

Chapter 21

The Governance of Migration-Related Diversity



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The governance of migration-related diversity encompasses a broad range of topics, such as [integration policies](#), [anti-discrimination and anti-racism strategies](#), diversity policies, and various others. In this chapter we will limit ourselves to governance by government bodies (local, national, other) and focus explicitly on migration-related diversities (ethnic, cultural, religious, racial, other). We will discuss various theoretical models for the governance of migration-related diversity, but will also discuss empirical material on how and why governments choose very different perspectives and approaches, for instance either focusing on integration, or inclusion, or anti-discrimination, or not having an explicitly focused policy on migration-related diversities at all.

In the field of migration studies, the literature on the governance of migration-related diversities (often framed as integration policies) not only comprises a very significant part of the body of publications, but also a part that has played a major role in the overall development of the field. On the one hand, this has led to a burgeoning of theoretical perspectives that build on insights from various disciplines and that have played a major role in broader public and political debate on migration-related diversities. For instance, concepts like multiculturalism and assimilationism continue to frame our public debates today.

On the other hand, as reflected upon in the previous chapter, this literature has also been criticised from a more critical perspective for its strong policy orientation and entanglement with policy interests, and then in particular with those of nation-states.

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This chapter will enable the reader to gain a general overview of key perspectives on and key concepts used in the study of the governance of migration-related diversity. We will not make a choice between any of the core perspectives, but allow for a better appreciation of the pluralism of perspectives needed to understand the many different facts of diversity governance. We will also bring in some more empirical material, reflecting on how key concepts and perspectives are applied in the practice of governance.

21.1 Theoretical Perspectives on the Governance of Migration-Related Diversity

Just as the social processes of migration and migrant incorporation has been theorised from various perspectives, the governance of migration-related diversity has also been theorised from a broad variety of perspectives. Such theoretical perspectives on governance often carry a strong relationship to such theories on migration and for instance ‘integration’ (see the preceding chapter). However, they also reflect broader theoretical concerns such as on the [role of the state](#), on [citizenship](#), on equality, and many other broader perspectives. This is why, echoing broader theoretical debates in political science, political philosophy and sociology, very different perspectives have evolved.

And this is not just theory; also in empirical practice we can witness a strong diversity in perspectives chosen and developed in different settings. For instance, key readings such as Brubaker’s (2009) work on the governance of citizenship in France and Germany shows how choices between different perspectives or ‘models’ are not just theoretical choices. Instead, they are often deeply rooted in specific (in this case national) histories, traditions, and institutions. The perspectives are often ‘implicit’, they are part of everyday discourses about migrants and diversities.

Taking stock of the most widely used theoretical perspectives on the governance of migration-related diversity will enable the reader to recognise and reflect upon the different perspectives and the choices made in different settings. Here one has to be mindful that this involves often pure or idealised theoretical perspectives, or even ‘ideal-type’ models. This means that one is unlikely to find one of the models in its pure form in empirical instances, which will often be more blurry and mixed. However, understanding the different perspectives will enable a better understanding of such empirical instances, however complex.

Understanding the perspectives will also help the reader to understand your own views or disposition concerning the governance of migration-related diversity. It will enable a process of introspection to identify where you stand and how you related to other perspectives, and perhaps also assist critical reflection upon one’s own views.

21.1.1 Differentialism

A widely used overview of early perspectives was made by Castles and Miller (1993). They distinguish between assimilationism, multiculturalism, and what they define as ‘ethnic segregationism’. The latter perspective has become more widely known in the literature as ‘differentialism’ (Koopmans & Statham, 2000). Following the historic mode of development of these perspectives, it is good to start with differentialism. This perspective involves a societal differentiation (such as social, spatial, political, economic or other) along specific migration-related diversities (such as ethnic, racial, cultural, religious, or other).

There are many examples of differentialism today and in the past. Obvious and rather radical forms of differentialism involve for instance the caste system in India, colour segregation in the US, pillarisation in the Netherlands, or the regime of Apartheid in South Africa. In these cases differentialism serves the preservation of broader political and societal structures and the inequalities that characterised these structures. For instance, in South Africa the differentialist Apartheid regime helped preserve the dominance of the white population, and in India the caste system helps preserve traditional religious structures in society.

There are many more moderate examples of differentialism. For instance, the guest labour regime for labour migrants to various European countries in the second half of the twentieth century can also be considered a form of differentialism. By defining [labour migrants](#) as guest labourers a structure was legitimated that defined them as temporary, pre-empting a discussion on the proper societal incorporation of these migrants. In various cases, this differentialism was also legitimated with reference to return aspirations of migrants themselves.

However, it is important to be aware of more implicit forms of differentialism as well. Institutional racism can be considered an important form of upholding differentialist structures that are often more tacit in spite of being very powerful. For instance, the ethnicisation of the debate on migration-related diversities can inadvertently contribute to a problematisation of ethnic differences and a legitimisation of policies that treat ethnic minorities as different or even as problematic. Rath (1991) refers in this regard to the phenomenon of ‘minoritisation’ when policies targeted at specific groups inadvertently contribute to a further problematisation and caricaturing of these groups.

21.1.2 Assimilationism

Another ‘traditional’ perspective in the literature on governance of migration-related diversity is the assimilationist model. It has traditionally been developed as a uni-directional and transformative model of how a migrant becomes a full and equal member of the host society. Originating from the Chicago school of sociology, assimilation originally emerged as an empirical perspective on how groups gradually

assimilate to their host societies over times (Park & Burgess, 1921; the ‘[race relations cycle](#)’). This also echoes with other studies in this period, such as the famous work by Thomas and Znaniecki (1927) on the assimilation of Polish peasants in the US. In political theory, assimilationism gradually involved in a more normative political perspective on the governance of migration-related diversities. It became a model for how to make sure that migrants would transform into full citizens.

An often made distinction in the literature is between structural and cultural assimilation. Cultural assimilation (sometimes also described as [acculturation](#)) assumes a process of cultural transformation, where the migrant also associates and identifies with the host society’s culture, internalises core societal values and norms and feels part of the host society. [Structural assimilation](#) refers primarily to a process of participation and inclusion into societal structures, such as being able to work, to vote, to go to school, to be protected against discrimination, etc. Often assimilation also assumes a relation between these two; structural assimilation may promote cultural assimilation, as well as the other way around.

A widely cited case study of assimilationism is Brubaker’s work on the French Republicanist approach to migration-related diversity. The French Republicanist approach is based on a strong conception of French nationhood as based on secularism and on the core principles of freedom, equality, and brotherhood. Rather than recognising difference, the aim of the French approach has been to shape migrants into new French citizens.

Contemporary assimilationist thinking provides more nuanced perspectives on assimilation. In particular, assimilationist thinking has become less un-directional and less transformative. For instance, the literature on [segmented assimilationism](#) suggests that migrants can assimilate at different paces in different segments of society. So, high level of structural assimilation into the labour market may very well go together with processes of cultural distancing. For instance, Alba and Nee (1997) argue that assimilation can involve much more than only the crossing of boundaries from one side to another. It may also involve boundary blurring where over time the differentiation between groups becomes less clear, or boundary shifting as over time boundaries shift to include new groups (Alba, 2009).

21.1.3 Multiculturalism

Besides assimilationism, perhaps the most widely used perspective on the governance of migration and diversity is ‘[multiculturalism](#)’. It is important to be aware that the concept multiculturalism is often used with reference to a broader societal process of accommodating cultural diversity (as also discussed in the preceding chapter). However, it is also used in a more narrow sense as a model of how to govern cultural diversity. As a governance mode, multiculturalism involves the recognition of diversities (such as ethnic, cultural, racial, or religious groups), the development of targeted policies in order to achieve equality, and an active policy to

encourage the broader acceptance of diversity in society and the prevention of racism and discrimination.

Within multiculturalism there are many different traditions. Various multiculturalists have argued that multiculturalism primarily requires adjusting existing political and social structures to be able to accommodate diversities and include new groups and communities (Meer & Modood, 2012). This usually comes with group-specific policies to enable groups and communities to be incorporated and achieve equality within institutions as the labour market, education, political institutions, etc. Other multiculturalists have argued that multiculturalism also requires more structural differentiation in order to achieve equality and accommodate diversity to the full extent. For instance, Kymlicka (1995) and Parekh (2000) have argued in favour of differentiated forms of **multicultural citizenship**, bringing some extent of recognition of group specific rights and group structures. In such models the accommodation of diversity does not only change existing societal structures, but also the establishment of distinct or separate structure for the institutionalisation of differences.

There is a wide variety of applications of multiculturalism at various levels. For various cities, being multiculturalist became a key aspect of city branding; such as London, which clearly defines itself as a multiculturalist place. In practice, multiculturalism often seems to coincide with a strong role of the state that should warrant multiculturalist structures. For instance in Canada and the UK multiculturalism has been an important part of nation-building within diverse nations; it allowed for a conceptual frame for the shaping of one nation in the linguistically and culturally divided Canada.

21.1.4 Universalism

Koopmans and Statham (2000) add a fourth model besides differentialism, assimilationism and multiculturalism, which they describe as universalism. A core assumption in this model is that generic societal structures and institutions should be able to include various diversities without specifically accommodating these diversities. The neutrality of public institutions is an important premise of universalism. Diverse groups and communities are assumed to find their place by participation in general structures, such as socio-economic participation, political citizenship, etc. Although universalism implies that universal structures (such as the labour market, the welfare state, political institutions, etc.) should be open towards various diversities, universalism rejects the idea of group or culture-specific accommodation.

Although this is not one of the models that has been discussed as widely as the preceding ones, examples of universalism are widespread. For instance, throughout the world, migrants have been encouraged to enhance their position by participating on the labour market, accessing proper housing and achieving education. By far in most cases this has taken place without specific accommodation of diversity or support for migrants. In this sense, universalism not only asks much from

universalist structures that should be sufficiently open, but also from migrants themselves who are required to find their way into universalist structures largely by themselves.

The boundaries between universalism and other models are, however, not always clear. A widespread criticism on universalism is that its colourblind orientation assumes a more assimilationist orientation that takes tacit dominant cultural elements for granted. Another criticism is that accessing universalist structures often requires some form of help for vulnerable or new groups, as offered in a more multiculturalist approach.

21.1.5 Interculturalism

Besides the abovementioned four modes of governance of migration and diversity, several other models have emerged over the past decades. These models offer different governance perspective, but also often combine and recombine specific elements of the previously mentioned models. That is certainly the case for interculturalism, which has gained attention in migration rapidly over the past decades.

Interculturalism builds on but also distinguishes itself from multiculturalism in various ways (Levrau & Loobuyck, 2018; Meer, 2016; Zapata-Barrero, 2015). A core difference is that while multiculturalism assumes at least some recognition of difference, interculturalism rather focuses on contact and interaction. Rather than focusing on specific groups or communities, interculturalism focus on the creation of opportunities for intercultural interaction. This can involve conditions for interaction as well as the creation of specific spaces for interaction. In the latter sense interculturalism also carries some relation with universalism which assumes that universalist societal structures should at least be open for various diversities.

Migration studies features various debates on multiculturalism versus interculturalism. Besides an academic model, the concept has also become very important in specific policy and political debates. In Canada interculturalism has been positioned already from the 2000s by Bouchard & Taylor (2008) as an alternative to the more traditional Canadian multiculturalist model. In Europe the concept gained attention in the context of a network of cities united by the Council of Europe under the banner Intercultural Cities. Increasingly, interculturalism was thus developed as a policy model as well.

21.1.6 Mainstreaming

Whereas interculturalism descends from multiculturalism while adding universalist elements, mainstreaming descends from universalism while adding multiculturalist elements. Mainstreaming as a mode of governance of migration and diversity echoes

broader experiences with the mainstreaming of gender, disability, and the environment. Like universalism, it focuses on making migration and diversity part of the mainstream. It assumes that migration and diversity can best be accommodated when incorporated structurally in how generic societal institutions function, such as the welfare state, education, the state itself, etc. Unlike universalism, it assumes that this does require an explicit focus on migration and diversity within these institutions. Rather than a colourblind approach, mainstreaming assumes that awareness of mobilities and diversities should be actively encouraged and incorporated within such generic institutions (Scholten, 2018).

A core aspect of mainstreaming is that migration and diversity should not be set apart as stand-alone topics (Collett & Petrovic, 2014; Scholten, 2018, 2020). This would argue against having only specific minority policies or an integration policy as a policy area distinct from others. However, mainstreaming does require an active policy approach, but then oriented at transforming generic institutions (in a way similar to gender mainstreaming).

In addition, mainstreaming advocates a focus on the whole diverse population rather than on specific groups. Partially, this echoes the view from classical sociological labelling theory that focusing on specific groups risks reifying group differentiations rather than bringing groups together. It also echoes the belief that diversity reveals so much social complexity (not only different groups, but also intersections with class, colour, religion, status, etc.) that a specific focus is also not valid; a belief that has been developed further in the super-diversity literature. Furthermore, focusing on the whole diverse population also includes the non-migrant population as a target group.

There are many examples of mainstreaming in policy practices, such as in the de-institutionalisation of integration policies in many countries in Europe since the 2000s (Collett & Petrovic, 2014). Also, at a city level, many cities have mainstreamed diversity into the generic urban policies. However, there is also much criticism on practices of mainstreaming. One is that in practice often mainstreaming comes down to the deconstruction of specific diversity policies without adding an active strategy towards generic policies. In addition, in practice many proxies can be found that enable the targeting of specific groups without naming them explicitly, such as the use of needs-based proxies or area-based proxies (targeting the neighbourhood where specific groups live rather than the groups themselves).

21.1.7 Integrationism

Finally, the governance model that is perhaps most difficult to define is integrationism (Penninx, 2019; Saharso, 2019; Favell, 2016). The previous chapter already elaborated the contestation around the concept of integration. This essentially contested nature of integration also has consequences for it as a governance model. The term integration has been used with reference to various of the

abovementioned models. For some it is just another word for assimilationism. For others integration is an overarching term under which various models can be chosen, such as universalism or interculturalism. For others integrationism refers to a distinct mode of governance that should be clearly distinguished from the other modes discussed above.

Building on the conceptual analysis of integration from the preceding chapter, integrationism as a governance model would refer to an approach to promote participation and social interaction in order to have migrants integrate into their host societies. In contrast to assimilationism which assumes a linear and transformative process, integrationism involves a two-sided process where host society institutions also adapt in order to provide opportunities for the integration of migrants. However, in contrast to multiculturalism and interculturalism, the focus is much more on participation and encouraging migrants to integrate into the host society. And in contrast to mainstreaming, integrationism assumes that this can best be achieved by a distinct policy oriented specifically at migrant groups that need help in their integration process.

21.2 Dimensions of Diversity Governance

Integration policies are a response both to the perceived needs both of immigrants and the receiving society. The introduction of an integration policy by a new destination country, region or city can act symbolically as a recognition of its changing context and its new identity as a society of immigration. According to the UN's 2019 World Population Policies report, 85 of 195 countries self-reported that their national government had a national policy or strategy to promote immigrant integration or inclusion. Integration policies were reported in nearly all highly-developed countries and the Americas and around two-thirds of low- and medium-developed countries in Africa, the Middle East, Asia, and Oceania.

Official government definitions most often describe integration as a 'two-way' process of mutual accommodation or interaction between immigrants and non-immigrants. The general aims of these policies are to improve participation, interaction and attitudes among immigrants and non-immigrants, in order to develop a common sense of belonging and citizenship. Non-discrimination is usually presented as the main way that non-immigrants contribute to this 'two-way' process. These aims are then pursued in various areas of public life, as integration is defined as a multi-dimensional process, where one area affects the other: from employment to education, health to housing, local communities to national politics. Integration policies pursue these aims along three distinct dimensions, according to the [Migrant Integration Policy Index \(MIPEX\)](#), which analysed 58 core indicators in 52 countries. Policies determine the extent to which immigrants and non-immigrants enjoy the same fundamental rights, secure future and equal opportunities.

Official definitions of integration as a 'two-way process' are near-universal but superficial, with the role of the receiving society reduced down to passive

non-discrimination, raising public awareness and the training of government and NGO staff. The effort falls on the migrant and the role and obligations for the receiving society is poorly defined. Only a minority of countries (mostly the inclusive integration policies in traditional and larger destination countries) make the entire society the target group for integration policy. These few countries link their integration policies to broader policies of non-discrimination, equality, social inclusion, or cohesion.

Debate regularly resurfaces around the immigrants who are made the target groups of integration policy. Even the most inclusive countries tend to exclude the [undocumented](#) and [asylum seekers](#) as target groups of their national integration policies and support, apart from the specific areas where all residents regardless of status have the right to participate (i.e. essential/emergency healthcare, education of children, access to justice). In contrast, most countries' integration policies focus only on foreign (i.e. non-naturalised) residents. Newer destinations tend to further restrict their target group to certain categories of newcomers or beneficiaries of international protection. Privileged immigration categories (i.e. highly-skilled migrant workers, EU citizens using EU free movement rights, co-ethnics in Central Asia) are not only [facilitated in terms of their immigration rights](#), but also [exempted and even excluded from integration approaches](#).

21.2.1 Fundamental Rights

Firstly, the rights framework influences the extent to which immigrants can participate in different areas of public life and, by extension, interact and identify positively with non-immigrants. This framework covers the basic, social, economic and civic rights enshrined in international human rights conventions. These rights may be extended to all legal residents over time, regardless of nationality, such as the rights to access the labour market, education, training and social protection. Whereas more universal human rights may apply to all residents regardless of legal status, such as the rights to non-discrimination, access to justice, health, decent working conditions and education of children. Among immigrant categories, a hierarchy of rights tends to appear across countries, in order from most-to-least socio-economic rights: permanent residents, refugees, highly-skilled workers, other forms of international protection, other temporary residents, forms of humanitarian protection or tolerated stay, asylum-seekers and foreign citizens in an irregular situation.

The presence and strength of anti-discrimination policies is highly relevant to immigrants' rights, but more related to countries' approach to diversity overall and to ethnic and religious minorities. Anti-discrimination laws and policies are not able or intended to eliminate discrimination, but rather, as with other crimes and areas of the law, to secure access to justice for victims and public awareness of the problem. Going beyond vague constitutional provisions, dedicated legislation and specific enforcement procedures must exist in criminal and civil law in conformity with the relevant international standards, such as the International Convention on the

Elimination of All Forms of Racial Discrimination. These protections must explicitly apply to discrimination not only on the grounds of race, but also ethnicity, religion or belief, nationality/citizenship and multiple grounds. The protections must extend to all areas of life: employment, education and training, social protection, the police and the access to and supply of public goods and services, including housing and healthcare. Comparative studies of strong enforcement mechanisms are available from Europe and beyond. Strong enforcement procedures require:

- Protections against victimisation of the claimant;
- Wide range of evidence (i.e. situation testing or statistical data);
- Shift in the burden of proof (from claimant to accused in *prima facie* discrimination cases);
- Support of legal aid, interpreters and legal entities working in their support or on their behalf, including through class actions or *actio popularis*; and
- Ultimately, use of a range of financial, positive and negative sanctions with dissuasive effect.

Independent equality bodies must be able to assist, advise and represent potential victims, also in accordance with the UN ‘Paris Principles’ for National Human Rights Institutions (NHRIs). Outside the courts, equality policies can mandate and/or encourage dialogue and information provision, anti-discrimination plans and training, positive actions and equality duties (i.e. for hiring/staffing, procurement and funding), equality impact assessments and equality data collection.

21.2.2 *Security of Status*

Secondly, legal status influences the extent to which immigrants can settle long-term, and, by extension, feel the same sense of security and belonging as non-immigrants. Legal status not only determines immigrants’ levels of rights and responsibilities, but also influences their decision-making. Participation, interaction and belonging develop over the long-term, yet immigrants cannot be certain that they will enjoy these benefits or return on their long-term investment. Immigrants’ decisions about their life in their new country are influenced by their (un)certainly and agency over their future.

Questions of legal status begin with access to temporary residence. Regularisations, which exceptionally grant residence or work status to foreign citizens in an irregular situation, often involve *de facto* integration criteria, such as years of residence, work or family ties to attribute legal residence or work status to foreign citizens in an irregular situation. Family migration policies can be considered a **mixed migration-integration tool**: one-third migration (family reunification or formation with family members) and two-thirds integration (the right to family life for the sponsor and the rights and status for the family members). So-called ‘**civic integration**’ requirements, **tests** and criteria raise similar questions of conflicting logics between **promoting integration vs. migration control**.

Immigrants' ability to settle long-term are determined by the path to permanent residence and nationality. Permanent residence should be available as an option or (un)conditional right for most categories of temporary residents, while access to nationality may be restricted to permanent residents. Naturalised citizens enjoy equal rights and full security, except for cases of citizenship loss or withdrawal, while permanent residents should enjoy greater residence security (either unlimited or 5–10 years' permit validity and renewable), protections against expulsion, longer periods of absence abroad and largely equal socio-economic rights.

[Evidence from Europe](#) suggests that a country's ordinary naturalisation policy is the best predictor of its overall approach to integration (Huddleston & Vink, 2015). For countries of immigration, especially for more recent destinations, reforms to nationality laws are given significant weight as either public recognition or politicisation of the changing nature of society. Notwithstanding the heated political debates about the desired role of nationality acquisition as a tool or reward for integration, nationality acquisition is a key indicator of democratic and societal inclusion and the best guarantee of immigrants' citizenship rights and sense of belonging. Although ordinary naturalisation is allowed in all but five countries worldwide, the requirements vary significantly and the procedures are highly discretionary (see Global Citizenship Observatory). The most important requirement for immigrants is the renunciation of their foreign nationality, as access to dual nationality strongly determines most immigrants' interest in acquiring a new nationality.

In contrast, permanent residence may be facilitated as an alternative in countries with restrictive naturalisation policies. The benchmarks underlying the requirements for permanent residence vary significantly across categories and countries. Free movement or permanent migration channels facilitate permanent residence either immediately upon arrival or automatically after 5 years. The most restrictive regimes make permanent residence impossible (i.e. 'permanently temporary' migration), make the requirements as difficult as for naturalisation. (i.e. 'second-class' or [subsidiary](#) citizenship, Carrera (2009)) or make the status insecure and unequal (i.e. denizenship).

21.2.3 Equal Opportunities: Support for Immigrants and Non-immigrants

Thirdly, support for equal opportunities helps to close gaps and inequalities between immigrants and non-immigrants. State services and institutions address specific obstacles faced by immigrants as a disadvantaged or discriminated group by improving their information, skills or opportunities. Depending on the available social policies and services, this support may be provided through mainstream services, with targeted outreach, staff or monitoring to ensure equal access, or through targeted services available to the specific target group. Targeted support is often

understood narrowly as addressing immigrant-specific issues only: language, recognition of foreign qualifications, discrimination, issues related to specific migration channels. In fact, support may also be provided to non-immigrants, who may lack sufficient intercultural competences, information or opportunities for interaction with immigrants. Support for equal opportunities can be offered in all different areas of public life: support from employers and public employment services, schools and teachers, healthcare providers, cities and political parties and so on.

Support for equal opportunities aims to activate, develop and fully recognise the specific human capital that immigrants and/or non-immigrants need for a diverse society. These three pillars – activating, developing and using skills – were summarised from the labour market integration approach of the [Organisation for Economic Cooperation and Development \(OECD\)](#), the intergovernmental economic think-tank of developed democracies, but these can be applied whatever the area of life:

- *Skills activation* both informs and motivates inactive immigrants, non-immigrants and stakeholders to invest in their human capital, interact with one another and participate more in a specific area of life. Activation measures combine incentives, subsidies and sanctions, campaigns and information provision, and bonding through self-organisation, mentorship and networking.
- *Skill development* address skills mismatches by supplying missing context-specific human capital through various formal, informal or non-formal learning methods for adults and children. The key roles are played by the adult education sector, Active Labour Market Programmes (ALMPs) [pedagogical experts](#), second language teachers and intercultural educators and mediators, especially from diverse backgrounds (a.o. Butschek & Walter, 2014).
- *Skill recognition* aims to avoid ‘brain waste’ by facilitating the rapid use of relevant human capital acquired domestically or abroad. Specific mechanisms and roles are created for assessment, validation, certification, communication or use of these skills within a specific area of life. Concepts developed for [the recognition of foreign qualifications](#) have been applied to various forms of employment and leisure: health, politics, sport, culture, local development, etc. A recurring concept in skill recognition is “bridging” (Putnam, 2007) which increases interaction and belonging among diverse groups by expanding shared experiences, networks and social capital around common interests and activities. Recognition schemes require intermediaries with significant capacity, visibility and networks, such as temporary employment agencies, professional bodies and civil society actors like immigrant-led and neighbourhood associations.

Overall, these target skills investments aim to enhance the contributions of immigration to current and future challenges to social mobility. This support for equal opportunities looks and sounds different in each area of life, with different terms, practices, stakeholders and policymakers involved:

- Labour market integration is largely the domain of the public employment services, adult education sector, social partners (employers and trade unions) and public-private partnerships (see the work of OECD).
- For children, an inclusive, intercultural and multilingual education requires the cooperation of multiple education stakeholders (i.e. government agencies, parents associations, student associations, local NGOs and, especially teachers, also see the work of [stakeholders](#), OECD's PISA and UN's UNESCO).
- Health is a traditionally overlooked area of integration policy. The migrant health agenda has advanced through research and standards for culturally competent healthcare, migrant-friendly healthcare providers, good practices on workforce diversification and intercultural interpreters, and comprehensive intercultural health strategies (see work of the UN World Health Organisation).
- For political integration, one of the most reliable indicators of a country's approach is the [expansion of voting rights beyond citizenship and residence](#) (see global overviews of voting rights, including for foreign residents). But beyond voting rights, immigrant leaders can be supported, while immigrants can be systematically informed (e.g. 'Get Out the Vote' GOTV), [organised](#) and consulted on both integration and mainstream policies. [Evidence from European cities](#) suggests that political participation requires inclusive general and targeted macro-level political opportunity structure and strong meso-level institutions. The key actors are political parties, civil society and governments at local, regional and national level (see the migrant and refugee work of IDEA, the intergovernmental democracy think-tank of developed democracies).

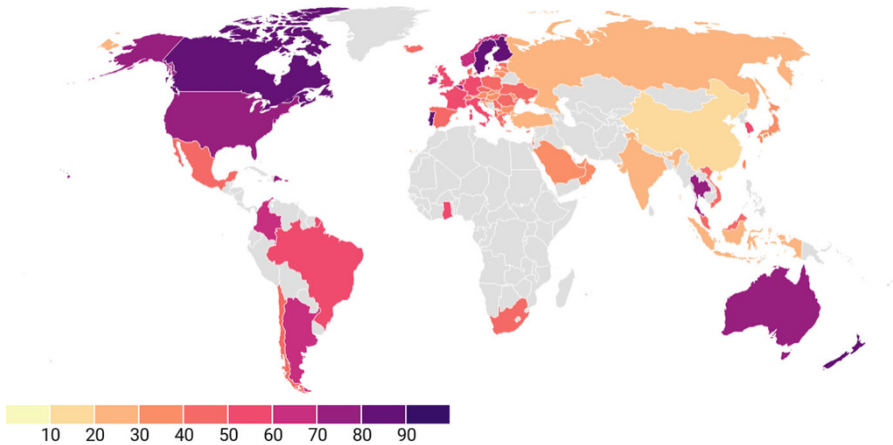
These four examples, with unrelated policy areas, actors and interventions, demonstrate the importance of a mainstreaming and comprehensive approach to secure attention to equal opportunities in all areas of life.

21.3 Empirical Trends and Patterns

21.3.1 *Overall Variation in National Approaches to Integration*

Internationally, integration policies differ significantly in terms of immigrants' rights, security and opportunities. The trends are most clear from [MIPLEX](#), which has been recognised by the EU and UN as one of the reliable and most comprehensive measures of integration policies in terms of the number of indicators, policy areas and years covered. The MIPLEX data on 52 countries is also comparable to other indexes covering additional countries ([ICRI](#), [IMPIC](#) and [Ruhs, 2018](#)). More national research teams should participate in MIPLEX to include more medium and low-developed countries in Africa and Asia.

Integration policies in 66 countries



Map: Thomas Huddleston • Source: Author's own complication • Created with Datawrapper

Fig. 21.1 Integration policies in 66 countries: Authors' own adaptation of MIPEX indicators (NOTE: Author's own adaptation of MIPEX indicators (2014: 52 countries), ICRI (2008: GH, KW, SG, VE, ZA) and Ruhs (2009: AE, CO, DO, HK, MY, OM, SA, TH, TW). MIPEX and ICRI scores are simple average of their common policy dimensions: family reunification, education, political participation, access to nationality and anti-discrimination policies. The Ruhs score reflects the original overall index score)

21.3.2 State of Development of Governance of Migration-Related Diversity

A country's approach to integration is strongly related to its level of **economic and human development, democracy**, immigration and politicisation of immigration (Ruhs, 2018).¹ On one end of the scale, integration policies tend to grant equal rights, security, and opportunities in highly developed democracies, particularly countries with larger, longstanding immigrant populations and weaker anti-immigrant parties. On the other end, these policies are weaker in countries with weaker democracies and development, newer and smaller immigrant populations and more xenophobic politics (Fig. 21.1).

Over the past decade, MIPEX observes a slow global improvement but not necessarily convergence in integration policies. Although anti-immigrant pressure has increased on the most inclusive countries (i.e. in some Nordics, Benelux and English-speaking countries), policy reform and development continue in these countries and across all regions. Trends in integration policies are ambivalent and

¹Interestingly, an often assumed bi-dimensionality between individual civic vs. cultural group rights has not materialised empirically. In other words, granting individual civic rights tend to go hand-in-hand with cultural group rights.

policies are very slow to change over time because of **contextual factors** like historical institutionalism, path dependency and national politics (Koopmans et al., 2012).

The policies of neighbouring countries also matter, as integration policies show significant international divergence but a certain regional convergence. Regional norm diffusion is a countervailing factor influencing changes in countries' integration approach and policies (Shachar et al., 2017). For example, integration policies are improving in similar ways across Europe, both in Western and in Eastern Europe. Similarly, birthright citizenship, **dual nationality**, integration requirements, and **targeted labour market support** are spreading across different regions, despite the absence of supra- or international standards in these areas. Despite this regional normative pressure, no single model or trend can be identified within these regions. There is no traditional destination or new destination model, Asian or Latin American model, Western or Eastern European model, Mediterranean model, or Nordic model. Inclusive countries can be found in all these respective regions: South Korea, Canada, New Zealand, Brazil, Belgium, Czechia, Estonia, Portugal, Sweden, and Finland. Instead, certain patterns can be identified within the same region:

- Basic rights denied in recent destinations in Asia, Eastern Europe and the Mideast
- Lack of attention to equal opportunities in Eastern Europe and Latin America
- Tension between comprehensive vs. temporary integration in Western Europe
- Growing divergences with the politicisation of immigration among traditional destination countries.

While integration is a multidimensional policy where all areas are highly correlated together, the policy is systematically defined by certain international areas of strength and weakness.

21.3.3 Fundamental Rights

The major areas of strength are basic residence rights and anti-discrimination policies. Migrant workers, reunited families and permanent residents enjoy basic security, rights and protection from discrimination. For example, the 2019 UN World Population Policies report found that universal access, regardless of immigration status, is available in majority of countries for essential/emergency health care, access to justice, and, to some extent, public education, but only a minority of countries for equal working conditions or social security. Basic rights are weaker in recent destination countries and low- and medium-developed countries, particularly in Africa, Asia, Latin America and Oceania.

These policies improved significantly over the 20 years, partly thanks to supra- and international standards.

Anti-discrimination policies have become a major area of progress for integration policies worldwide. Protection, assistance and training on racism, xenophobia and hate crimes against migrants are provided by two-thirds of countries worldwide, with

weaker provisions in low-to-medium developed countries, particularly in Africa and Asia. Victims are best protected in traditional destination countries, several [Western European countries with longstanding legislation](#) and several Central European countries with EU-accession-related legislation. Gaps appear in nationality discrimination and areas like education and public good and services. However, the major gaps are, on the one hand, the relative newness and public ignorance of this legislation, jurisprudence and support bodies and, on the other hand, the weakness of the existing enforcement mechanisms, equality bodies and policies. Many equality bodies are weak or relatively new, and chronically under-staffed. For example, these bodies are not fully compliant with the UN 'Paris principles'. Equality policies are usually limited to voluntary initiatives, such as action plans and diversity charters, which do not set out obligations or monitoring mechanisms. As a result, limited state commitments and resources for equality bodies and policies mean that most victims are too poorly informed or supported to even report their complaint, which represents the first step in the long path to justice.

Labour market policies are one of the most developed and improving area of a country's integration policy. Policies are most extensive in the Americas and Western Europe and most restricted in recent destination countries. On average across the MIPEX countries, family and long-term residents can immediately access the private labour market, public employment services and training, but not necessarily public sector jobs, recognition procedures for foreign qualifications or [social security and assistance](#). These rights are weakest for [temporary residents and low-to-medium-skilled migrant workers](#).

21.3.4 Security of Status

Security of status emerges as an obstacle to integration in countries with restrictive integration policies. Recent destinations tend to restrict rights and long-term settlement to highly-skilled and/or co-ethnic immigrants. Whereas developed democracies with sizeable anti-immigrant parties tend to promote basic rights and opportunities, but restrict family reunification, permanent residence and citizenship.

Rarely reformed in law or practice, the path to permanent residence is a normal part of the integration process in only the most inclusive countries in the Americas, Nordic countries and several European countries. In most MIPEX countries, the majority of temporary residents can apply after 5 years to become permanent residents with equal socio-economic rights, but only after proving that they are economically self-sufficient. Half of MIPEX countries also impose a language requirement. In traditional destination countries, temporary residents can apply earlier, but without the right to permanent residence. In contrast, countries in the Mideast and Asia place significantly restrictions on immigrants' long-term rights, particularly for low- and medium-skilled ['temporary' worker programmes](#).

Access to nationality is a major area of divergence. Policies are facilitated in traditional destination countries, Western Europe and the Americas, uneven in

Africa and East Asia and restricted in Eastern and Southeast Europe, the Mideast and Asia. Birthright citizenship for the native-born children of immigrants is fully available in the Americas, restricted in Western Europe and unavailable in most countries in Africa, Mideast and Asia (see GLOBALCIT's Global Birthright Indicators). Even though countries are extending birthright citizenship and dual nationality, the politicisation of immigration regularly affects ordinary naturalisation requirements like language, integration and economic resource requirements. Dual nationality is now accepted for immigrants in two-thirds of countries worldwide (see [MACIMIDE Global Expatriate Dual Citizenship Dataset](#)). GLOBALCIT's Modes of Acquisition database demonstrates the wide variation in ordinary naturalisation requirements differ significantly across countries, even within the same regions. The residence requirement ranges from ≤ 5 years in half the world's countries to 10+ in one-third. Proof of income or employment is also required in half the countries. Although language requirements are widespread and integration requirements exist in half the MIPEX countries, most do not provide sufficient free courses and support for immigrants to obtain the levels required for naturalisation.

21.3.5 Equal Opportunities

Support for equal opportunities is the major international area of weakness in integration policies, especially in the areas of education and political participation. The greatest obstacles arise for mainstream services to guarantee equal access and opportunities and for foreign citizens to become politically active. Interestingly, these areas of weakness have started to improve over the past 5 years, even despite the absence of international standards in these areas.

In terms of education, most schools and teachers receive little targeted support to address the needs of immigrant pupils, multilingualism, social integration or intercultural education.

Language learning and multilingualism are more often addressed than issues of school segregation, teacher diversity or mainstreaming intercultural education throughout school. Support is critically weak in Asia, Central and Eastern Europe and Latin America. Education systems are one of the most conservative and difficult areas of integration policy. Among best practices, Nordic countries focus on inclusive education, with an individualised, needs-based approach for pupils with and without an immigrant background. The US focuses on the needs of racial minority and second-language students. Australia, Canada and New Zealand target both needs and opportunities through multiculturalism policies. Targeted support does expand with growing numbers of immigrant pupils, but reforms are slow and effective solutions are plagued by problems of scale and implementation gaps.

A country's [political participation](#) policies are generally a function of the health of their democracy and the sign of a confident destination country. In most countries, immigrants have few opportunities to inform and improve the policies that affect them daily. As of 2019, some form of voting rights to foreign residents has been

extended by 94 of 195 countries (48%), of whom half have sizeable foreign populations. Immigrant voting fits within different [voting rights regimes](#) and a long forgotten history in the US and British Commonwealth. Today, immigrant voting rights tend to be limited to the local right to vote (not the right to stand as a candidate). Four countries extend the national right to vote to foreign residents: Chile, Malawi, New Zealand and Uruguay. Voting rights are generally secure but hard to obtain, with [ongoing debates for decades](#). Beyond voting rights, most immigrants are not regularly informed, consulted or involved in local civil society and public life. Consultative bodies available in a dozen countries may be too weak, government-led and too poorly funded to engage immigrants, while information and funding for immigrant political participation is usually ad hoc and highly dependent on government interests.

Limited support for equal opportunities exists across all areas of integration policy. For instance, targeted support is the main weakness within labour market integration policies, mostly limited to traditional destination countries and Western Europe. Rarely are general services able to address the specific needs of the foreign-trained, very low-educated, or migrant women and youth. For example, few countries take a needs-based, individualised approach to language learning by opening courses to all residents with limited language proficiency, developing specific tracks based on language ability or orienting these courses towards practical activities, most importantly employment. More broadly, less than a dozen countries facilitate qualification recognition and bridging, target skill development beyond generic language courses, or activate skills through mentoring, employer incentives or entrepreneurship. As a result, relatively few immigrants access effective ALMPs or apply for qualification recognition.

21.4 Policy Gaps

Most scientific and applied studies of the governance of migration-related diversity focus on the gaps between integration discourses, policies and processes. Due to the often normative and politicised around immigration, researchers need a ‘good governance’ framework that challenges our assumptions about the effectiveness of immigration policies and the supposed ‘successes’ or ‘failures’ of policies and approaches. Integration outcomes are not necessarily the ‘outcomes’ of models or policies, as these approaches may not actually affect integration processes, at least not in the ways expected by policymakers or theorised by scholars. Similarly, this relatively new governance area needs to set ‘reasonable expectations’ for what policies can and do achieve, both for immigrant target groups and for the wider public.

Czaika and de Haas’ (2013) conceptual framework (see below) can be applied to studies of three types of gaps between integration debates and integration outcomes. Their “discursive gap” investigates potential discrepancies between public discourses or “integration models” and the actual policies on paper. Their

“implementation gap” investigates potential disparities between policies on paper and their implementation. Their “efficacy gap” measures the extent to which integration processes are affected by implemented policies compared to the major well-known micro-, meso- and macro-level drivers of integration. Evaluation of each of these gaps requires specific types of data, evidence and methodologies, which traditionally have been missing in the study of immigration (Fig. 21.2).

21.4.1 *The Discursive Gap*

One of the gaps identified in many studies is the discrepancy between policy discourses and policy practices. Discourses refer to narratives or stories that actors (policymakers as well as others) use to make sense of a problem situation and frame how a policy measure or program would address the problem situation. Amongst others due to their complex and contested nature, discourses on migration-related diversities tend to be sharply articulated in connected to broader societal beliefs, values and norms. One concrete example is the prevalence of sharply articulated ‘national models’ regarding migration-related diversities. Bertossi (2011) refers in this regard to nationally and historically embedded ways of talking about and coping with issues of migration and diversity. However, as many studies show, such national model discourses often deny the much more complex nature of actual policy practices.

Examples of such national models are widespread. For instance, the Australian model is often described in terms of being a multiculturalist settlement nation, the French model as a Republicanist country with a colourblind approach to the assimilation of newcomers, the Canadian model as a multiculturalist country, the US model as an economic approach that grants an American dream to all those who work hard, etc. Although these models can change and evolve over time, they tend to be rooted in broader beliefs about the nation-state that are often very path-dependent and resistant to change.

Policy discourses such as these national models are often reproduced in how politicians, policymakers and scholars talk about migration and diversity. In this sense they are not only used to make sense of specific situations but also to shape these situations. In accordance with the famous Thomas-theorema, discourses can become real in their consequences. For instance, public discourses that consistently refer to migrants as ‘the other’ may also contribute to the ‘othering’ of migrants. When migrants are consistently approached as foreigners or as in Germany ‘auslander’, they may also start to feel like foreigners and are more likely to be treated as such as well.

However, research reports a widespread discrepancy between such discourses and actual policies on migration and migration-related diversities. On the one hand, this seems due to the simplifying logic of such discourses, which does not do justice to the complexity and diversity of actual policy practices. Various studies that refer to the so-called ‘local turn’ argue that local policies on migration and diversity

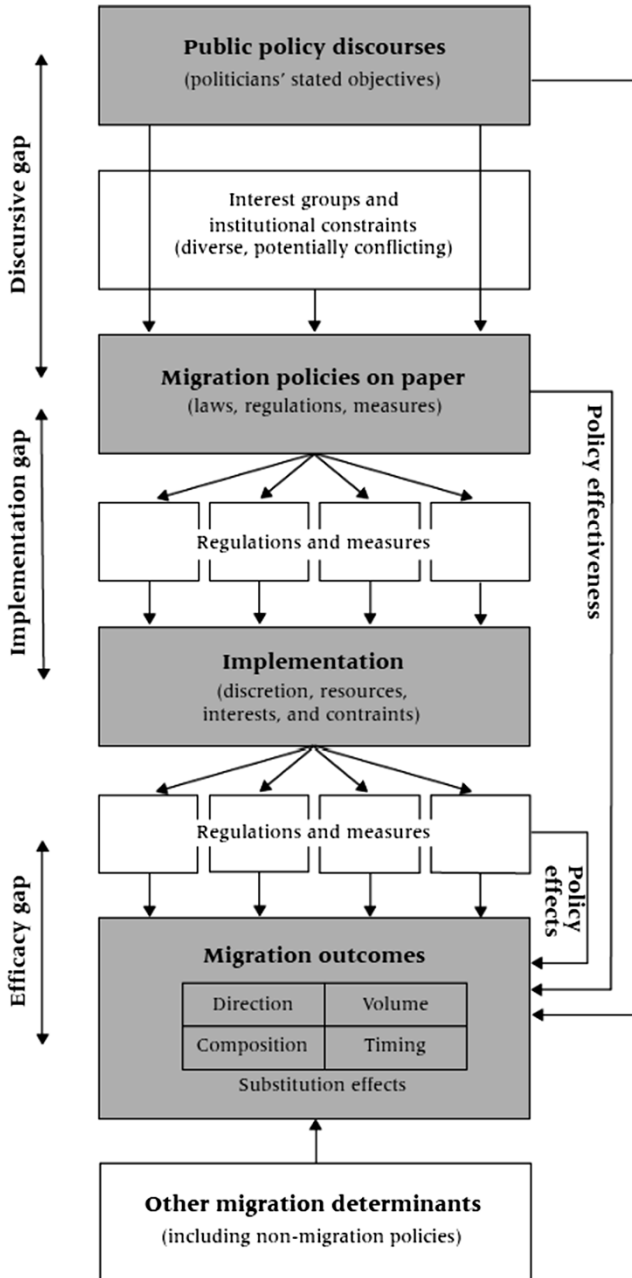


Fig. 21.2 Conceptual framework of migration policy effects and effectiveness (Czaika & De Haas, 2013)

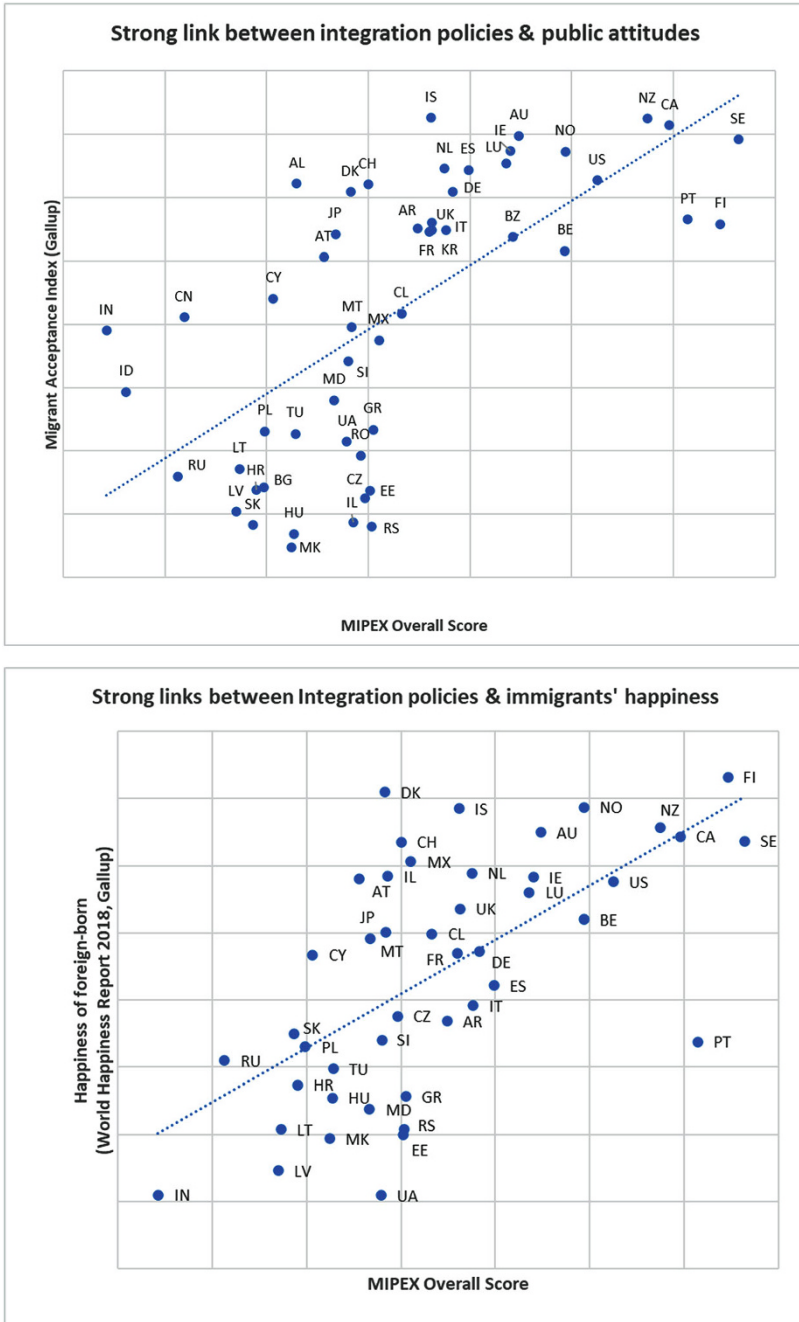
exhibit much more variation than assumed by national models (Zapata-Barrero et al., 2017). For instance, even within a rather centralised policy regime as France, studies have revealed sharp differences between national and local policies in France, such as between the colourblind republicanist philosophy of national government and the more pragmatic approach of the local policies of the ‘politique de la ville’ (Amiriaux & Simon, 2006; Scholten, 2016).

On the other hand, studies also relate the discrepancy to policy factors that inhibit the implementation of policy discourses such as national models of integration. The so-called client politics thesis argues that actors involved in policy practices may have interests that are not in line with policy discourses. There may be actors who have interests that conflict with national policies on integration or migration, and will not cooperate in a policy’s implementation. For instance, in countries with restrictive migration regimes, businesses may have interests in maintaining immigration to secure the supply of cheap labour. Besides interests, institutional constraints may establish path-dependent logics that are difficult to change by government policies.

21.4.2 *The Efficacy Gap*

As data sources improve, a substantial national and international literature is emerging on the links between integration policies and outcomes. While data gaps and methodological questions persist, the most studied areas of integration offer clear trends and lessons learned about the effectiveness of specific integration policies. This initial exploratory phase in integration policy evaluation is identifying what are the various intended and unintended outcomes of policy. These systematic studies allow for the measurement and interpretation of potential efficacy gaps, with contributions from diverse academic disciplines and practitioners. The findings from these studies are also providing more reasonable expectations for what integration policies can and cannot achieve. To explore the potential links and gaps between integration policies and outcomes, this chapter summarises the key findings from an international literature review of 130 multivariate analyses linking MIPEx to outcomes across dozens of mostly European countries.

A country’s approach to integration, as measured by MIPEx, may not only increase positive attitudes and interactions between the public and immigrants, but also create a more common sense of belonging, well-being and citizenship (Ariely, 2017; Hadjar & Backes, 2013). Dozens of studies confirm that integration policies are one of the strongest factors behind the public’s willingness to accept and interact with immigrants. This dynamic is illustrated by the global correlation between MIPEx and Gallup’s Migrant Acceptance Index. Second, a country’s approach to integration shapes how well immigrants think and feel about their new home country. Policies can improve immigrants’ (self)perceptions and close gaps in terms of immigrants’ **identity**, their health, their **satisfaction with life**, their **trust in society** and politics and their political participation in conventional and unconventional ways (Fig. 21.3).



In terms of the impact of fundamental rights, the slow expansion of anti-discrimination policies could have a long-term impact on reshaping public attitudes, awareness, trust and reporting on discrimination. While discrimination occurs in all societies, people in European countries with strong anti-discrimination policies are more likely to know their rights and see discrimination as a problem (Ziller, 2014). The fact that, in most immigrants and non-immigrants in inclusive countries perceive widespread racism is a sign that these policies are working to raise public awareness and expectations for justice. Under strong policies, immigrants also tend to develop greater trust in the police and legal system and a shared sense of [trust in society](#) and the country's democratic system. Over time, people well-informed of their rights are more likely to report discrimination and less likely to identify as a discriminated minority. Anti-discrimination policies could be linked to other integration outcomes, but better targeted research is needed.

Immigrants' security of status is predominantly determined by integration policies. Access to nationality is one of the best studied areas of integration policy. Naturalisation rates for first generation immigrants from developing countries are strongly influenced by the policies in place, especially on [dual nationality](#), birthright citizenship and the [legal and procedural requirements](#). Inclusive naturalisation policies can also boost the '[citizenship premium](#)' that improves some immigrants' public acceptance, [socio-economic status](#), political participation, [sense of belonging](#) and trust. More research is needed to measure how family reunification and permanent residence policies affect immigrants' security of status and other integration outcomes.

The impact of support for equal opportunities is harder to measure accurately. Although employment rates are the most used indicator of integration and measure of policy success or failure, whether or not immigrants find jobs actually depends most on their skills, immigration channel and the economic and social conditions at the time. Instead, targeted policies in this area raise the standards for labour market integration to address more long- than short-term challenges. These policies aim to secure a fairer labour market for everyone by securing equitable quality employment that improves immigrants' wider integration in society. Under these policies, immigrant men and women, over time, are able to develop context-specific professional and language skills demanded by non-immigrants. They can then use these skills to respond to new opportunities, secure [better quality jobs similar to non-immigrants](#) and gain [greater acceptance from non-immigrants](#). Further evidence from robust impact evaluations, meta-analyses and [international experts](#) suggest that immigrants are less likely to access but more likely to benefit from ALMPs providing early work experience (e.g. subsidised private sector for recent unemployed or arrivals), a domestic post-secondary degree, sector-specific and on-the-job language and vocational training, intensive individualised coaching and small business start-up funds. Given that most studies focus on short-term employment rather than skill development and use, their findings sometimes encounter problems of 'reverse causality', whereby more extensive support seem to lead to worse employment outcomes. Instead, countries may be responding to poorer employment rates by investing in

greater support, which delays labour market participation but may lead to better long-term careers.

Similar findings can be cited from the few studies on migrant education. Policies may not impact all educational outcomes for all children, but lead instead to long-term progress and belonging. Well-developed targeted policies can not only help [academically](#), for vulnerable groups, leading to [higher education](#) from one generation to the next. These policies may also help immigrant pupils develop a similar sense of pride, safety and belonging at school as their non-immigrant peers.

While these studies reveal efficacy gaps and links between policies and the intended and unintended outcomes for their target groups, integration and immigration policies do not appear to be the main factors influencing integration outcomes. The limited effects of policies improve – but do not fully determine – the outcomes of the entire 1st and 2nd generation and non-immigrant population. Instead, outcomes are mostly shaped by individual, group/community and destination/origin country contextual factors at micro-, meso- and macro-level respectively. For example, the main factors behind employment, education and political participation, for both immigrants and non-immigrants, are their levels of human capital, previous experiences and current opportunities (i.e. inclusiveness of the labour market, [education system](#), and [political opportunity structure](#)).

What therefore should we conclude from the growing literature on policy efficacy and the main drivers of integration? Do these findings provide reasonable expectations of what can be accomplished under well-developed inclusive policies? Comparing the countries with the most vs. the least inclusive policies on MIPEX, the difference between the two are significant: 30% vs. 3% for [immigrant discrimination reporting](#), 73% vs. 28% for [naturalisation uptake](#), 90% vs. 50% for voter turnout, 90% vs. 24% for [language fluency](#) and 20% vs. >60% for [anti-immigrant public sentiment](#). For the least inclusive countries, these studies help to quantify the impacts of weak integration policies and show the potential for improvement in outcomes. But for those most inclusive countries, is it sufficient and acceptable that two-thirds of immigrant victims do not report discrimination, a quarter do not naturalise, one in ten do not vote or master the language, while one in five non-immigrants are xenophobic? Do these efficacy gaps simply represent the ‘new normal’ of being a diverse country of immigration? Inclusive policies have not ‘failed’ and such a public narrative associating integration with problems may serve to feed anti-immigrant forces pushing restrictive policies. Rather, the real nagging question for policy actors and researchers alike is: what else can be done? These results can serve as the grounds for a more radical reimagining of what the governance of migration-related diversity can be, with new policy ideas and innovations. Alternatively, these findings often lead to discussions focused on what are the problems and solutions for more effective implementation of the current policy framework.

21.4.3 *The Implementation Gap*

Countries may have a national integration policy, but these policies are usually relatively new, time-limited and not comprehensive or locally-embedded. Fleischmann and Dronkers (2007) and Czaika and de Haas (2013) hypothesise that national policies may be poorly implemented in practice, inconsistent with their stated aims and incompatible with the reality of immigrant groups. Currently, most implementation studies of integration policies are descriptive, single-country studies in applied – rather than scientific – studies. The relatively [new and limited development of integration policies and resources](#) (Bilgili, 2015) may mean that policies are too new, too small-scale, or too generic to reach beneficiaries and affect aggregate outcomes at national or even local level.

Migration studies have only recently started to measure implementation. The [MIPEX indicators](#) and studies of [integration mainstreaming](#) and [refugee integration](#) draw attention to mechanisms for multi-stakeholder coordination and resource distribution. The study of naturalisation procedures (Huddleston, 2016) has identified five dimensions of implementation that may affect uptake among eligible immigrants: (1) Lack of information and promotion; (2) Complicated documentation; (3) Significant discretion for authorities; (4) Delays and difficulties due to bureaucratic decision-making; and (5) Weak judicial oversight of implementation. Implementation studies, combining quantitative measurements and qualitative process tracing, should be replicated across the various areas of discretionary decision-making and practice in the highly procedural fields of immigration and integration. Implementation measures could significantly influence immigrants' interests and ability to succeed in residence procedures, language and integration courses, discrimination cases and access to services like ALMPs and recognition procedures for foreign qualifications.

This nascent field of study points to systemic flaws in how countries answer the basic questions of what measures should be implemented when, how and by whom.

What measures are prioritised depends on more political cost-benefit analyses (Benton & Diegert, 2018) that prioritise [low-cost, immediate and visible gains](#). This approach to project-based funding and discrete services can lead to a lack of evidence-based investment in the most effective measures, where the upfront financial and operational costs are high and the benefits are often not immediate. As a result, relatively few immigrants in developed democracies benefit from these most effective ALMPs, such as vocation-specific or on-the-job language trainings, because these are often either absent or a small part of integration policies and courses on offer. This imbalance of demand and supply can lead to long waiting lists, backlogs and bureaucratic obstacles.

When measures are implemented can exclude large numbers of immigrants in need. A lack of [early intervention](#) (facilitating integration from day one for newcomers and from a young age for children and young adults) may limit both the uptake and effectiveness of available support. [Inappropriate targeting](#) can lead too inclusive or too restrictive target groups, often based on legal categories than on

assessments of needs. For example, asylum-seekers and the undocumented must wait to receive a secure legal status and access to integration support. Naturalised citizens and privileged immigrants like EU citizens may be excluded from support, despite their demonstrated needs.

How measures are implemented are shaped by ongoing decisions about inclusion and individualisation that affect the ultimate quality of the intervention. Concerns about mainstream services' accessibility and visibility for potential immigrant beneficiaries led to innovative service-delivery models, such as 'one-stop-shops', voluntary/citizens' initiatives and free digital learning and MOOCs. The wider literature on the delivery of public services by non-profit and for-profit providers raises alarms about implementation obstacles facing immigrants. **Creaming** might explain why the foreign-born are under-represented among beneficiaries of the most effective ALMPs. Service-providers are biased towards selecting the 'easy cases' (e.g. most employable candidates) and tend to side-line those most in need of the support, such as **foreign citizens** or specific vulnerable immigrant groups. Creaming occurs through informal and potentially discriminating selection mechanisms whether explicitly, through eligibility criteria or staff protocols, or implicitly, for example through the use of artificial intelligence. Similarly, pedagogical experts deplore the misuse of standardised tests and tools, like the CEFR for languages, as tools for selection and control, rather than as intended as diagnostic tools for needs assessments and service design (see European Languages Portfolio and EU Skills Profile). **'Lock-in' effects** mean that skill development or activation programmes are designed in ways that delay and discourage participants from exiting the programme and actually applying and using their skills. For example, participants may be required to pass a certain language test before accessing a vocational training or internship. More flexible tracking in programmes for adults should be individualised to participants' specific needs and previous education, skills and language portfolio.

Lastly, *who implements* these services generates critique of **'migration industries'**, from both a good governance and social justice perspective. Intercultural competence in service-provision is still relatively young and niche concept, outside of traditional destination countries. Integration services depend on countries' adult education and lifelong learning sectors, which differ significantly in size and strengths country-by-country. In most countries, service-providers with experience serving immigrants are growing. Most are humanitarian and religious NGOs in developed countries or INGOs in developing countries. Still, these service-providers are often limited in number and profile, under-recognised as a sector (i.e. organisation and certification of second-language teaching, diversity training, intercultural mediation, etc.) and under-valued in both financial and social terms.

Case studies also highlight the lack of diversity among not only policymakers and the **public sector**, but also the staff and leadership of non-profit service-providers and advocates.

The presence of non-immigrants is useful, particularly to expand community-based services and interaction, with volunteers, mentors and bridge-builders. The critique of non-immigrant organisations' staffing and privileged relationships with government argues that their approach is more government/donor dependent and

more humanitarian than empowerment-driven. The lack of diversity is indicative an endemic lack of direct accountability to immigrants, exemplified by the limited involvement of immigrant beneficiaries and communities in the design, implementation and evaluation of policies and services. The [size and strength of immigrant-led organisations](#) are extremely important for reaching immigrants, particularly in countries with weak integration policies. Yet immigrant-led organisations in most countries are underfunded without self-funding strategies, understaffed without a volunteering base, co-opted as marginal partners in services and largely ignored by policymakers, donors and non-immigrant civil society.

21.5 Critical Approaches to Diversity Governance

21.5.1 *From Integration to Inequality Data and Reducing Inequalities*

Immigrant integration both requires and contributes to non-discrimination and equality for all, yet these links are often missing in research, policy and civil society. Building on calls for mainstreaming integration, the governance of migration-related diversity could shift from a separate policy ‘silo’ focused on immigrants only to become one – potentially leading – constituent of a broader agenda fighting discrimination and inequality. For example, in Europe, data collection on immigrants and ethnic minorities is far ahead of equality data collection and equality policies on many other protected grounds. Migration-related diversity is increasingly well captured, regulated and addressed in policymaking, as extensively as other major grounds like age and disability. Religion/belief, race, sexual orientation and gender identity lag behind. Gender mainstreaming remains the most extensive policy area. As a result, equality data and policies are weak and little used in practice.

Instead of a group-based approach with separate and uneven data and policies for each, a more intersectional approach could emerge from a common set of equality policies, duties and data that address people in all their diversity. For instance, an intersectional approach would fully represent and include immigrants as women, elderly, youth, people of colour, people of faith, ethnic minorities, LGBTI, people with disabilities and so on. With greater policy coordination, civil society coalitions and harmonised data, immigrants and other discriminated groups could better identify, compare, and work together on the specific and common obstacles they face in all key areas of public life: employment, education, health, housing, poverty and political participation and access to justice. This equality approach is still rare internationally, but emerging in a few developed democracies (e.g. among Nordic and English-speaking countries).

Going beyond equality for discriminated groups, the governance of migration-related diversity should explore the complex links between immigrant integration and socio-economic (in)equality. While countries’ level of human development

Table 21.1 Typology of integration policies and inequalities

		Integration policy (MIPEX)	
		Weak	Inclusive
Inequality (GINI)	High	Asia, Mideast & Eastern Europe	Traditional destination countries, Americas & Western Mediterranean
	Low	Central & Southeast Europe	Northwest Europe

(measured as HDI or GDP) is strongly related to their integration policies, attitudes and outcomes, countries' level of inequality (measured as the GINI coefficient) seem to be a distinct, significant and overlooked factor confounding integration outcomes. A typology of integration policies and inequalities reveals four regional patterns (Table 21.1).

Emerging global studies suggest that higher development and equality are, more often than not, associated with pro-immigrant attitudes and [immigrant life satisfaction](#). Looking deeper, countries' level of inequality affects integration outcomes in different ways than their level of human development or integration policies. Immigrants in more equitable labour markets are more likely to be [inactive](#), but, when working, in [jobs that are different from non-immigrants and at or even below their skill level](#). Immigrants in more unequal labour markets seem more likely to be active and working in jobs similar to non-immigrants, but also more likely than non-immigrants to be over-qualified for their job. [Highly educated immigrants](#) also seem more satisfied with their life in more unequal than in equal societies. Similarly in the field of [child education](#), the gaps between immigrant and non-immigrant pupils are lower in more unequal than in equal developed countries, although these gaps can emerge in education systems with high socio-economic school segregation and limited redistribution of resources. Moreover, the overall level of education is generally lower in more unequal countries, while [school truancy](#) and [child poverty](#) are higher.

So where is integration best achieved? The societies where immigrants and non-immigrants participate more equally for poorer quality employment and education? Or the societies where immigrants are comparatively disadvantaged to non-immigrants to access higher quality employment and education? The conventional view of integration-as-gaps would choose the unequal countries, where the bar is lower for equal outcomes, over the equal countries, where integration is harder. This corresponds to the 'de Tocqueville paradox' whereby more equal societies are judged (and judge themselves) more harshly for inequalities than unequal societies. Indeed, ethnic minorities in Europe have less social trust in [countries with greater institutional fairness](#), unless strong anti-discrimination policies are implemented. This paradox indicates how policy priorities should differ for migration-related diversity in more equal vs. unequal societies. More equal countries may focus more on implementing integration policies and closing gaps, while more unequal countries with inclusive integration policies may focus on reform of social, educational and labour market policies to reduce socio-economic inequalities for all.

21.5.2 In Favour of Complexity Governance

Another critical perspective on the governance of migration-related diversity has emerged from complexity theory. Complexity theory stems from a broader development in the social sciences towards the recognition of the uncertainties and fragmentation that come with an increase of social complexity and a recognition of the limitations of traditional policy perspectives based on the belief that governments can predict and control problem situations (Byrne, 1998).

On the one hand, complexity theory has had a significant impact on the understanding of migration and diversity. This is manifest for instance in studies of complex intersectionalities of various forms of diversity (origin, gender, race, religion, class, status, etc.), in the work on social complexity and super-diversity, and in the work on ‘liquid’ mobilities that often defy traditional demarcations of labour, family and humanitarian migration (Vertovec, 2007; Engbersen, 2012). This has challenged various conventional ways of thinking about migration and diversity. The traditional focus on specific groups, such as ethnic groups or cultural or racial minorities, has been challenged as a reduction of the complexity of diversities. Complexity theory has also helped expose and deconstruct the traditional linear image of migration as migrants leaving one place to move to and settle permanently in a new host society.

On the other hand, there has been very little recognition of complexity in the governance of migration-related diversities (Scholten, 2018, 2020). Complexity governance literature offers a perspective on governance that is networked, responsive and evidence-based. The governance of migration-related diversity is often not networked but characterised by a strong belief in state-centric steering. For instance, the belief in integration comes with a strong belief in the role that state policies can play in facilitating or even enforcing such integration with coordinated policies, often at the level of the nation-state (national models of integration). Migration regulation and integration promotion would be primarily national prerogatives. A more networked approach calls for a more modest perception of the role that states and policies can play; integration is largely an autonomous social process. It also calls for more appreciation of the interaction with other societal stakeholders, such as businesses, schools, NGOs and a broad variety of other organisations.

Also, the governance of migration-related diversity is often not responsive but driven by a strong urge to find ‘quick fixes’ for problems. Being responsive means that policies constantly adapt to new needs and issues that arise in the context of migration-related diversity. This, however, seems to conflict with a strong urge towards quick fixes and problem resolution in actual policy practices. This appears one of the causes for the frequent discarding of migration and integration policies as ‘failures’, as happened in Europe in the early 2000s when multiculturalist policies were discarded a failure.

21.6 Conclusions

This chapter has provided a broad overview of key issues in the literature on the governance of migration-related diversities. It has provided an effort to open-up the black box of this concept and appreciate the variety of core models, concepts, and theories. This has revealed a variety of governance models associated with the governance of migration-related diversity, from assimilationism and differentialism to interculturalism. It has also revealed a broad variety of dimensions covered, from economic dimensions of participation to cultural dimensions of equality and anti-discrimination. Finally, the chapter has also offered a critical perspective on the governance of migration and diversity, exposing a variety of policy gaps (discursive gap, implementation gap, efficacy gap) as well as discussing two more recent critical perspectives on how to take the discussion on the governance of migration-related diversities forward.

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