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The integration of immigrant communities in
France, the United Kingdom and the
Netherlands: National models in a European
context

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ABSTRACT

Though having known similar migration inflows for the past six decades, France, the Netherlands and the United Kingdom have adopted widely different models for the integration of their immigrant communities. France's assimilationist model contrasts sharply with the British and Dutch multiculturalism, and puts them at opposite poles of integration strategies. However, as demonstrated by the 7/7 bombing of the London underground, the 2005 riots in France and the murders of Pim Fortuyn and Theo van Gogh in the Netherlands, neither of these models seem to have prevented social exclusion of the adult second-generation born to the post-war migrants. This paper aims to compare and contrast the different integration models of these three countries, and to demonstrate that they are evolving towards a greater convergence against the background of an EU-wide focus on integration.

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Introduction¹

On 7 July 2005, four British-born young men of migrant descent bombed the London underground, causing the death of 56 people including themselves. In October of the same year, riots broke out in the suburbs of French cities, during which cars and public buildings were burnt by second-generation migrants. The four 7/7 bombers and most French rioters were previously unknown to the police. In the meantime, the Netherlands were still dealing with the consequences of the murders of populist leader Pim Fortuyn in 2002 and of filmmaker Theo van Gogh in 2004, assassinated for their anti-Islam expressions. In the past years, these three countries had to face the violent outcomes of ‘failed’ integration of immigrant communities.

The Netherlands, France and the United Kingdom are similar in a way. They are three old nation-states sharing a colonial past. They all received large influxes of colonial migrants after the Second World War, granting them the citizenship of their country. Yet, they adopted completely different responses to their integration. France’s assimilationist model contrasts sharply with the British and Dutch multiculturalism, and puts them at opposite poles of integration strategies. As demonstrated by recent events, neither of these models seem to have prevented social exclusion of the adult second-generation born to the post-war migrants.

This perceived crisis of traditional integration strategies occurs in the background of an increasing communitarisation. Since the 1999 Amsterdam treaty, the issue of immigration ceased to be the exclusive prerogative of the EU Member States. The EU’s desire to

¹ I would like to thank Maurice Fraser for his helpful guidance during the redaction of this text.

standardise these policies added a new dimension to national debates. The ‘soft law’ approach emphasises the importance of developing an EU integration framework, while EU legislation has been passed on the status of third-country nationals and on non-discrimination. At the level of the Member States, some recent pieces of legislation in France, Britain and the Netherlands reflect the desire to comply with the European legislation.

This essay aims to demonstrate that even if the integration models of these three countries are historically different, they are evolving towards a greater convergence, against the background of an EU-wide focus on integration. After a brief contextualisation of the topic, the first chapters analyse the three national models, starting with Britain, and proceeding with the Netherlands and France. This essay will focus thereafter on the European dimension of integration policies and examine whether an EU framework on integration is likely to be strengthened in the near future.

1. Contextualisation

This chapter will briefly contextualise how immigrant minorities were formed in Western Europe after the Second World War. This chapter will also briefly review the literature on the topic of integration and immigrant communities. It will then define the concept of integration, explaining the differences between the models of assimilation and multiculturalism, and distinguishing between socio-economic, cultural and political integration.

1.1. Immigration and the formation of ethnic minorities

According to Castles and Miller (2003), three main phases characterised post-war migration to Europe. This evolution was marked by changes in the demographic and economic needs of the receiving societies, and by a parallel shift in the origin and in the socio-economic profile of migrants.

The first phase started immediately after the Second World War, when immigration was used as a supply for the economic and demographic needs of the reconstruction. Many European countries started to recruit foreign workers through special agreements with sending countries, or adopted a *laissez-faire* immigration policy. For Britain, France and the Netherlands, migration was largely “postcolonial in nature” (Lahav 2004:29). Although these countries exerted different forms of imperialism, they all had to progressively change their colonial rule from domination to some sort of equal partnership between the ‘metropolis’ and the ‘overseas territories’. This implied that the colonial natives had rights of settlement and of citizenship in the metropolis. As a consequence, immigrants arrived from their colonies (New Commonwealth migrants in the United Kingdom, Indonesians and Surinamese in The Netherlands, and Maghreb in France) with the same nationality, and therefore the same

political rights, as other citizens². This system was originally designed to ensure colonial rule and not to favour the integration of colonial immigrants.

The economic and social crises of the early 1970s marked the beginning of a second phase. Most Western European countries underwent an economic recession, paralleled with a rise in unemployment. They realized that the continuation of a large-scale migration had become impossible and expected migrant workers to return home. Yet, by the 1980s, many migrant workers had become permanent residents, and immigration continued as family reunification. What was perceived as a temporary solution to economic shortages resulted in the formation of ethnic minorities. For France, the Netherlands and Britain, these minorities had been formed in the shadow of their colonial relationships; cultural and colonial ties, the presence of relatives and communication and transport links created immigration patterns that are still very influential today. From the 1980s onwards, the integration of ethnic minorities entered the political agenda of most Western European countries, especially with the coming of age of a second-generation. In parallel, many countries adopted ever-more tightened immigration control.

The third phase started with the 1990s. The end of the Cold War and the outbreak of the Yugoslav wars resulted in a sharp rise in asylum-seekers. This new wave of migration was soon to be perceived as a ‘flood’ and to receive negative reactions from the public opinion.

Since the beginning of the 21st century, there also seem to be a new shift in immigration policies. As Lahav explains, the Cold War ideology was supplanted by “new security issues”: ethnic conflict, drug and human smuggling, and more recently terrorism and Islamic fundamentalism, resulting in public opposition to immigration and migrants. Ironically, this hostility towards immigration inspired by security concerns is at odds with the perception of

² It must be pointed out that France and the Netherlands also welcomed a large proportion of immigrants on recruitment agreements with other countries.

new economic and demographic demand in immigrants, and therefore by the prospect of opening the doors to immigration in the next decade (Lahav, 2004:31).

1.2.Literature review and national models of integration

The primary source of this essay is the national legislation of France, the United Kingdom and the Netherlands on matters related to immigration and integration from the end of the Second World War. It also analyses recent European law from 1999, principally the European Directives 2000/43/EC, 2000/78/EC, 2003/86/EC and 2003/109/EC. Moreover, several arguments are drawn from recent Commission and Council communications, NGOs' statements and policy institutes' publications.

The academic literature has been divided on the topic of immigrant integration and reflects the wide variety of the national models. Indeed, each country considers differently which kinds of rights should be granted to which kind of groups, and according to which methods (Lahav 2004:3). Despite national variations, the literature distinguishes between three integration strategies for the integration of migrants: assimilation, multiculturalism and exclusion.

According to Boswell, the concept of assimilation is linked to a stronger conception of the meaning of being a citizen (2003:76). Assimilation involves the complete adaptation of the immigrants to the receiving society, so that they or their descendants would not be recognisable from the rest of the population (Castles, 2000:60). Assimilation usually requires the abandonment of one's previous identity. The French model is traditionally described as the best representative of assimilationism.

On the other hand, multiculturalism claims that minorities could be successfully integrated if the culture of each minority group is acknowledged as having equal value to the mainstream

one (Messina, Lahav 2006:405). Multiculturalism, therefore, allows for coexistence between cultures, religions and values. It requires a lower adaptation of immigrants to the receiving country. According to Boswell, the rationale behind multiculturalism could be twofold (2003:75): it could either be born out of a pragmatic calculation in countries where assimilation is considered as impossible or counterproductive, or it could be defended on the grounds of a commitment to cultural pluralism. Multiculturalism is usually associated with the Anglo-American model of the liberal pluralist state, “which values the individual freedom of its members, allows scope for a considerable degree of cultural diversity and embraces only a minimal concept of shared identity (...) between residents” (Boswell 2003:76). In Western Europe, the United Kingdom and the Netherlands are renowned for their multicultural approach to integration.

Finally, there is a third ‘exclusionist’ model, which will not concern our analysis. It is characterised by restrictive policies excluding immigrants from the political community, aimed at artificially maintaining a temporal character to immigration. Germany is a classic example of this model.

An increasing number of analysts, like Carrera, argue that these traditional models of integration no longer exist: they evolved along with post-national contemporary priorities (2006:2). Despite historically-rooted national differences, societal models and immigration patterns, many countries tend to turn away from their traditional policies on integration. This essay argues that France, the United Kingdom and the Netherlands, traditionally associated with a classical model, are moving towards a more nuanced approach to the question. On the one hand, France’s ideal of assimilation evolved over time, and the French concept of *assimilation* has been gradually replaced by *insertion* and then *intégration*. On the other hand, the Netherlands and the UK have started to abandon their multicultural ideal and have developed more assimilationist policies (Geddes 2003:5). With the new century, the

Netherlands swiftly moved away from multiculturalism towards a more coercive approach promoting language training and education, whilst at the same time the United Kingdom has begun to insist on the duty of migrants to adapt to British values.

1.3. The concept of integration

Integration could be defined as a “process of incorporating immigrants and ethnic minorities into the economy, society and political life of their host country” (Boswell 2003:75). There are three dimensions to integration: socio-economic, cultural and political integration.

Firstly, **economic and social integration** involves access to housing, welfare, education, employment and services. It is this aspect of integration that allows migrants to function in society on a day-to-day basis. It is also the dimension of integration with which Western European countries are the most concerned today.

Secondly, **cultural integration** is not easily definable, and is subject of interpretation and debates. It usually implies knowledge of the language and of the values of the host country. Cultural integration is not easily measurable; it would mean that one can define and measure what conformity to a national identity is. Assimilationist models, like in France, are less disposed to accommodate this aspect of integration.

Finally, **political and legal integration** is the most controversial aspect of integration, because it usually means granting political rights. These political rights involve the right to vote and to be elected, as well as other rights usually granted to citizens such as public employment rights. In most countries, political integration requires citizenship or naturalization, because citizenship implies some sort of exclusivity (Messina, Lahav 2006:403), and is often the key to access fundamental rights in a society. However, the gap

tends to narrow between the rights granted to citizens and to non-citizens. In some countries, a residence permit is sufficient; the Netherlands, for example, granted local voting rights to long-term residents. Political integration is often considered as the final stage of integration (Boswell 2003:75). Therefore, it is not rare that first-generation immigrants remain legally foreign for their entire life. Even though in countries where citizenship is based on *ius soli*, and therefore where second-generation immigrants born on the territory receive political rights at birth, instances of their failed integration prove that the extension of political rights alone is not the key to integration.

2. The United Kingdom

Britain's approach to immigration and integration has traditionally been associated with multiculturalism and has extensively focused on "race relations". Yet, since the 2001 attacks in New York, and more particularly since the 7/7 bombings of the London underground, Britain's approach has been evolving. Through a new emphasis on security, on the migrants' duty to integrate and on the values of the United Kingdom, the government is progressively moving away from its traditional encouragement of ethnic diversity.

2.1. The origins of British multiculturalism

Britain's approach to integration has traditionally been qualified as 'multicultural', although it never had a strong legal commitment to it. As Kymlicka explains, many forms of multicultural accommodation exist at various levels of the public institutions, but there has been a great reluctance to turn it into official public policy (Kymlicka 2003:203).

According to Boswell, Britain's tradition of multiculturalism could be partly explained by its specific history (2003:77). The United Kingdom is a constitutional monarchy uniting four different entities: England, Wales, Scotland and Ireland; the British nation has never been as homogeneous as other countries like France. Moreover, British society was also marked by its colonial past. At its height, the British Empire encompassed a quarter of the world's land surface and population. As a result, the number of migrants that post-war Britain received from its former colonies was relatively large and diverse. Boswell believes that Britain adopted a multicultural take on integration as an extension of its long history of its ethnic and cultural diversity (Boswell 2003:77).

Boswell also argues that a significant factor in shaping Britain's multiculturalism is its tradition as a liberal pluralist state, defined as a state which "embraces a philosophy of minimalist state intervention, individual freedom and limited expectations about the duties and shared characteristics of citizens" (2003:77), and which also puts low expectation on the migrants' duty to adapt.

2.2. 'Race relations' and immigration control

When the United Kingdom faced post-war waves of migration, it was primarily concerned about preventing conflicts between the British 'white' natives and 'black' (West-India, Africa) or 'Asian' (Indian sub-continent) immigrants. From the outset, the problem was defined as one of 'race'. Indeed, the British colonial conception of racial inequality, according to which inequalities in society are justified by a hierarchy of race (Jackson-Preece 2005:79), was perpetuated by popular attitudes after decolonisation, causing a widespread discrimination of 'black' and 'Asian' immigrants on racial grounds (Boswell 2003:78). The issue of 'race relations' rose to the top of the political agenda after 1958, when 'race riots'

occurred in Nottingham and in Notting Hill. It was translated into legislation by new laws against racial discrimination paired with a limitation of immigration from the New Commonwealth.

On the one hand, Race Relation Acts were implemented in order to combat racial discrimination and to implement institutions that would monitor compliance. The first Race Relation Act was introduced in 1965 and prohibited discrimination on the grounds of race, colour, nationality or ethnic or national origin. Yet, it was only limited to ‘places of public resort’. The law was extended in 1968 to cover education, housing, employment, training as well as the provision of goods, facilities and services. The main weakness of the 1965 and 1968 Acts, as Geddes argues, was “that they were centred on direct discrimination and that they relied on conciliation rather than legal redress” (2003:45). Therefore, the 1976 Race Relations Act introduced the concept of ‘indirect discrimination’, allowed for ‘positive action’ and created the Commission for Racial Equality. More recently, the Equality Act 2006 extended protection against discrimination in the provision of goods and services on the grounds of religion and belief. As Elizabeth Collet explains, the specificity of British multiculturalism and integration policies is that they “focus on ensuring that migrants are included in British society by promoting equal opportunities, rather than on emphasising their specific needs” (2007:14).

‘Race-relations’ and anti-discrimination mattered in Britain like in no other European countries, aligning the UK’s approach with the United States more than with the European continent. In that sense, Britain is often qualified as a ‘multiracial’ rather than ‘multicultural’ state. However, there is no evidence that well-defined racial categories exist in Britain or that analysing the society according to these categories could be meaningful (Geddes 2003:30).

On the other hand, legislation on anti-discrimination was coupled with a restriction of immigration from the New Commonwealth. Reforms of British nationality laws allowed for screening migrants defined as unwanted.

After the Second World War, colonial migrants arrived in the United Kingdom as British subjects, and afterwards as “Citizens of the United Kingdom and Colonies” (CUKC) under the 1948 British Nationality Act. The imperial nationality was based on formal equality among its members, at least in appearance. However, as Kathleen Paul points out, it was difficult for British natives to consider migrants of coloured skin as belonging to their community and each group of migrants was perceived as belonging to a different tier of ‘Britishness’. “Racialization created a fundamental contradiction between an inclusive legal nationality policy – the normal definition of who had the right to enter the country – and an exclusive constructed national identity – the informal notion of who really did or could belong” (Paul 1997:xii). The 1962 Commonwealth Immigrants Act was implemented in order to control colonial migration, and by 1972, only holders of work permits or peoples with a parental or grandparental connection with the UK could enter the country. In practice, this restriction resulted in a screening of migrants: the wanted migrants sharing blood ties with British natives were ‘white’, from the Old Commonwealth, and the unwanted ones had a coloured skin and were from the New Commonwealth (Joppke 2005:97). Eventually, the distinction between different tiers in British nationality was introduced by the British Nationality Act 1981, in which the term ‘British citizen’ was enshrined.

However, despite all immigration acts, the notion of British citizenship is still vague and contradictory (Paul 1997:170), while legislation on race relations did not suppress deep-seated discrimination. The 2006 European Network Against Racism (ENAR) Shadow Report for the United Kingdom points out that inequalities persist in many areas, especially education, housing, health, justice and employment. The report demonstrates that ‘black’ and minority

ethnic people are twice as likely to be unemployed as the 'white' population, twice as likely to live in substandard homes, and they tend to have poorer health than the average population. They are disproportionately stopped and searched by the police, and there are five times more 'black' prisoners than 'white' ones. Moreover, members of ethnic minorities tend to perform poorly in the educational system, which however could be rather linked to socio-economic disadvantage than to ethnicity (2006:10-21). On the political point of view, Geddes argues that the formal extension of rights has not been matched with their effective utilisation. There is still a very low number of representatives from ethnic minority origins (Geddes, 2003:47). Within political parties themselves, reactionary voices against ethnic diversity can be heard, mainly from the right and the far right. Even if the influence of the far-right remained moderate and completely insignificant compared to its French counterpart, the British National Front (NF) finished third in three parliamentary by-elections during the 1970s. The Conservative Party also reacted on several occasions, the most notorious one being Enoch Powell's 1968 "River of Blood" speech, which depicted the country as being wracked by violent conflict between ethnic groups. The fact that the British National Party (BNP) has won 33 seats in the 2006 local elections may also signify contemporary public unease with questions of ethnic diversity.

2.3. Shifting away from multiculturalism?

Nowadays, the multicultural model is being called into question by the British government. If multiculturalism allows for the cohabitation of different cultures, its potential danger is that it leads to secluded communities of migrants at the expense of a common national identity, and therefore may result in "ethnic solitudes" rather than in an "inclusive conversation which crosses ethnic and other divides" (Jackson-Preece, 2005:162). The lack of integration can lead

to strong resentment from ethnic minorities towards the mainstream society. 'Failed' integration was illustrated by the 2005 bombings of the London underground, perpetrated by British-born young men of migrant descent.

The shift in policy-making was triggered by the 2001 terrorist attacks in New York and intensified by the 7/7 bombings. Antiterrorist legislation was adopted as the result of a new focus on security issues, such as the Prevention of Terrorism Act 2005 or the Terrorism Act 2006. Emergency provisions, previously limited to foreigners in a counter-terrorism context, were expanded to cover the entire population. While the new measures brought limitations to all citizens' right to privacy and to the notion of *habeas corpus*, in practice it is the Muslim community that suffered the consequences the most. Indeed, the rising Islamophobia increased the salience of Muslim minorities, leaving them more vulnerable to suspicion and faith hate crimes (EUMC 2005:6). Moreover, series of police raids on Muslim communities contributed to a sense of alienation and injustice among those communities (ENAR UK 2006:4).

The regulations on citizenship evolved as well. Since the Immigration and Asylum Act of 1999, selectivity on immigrants went a step further with the concept of 'managed migration', tailoring immigration to Britain according to potential benefits that they would bring to the British economy. More recently, the Nationality, Immigration and Asylum Act 2002, which entered into force in 2005, increased restrictions on asylum-seekers (Stevens, 2004). Language tests are now required for naturalization, and citizenship ceremonies and oaths have been introduced.

The debate is now on knowing whether social cohesion and inclusion are more conducive to social harmony than cultural diversity. New measures aim to create a 'common sense of belonging' while still allowing for different identities to co-exist. In a speech made in December 2006, Tony Blair, then Prime Minister, praised multiculturalism, and yet at the

same time reasserted the migrants' duty to integrate. He insisted that there were "common values" to which all citizens were "expected to conform to". He notoriously stated, "the right to be different, the duty to integrate: that is what being British means"³. Officially the Government is not turning away from multiculturalism; in the contrary, it argues that a stronger commitment to citizenship will increase respect for diversity (White Paper 2002). Yet, many critics believe that the British government is switching from its traditional encouragement of ethnic pluralism to replace it with a more assimilationist approach (Joppke, Morawska, 2003).

The new security issue seems determinant in the shift of politics. As the 2006 ENAR Shadow Report for Britain points out, the new debate on integration "seemed more connected to the government's attempts at dealing with the aftermath of the 7/7 attacks in London, than the situation of migrants per se". The debate focused on "common values, knowledge of English, duties imposed on migrants, community cohesion, civic participation and social inclusion". It did not focus, however, on the nature of the obstacles to integration, such as socio-economic disadvantage or lack of influence in shaping equality outcomes. Neither did it clearly define what integration involved and which groups it targeted (2006:29-30).

3. The Netherlands

Another illustration of the multicultural model is the Netherlands. The Dutch government was traditionally committed to a strongly multicultural approach towards migration and migrants, with an emphasis on tolerance for all cultures. Yet, it drastically switched its attitude since the end of the 1990s after it realised that its integration model was unsuccessful. The murders of Pim Fortuyn and of Theo van Gogh only emphasised the perceived inadequacy of

³ Tony Blair, "The Duty to Integrate: Shared British Values" in <http://www.pm.gov.uk/output/Page10563.asp> last accessed on 04/08/2007.

multiculturalism to address questions of ethnic diversity. The Netherlands is now turning towards a more assimilationist and coercive approach.

3.1. The origins of Dutch multiculturalism

The Dutch attitude towards immigration and migrants has come a long way since the end of the Second World War. For a long time, the Dutch did not consider their country as one of immigration, despite large postcolonial and labour arrivals. On the contrary, the government regarded the Netherlands as ‘overpopulated’ and widely encouraged emigration. Until 1983, the government denied that there were immigrant communities in the Netherlands; the term ‘immigrant’ itself was avoided, and other words were used to describe them (Amersfoort, Niekerk, 2006:324).

Similarly to France and the United Kingdom, post-colonial ties and labour recruitment agreements determined migration patterns. Colonial migration was present before the Second World War but intensified in the post-war context, especially when colonial natives were granted Dutch citizenship under the 1954 Dutch Nationality law. In practice, migration flows were highly heterogeneous. As Van Amersfoort and van Niekerk argue, they had “little in common except that they were genetically linked to the colonial past” (2006:340). Four main groups arrived from the colonies: from the East Indies, the two main ones were the ‘repatriates’ and the Moluccans; from the West Indies arrived migrants from Surinam (Dutch Guiana) and from the Netherlands Antilles.

The ‘repatriates’ integrated relatively easily compared to other groups; yet, this success contrasts with the failed integration of the Moluccans and of West Indies’ migrants. Immigrant groups were considered as temporary migrants by the Dutch government, and apart from the ‘repatriates’, no extensive resources were dedicated to their integration. On the

contrary, the government fostered respect for their distinct cultural identities, even granting them the right to be educated in their own language in view of their return (Lucassen, Penninx, 1997:142). The Dutch Government shared the same conception towards the *Gastarbeiders* (guestworkers), who arrived from the 1960s onwards, mainly from Turkey and Morocco with whom the Netherlands signed recruitment agreements in 1964 and 1969 respectively.

Only in the 1980s did the government acknowledge that the immigrant minorities had become permanently settled. In 1983, it decided to reverse its attitude and to embark on an extensive integration policy (Minorities Memorandum, 1983). While doing so, it maintained a strong commitment for multiculturalism and for the respect for cultural difference.

The reversal policy had two main aspects. On the one hand, it “aimed at a tolerant, multicultural or multi-ethnic society, in which ethnic and cultural distinctiveness should be valued” (Lucassen, Penninx, 1997:150). The policy fostered the emancipation of recognised minority groups (the Moluccans, Surinamese, Antilleans, guest workers, gypsies, caravan dwellers, and later also the refugees) through their own state-supported ethnic infrastructures.

This deeply multicultural position fits the particular organisation of the Dutch society as a consociational democracy (Lijphart 1975), a system in which minority groups are incorporated by making them institutionally independent from each other. In the 19th century, the Dutch society became segmented into ‘pillars’ (*zuilen*) based on religion and ideology, which were originally divided into Protestant, Catholic and Social-democratic. This system allowed for peaceful cooperation between the ‘pillars’ leaders while maintaining the segregation of its constituencies through their own political, social and cultural organizations. The ‘pillarization’ (*verzuiling*) dominated the Dutch society until the 1950s. Although this form of organisation declined with the emergence of the welfare state, its key assumptions kept shaping policy responses on minorities. Ethnic institutions such as Islamic primary

schools, for example, were created within the rules of Dutch ‘pillarized’ legislation (Lucassen, Penninx 1997:158-162).

On the other hand, the reversal policy also aimed to tackle social disadvantage and institutional discrimination, through legislation on employment, education and housing. At first, social disadvantage was addressed in the form of non-discrimination, as explicitly affirmed in Article 1 of the 1983 reformed Dutch Constitution⁴. Then, by the end of the 1980s, positive discrimination started to gain prominence in integration policy. Its most notorious illustration is the 1994 Act⁵ promoting equal opportunities in employment, in a similar manner to that in the United Kingdom, even though most employers still do not comply with it.

3.2. From multiculturalism to assimilation

From the end of the 1990s, there was a general consensus that the Dutch multicultural policy did not achieve its goals. As Joppke states it, “one of Europe’s biggest socioeconomic integration failures happened in the shadow of multiculturalism” (2007:5). As he argues, the Netherlands displays the highest non-EU citizens’ unemployment rates in the European Union; for the past seven years, immigrants have been about three times more unemployed than the natives. Welfare state dependency is also strong: in 1998, 47% of welfare state dependents were immigrants. In the same year, immigrant drop out rates from high school was 2,5 times higher than that of Dutch natives. Spatial segregation is high compared to other EU Member States’ standards: two thirds of the residents of Amsterdam’s and Rotterdam’s ethnic neighbourhoods are foreigners (Joppke, 2007:6). All figures tend to prove that the

⁴ 1983 Constitution of The Netherlands, art. 1: “All persons in the Netherlands shall be treated equally in equal circumstances. Discrimination on the grounds of religion, belief, political opinion, race or sex or on other grounds whatsoever shall not be permitted”.

⁵ Wet Bevordering Evenredige Arbeidsdeelname Allochtonen (WBEAA), 11 May 1994.

Netherlands' proudly-affirmed multiculturalism, in fact, contributed to social exclusion and did not provide incentives for the Dutch institutions to become more accommodating of newcomers (Geddes 2003:113).

The political elites responded by reassessing multiculturalism and by switching their approaches towards civic integration. The Netherlands moved from minorities' policy to integration policy, from group rights to an approach emphasising individual rights and adaptation into the host society (Geddes 2003:113). In September 1998, the Newcomer Integration Law (*Wet Inburgering Nieuwkomers*) came into force. In reality, the term '*inburgering*', translated as 'integration', does not mean integration in the Anglo-Saxon understanding of the term. Though the official definition of the term is: 'adaptation to a new surrounding', the root of the word, '*burger*', means 'citizen' or 'civil'; therefore the term could be interpreted as 'the entrance into civility' or 'the entrance into Dutchness'. Practically, the law implemented obligatory integration courses for migrants, consisting of 600 hours of language training and civic education.

The murder of populist leader Pim Fortuyn in 2002 served as a catalysis for the promotion of a more coercive dimension of civic integration. Pim Fortuyn was a charismatic, populist right-wing leader who founded his own party, the '*Lijst Pim Fortuyn*'. Though he was murdered by an animal rights activist, Fortuyn had provoked the controversy for his anti-immigrant position and for his depiction of Islam, which he often characterised as 'backward culture'. His friend, filmmaker Theo van Gogh, was also murdered in 2004 after he created a 10-minute movie *Submission*, written by Ayaan Hirsi Ali, in which he denounced violence against women in Islamic societies.

From the death of Pim Fortuyn, the Dutch nationality law has been modified three times (1 April 2003, 1 January 2004 and 1 January 2005); from 2003, naturalisation was made dependent on the passing of the civic test, which resulted in a drastic decrease in the number

of applications (Groenendijk 2004:2). This test was further tightened by a revision of the Newcomer Integration Act 1998, which was replaced by the bill on Integration (*Wet inburgering*) in 2007. The result is that today, the migrants have to pay for their integration courses in full. At the same time, in 2005, a civic integration examination abroad has been put into use (*Wet inburgering in het buitenland*), and the concession of permanent residence permits was made dependent of the successful passing of this test. The migrants are thereby made responsible for their own integration, and state intervention is limited to holding a test at the end of the process. According to Joppke, this constitutes an entirely new view on immigrant integration: as the lack of integration now determines the refusal of residence permits, “the entire integration domain is potentially subordinated to the exigencies of migration control” (Joppke 2007:8). The process of integration is no longer seen as taking place within the host society, but as commencing even before the immigrant has left his country of origin. As Besselink argues, the recent acts marked a shift from a “social measure” aimed at solving a social problem to an “immigration measure” (2006:20).

Thereby, since the end of the 1990s, the Netherlands moved from a proudly exhibited multiculturalism to an assimilationist approach, which increasingly takes coercive overtones. Moreover, it adopted measures on cultural integration to tackle what are in fact problems of socio-economic integration.

4. France

France's approach towards immigration and migrants is often cited as the counterpart of the British and Dutch multicultural position. France's has traditionally been assimilating migrants under the republican principles of equality, homogeneity and secularism. Yet, despite emphasis on equality, France's immigrant communities have become more and more marginalised over the years. The 2005 urban unrest in the *banlieues* forced France to consider new options in order to tackle discrimination and social exclusion, on the one hand, and to limit immigration to those considered easiest to integrate on the other hand.

4.1. The origins of France's assimilationism

France's model of integration is traditionally based on assimilationism and individualism. The underlying idea is that the immigrants will be emancipated from their status of minorities as they integrate, and that their descendents will not be recognisable from the mainstream society (Castles, 2000:60). As a result, the concept of minority is absent from French law. This approach is in sharp contrast with the British and Dutch multiculturalism and ethnic pluralism. One can argue that whilst the United Kingdom and the Netherlands managed immigration and integration in a pragmatic way, France focused extensively on a long-term theory on nationality and integration.

Brubaker believes that the roots of French public philosophy can be found in its specific assimilatory nation-state building (Brubaker, 1992:14). Especially during the Third Republic (1871-1914), the government attempted to unify all French regional identities under a common 'French' citizenry, on the basis of republican principles. The civic idea of France as a universal nation of equal and free citizens, which developed during that period, could

therefore explain the present dynamics of integration. As Favell describes it, since that time, questions of integration have been dealt with “in terms referring to the theoretical foundations of French political unity and cohesiveness: around grand themes of republican values, citizenship and the ‘traditional’ universal and cosmopolitan nature of French nationhood” (1998:40).

Geddes (2003:57) summarises these French republican ideas as resting on universalism, unitarism, *laïcité* and assimilation. Firstly, the **universal** nature of the French republic lies at the very heart of the 1789 *Droits de l’Homme et du Citoyen*. The French republic was also thought of in terms of **unity** and homogeneity, as *la République une et indivisible*. A high importance was placed on **secularism** (*laïcité*), as the separation between the Church and the State and their mutual non-interference. Lastly, **assimilation** is an idea which evolved over time, but which involved adaptation to French society to the detriment of previous identities.

4.2. *From assimilation to insertion*

After the Second World War, France also welcomed a large number of immigrants. Yet, contrary to the United Kingdom and to the Netherlands, France has historically been a major immigration country, which saw immigration as a way to enhance its demography and its economy. *Assimilation* was the official integration policy from the 19th century onwards. Sassen summarises the French attitude towards migrants by the idiom: “the more the better, and make them all French” (1999:63). *Assimilation* implied the unilateral adaptation of the migrant to the French culture and laws, as well as the renunciation of any previous identity.

It was under that principle that post-war migrants arrived. They came from France’s colonies and also from 16 other European and non-European countries with which France

signed recruitment agreements. The French nationality law, reformed in 1945, offered relatively easy possibilities of naturalisation.

Yet, decolonisation in the 1950s and the 1960s triggered debates on citizenship. Algeria was a particular case in that regard: until 1962, it was not regarded as a French overseas colony, but rather as an integral *département* (county) of the French state. After the Algerian war leading to its independence in 1962, the idea of universality, characteristic to the French civic idea, broke apart, calling into question the validity of *assimilation*. This concept became therefore associated with French imperialism in a context of decolonisation. As Weil and Crowley argue, *assimilation* already started to lose its legitimacy after the Second World War, because it presupposed the superiority of the French culture, which recalled uncomfortable aspects of fascism (Weil, Crowley, 1994:113).

When labour migration was stopped in 1974, the rival concept of *insertion* came to the fore. The left wing believed that immigrants should not be assimilated and had the right to be different (*droit à la différence*). Yet, *insertion* was also seen by the right wing as a way to deny French citizenship, expressing the fact that immigrants were *inassimilable*, and therefore had to be prepared to return home (Weil, Crowley, 1994:114). At that moment, the socio-economic situation of migrants also started to change. The demand for low-skilled labour ceased all at once. For the next decades, the migrants and their children were to face rising unemployment, spatial segregation in low quality housing of the large cities' suburbs, and a crisis of the school system which was to affect young migrants disproportionately.

4.3. *From insertion to intégration*

In 1983, Jean-Marie Le Pen, leader of the far right Front National, started to promote the *droit à la différence* himself. Instead of supporting the right of non-European immigrants to

be different from the French, he claimed that the French had the right to be different from the non-Europeans, and ultimately had the right to deport them. The Front National made considerable electoral gains in 1983-1984. Political actors, including President Giscard d'Estaing, also argued that French nationality was not to be granted to 'inassimilable' foreigners (Weil, Crowley, 1994:121). Against this situation, organisations and political actors started to strive for the foreign residents' right to equality and to Frenchness again. The issue of immigration became highly politicised, and the debates raged on questions of belonging, on the cultural integrity of France, on the conception of nationhood and on the obligations involved by French citizenship (Favell, 1998:48). Eventually, the political debate shifted from *insertion* to *intégration*, seen as a two-way process which accepts mutual influences of both the society on migrants and of migrants on the society.

The debate on *intégration* was accompanied by series of reforms of the status of foreigners, previously established by the 2 November 1945 Ordonnance. The reforms reflected a struggle between left and right wing positions, but at the same time, progressively tended towards a tightening of immigration control, despite temporary returns to a more pluralist legislation. The *loi Bonnet* of 10 January 1980, voted under a right-wing government, gave the French administration powers to expel illegal migrants. The left, once in power, counterbalanced the *loi Bonnet* by the law of 29 October 1981. The left government also passed the law of 17 July 1984 which conferred a certain protection against expulsion by granting ten-years renewable residence permits to all foreigners who legally resided in France at least three years before the law was passed. Yet, on 9 September 1986, the *loi Pasqua* (voted by a right wing majority) reversed the socialist laws and re-established expulsion regulations as they were before 1981. After the return of the left, the *loi Joxe* of 2 August 1989 re-implemented several dispositions of the 29 October 1981 law. Yet, once the left was defeated in 1993, the right swiftly implemented three restrictive pieces of legislation, also

called *lois Pasqua*, in reference to the right-wing Interior Minister: the law of 22 July 1993 requiring a declaration of intent for French-born children of foreign migrants to acquire citizenship (until then citizenship was automatic for them); the law of 10 August 1993 on identity controls; and the law of 24 August 1993 which strengthened the conditions of entry and stay of foreigners. The laws of 1993 were so restrictive that they proved impossible to apply, resulting in an increase of illegal migration, and generating massive public protests. As a response, the *loi Debré* was implemented on 24 April 1997, but it proved to be as repressive as its predecessors. The right was defeated in 1997, and some say that the protests that resulted from the *lois Pasqua* and *loi Debré* may have influenced this result. As a consequence, the return of the left was followed by the *loi Chevènement* of 11 May 1998; it was presented as a long-term consensus on the status of foreigners, even though it did keep many dispositions of the previous right wing laws. Yet, in 2003, under a right wing government, Interior Minister Nicolas Sarkozy announced a drastic reform of the nationality code aimed at improving control over immigration.

Still in 2003, the government also launched the *Contrats d'accueil et de l'intégration* (CAI) programme, inspired by the Dutch policies of civic integration tests, though not as far reaching. The CAI establishes a contract between the state and the immigrant, according to which the state will provide support to the newcomers, while the latter has to follow a one-year integration programme, consisting in civic instruction, and when necessary in French language courses (between 200 and 500 hours). As Joppke argues, only a small share of migrants is concerned by the language tests, because most of them already have a francophone background (2007:9). The contract is signed on a voluntary basis, but once signed, it binds the State and the newcomer by contractual obligations. In 2004, the *Ministère de l'emploi, du travail et de la cohésion sociale* proposed a draft law which would make the integration contract mandatory.

The year before, the 2002 presidential elections saw the spectacular electoral success of the far-right. Le Pen was passed to the second election round, beating Socialist candidate Jospin. As a consequence, the government had to reconsider once again its position towards immigration and integration. In 2006, the law of immigration and integration was passed, which was meant to open up the doors to highly-skilled migrants and to close them to the low-skilled and the asylum-seekers. A distinction was made between unwanted (*subie*) and chosen (*choisie*) immigration, considered as easier to integrate, and being meant to replace the current existing flows.

Yet the 2005 riots that literally enflamed the disadvantaged suburbs of the great cities, putting France in a state of emergency, illustrated that the real problem with the French model is that it did not prevent social exclusion and marginalisation. In housing for example, a person of African or North-African background has one ninth the probability to find a suitable accommodation (HALDE, 2006:39); moreover, when living in disadvantaged suburbs, ethnic communities are more likely to be targeted by the police (LDH 2006). The political taboo on the concept of “ethnic minorities” makes it difficult for policy-makers to redress the situation. In the field of employment, for example, the French public philosophy does not allow for positive discrimination; the colour-blind approach is therefore being reinforced, with an increasing number of propositions in the direction of anonymous applications and curriculum vitae (ENAR France, 2006:27).

5. Europe

As illustrated by the above chapters, integration policies mostly take place at the local, regional or national levels. Yet, this subject has ceased to be a nationally-specific concern, and the consequences of ‘failed’ integration are falling back on all Member States, especially since the free movement of people has been established. While the lack of integration has become a European problem, the tools that the EU has at its disposition are rather limited.

The European Commission began to tackle problems of integration since 1999. That year, the Tampere European Council explicitly called for “a more vigorous integration policy” aiming to grant third-country nationals “rights and obligations comparable to those of EU citizens”, to “enhance non-discrimination in economic, social and cultural life and develop measures against racism and xenophobia” (art.18). Still in 1999, the 1997 Amsterdam Treaty entered into force. Its Article 13 prohibited all forms of discrimination based on “sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation”, fostering therefore equality and social inclusion.

In the following years, several legislative changes occurred in the European Union. Two kinds of measures can be distinguished at that level: the ‘soft law’ approach, consisting mainly of suggestions from the European Council and the European Commission, and the ‘hard law’ approach of EU law. As Carrera argues, there is often a wide gap between these two (Carrera 2006b:6). Other European and supranational texts on the field of human rights and minority rights could add interesting considerations on this topic. Yet, for the purpose of this essay, the following analysis will be restricted to the ‘soft law’ and ‘hard law’ measures of the European Commission and the European Council.

5.1. ‘Soft Law’: The Common Basic Principles

In The Hague Programme of 2004, The European Council declared “the integration of immigrants” a priority for the next five years. This was later confirmed by the European Commission in its Action Plan implementing The Hague Programme of May 2005. Still on the basis of The Hague Programme, the Justice and Home Affairs Council adopted in November 2004 eleven Common Basic Principles for Immigrant Integration Policy (CBPs), which outlined the priorities which any integration policies should include. The CBPs were to become the cornerstone for the establishment of a common EU framework on integration. Since then, the Commission used the CBPs in its Agenda for a Common Policy on Integration (COM(2005)389) to present measures which Member States could use to improve their integration programmes.

The eleven common principles firstly defined integration in the EU context as “a dynamic, two-way process of mutual accommodation by all immigrants and residents of the Member States” (2004:19). It based the definition of integration on the assumption that both migrants and the receiving society have to change, and suggested that the host society had to create “the opportunities for the immigrants’ full economic, social, cultural, and political participation” (2004:19). According to Joppke, this is a major step that will take time to implement. Under most integration models, the host society does not accept that it should change because of a numerically inferior number of migrants. “That a settled society *would* change as a result of migration is of course inevitable, but elevating this into an ethical maxim, a *should*, is an unprecedented stance to take” (2007:3, italics in the text).

The CBPs also addressed questions of socio-economic integration, such as employment, education, access to services and non-discrimination. It is interesting to note that one of these principles imply that “basic knowledge of the host society’s language, history, and institutions is indispensable to integration” (2004:20). Since the Dutch 1998 *Wet Inburgering*

Nieuwkomers, several other Member States, such as Denmark, Germany or France, adopted civic examination tests, on which access to the territory is sometimes determined.

These eleven common principles are not legally binding for the Member States. They primarily aim “to assist Member States in formulating integration policies for immigrants by offering them a simple non-binding but thoughtful guide of basic principles against which they can judge and assess their own priorities” (p.16). Carrera argues that the majority of the CBPs are therefore purely symbolic (2006a:15). While they provide useful benchmarks to assess the integration policies of Member States, their impact on national and EU legislation has been rather limited.

In recent years, other ‘soft law’ measures on integration were taken. National Contact Points on integration were created. The Commission published a first handbook on integration in 2004, and a second in 2007. Several communications of the Commission also addressed the problem of integration on various sectors. Yet, the ‘soft law’ approach consists mainly in recommendations and suggestions. While it is important to a common EU framework on integration, it has little impact in EU legislation.

5.2. ‘Hard law’: the EU legislation

The pieces of legislation that had the most far-reaching consequences on integration were aimed at immigration on the one hand, and at equality of treatment on the other hand.

The most important acts related to immigration are the Council Directives on the status of long-term residents (2003/109/EC) and on the right to family reunification (2003/86/EC). The two directives established a set of minimum standards on the rights of third-country nationals. They both linked access to rights with conditions that were to be set up by the Member States, leaving a wide scope for interpretation. Article 5 of the Directive 2003/109, for example,

states that “Member States may require third-country nationals to comply with integration conditions, in accordance with national law”, in which ‘integration’ is to be interpreted by the Member States, reinforcing therefore national flexibility.

According to Carrera, these Directives strengthened a new nexus between integration, immigration and citizenship. “Integration becomes the obligatory juridical requirement for having access to the set of rights and liberties that these laws provide and a more secure status” (Carrera 2006b:7). This argument is especially applicable to the countries that increasingly require civic integration tests to determine access to rights. Carrera believes that the downside of these directives would be to reinforce national legislations and philosophies that might marginalise communities of immigrants. As Groenendijk also argues, they can reflect integration as “a genuine policy aim” as well as “a code word for the selection and exclusion of immigrants from their societies” (2006:11). The Directives 2003/109 and 2003/86 are nevertheless the centrepieces of any EU integration policy. It must be noted, however, that they only apply to third-country nationals who do not own the citizenship of a Member State; citizens of foreign origin are entitled to the same rights as all other citizens.

Another determinant set of EU laws followed the Amsterdam Treaty of 1999, was concerned with anti-discrimination and therefore had a determining impact on social inclusion. These are the Directives 2000/43/EC implementing the equal treatment between persons irrespective of racial or ethnic origin (the ‘Race Equality Directive’) and 2000/78/EC establishing a general framework for equal treatment in employment and occupation (the ‘Employment Equality Directive’). The Race Equality Directive states that all shall be treated equally irrespective of racial or ethnic origin. It offers protection against discrimination in employment, education, welfare, housing and access to goods and services; it also allows for positive discrimination in order to combat inequality. The Employment Equality Directive contains some clauses of the Race Equality Directive but focuses especially on equal

treatment in employment and training regardless of religion, disability, age or sexual orientation.

These two Directives aim to tackle both direct and indirect discrimination; in that sense, they go beyond the provisions of any Member States. There is still a gap, however, between legislation and implementation. The Commission completed a five-year evaluation of the Race Equality Directive in 2006 (COM(2006) 643final) and concluded that it is yet too early to evaluate its impact. Yet, the ENAR has been reviewing annually the implementation of the Directive and demonstrates that there are still many efforts to be made in terms of implementation (ENAR EU, 2005:26).

The two Directives on equality of treatment counterbalance the Directives on immigration in the sense that they offer a more positive approach on integration, understood as social inclusion requiring the equality of all. The Directives on immigration, in the contrary, negatively link integration to immigration requirements. Many academics and NGOs actors believe that the EU should seek to achieve greater integration for immigrant on the grounds of the two anti-discrimination Directives rather than on the Directives 2003/109 and 2003/86 (e.g. Guild 2006:41).

5.3. The national legislation versus a European framework

Despite a growing EU-wide concern about integration, policy-making on that matter remains mostly in the hands of the Member States. While there is a general agreement that the EU should foster its policies on integration, there is also an equal concern about the respect of the principle of subsidiarity. The debate is on knowing whether an EU framework is necessary beyond the scope of what has already been implemented. As Bertozzi argues, this debate “epitomises the ambivalent attitude of EU Member States to *all things European*” (italics in

the text): on the one hand, integration policy is under the responsibility of the Member States; on the other hand, the degree of trust between Member States is not always high, and therefore reference is made “to the need to harmonise certain aspects of integration policy so as to prevent some countries from adopting provisions that might harm others” (2007:5).

The Treaty establishing a Constitution for Europe would have solved this question, because it would have provided the legal foundation for the development of a common policy on the integration of citizens of immigrant origin (Art.III-267). Yet Collet believes that after the rejection of the Constitutional Treaty, it is unlikely that the highly sensitive subject of integration will be regulated by a detailed EU ‘hard law’ in the near future (2007:18).

Conclusion

In the early days of postcolonial migration, few observers could have predicted its long-term consequences on the host societies. The migrants, who were primarily thought of as a temporary workforce, settled and produced an adult second-generation. Their presence has become a highly politicised issue in almost every Western European state.

France, Britain and the Netherlands attracted large numbers of post-war immigrants from their colonies and through recruitment agreements (in France and the Netherlands). These migrants differed in their origin: they came from the Maghreb for France, from the Caribbean and the Indian sub-continent for the United Kingdom, and from Indonesia, the Caribbean, Morocco and Turkey for the Netherlands. They held the citizenship of the host country; therefore, they were entitled to the same rights as the natives.

Important differences also lie in the countries' traditional philosophies on integration. On the one hand, the French republican model is based on a strong conception of citizenship and on equality between its citizens. It traditionally asked immigrants to assimilate into the mainstream society, and therefore refused to legally recognise the existence of 'ethnic minorities'. Yet, after decolonisation, the assimilation model was called into question and migrants asked for a *droit à la différence*. Pressure for changes came from two directions: the Socialists tried to orientate France towards cultural pluralism, while the right and far-right promoted a more unitary concept of citizenship.

On the other hand, the United Kingdom and the Netherlands adopted a multicultural approach towards post-war immigration. The United Kingdom did not have France's strong conception of citizenship and also had a long tradition as being a liberal pluralist state. As a result, it was far more concerned about 'race relations', translated into provisions of non-discrimination on racial grounds and into restrictive immigration policies. In the Netherlands,

the multicultural approach fitted well the traditional organisation of society into ‘pillars’. The incorporation of immigrant communities was managed by ensuring their autonomy within the Dutch institutions. Both multicultural attitudes promoted the respect for different cultures and identities; yet one can argue that they also perpetuated and enforced the racialisation and marginalisation of immigrant minorities.

However, neither of these two models succeeded in preventing social exclusion of the second-generation born to the post-war migrants. The Netherlands’ commitment to multiculturalism and tolerance has been undergoing a deep crisis since the 1990s; the murders of Pim Fortuyn in 2002 and of Theo van Gogh in 2004 are often taken as examples of the failure of the Dutch model, although the perception of this failure goes deeper in time. The 7 July 2005 bombings of the London underground, perpetrated by British-born young men of migrant descent, exemplify the marginalisation of the Muslim community in British society. In France, the 2005 riots in the *banlieues* occurred as a form of protest against the social exclusion of the second-generation.

When breaking the concept of integration into political, cultural and socio-economic dimensions, one must notice that ‘integration’ covers a very wide range of areas and policies.

The political integration of (post)colonial immigrants had a characteristic that was almost exclusive to the three analysed countries. The citizenship laws passed in the post-war context granted the colonial natives the same political rights and citizenship as the French, the British or the Dutch. Nowadays, most of the second-generation of these migrants are citizens; yet, their political rights are not always translated into full participation and are by no means sufficient to successfully achieve their incorporation.

In that regard, citizenship has been a particularly salient issue in France; in fact, most of its national debates on integration revolve around a nexus of national identity, immigration and citizenship. The high number of revisions of the laws on the status of foreigners,

illustrating the tension between the left and the right, illustrate how citizenship became such a contentious issue since the 1980s. Conversely, in Britain, citizenship has been largely absent from the political agenda. The concept of British citizenship, only legally introduced in 1981, remained rather vague and had nothing of the significance of its French counterpart. Moreover, in both Britain and the Netherlands, political rights are not linked to citizenship; unlike in France, some political rights can be granted to non-citizens. The Netherlands were even seen as a precursor to that regard.

Problems of cultural integration, on the other hand, concern mainly the Muslim community. Talks on cultural integration are incorporated in a wider debate on the ‘clash of civilisations’ between Islam and the Western world. Muslim communities were singled out after the 9/11 and 7/7 attacks and the murders of Pim Fortuyn and Theo van Gogh. Fears of Islamic fundamentalism led to an increasing focus on security and on restrictive immigration laws.

Yet, it is widely agreed that it is the socio-economic integration that is by far the most problematic. For example, more than any cultural difference or lack of political rights, it is socio-economic disadvantage that led to the 2005 riots in France. In the three countries, if immigrant communities are being marginalised, it is essentially because of discrimination in employment, housing, education, welfare and access to goods and services. There is a more European perspective on the measures taken to tackle socio-economic inequality, as addressed by the CBPs and the Directives 2000/43/EC and 2000/78/EC. It is mostly employment that needs improvement; the European Commission declared employment “the most important political priority within national integration policies” (2004:5) and dedicated an entire Directive to discrimination in the workplace.

There is a general consensus that integration stopped to be exclusively a national problem and that a supranational approach is needed. The European Union increasingly emerges as

main actor for the convergence of integration policies at that level. In addition to the Directives 2003/109/EC, 2003/86/EC, 2000/78/EC and 2000/43/EC, a series of non-binding 'soft laws' and recommendations have flourished in recent years. However, for the time being, integration policies remain the competencies of Member States, and the implementation record for EU integration policies remains weak.

Recent measures in France, the Netherlands and the United Kingdom reflect both the Western world's concerns about security and the European trend towards greater immigration control. They also seek to address an EU-wide focus on equality and non-discrimination on the basis of race and ethnicity. Despite deeply-rooted differences in their integration philosophies, the three countries seem to be moving towards a greater convergence. The most striking transformation occurred in the Netherlands: from an openly multicultural country, it moved in the direction of assimilationism, taking increasingly mandatory overtones. The required civic integration test, to which entry and residence rights are linked, now asks for integration to take place even before the migrant leaves his country. In Britain, the security issue resulted in terrorist acts on the one hand, and emphasised the need for a collective British identity on the other hand. Finally, in France, even if the prevailing philosophy of assimilation has been called into question since the 1980s and more recently by the 2005 riots, the right-wing French government now seems to be going in the direction of more restrictive policies.

The three Member States do not seem to agree that their society should change to accommodate their immigrant communities, even if the European Commission defined integration as a two-way process requiring changes both from the immigrant communities and from the host society. On the contrary, France, the Netherlands and the United Kingdom all seem to strive for a stronger national identity or collective values, to which conformity starts to be coercively required. It is too early to tell whether these trends are a temporary reaction

to the events that recently shattered their societies or whether they reflect a long-term commitment towards a more assimilationist stance.

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