equal rights before the law and decisionmakers were insulated from public opinion and electoral pressures. Political rights, on the other hand, could only be extended through constitutional changes that required open debate and political support. Hence social rights were extended, *contra* Marshall, before political rights. This was not simply idealism or generosity on the part of bureaucrats and judges: "What transpires from policy documents in the three countries studied, however, is that equality in law is important because it replaces special services and is thus less costly" (2000:82–83).

If the territorial logic of the welfare state worked mostly in favor of immigrants, is it, nevertheless, eroding general support for the welfare state precisely because its guarantee of access to migrants is seen as illegitimate by sections of the national community? To answer these questions, one needs evidence on 1) rates of migrant welfare participation across the democracies; 2) public perceptions of these rates; and 3) the role of immigration in stimulating backlash against welfare programs. With respect to the first issue, the most comprehensive study is Brücker *et al.* (2002). Although their presentation is inconsistent (p. 122), they conclude that some generous welfare states do act as magnets attracting migrants, the existence of benefit programs distorts the composition of migrant streams, migrant dependency

on welfare is more extensive than their socioeconomic characteristics predict, and there are strong residual dependency effects in countries with generous programs (pp. 89–90; *cf.* Borjas, 2003; Reitz, 1998). Comparative data on the perception of electorates in Western states about the nexus between migrants and welfare usage is scarce. Brücker *et al.* (2002), reviewing Eurobarometer polls, conclude, “the claims that migrants are a burden on the welfare state and a threat to the labor market show up in the measured opinions” (p. 122). Fetzer (2000), on the other hand, fails to find statistically significant effects of worries over immigrant use of services and anti-immigrant attitudes in the United States, Germany, or France.

There is contention over the role of immigration in stimulating welfare backlash. Bommers and Geddes (2000) and Banting (2000) make spirited cases against the proposition. Banting concludes that only the liberal welfare states of the United States, Canada, and Switzerland display any ill effects of cultural, ethnic, and linguistic diversity and that the tension between ethnic heterogeneity and welfare state development is potential but not inevitable (p. 21). Banting admits, of course, that “incorporation is not uncontested,” and European countries show signs of welfare chauvinism in trying to deny foreigners entry into the country and to deny access to benefits. These efforts, he concludes, have not normally been successful and never decisive (p. 23; *cf.* Freeman, 2001).

The discussion to this point has dealt with national welfare state arrangements and the rules regulating immigrant participation in them. Ireland (1994; 2004) makes a strong case that it is necessary to get much closer to the terrain of local governments in different national settings in order to uncover the real impacts of welfare policies on immigrants (*cf.* Body-Gendrot and Martiniello, 2000; Garbaye, 2000). Guiraudon (2000), as noted above, argues that universalism was a policy designed to avoid expensive and contentious targeted programs for migrants. Nevertheless, such policies have proliferated and might be labeled as settlement programs. Bach (1992) shows that although the United States has few formal settlement programs there is a vast, quasi-public enterprise devoted to settling immigrants. Jupp (1992) contrasts this arrangement with the centrally-directed and highly interventionist settlement tradition in Australia (*cf.* Lanthier and Lukomskyj, 1994, on Canada and Australia).

In Europe, settlement policy has been deeply affected by the anticipation that many of the postwar migration flows would be temporary. It has taken some time for governments to grasp the nettle of deliberately intervening into the settlement and incorporation process. Soysal (1994) remains

one of the most useful comparisons of state policies in this regard. Ireland is the most detailed study, focusing on Germany, the Netherlands, and Belgium. Ireland's thesis is that restructuring of the welfare state through retrenchment, decentralization, and delegation to nonprofits has had a greater influence on the incorporation of immigrants and their families into European host societies than ethnic background, social class, high unemployment, or budget cuts (p. 5). These changes have "generally encouraged ethnic-based mobilization" (p. 7). Ireland attacks the broad typologies that scholars employ to describe national immigrant policies. In effect, countries, cities, groups, and even neighborhoods have distinctive "caring strategies" (p. 24) that emphasize either individuals or groups and are either inclusive or exclusive.

Culture

State policies that stipulate the conditions of cultural recognition and expression produce critical incentive structures for the retention or loss of immigrant cultural characteristics and can seek to protect or transform the cultures of the receiving societies. These matters are at the heart of many of the leading conflicts involving immigration in Western states. The depth of feeling can be seen in the explosion of writing by Western intellectual elites seeking agreement on what is normatively acceptable for host societies to ask in the way of cultural concessions by migrants and natives (Kymlicka and Norman, 2000). In addition, the practice of religion and the display of religious symbols, use of native languages, and treatment of women and children have all generated serious conflicts. Empirical studies of state policies toward cultural practice have focused on two broad topics: 1) the location of particular countries along a continuum that includes efforts at marginalization and exclusion, expectations of assimilation, and endorsement of official multiculturalism; and 2) the extent to which states direct their policies at migrants as individuals or as members of ethnic or national-origin groups.

The United States before 1965 is said to have pursued a particularly harsh form of assimilationism (Schmitter Heisler, 2000; Tichenor, 2002; King, 2000; Gerstle and Mollenkopf, 2001). The Germanic countries set themselves apart by their ethnonational bases of statehood (Brubaker, 1992; Joppke, 1999; Klopp, 2002; Schmitter Heisler, 2002). France is depicted as having a civic territorial conception of citizenship but a strongly assimilationist attitude toward cultural practices (Noiriel, 1996; Feldblum, 1999;

Hollifield, 1994). Canada, Australia, Sweden, and the Netherlands, on the other hand, have attracted a good deal of favorable comment from scholars impressed with their more enthusiastic embrace of official multiculturalism (Banting, 2000; Coulombe, 2000; Castles *et al.*, 1988; Hammar, 1999; Entzinger, 1994, 2003).

These patterns are not especially stable, however. There can be little doubt that hard-line assimilationism is both out of favor with commentators and losing ground in its few national redoubts. In recent years, the United States has moved sharply away from assimilation towards multiculturalism, but not always in a formal, state-sanctioned manner (de la Garza and DeSipio, 1992; Salins, 1997). France has made numerous practical concessions to multiculturalism despite its strong republican tradition (Schain, 1999; Feldblum, 1999). Germany has finally yielded to the weight of reality and admitted that it is a country of immigration and its citizenship reforms noted above depart significantly from assimilationist requirements (Brubaker, 2003; Hansen, 1998, 2003).

But a more recent and telling development could be in the making. Joppke and Morawska (2003:10) argue that the infatuation with official multiculturalism is on the wane. Noting that “*de facto* multiculturalism has become a pervasive reality in liberal, immigrant-receiving states,” they nonetheless claim that official multiculturalism, the deliberate and explicit recognition and protection of immigrants as distinct ethnic groups, is in decline, notably in Sweden (Hammar, 1999), the Netherlands (Entzinger, 1994, 2003), and Australia (Freeman and Birrell, 2001).

Broad trends at the national level both reflect and camouflage a myriad of small-scale, localized, and diverse outcomes below and ignore the impact of developments at supranational venues above (Lahav, 1998). Recent scholarship has begun to address both of these issues. An example of work on the big issues of immigrant integration through highly detailed, ethnographic research in specific locales is Ireland’s important book on Germany and the Low Countries. His painstaking review traces the interaction between large-scale structural changes in the welfare state and migrant trends as they are played on local terrain. At the supranational level, the European Union is playing a growing, if not decisive, role in shaping the social policy of member states towards immigrants. As one observer puts it (Geddes, 2000a, b), EU social policy is creating a “thin Europeanization” that entails a migrant inclusion agenda of free movement rights, transferable social entitlements, and anti-discrimination (Brochmann, 1996, 2002; Favell, 1998b; Favell and Geddes, 2000).

The central issue related to the integration of immigrants in Western Europe is Islam. One reason is sheer novelty. As Bernard Lewis (1994) puts it, the voluntary migration of large numbers of Muslims to non-Muslim countries has “no precedent in Islamic history, no previous discussion in Islamic legal literature A mass migration, a reverse *hijra* of ordinary people seeking a new life among the unbelievers, is an entirely new phenomenon . . .” (p. 14). This leaves both Muslims and their hosts unprepared as to which rules and practices will be acceptable. Exponents of extreme-right ideologies have declared the incompatibility between communities of devout Muslims and secular/Christian Western societies, while advocates of liberal multiculturalism have been loathe to admit that serious problems exist. Even without the current context of fears of terrorism and pressures to view Muslim inhabitants through the lens of security questions, working out a suitable *modus vivendi* between these different cultural communities will require great patience and ingenuity. Various national and local efforts to date should be viewed as tentative experiments the outcomes of which cannot be known for some time (Nonneman *et al.*, 1996; Lewis and Schnapper, 1994).

CONCLUSION

Social scientists engaging in comparative research must manage the tension between the impulse and call to generalize and to identify unifying trends and the equally compelling need to pay attention to specificity and idiosyncrasy. This article errs on the side of complexity at the expense of general propositions. Against the most ambitious attempts to develop general models of incorporation, it has argued that the idea of incorporation itself is problematic and that the insertion of migrants into the Western democracies takes place in a number of interrelated but distinct domains.

State regulations play a central role in each domain but only occasionally deal with migrants directly. Most countries have only a loosely integrated set of regulatory frameworks that do no more than create incentive (opportunity) structures for both migrants and natives. Taken together, these frameworks constitute the incorporation schemes of Western democracies. Rather than anticipating a small number of distinct ‘modes of immigrant incorporation’ that might characterize the policies of particular countries, we should expect different modes in particular domains – state, market, welfare, culture – within individual states; the overall outcome being a mixed bag not fully assimilationist, pluralist, or multicultural.

One might describe these as “syndromes” (Engelen, 2003) that involve less than perfectly cohesive approaches across the four domains. It is easier to specify the institutional framework in place in the market and welfare sectors than the others, largely because more comparative work is available upon which to build. Even so, as I have noted, reigning typologies of varieties of capitalism and welfare states accommodate some but not all Western nations. Making sense of immigration and citizenship policy is a more trying task. Most European states are relatively closed to immigration in the sense that they eschew the annual quota systems of the settler societies. Yet they either recruit or accept labor migration, especially but not exclusively high-skilled entrants. Repeated amnesties (Italy) and easy regularization (Spain) also muddy the waters. Cultural policies, where they exist, defy generalization. Except in Canada, Australia, the Netherlands, and Sweden, multiculturalism is less a choice than an unintended and often most unwelcome outcome.

With these reservations, it is possible to perceive the outlines of four syndromes pertinent to immigrant incorporation. One consists of open immigration and citizenship practices, liberal political economies and welfare states, and *laissez-faire* or formal multiculturalism (United States, Canada, and Australia). A second syndrome is exhibited by Sweden and the Netherlands and entails a moderately open immigration and citizenship regime, coordinated market economies, social democratic or corporatist welfare states, and formal settlement policies uneasily embracing multiculturalism. Third, there is a group of countries that are open to labor migration and have coordinated market economies and corporatist welfare systems. However, these same countries discourage access to citizenship and are reluctant to accept permanent settlement. They have at times resisted both multiculturalism and assimilation. The key examples are Germany, Austria, and Switzerland. Finally, a few countries have lacked until recently any formal immigration programs but have alternately condoned irregular migration or have recruited foreign labor. These states have had restrictive citizenship policies, liberal political economies and welfare states, and no policy on assimilation or multiculturalism, although they are perilously close to a *de facto* policy of differential exclusion (Spain, Portugal, and Greece).

The identification of these syndromes begs many questions and requires a number of highly contestable classificatory decisions. Except for the strong linkages between the market and welfare sectors, developments in one domain appear to be largely independent of those in others. Cultural policies seem especially autonomous. Immigration and citizenship frameworks have

changed a good deal since the mid-1970s, as have cultural policies. Market and welfare arrangements are more stable. As states gain more experience with different approaches, and as immigrant-origin populations become more settled and entrenched, incorporation practices may eventually display more coherence and order than is currently perceptible.

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