Migrant incorporation in highly developed countries: an international comparison

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Migrant incorporation in highly developed countries: an international comparison

Abstract
The incorporation of migrants into society has become an important public policy issue in most highly-developed countries. The ‘traditional countries of immigration’ have treated migrants as permanent settlers, permitting family reunion and acquisition of citizenship. Canada and Australia have introduced multicultural policies which recognise cultural rights and seek to remove barriers to full participation in society. The USA has mainly left integration to market forces, but has brought in equal opportunities and anti-racist measures. The European ‘labour-importing countries’ originally saw most migrants as temporary workers. Policies have changed in response to family reunion and settlement. Sweden has a multicultural policy, while the Dutch minorities policy is fairly similar. France and Britain attempt to integrate settlers into citizenship, and have social policies to overcome migrant disadvantage and reduce conflict. Germany and Switzerland have clung to the myth of temporariness, refusing to grant citizenship to most settlers, yet have had to introduce some social policy measures.

Labour migration almost always leads to settlement and ethnic group formation. It has become clear that old ideas of individual assimilation into homogeneous societies are mistaken. Ethnic groups are incorporated into social structures marked by differentiation on the basis of class, gender and other factors. The character of the ethnic groups depends to a large extent on the immigration and social policies of the receiving country. For successful incorporation, ethnic groups need associations and social networks, as well as their own languages and cultures. Multicultural models appear to offer the best chance of integration, while reducing social conflict and racism. Such models could be adapted to fit the needs of most Western European countries, and could offer useful perspectives for new countries of immigration.

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Migrant Incorporation in Highly Developed Countries: An International Perspective
Stephen Castles
Occasional Paper No. 27
Migrant incorporation in highly developed countries: an international comparison

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Foreword

This paper is based on work carried out on behalf of the Population Division of the United Nations, as part of the preparations for the 1994 International Conference on Population and Development.
Abstract

The incorporation of migrants into society has become an important public policy issue in most highly-developed countries. The 'traditional countries of immigration' have treated migrants as permanent settlers, permitting family reunion and acquisition of citizenship. Canada and Australia have introduced multicultural policies which recognise cultural rights and seek to remove barriers to full participation in society. The USA has mainly left integration to market forces, but has brought in equal opportunities and anti-racist measures. The European 'labour-importing countries' originally saw most migrants as temporary workers. Policies have changed in response to family reunion and settlement. Sweden has a multicultural policy, while the Dutch minorities policy is fairly similar. France and Britain attempt to integrate settlers into citizenship, and have social policies to overcome migrant disadvantage and reduce conflict. Germany and Switzerland have clung to the myth of temporariness, refusing to grant citizenship to most settlers, yet have had to introduce some social policy measures.

Labour migration almost always leads to settlement and ethnic group formation. It has become clear that old ideas of individual assimilation into homogeneous societies are mistaken. Ethnic groups are incorporated into social structures marked by differentiation on the basis of class, gender and other factors. The character of the ethnic groups depends to a large extent on the immigration and social policies of the receiving country. For successful incorporation, ethnic groups need associations and social networks, as well as their own languages and cultures. Multicultural models appear to offer the best chance of integration, while reducing social conflict and racism. Such models could be adapted to fit the needs of most Western European countries, and could offer useful perspectives for new countries of immigration.
I. Introduction

Most highly-developed countries have experienced large-scale immigration from less-developed areas since 1945. Whatever the original intentions of the governments and of the migrants concerned, many migrants have become long-term or permanent settlers. The incorporation of migrants into the societies of the receiving countries has therefore become an important issue of public policy, with significant effects on the labour market, housing, education and social welfare, as well as on national identity and political institutions. This paper will discuss concepts of incorporation and ethnic group formation. It will go on to examine experiences and policies in both 'traditional countries of immigration' and in the Western European countries which have recruited foreign labour. This leads on to cross-national sectoral comparisons, designed to show both the common factors and the differences in the process of incorporation in the various countries. Finally the relative success of differing approaches will be discussed. Much of the analysis is based on Castles and Miller (1993).

II. The concept of migrant incorporation

Integration is widely used as a general term to refer to the process by which immigrants become members of a receiving society. It would be more correct to speak of various forms of migrant incorporation, of which integration is just one. An assessment of incorporation cannot restrict itself to government policies, but must look at a wide range of social processes, such as inclusion in social, economic and political structures; the degree and nature of migrant participation in the institutions of the society; and the emergence of various forms of inequality. It is important to examine what social conditions facilitate or hinder full incorporation of migrants into the social fabric (compare Breton et al. 1990: 3). The outcome of the process may not be absorption of immigrants but formation of ethnic groups (see Rex and Mason, 1986). In principle, it is possible to differentiate between four possible approaches to migrant incorporation, each of which implies different outcomes. These are commonly referred to as assimilation, integration, exclusion and multiculturalism. As will be discussed below, the two base forms may lead to the formation of distinct ethnic groups.

Assimilation

Assimilation refers to the incorporation of migrants into society through a one-sided process of adaptation, in which they are expected to give up their distinctive
linguistic, cultural or social characteristics and become indistinguishable from the majority population. Assimilation is generally seen as a process of individual adaptation to prevailing values, norms and behavioural forms. A theory of migrant assimilation was first provided by the 'Chicago School' of sociology in the 1920s. It is summed up in Park's concept of the 'race relations cycle', in which groups pass through the stages of contact, conflict, accommodation and assimilation (Park, 1950: 82-4). Successful completion of this process can lead to a restoration of the overall cohesiveness of society. The 'commonsense' version is that immigrants must speak the majority language and learn to behave like the majority if they want to be accepted. Assimilation presupposes the willingness and ability of immigrants to discard distinct traits and the willingness of the dominant group to accept new members. It also assumes a high degree of cultural homogeneity and consensus on values and norms among the population of the receiving society.

Assimilation was the prevailing approach to immigrant incorporation in the USA in the early part of this century, at a time of massive immigration and urbanisation. It was also the conventional wisdom in several countries which experienced mass immigration after 1945, including Britain, Canada and Australia. Assimilation implies that the role of the state is to create conditions favourable to individual adaptation, but not to maintenance of distinct ethnic groups. This usually means a policy of 'benign neglect', in which government does not provide special services for immigrants (except perhaps initial settlement services and language courses). Insistence on use of the dominant language and attendance at normal schools for migrant children is seen as a way of transferring the majority culture and values. Assimilation is inherent in current 'human capital' approaches to immigration, which argue that the state should simply leave matters to market mechanisms, which will select the most suitable immigrants and encourage successful adaptation (compare Borjas, 1990).

Integration
Integration refers to a process of mutual accommodation between immigrants and the majority population. The concept implies that immigrant groups will cease to be distinctive in culture and behaviour over time, but sees the adaptation as a two-way process in which minority and majority groups learn from each other and take on aspects of each other's culture. Integrationist approaches developed in the 1960s in response to several factors. Firstly, it became evident that recent immigrants were not simply becoming assimilated as individuals, but were tending to form social, cultural and political associations, and to maintain the use of their mother tongues. Secondly,
it became clear that immigrants were becoming concentrated into particular occupations and residential areas, so that ethnic background and class were linked. Thirdly, as immigrants formed groups and associations, they became increasingly critical of the denial of legitimacy to their cultures and languages.

As a result, official policies shifted. Integration became a tenet of official policy in Australia (Collins, 1991: 231) and Canada (Fleras and Elliott, 1992: 61-2). It also became the guiding principle for educational policy in Britain. In the USA, the shift was rather towards changing the role of the state, to remove barriers to individual participation through equal opportunities and affirmative action legislation. The legitimacy of ethnic organisations and the inevitability of some degree of cultural and linguistic maintenance in the first and second generations was accepted. Ethnic group solidarity came to be seen as an instrument of successful settlement and adaptation, rather than a sign of maladaptation to the receiving society.

**Exclusion**
Exclusion refers to a situation in which immigrants are incorporated into certain areas of society (above all, the labour market) but denied access to others (such as welfare systems, citizenship and political participation). Exclusion may take place through legal mechanisms (such as refusal of naturalisation and sharp distinctions between the rights of citizens and non-citizens) or through informal practices (racism and discrimination). Immigrants become rightless ethnic minorities, who are part of society but are excluded from the state and nation. Since such ethnic minorities are usually socio-economically disadvantaged, this situation implies a strong and continuing link between class and ethnic background. Former 'guestworker' recruiting countries in Western Europe have tended towards exclusionary models.

**Multiculturalism**
Multiculturalism refers to the development of immigrant populations into ethnic communities which remain distinguishable from the majority population with regard to language, culture, social behaviour and autonomous associations over a long period (usually several generations). It differs from exclusion in that immigrants are granted more or less equal rights in most spheres of society, without being expected to give up their diversity, although usually with an expectation of conformity to certain key values. Multiculturalism implies the willingness of the majority group to accept and even welcome cultural difference, and to change social behaviour and institutional structures accordingly. General policies of multiculturalism exist in Canada,
Australia and Sweden, while multicultural policies exist in specific sectors such as education or welfare in Britain and the Netherlands.

**Ethnic group formation**

Although exclusion and multiculturalism appear as opposites, they are facets of a single process: that of ethnic group formation. A number of structural factors in highly-developed countries cause migrants to take on specific (and often inferior) social positions. At the same time, group solidarity in the face of a new (and sometimes hostile) environment gives a subjective dimension to group formation. Whether the ethnic group takes the form of an excluded minority or of an accepted community depends largely on the attitudes of the majority population and the actions of the state. Ethnic group position is a product of both 'other-definition', and of 'self-definition'. Other-definition means ascription of undesirable characteristics and assignment to inferior social positions by dominant groups. Self-definition refers to the consciousness of group members of belonging together on the basis of shared cultural and social characteristics. The relative strength of other and self-definition can vary. Some minorities are mainly constituted on the basis of cultural and historical consciousness (or *ethnicity*) among their members. Others are mainly constructed through processes of exclusion (or *racism*) by the majority.

*Ethnicity* may be understood as a sense of group belonging, based on ideas of common origins, history, culture, experience and values (Fishman, 1985: 4; Smith, 1986: 27). Ethnicity is sometimes seen as *primordial*, that is as pre-social, almost instinctual, something one is born into (Geertz, 1963). However, other scholars speak of *situational* ethnicity: members of a group decide to 'invoke' ethnicity, as a criterion for self-identification. The markers chosen for the ethnic boundaries are variable, generally emphasising cultural characteristics, such as language, history, customs and religion, but sometimes including 'phenotype' or physical characteristics (popularly referred to as 'race') (Wallman, 1986). Similarly, studies of the 'ethnic revival' by the US sociologists Glazer and Moynihan (1975) and Bell (1975) emphasise the *instrumental* role of ethnic identification, which is used to strengthen group solidarity in order to struggle more effectively for market advantages, or for allocation of resources by the state.

Whether ethnicity is 'primordial', 'situational' or 'instrumental' need not concern us here. The point is that ethnicity leads to identification with a specific group, but its visible markers—phenotype, language, culture, customs, religion, behaviour—may also be used as criteria for exclusion by other groups. Becoming an ethnic minority is not
an automatic result of immigration, but rather the consequence of specific mechanisms of marginalisation, which affect different groups in different ways. Exclusionary practices against ethnic minorities are known as *racism*, which may be defined as:

The process whereby social groups categorise other groups as different or inferior, on the basis of phenotypical or cultural markers. This process involves the use of economic, social or political power, and generally has the purpose of legitimating exploitation or exclusion of the group so defined.

Racism means making (and acting upon) predictions about people’s character, abilities or behaviour on the basis of socially constructed markers of difference. The power of the dominant group is sustained by developing structures (such as laws and administrative practices) that exclude or discriminate against the dominated group. This is referred to as institutional or structural racism. Racist attitudes and discriminatory behaviour on the part of members of the dominant group are referred to as informal racism. In many cases, supposed biological differences are not the only markers for exclusion: culture, religion or language are also used.

The historical explanation for racism lies in traditions, ideologies and cultural practices, which have developed through ethnic conflicts associated with nation-building, as well as through colonial expansion (compare Miles, 1989). The reasons for recent increases in racism in highly-developed countries must be sought in fundamental economic and social changes. Since the early 1970s, world economic restructuring and increasing international cultural interchange have been experienced by some social groups as a direct threat to their livelihood, life-style and national identity. Since these changes have coincided with the implantation of new ethnic minorities the tendency has been to perceive the newcomers as the cause of the threatening changes.

Ethnic group formation is obviously of great importance. If migrant settlement generally leads to formation of ethnic groups, then notions of fairly rapid assimilation or integration are mistaken. Immigration countries have to face up to the long-term prospect of pluralist societies. The crucial question then is whether structural factors and policies lead to excluded ethnic minorities, or to accepted ethnic communities. Ethnic minorities are likely to lead a disadvantaged and conflictual life on the margins of societies which seek to maintain the myth of cultural homogeneity. Ethnic communities, on the other hand, can be integral parts of societies which are
consciously multicultural. Obviously this dichotomy refers to ideal types, while most real societies come somewhere in-between, as will be shown below.

It is also vital to realise that migrants do not enter consensual societies with homogeneous cultures and universally accepted values. Rather they are incorporated into social structures marked by differentiation on lines of class, gender, position in the life-cycle, etc. Nor are the migrant or ethnic groups themselves homogeneous: they are structured according to similar criteria. Thus the study of integration means looking at the way complex social groups interact with each other, form new social networks and modify their cultures and forms of action.

III. Policy and experience in traditional countries of immigration

Since 1945, the countries with the largest permanent settler inflows have been the USA, Canada and Australia. Other traditional immigration countries, such as Argentina, Brazil and New Zealand, will not be discussed here for reasons of space. The USA, Canada and Australia have certain common features. They are white settler societies in which mainly British colonists destroyed or dispossessed aboriginal populations. Mass immigration has been part of the strategy for nation-building and industrialisation. All three have regarded most entrants as permanent settlers and have allowed family reunion. Immigrants have readily been granted citizenship, while their children have been born as citizens. All three countries preferred British immigrants, but admitted other Europeans too. Asians and other non-Europeans were excluded until the 1960s, but now form a large proportion of new entrants.

The USA

US society is a complex ethnic mosaic deriving from five centuries of immigration (Feagin, 1989). Until 1965, most migrants came from Europe. The 1965 Immigration Act removed national quotas, and opened the door for worldwide entries, mainly through the family reunion categories. New settlers have come mainly from Latin America and Asia. The main Latin American source country is Mexico, with many migrants coming as undocumented agricultural workers. The main Asian countries of origin are the Philippines, China, South Korea, Vietnam and India. Current policy is for increased intakes, with a larger share of economic migrants. The 1990 Census enumerated a total population of 249 million, of whom 80 per cent were white, 12 per cent black, 1 per cent American Indian, 3 per cent Asian or Pacific Islanders and 4 per cent of other race. Hispanics (who can be of any
race) made up 9 per cent of the total population (Bureau of the Census, 1991). In 1980 there were 14 million foreign-born people in the USA (6 per cent of the total population) (Briggs, 1984: 77). At the time of writing, the foreign-born figure for 1990 is not available, but there has certainly been a large increase, since immigration in the 1980s averaged over 600,000 per year.

Before 1945, most Europeans and Afro-Americans were incorporated into low-skilled industrial jobs, which led to labour market disadvantage and residential segregation. In the long run, many 'white ethnics' have been able to achieve upward mobility, while Afro-Americans have become increasingly ghettoised. Distinctions between blacks and whites in income, unemployment rates, social conditions and education are still extreme. Members of some recent immigrant groups, especially from Asia, have high educational and occupational levels, while most Latin Americans lack education and are concentrated in unskilled categories (Portes and Rumbaut, 1990).

Integration of immigrants into economy and society has been largely left to market forces. The egalitarian character of US society has been seen as providing the best possible chances for immigrant groups to become part of the 'American dream'. Nonetheless, government has played a role by making it easy to obtain US citizenship, and through using compulsory education as a way of transmitting the English language and American values. Legislation following the Civil Rights Movement of the 1950s and 1960s led to measures to prevent discrimination and secure equal opportunities for ethnic minorities. However, commitment to equal opportunities and anti-poverty measures declined during the Reagan-Bush era, leading to increased community tension and racism.

Canada
The 1986 Census counted 3.9 million overseas-born people, of whom 2.4 million were from Europe, 623,000 from American countries and 693,000 from Asia. In recent years Asians have been the largest group of entrants, followed by Latin Americans (including Caribbeans). The five-year immigration plan announced in 1990 lays down entry levels of 250,000 per year from 1992-95 (Immigration Canada, 1991). According to 1986 data on the 'ethnocultural origins' of Canada's 25 million people, 34 per cent were of British origin, 24 per cent of French origin, 5 per cent British-French combined and 38 per cent of 'other' (mainly immigrant) origin. In 1986 about 6 per cent of the total population were regarded as belonging to 'visible minorities' (i.e. non-Europeans), of whom 2 per cent were Native Peoples, 1 per cent South Asian, and 1 per cent black.
After 1945 a policy of assimilation (or 'Anglo-conformity') was pursued towards non-British settlers (mainly Southern Europeans). In the 1960s, there was a move towards integrationist approaches for both immigrants and aboriginal peoples. In 1971, multiculturalism was proclaimed as Canada’s official policy and a Minister of State for Multiculturalism was appointed. In 1988, Canada became the first country in the world to pass a Multiculturalism Act. It proclaimed multiculturalism as a central feature of Canadian society, and laid down principles for cultural and language preservation, reducing discrimination and enhancing intercultural awareness and understanding.

Multiculturalism was seen as a central strategy for all government policies which might affect immigrants. This involved recognition of the need for institutional change in areas such as law enforcement, legal services, health services and education. Anti-racism and equal opportunities measures were integral parts of the multiculturalism policy, as were measures to improve the situation of immigrant and 'visible minority' women (Fleras and Elliott, 1992: 76-7). The Employment Equity Act of 1986 required all federally regulated employers to assess and report on the composition of their workforce in order to correct disadvantages faced by women, visible minorities, native people and the disabled. Despite such policies, community relations appeared to be deteriorating in the 1980s. Among the visible signs of conflict were discrimination against Native Canadians, and racial assaults against blacks and Asians. The unwillingness of the authorities to respond to racist attacks has been a major cause of politicisation and resistance among visible minorities. Police treatment of minorities became a major issue (Stasiulis, 1988).

Australia
In 1947, the Australian Government started a large-scale immigration program, to increase the population and stimulate industrial development. The Government wanted British migrants, but not enough came. In the late 1940s, most migrants came from Eastern and Northwestern Europe; in the 1950s and 1960s, Southern Europeans predominated; while in the 1970s and 1980s, the collapse of the White Australia Policy opened the way for migrants from Asia, the Middle East and Latin America (Collins, 1991). Australia moved from being an almost mono-cultural country to one of great diversity. By 1991, 23 per cent of the population were immigrants, and another 20 per cent were Australian-born with one or both parents immigrants. Two per cent of the population were Aborigines or Torres Strait Islanders. In 1991 there were 3.9 million overseas-born people, of whom 2.4 million came from Europe (1.2 million of these from the UK), 898,000 from Asia, 288,000 from New Zealand,
186,000 from Africa and 158,000 from the Americas (OECD SOPEMI, 1992, Table 26).

Australia wanted permanent settlers: family re-union and naturalisation were encouraged. The initial five-year waiting period for naturalisation was reduced to three and then two years. Children born to legal immigrants in Australia are automatically citizens. The Australian model for managing diversity has had two main stages. At first there was a policy of *assimilationism*, based on the doctrine that immigrants could be culturally and socially absorbed, and become indistinguishable from Anglo-Australians. Migrants were treated as 'New Australians', who were to live and work with Anglo-Australians and rapidly become citizens. There was no special educational provision for migrant children. Cultural pluralism and the formation of 'ethnic ghettos' was to be avoided at all costs. But by the 1960s it became clear that assimilationism was not working due to processes of labour market segmentation, residential segregation and community formation. Moreover, political parties were beginning to discover the political potential of the 'ethnic vote'.

The result was a shift to *multiculturalism* in the 1970s. This is based on the idea that ethnic communities, which maintain their own languages and cultures are legitimate and consistent with Australian citizenship, as long as respect for basic values and democratic institutions is safeguarded. Multiculturalism also means recognition of the need for special laws, institutions and social policies to overcome barriers to full participation in society (Castles et al. 1990; Castles, 1992). Multicultural policies are implemented by a range of special agencies. The Office of Multicultural Affairs in the Prime Minister's Department is responsible for promoting multiculturalism in Federal Government policies. There are similar bodies at the state government level. Health, education and other departments have multicultural units to ensure that services are appropriate to the needs of the various ethnic groups. The government provides services for migrants such as reception centres, help in finding work, language courses, educational support for children, and translating and interpreting services. Ethnic organisations participate in planning of services through consultative bodies.
IV. Policy and experience in the former labour importing countries of Western Europe

Table 1: Foreign resident population in selected European countries (thousands)

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<tbody>
<tr>
<td>Austria</td>
<td>283</td>
<td>272</td>
<td>413</td>
<td>5.3</td>
</tr>
<tr>
<td>Belgium</td>
<td>..</td>
<td>845</td>
<td>905</td>
<td>9.1</td>
</tr>
<tr>
<td>Denmark</td>
<td>102</td>
<td>117</td>
<td>161</td>
<td>3.1</td>
</tr>
<tr>
<td>France</td>
<td>3,714*</td>
<td>..</td>
<td>3,608</td>
<td>6.4</td>
</tr>
<tr>
<td>Germany</td>
<td>4,453</td>
<td>4,379</td>
<td>5,242</td>
<td>8.2</td>
</tr>
<tr>
<td>Italy</td>
<td>299</td>
<td>423</td>
<td>781</td>
<td>1.4</td>
</tr>
<tr>
<td>Luxembourg</td>
<td>94</td>
<td>98</td>
<td>..</td>
<td>27.5**</td>
</tr>
<tr>
<td>Netherlands</td>
<td>521</td>
<td>553</td>
<td>692</td>
<td>4.6</td>
</tr>
<tr>
<td>Norway</td>
<td>83</td>
<td>102</td>
<td>143</td>
<td>3.4</td>
</tr>
<tr>
<td>Sweden</td>
<td>422</td>
<td>389</td>
<td>484</td>
<td>5.6</td>
</tr>
<tr>
<td>Switzerland</td>
<td>893</td>
<td>940</td>
<td>1,100</td>
<td>16.3</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>..</td>
<td>1,731</td>
<td>1,875</td>
<td>3.3</td>
</tr>
</tbody>
</table>

Notes: *Figure for 1982. **Figure for 1989. These figures are for foreign population. They therefore exclude naturalised immigrants (particularly important for France, the United Kingdom and Sweden). They also exclude immigrants from colonies or former colonies with the citizenship of the immigration country (particularly important for France, the Netherlands and the United Kingdom).


The main period of migration to Western Europe was from the late 1950s to the early 1970s. There were two main types of migration: movement of foreign workers from the European periphery, and movement of 'colonial workers' to the former colonising country. Both movements started off as labour migration. Both led to family reunion and permanent settlement, but the legal arrangements for entry and integration were very different. As Table 1 shows, foreign populations started to grow again in the late 1980s, partly through renewed entries of workers, but above all through entries of asylum seekers. Foreign residents make up a significant percentage of the population in most Western European countries. Growth has been partly through immigration and partly through births to immigrant parents.

The United Kingdom

In 1990 there were 1.9 million foreign citizens in the UK (3.3 per cent of the total population). The largest single group were the 638,000 Irish, followed by Indians (155,000), US citizens (102,000) and Italians (75,000) (OECD SOPEMI, 1992). The
ethnic minority population, most of whom are British citizens of Afro-Caribbean and Asian origin, totals 2.7 million (4.7 per cent of the population). Most have been born in Britain—they are second or third generation descendants of immigrants who came from the 1950s to the 1970s. About 1.4 million have their origins in the Indian subcontinent (India, Pakistan and Bangladesh) and 455,000 in the Caribbean. The overall population of immigrant origin may be estimated at 4.5 million or about 8 per cent of the total population.

Most Commonwealth immigrants entered as British subjects, who enjoyed all rights once admitted. This situation was ended by the 1971 Immigration Act and the 1981 British Nationality Act, which put new Commonwealth immigrants on a par with foreigners. Irish settlers enjoy virtually all rights, including the right to vote. It is relatively easy for foreigners to obtain citizenship after 5 years of legal residence in Britain. Since 1965, a series of Race Relations Acts has been passed, outlawing discrimination in public places, in employment and housing. A Commission for Racial Equality (CRE) was set up to enforce anti-discrimination laws and promote good community relations (Banton, 1985).

Labour market segmentation developed in the 1950s and 1960s, with Asians and Afro-Caribbeans concentrated in the least desirable jobs. Today, black workers still have low average socio-economic status and high unemployment. Ethnic minorities are heavily concentrated in the most run down areas of the inner cities. In the 1960s, policies towards black immigrants oscillated between calls for cultural assimilation and the demand for repatriation. The school was seen as an important instrument of assimilation for the second generation. In the 1970s there was a move towards integration policies with emphasis on adaptation as a long-term group process, and special measures to overcome the disadvantages of migrant children at school. Social policies were changed to provide special funding for local government areas with high migrant populations. By the 1980s, multicultural education became official policy in many areas, with recognition of ethnic group cultures in teaching and curriculum. Social policy initiatives were designed to draw ethnic organisations into youth and community work. However, some black organisations argued that such measures were designed to coopt leaderships and stifle protest. They called instead for anti-racist policies.

Organised racist groups such as the National Front grew rapidly in the 1970s and 1980s. Their electoral success was limited, but they recruited members of violent youth sub-cultures, such as skinheads. Racist violence became a major problem. A
Home Office survey in 1981 found that the rate of attacks on Asians was 50 times that for white people, and the rate for blacks was 36 that for white people (Home Office, 1989). Black youth discontent exploded into riots in inner-city areas in 1980-81 and again in 1985-86 (Beynon, 1986). Growing conflicts in inner-city areas led to government measures to combat youth unemployment, make education more accessible to minorities, improve the conditions in urban areas and to change police practices. Task forces were set up for disadvantaged areas; spending under the Urban Program was substantially increased, and a large scale Youth Training Scheme was introduced (Layton-Henry, 1986; Solomos, 1989).

France
After 1945 the French Government recruited migrant workers in Southern Europe. There were also movements from the colonies or former colonies in North Africa and, to a lesser extent, West Africa and the Caribbean. Labour recruitment was stopped in 1974, but family entries and other forms of immigration continued. The 3.6 million foreign residents made up 6.4 per cent of France's total population in 1990. The main groups were Portuguese (646,000), Algerians (620,000), Moroccans (585,000) Italians (254,000) Spaniards (216,000), Tunisians (208,000) and Turks (202,000) (OECD SOPEMI, 1992: Table 9). In addition there are over 1 million immigrants who have become French citizens, and up to half a million French citizens of African, Caribbean and Pacific Island origin from 'Overseas Departments and Territories'.

European community citizens enjoy all basic rights, except the right to vote. Immigrants from Yugoslavia, Poland and other non-EC European countries lack the privileges of EC citizens, and many have an irregular legal situation. People of non-European birth or parentage, whether French citizens or not, constitute the ethnic minorities. These include Algerians, Tunisians and Moroccans, young Franco-Algerians, black Africans, Turks and settlers from the Overseas Departments and Territories. Citizenship is fairly easy to obtain for immigrants, while children born to foreign residents in France can choose to become citizens at the age of 18. The 1972 Law Against Racism, prohibited racial incitement and discrimination in public places and employment. There is no special body to enforce the law and the number of prosecutions is small (Costa-Lascoux, 1989). There is little support for multicultural policies in France. The prevailing view is that immigrants are best integrated through citizenship, which in turn presupposes a certain degree of cultural assimilation. Special policies for ethnic groups and recognition of their leaderships are seen as potential hindrances to integration (Weil, 1991).
The bidonvilles (shanty-towns) which developed around French cities in the 1960s have disappeared, but there is still residential concentration in inner-city areas and in the grandes ensembles—the public housing areas on the periphery of the cities. The work situation of ethnic minorities is marked by low status, insecure jobs and high unemployment rates (Verbunt, 1985). In the late 1980s, growing racism and serious social problems led to a series of special programs to improve housing and education and combat youth unemployment.

The position of ethnic minorities in French society has become highly politicised. Immigrants have taken an active role in major strikes, and demanded civil, political and cultural rights. The second generation (known as beurs) and the Muslim organisations are emerging political forces (de Wenden, 1987). Youth discontent with unemployment and police practices led to riots in Lyon, Paris and other cities in the 1980s. Immigration is a central issue in party and electoral politics. The extreme-right Front National mobilises on issues of immigration and cultural difference. By the early 1990s it had become a major political force (Lapeyronnie et al. 1990).

Germany
The foreign resident population of the Federal Republic of Germany (FRG) has grown from 4.5 million in 1980 to 5.2 million in 1990 (figures refer to the area of Western Germany only). The main groups in 1990 were Turks (1.7 million), Yugoslavs (652,000), Italians (548,000), Greeks (315,000) and Poles (241,000) (OECD SOPEMI, 1992: Table 10). The FRG has experienced several migratory movements, including large inflows of people of German ethnic background from Eastern Europe after the Second World War and again since 1989. Here we will confine ourselves to discussing foreign immigration. This started after 1955, when the government signed labour recruitment agreements with Italy, Spain, Greece, Turkey, Morocco, Portugal, Tunisia and Yugoslavia. The migrants were regarded as 'guestworkers' who would work in Germany for a few years and then go home. They were not expected to settle and family reunion was discouraged (Castles and Kosack, 1973: 39-43).

Migrants became manual workers in construction or in factories. Most were men, but there was a substantial female minority. Employers in the textile and clothing, electrical assembly and food processing branches often preferred female labour. In the early 1970s Turkish workers became the largest single migrant group. The German Government stopped labour recruitment in 1973, hoping that surplus workers would leave. In fact, many foreign workers stayed, and family reunion continued.
By the late 1970s it was clear that permanent settlement was taking place. However, the Federal Government continued to assert that Germany 'is not a country of immigration'. Since the mid-1980s there has been a growth of temporary labour migration (mostly short-term) from Poland. These workers now play a major role in building, domestic work and other informal sector activities in Germany—a resumption of historical patterns going back to the 19th century.

Asylum seeker inflows increased dramatically in the late 1980s reaching 100,000 in 1986, 193,000 in 1990 and 256,000 in 1991 (OECD SOPEMI, 1992: 132). Many of the asylum-seekers come from Africa and Asia, but the main growth since 1989 has been in East-West movements. Anybody who arrives in the FRG and claims to be an asylum seeker is permitted to stay pending an official decision on refugee status, which can take several years. In 1990, 96 per cent of applications were rejected. However, legal and practical difficulties precludes deportation of most rejected applicants, and many stay on. Most Eastern European asylum-seekers belong to ethnic minorities, including Jews and Gypsies (OECD SOPEMI, 1991: 8-18). In 1992 there was an upsurge in asylum-seeker entries from war-zones of the former Yugoslavia. Many Yugoslav asylum-seekers are Gypsies, as are the majority of those from Romania. This ethnic group became the main target of racist attacks in mid-1992. Much of the violence was organised by extreme-right groups, and was concentrated in the area of the former German Democratic Republic.

The myth of temporary residence still shapes the legal status of foreigners, except those from EC countries, who largely enjoy social and economic parity with German citizens. Non-EC residents are excluded from a whole range of rights and services, and denied political participation and representation. There are considerable barriers to obtaining citizenship. By the mid-1980s over 3 million foreigners in the FRG fulfilled the 10 year residence qualification, but only about 14,000 per year actually obtained citizenship (Funcke, 1991). Nor do children born in Germany to foreign parents have any automatic right to citizenship, although the Foreigners Law of 1990 has made it somewhat easier. Even second generation immigrants can, under certain circumstances (conviction for criminal offences or long-term unemployment), be deported.

There is a constant public debate on 'foreigners policy', with three basic positions. Firstly, the right (both the extreme right and much of the ruling Christian Democratic Union (CDU)) call for a continuation of exclusionary policies, including restriction of family entry, limitation of rights and widespread use of deportation powers. The
second position (held by most members of the Social Democratic Party (SPD) and some parts of the CDU) recognises that settlement is irreversible, and calls for policies of assimilation or integration. The third position holds that assimilation is no longer possible in view of the emergence of ethnic communities, and that multicultural models are the only solution. This view is held in the Green Party, some parts of the SPD, the churches and the trade unions (Castles, 1985; Leggewie, 1990). The German model is still essentially exclusionary, but there is growing realisation that a democratic society cannot permanently deny citizenship and participation to a large section of the population. On the other hand, the growth of the racist extreme right hampers moves towards improving the position of migrants.

Sweden

Until 1945 Sweden was a fairly homogeneous country, with only a small Lapp minority (about 10,000 people today). After 1945, labour migration was encouraged. Foreign worker recruitment was stopped in 1972, but family reunion and refugee entries continued. In 1990, there were 484,000 foreign residents who made up 5.6 per cent of the total population. Other Scandinavian countries (particularly Finnland) provided 185,000 of them. The largest non-Scandinavian groups were Yugoslavs (41,000), Iranians (39,000), Turks (26,000) and Chileans (20,000). Many immigrants have become Swedish citizens. In 1986, the total population of immigrant background was calculated to be 920,014—about 11 per cent of the total population. Of these 250,138 had been born in Sweden (Lithmann, 1987).

Migrant workers are over-represented in manufacturing and in lower-skilled services occupations. They are under-represented in agriculture, health care and social work, administrative and clerical work, and commerce. Migrants have unemployment rates about twice as high as for Swedes. Most migrants settle in the cities, and people of the same nationality cluster in certain neighbourhoods, allowing linguistic and cultural maintenance.

Sweden is the only European country with a declared policy of multiculturalism, first introduced in 1975. The policy emphasises the need for measures to give immigrants the same living standards as Swedes, as well as the right of immigrants to choose between retaining their own cultural identities or assuming Swedish cultural identity. Sweden has a comprehensive set of social policies designed to integrate migrants into society. Since 1975, foreign residents have had the right to vote and stand for election in local and regional elections. The waiting period for naturalisation is two years for Scandinavians and five years for everybody else, while children born to
foreign resident parents can obtain Swedish citizenship upon application. In 1986 an Act Against Ethnic Discrimination came into force. Immigrants have the right to 400 hours of Swedish instruction with financial assistance. Children of immigrants can receive pre-school and school instruction in their own language, within the normal curriculum. Other measures include translator and interpreter services, information services, grants to immigrant organisations, and special consultative bodies (Hammar, 1985).

However, multiculturalism has been under attack in recent years. The increase in asylum-seeker entry in the late 1980s led to strains in housing and other areas (Alund and Schierup, 1991). The extreme-right Sverigepartiet (SP—the Sweden Party) started anti-immigrant campaigns in 1986. In the late 1980s there was an increase in racist violence, including arson and bomb attacks on refugee centres. In December 1989, the government decided that asylum should henceforth be granted only to applicants meeting the requirements of the UN Refugee Convention (Larsson, 1991).

Other European countries
This is only a brief outline of the situation in other Western European countries. In general terms it may be said that Belgium and Switzerland have policies rather similar to that of Germany. Migrants are not regarded as permanent settlers, lack rights and find it very difficult to become citizens. However, permanent settlement is inescapable, as shown by the fact that most foreign residents in Switzerland hold long-term 'establishment permits'. In Belgium, as in France and Germany, Muslim groups tend to be the most isolated from mainstream society. There have been a series of youth disturbances in major cities in recent years. The Netherlands has many similarities with the Swedish model. The Minorities Policy, introduced in 1983, accepted the need for specific social policies to integrate minorities, and recognised that it was necessary to deal not just with individuals but with ethnic groups. 'Integration with preservation of cultural identity' became the slogan. Anti-discrimination legislation and local voting rights for foreign residents were introduced. However, the growth of socio-economic disadvantage among migrants has led to a re-examination of policies. The 1991 government Action Program on Minorities Policy pays little attention to the former goal of minority group emancipation and participation, instead emphasising measures to reduce economic and social deprivation, to prevent discrimination and to improve the legal situation for minorities.
V. Comparative dimensions

Immigration policy and integration

Immigration policies may have considerable consequences for the integration process. In looking at the countries, three groups emerge. The 'traditional countries of immigration'—the USA, Canada and Australia—have encouraged permanent migration and treated most legal immigrants as future citizens, permitting family re-union and granting secure residence status. Sweden, despite its very different historical background, has followed similar policies. The second group includes France, the Netherlands and Britain: immigrants from former colonies have received preferential treatment and have often been citizens at the time of entry. Permanent immigration has generally been accepted, and family reunion has been permitted. Immigrants from European countries have also generally been allowed family re-union, permanent residence and naturalisation. The third group consists of those countries which have tried to cling to rigid 'guestworker' models—above all Germany and Switzerland. Such countries have tried to prevent family re-union, have been reluctant to grant secure residence status, and have highly restrictive naturalisation rules.

However, these distinctions are neither absolute nor static. There has been a convergence of policies in European countries: the former colonial countries have become more restrictive, while the former guestworker countries have become less so. This has gone hand-in-hand with a new differentiation: the European Community countries granted a privileged status towards intra-community migrants in 1968, and further improvements with the formation of the unified market at the beginning of 1993. At the same time, entry and residence has become far more difficult for non-EC nationals, especially those from outside Europe. Moreover, the current emotional debate on the 'refugee influx' from the South and East has had a considerable impact. Increased racism, restriction of the rights of foreigners, demands for repatriation, and the emergence of a 'fortress Europa' mentality cannot but worsen the social and political position of existing minorities.

Immigration policies affect other areas of policy, such as labour market rights, security of residence and naturalisation. Moreover, ideologies of temporary migration create expectations within the receiving population. If a temporary sojourn turns into settlement, and the governments concerned refuse to admit this, then it is the immigrants who are blamed for the resulting problems. Immigration policies also help shape the consciousness of migrants themselves. In countries where they are
granted secure residence status and civil rights, immigrants are able to build long-term perspectives for themselves and their families. Where the myth of short-term sojourn is maintained, immigrants' perspectives are contradictory. Return to the country of origin may be difficult or impossible, but permanence in the immigration country is doubtful. Such immigrants cannot plan a future as part of the wider society. The result is isolation, separatism and emphasis on difference.

**Labour market position**

Trends towards labour market segmentation by ethnicity and gender were intrinsic in the type of labour migration practised until the mid-1970s: institutional discrimination—such as rules against job-changing, refusal to recognise overseas qualifications or exclusion from public employment—was a major cause of disadvantage. Informal discrimination—the unwillingness of employers to hire or promote migrant workers—also played a part. The situation has changed since the 1970s: new migrants are much more diverse in education and occupational status. There is a trend towards polarisation: highly-skilled personnel are encouraged to enter, and are seen as an important factor in technology transfer. Low-skilled migrants are unwelcome as workers, but enter through family re-union, or as refugees. Their contribution to low-skilled occupations, casual work, the informal sector and small business is economically important, but is officially unrecognised.

When people come from poor to rich countries without local knowledge or networks, and lacking proficiency in the language, then their entry-point into the labour market is likely to be at a low level. The question is whether there is a fair chance of later upward mobility. The answer often depends on whether the state encourages the continuation of segmentation through its own practices, or whether it takes measures to give immigrants equal opportunities. Some countries have active policies to improve the labour market position of immigrants through language courses and vocational training, as well as equal opportunities and anti-discrimination legislation. These countries include Australia, Canada, Sweden and—to a lesser extent—Britain, France and the Netherlands. The USA also has equal opportunities, affirmative action and anti-discrimination legislation, but little in the way of language, education and training measures. This fits in with the laissez-faire model of social policy in the Reagan-Bush era.

The former guestworker countries—Germany and Switzerland—do offer some education and training measures for foreign workers and foreign youth. But at the same time there are restrictions on migrants' labour market rights. During the period
of labour recruitment, work permits often bound foreign workers to specific jobs. Most workers in the two countries now have the right to mobility, but in many cases the rule of primacy for nationals still applies. This means that an employer cannot take on a foreign worker for a job if a national (or an EC citizen in the case of Germany) is available. Foreigners only have full equality in the labour market if they have long-term residence status—which is becoming increasingly common.

Migrant women
Migrant women's settlement experience remains distinct from that of men. In the early stages of labour migrations, there is a tendency to concentrate on the situation of male workers. However, in most immigration countries, a growing proportion of migrant workers have been women. Women who come through family reunion also often join the labour force. A high proportion of refugees are women, often heads of families with children (Morokvasic, 1984). Migrant women form the lowest segment in a labour market divided according to ethnicity and gender. They frequently provide unpaid labour in ethnic small businesses, giving a competitive edge that makes survival possible. In some sectors, notably the garment industry, complex patterns of division of labour on ethnic and gender lines have developed. Male ethnic entrepreneurs use female labour from their own groups, but are themselves dependent on large retail corporations (Waldinger et al. 1990; Phizacklea, 1990). As Phizacklea (1983: 5) points out, it is particularly easy to ascribe inferiority to women migrant workers, just because their primary roles in patriarchal societies are defined as wife and mother, dependent on a male breadwinner. They can therefore be paid lower wages and controlled more easily than men.

For many women (especially those from Muslim societies), migration to a highly-developed country may mean a radical break with previous forms of social behaviour. Their important position as producers in rural households, and their experience of community within the women's group may disappear, leading to social isolation and dependence on their husbands or male relatives. Male roles, by contrast, which are based on work and social interaction outside the household, are easier to maintain or re-establish. Cultural factors as well as child-care needs make it much harder for women to participate in language or other educational courses. Health, birth and social services are also issues of special concern to migrant women.

It is therefore necessary for government agencies to provide special services which are appropriate to the needs of migrant women of varying backgrounds. Such services exist to some extent in most countries of immigration, although provision
tends to be more systematic and comprehensive where migrant women have been able to secure a consultative role through their own associations. Countries with multicultural policies have on the whole been more willing to recognise migrant women's needs, although even here there is still much to be done. Countries which have been reluctant to accept family reunion and permanent settlement have also been slow to recognise the needs of migrant women.

Migrant women play a particularly important part in the process of community formation. The significance of women's family and educational roles in reproducing and maintaining ethnic languages and cultures has been emphasised in many studies (see for instance Vasta, 1990). Family formation and the emergence of social networks in the immigration country helps to improve migrants' social and economic situation. These processes also provide the basis for community organisation and a measure of protection against racism. The formation of informal networks is an important part of the integration process (Boyd, 1989) and women play a special and decisive role in this.

Residential segregation and community formation

Residential segregation is to be found in all the immigration countries. It is extreme in the USA, where in certain areas there is almost complete separation between blacks and whites, and sometimes Asians and Hispanics too. In the other countries, immigrant groups are highly concentrated in certain city neighbourhoods, though they rarely form the majority of the population. Causes of residential segregation include low income and lack of local networks, discrimination, and the desire of immigrants to group together for cultural maintenance and for protection against racism. Institutional practises often encourage residential segregation. Many migrant workers were initially housed by employers or public authorities. This encouraged clustering, for when workers left their initial accommodation they tended to seek housing in the vicinity. Public housing allocation policies may also cause concentration.

Residential segregation is a contradictory phenomenon. Migrants may be socially disadvantaged by concentration in areas with poor housing and social amenities. But they frequently want to be together in order to provide mutual support, to rebuild family and neighbourhood networks and to maintain their languages and cultures. Ethnic neighbourhoods allow the establishment of small businesses and agencies which cater for immigrants' needs, as well as the formation of associations of all kinds. Residential segregation is thus both a pre-condition for and a result of community formation.
Some members of the majority population perceive residential segregation as a deliberate and threatening attempt to form 'ethnic enclaves' or 'ghettoes'. Racism is often a self-fulfilling prophecy: it justifies itself by portraying immigrants as alien groups, which will 'take over' the neighbourhood. By forcing immigrants to live together for protection, racism creates the 'ghettoes' it fears. One official reaction has been dispersal policies, designed to reduce ethnic concentrations. However, in the absence of the economic opportunities and political structures needed to overcome the powerful forces of marginalisation, dispersal policies are difficult to implement.

Social policy
As migrants moved into the inner cities and industrial towns, social conflicts with lower-income groups of the majority population developed. Immigrants were blamed for rising housing costs, declining housing quality and deteriorating social amenities. In response, a whole set of social policies developed in most immigration countries. In the early stages, social and community work measures were often initiated by non-governmental organisations. These included church, trade union and other voluntary agencies. As time went on, migrant associations took an important role. With growing recognition of the realities of settlement, government agencies became increasingly involved, often working in cooperation with voluntary bodies. Where government has been slow to act, the role of non-governmental organisations remained important, and the character of their involvement has become increasingly political.

In France, for instance, urban renewal policies since the late 1960s have included measures to make public housing more accessible to immigrants. At the same time, the concept of the seuil de tolérance (threshold of tolerance) was introduced, according to which the immigrant presence should be limited to a maximum of 10 or 15 per cent of residents in a housing estate or 25 per cent of students in a class (Verbunt, 1985). The implication was that immigrant concentrations presented a problem, and that dispersal was the pre-condition for assimilation. By the 1980s, the central social policy issue was the situation of ethnic minorities in the inner city areas and in the great public housing estates around the cities. These were rapidly turning into areas of persistent unemployment, social problems and conflicts between ethnic minorities and disadvantaged sections of the French population. Social policies focussed on urban youth (Lapeyronnie et al. 1990: 111). Weil concludes that the social policy measures of the 1980s have failed. They were designed to achieve integration into French society, but in fact they have 'linked all the problems of these towns and neighbourhoods to immigration: schooling, housing, employment or
national identity'. Thus social policy has encouraged concentration of minorities, which slows integration, encourages the formation of ethnic communities, and strengthens group religious and cultural affiliations (Weil, 1991: 176-9).

This is clearly a complex issue which would require careful analysis in each country. Special social policies for immigrants have often reinforced tendencies to segregation. For instance, the 'dual strategy' pursued in German education led to special classes for foreign children, causing both social isolation and poor educational performance. Housing allocation policies in Britain are intended to be non-discriminatory, yet they have sometimes led to the emergence of 'black' and 'white' housing estates. On the other hand, in Sweden, immigrant children have the right to instruction in mother-tongue classes. The official view is that these do not lead to separation, but encourage 'active bilingualism', which makes it easier for immigrant children to succeed at school and work (Lithman, 1987).

Again, it is possible to suggest a rough classification. Australia, Canada, Sweden and the Netherlands have pursued active social policies, linked to broader models of multiculturalism (or minorities policy, in the case of the Netherlands). The basic assumption has been that special social policies do not lead to separatism, but, on the contrary, form the precondition for successful integration. In Australia, there has been a policy of 'mainstreaming' migrant services—i.e. providing them through normal government agencies, rather than special bodies set up for migrants.

A second group of countries are those which reject special policies for migrants on principle. US authorities oppose special measures because they are seen as unnecessary government intervention. Nonetheless, equal opportunities, anti-discrimination and affirmative action measures deriving from civil rights laws have benefited immigrants. French governments have rejected special policies on the principle that immigrants should become citizens and that any special treatment would hinder that. Yet there have been a number of special social policies nonetheless. Britain has also developed a range of social policies in response to the urban crisis and youth riots, despite the ideological rejection of such measures by the Conservative leadership.

The third group of countries is, again, the former guestworker recruiters. In the early period of recruitment, the German Government delegated the provision of special social services to charitable organisations, linked to the churches and the labour movement. Although foreign workers were granted equal rights to work-related
health and pension benefits, they were excluded from some welfare rights. Application for social security payments on the grounds of long-term unemployment or disability could lead to deportation. In Switzerland, there are few special measures for immigrants. Provision of support in emergency situations is left largely to voluntary efforts (Hoffmann-Nowotny, 1985: 224).

**Racism and resistance**

Racist harassment and attacks have become major problems for ethnic minorities in all the countries of immigration. In Britain, racist violence organised by groups like the National Front became a problem in the 1970s. In London 2,179 racial incidents were reported to the police in 1987, including 270 cases of serious assault, 397 of minor assault, 483 of criminal damage, 47 of arson and 725 of abusive behaviour (Home Office, 1989). In France the extreme-right *Front National* has been able to mobilise resentments caused by unemployment and urban decline, and to crystallize them around the issues of immigration and cultural difference. German reunification was followed by an outburst of racist violence in 1991-92. The United States has a long history of white violence against Afro-Americans, and the Ku Klux Klan is still a powerful force. Asians, Arabs and other minorities are also frequent targets (ADL, 1988). Even countries which pride themselves on their tolerance, like Canada, Sweden and the Netherlands, report a growing incidence of racist attacks. The European Parliament's Committee of Inquiry into Fascism and Racism in Europe found that 'immigrant communities... are daily subject to displays of distrust and hostility, to continuous discrimination... and in many cases, to racial violence, including murder' (European Parliament, 1985).

Racism is directed particularly against people of non-European background, such as Asian migrants in Australia, Canada or the USA; Afro-Caribbeans and Asians in Britain; North Africans and Turks in most Western European countries; and asylum seekers of non-European background just about everywhere. Phenotypical difference ('race') seems to be the main criterion for hostility towards immigrants. A survey carried out on behalf of the EC Commission in all member countries in 1989 found strong feelings of distance and hostility towards non-Europeans, particularly Arabs, Africans and Asians. Overall, one European in three believed that there were too many people of another nationality or race in his or her country, with such feelings being most marked in Belgium and Germany (Commission of the European Communities, 1989).
Islam is a particularly important marker of difference. The largest non-European groups are of Islamic background in France (North Africans) and Germany (Turks). There are also large Muslim groups in Britain (Bangladeshis and Pakistanis), the Netherlands and Belgium (Turks and Moroccans). European fear of Islam and hostility to Muslims has a tradition going back to the medieval crusades. In recent years, anxiety about fundamentalism and loss of modernity and secularity have played a major role. But it could be argued that such fears are based on racist ideologies rather than social realities. The strengthening of Muslim affiliations is often a protective reaction of discriminated groups, so that fundamentalism is something of a self-fulfilling prophecy. Moreover, stereotypes of Islam are usually undifferentiated and inaccurate, and ignore the great diversity of religious values and behavioural forms in various countries of origin.

Racist campaigns, harassment and violence can be a major constraint to integration. One form of migrant resistance to racism is residential clustering and ethnic community formation. Such communities develop their own social political and religious institutions, which can increase isolation from the mainstream of society. Reactions of members of ethnic minorities to racism vary widely. There is often a gulf between the experiences of the migrant generation and those of their children, who have grown up and gone to school in the new country. Ethnic minority youth become aware of the contradiction between the prevailing ideologies of equal opportunity and the reality of discrimination and racism in their daily lives. This can lead to emergence of counter cultures and political radicalisation.

In turn, ethnic minority youth are perceived by those in power as a 'social time-bomb' or a threat to public order, which has to be contained through social control institutions such as the police, schools and welfare bureaucracies. The youth disturbances which took place in many European cities in the 1980s epitomise such conflicts. The USA also has experienced violent protests by minorities. The Los Angeles riots of May 1992 were provoked by police brutality towards a black motorist, which went unpunished by the courts. Aggression was directed not only against whites, but also Koreans and Cubans, who have taken on middleman minority roles in areas where big white-owned companies fear to trade.

VI. Citizenship

The analysis so far has shown important differences in models of migrant integration, not only between 'traditional immigration countries' and 'recent labour-importers' but
also within each group. The variations are linked to fundamental difference in concepts of the nation-state and citizenship. Some countries make it very difficult for immigrants to become citizens, others grant citizenship but only at the price of cultural assimilation, while a third group makes it possible for immigrants to become citizens while maintaining distinct cultural identities. This corresponds closely with other policies: countries which are unwilling to grant citizenship often deny the reality of settlement, restrict immigrant rights and follow exclusionary social policies. Countries with assimilationist citizenship policies accept permanent settlement, but tend to reject special social and cultural policies for immigrants. Countries which grant citizenship and accept cultural pluralism generally also see the need for special social policies for immigrants.

Table 2: Naturalisations in selected countries

<table>
<thead>
<tr>
<th>Country</th>
<th>Date of figures</th>
<th>Foreign resident population thousands</th>
<th>Number of naturalisations</th>
<th>Naturalisations per thousand foreign resident population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Australia</td>
<td>1988</td>
<td>1 427</td>
<td>81 218</td>
<td>56.9</td>
</tr>
<tr>
<td>Belgium</td>
<td>1989</td>
<td>881</td>
<td>1 878</td>
<td>2.1</td>
</tr>
<tr>
<td>Canada</td>
<td>1989</td>
<td>n.a.</td>
<td>87 476</td>
<td>n.a</td>
</tr>
<tr>
<td>France</td>
<td>1989</td>
<td>3 752</td>
<td>49 330</td>
<td>13.1</td>
</tr>
<tr>
<td>Germany</td>
<td>1988</td>
<td>4 489</td>
<td>16 660</td>
<td>3.7</td>
</tr>
<tr>
<td>Britain</td>
<td>1988</td>
<td>2 550</td>
<td>64 600</td>
<td>25.3</td>
</tr>
<tr>
<td>Netherlands</td>
<td>1990</td>
<td>642</td>
<td>12 700</td>
<td>19.8</td>
</tr>
<tr>
<td>Sweden</td>
<td>1989</td>
<td>456</td>
<td>17 552</td>
<td>38.5</td>
</tr>
<tr>
<td>Switzerland</td>
<td>1989</td>
<td>1040</td>
<td>10 342</td>
<td>9.9</td>
</tr>
<tr>
<td>USA</td>
<td>1989</td>
<td>n.a.</td>
<td>233 777</td>
<td>n.a</td>
</tr>
</tbody>
</table>

Notes: n.a. = not available. The foreign resident population figure for Australia for 1988 is an estimate, made by taking the foreign resident figure from the 1986 Census, and adding a factor proportionate to the growth in overall overseas-born population from 1986 to 1988. The foreign resident population figure for France is for 1985, although the naturalisation figure is for 1989. The foreign resident population for Great Britain is for 1989. The comparison merely has indicative value, as definitions and categories vary from country to country.

Naturalisation

Table 2 shows that the rank order of countries according to the number of naturalisations per thousand of foreign resident population is: Australia, Sweden, Britain, Netherlands, France, Switzerland, Germany, Belgium. It has not been possible to calculate rates for the USA and Canada due to lack of data on the foreign
resident population. However, the large absolute numbers of naturalisations makes it reasonable to assume rates of naturalisations somewhere between Australia's and Sweden's.

Even in countries where naturalisation is easy to obtain, some immigrants are unwilling to give up their original citizenship. This may be due to a refusal to cut symbolic links with the place of birth, but it can also be due to practical reasons connected with military service or land ownership rules in the area of origin. The best solution in such cases is the granting of dual citizenship. Dual citizenship is generally rejected by governments because of fears of 'divided loyalties', yet it is becoming increasingly common, especially for the children of mixed marriages. Another solution is to create special residence categories which confer some of the rights of citizenship (e.g. 'establishment permits' in Switzerland or 'residence entitlements' in Germany). Local voting rights for foreign residents is also a form of 'quasi-citizenship'. Such approaches, however, are unsatisfactory, for they create new divisions between full citizens, quasi-citizens and foreigners.

**Status of the the second generation**

In countries which apply the principle of *ius sanguinis* (that is citizenship by descent from parents who are citizens) such as Germany and Switzerland, children who are born and grow up in the country are denied not only security of residence, but also a clear national identity. They are formally citizens of a country they may have never seen, and can even be deported there in certain circumstances. In countries with *ius soli* (that is, citizenship through birth on the territory) such as Australia, Canada, the USA and Britain, second generation settlers still generally have multiple cultural identities, but they have a secure legal basis on which to make decisions about their life perspectives. Intermediate forms, such as choice of citizenship at the age of 18 (as in France or Sweden) are reasonably satisfactory. Again dual citizenship seems the best solution, as it would avoid decisions which can be extremely difficult for many individuals.

**Linguistic and cultural rights**

Maintenance of language and culture is seen as a need and a right by most immigrant groups. Many ethnic associations are concerned with language and culture: they teach the mother-tongue to the second generation, organise festivals and carry out rituals. Language and culture serve not only as means of communication, but take on a symbolic meaning which is central to ethnic group cohesion. In most cases, language maintenance applies in the first two to three generations, after which there is
a rapid decline. The significance of cultural symbols and rituals may last much longer.

Migrant languages and cultures become symbols of otherness and markers for discrimination. Many people regard cultural difference as a threat to a supposed cultural homogeneity and to national identity. This is rationalised with the assertion that the official language is essential for economic success, and that migrant cultures are inadequate for a modern secular society. The alternative view is that migrant communities need their own languages and cultures to develop identity and self-esteem. Cultural maintenance helps create a secure basis which assists group integration into the wider society, while bi-lingualism brings benefits in learning and intellectual development.

Policies and attitudes on cultural and linguistic maintenance vary considerably. Some countries have histories of multilingualism. Canada's policy of bilingualism is based on two 'official languages', English and French. Multicultural policies have led to limited recognition of and support for immigrant languages, but they have hardly penetrated into mainstream contexts, such as broadcasting. Switzerland has a multilingual policy for its founding languages, but does not recognise immigrant languages. Australia and Sweden both accept the principle of linguistic and cultural maintenance. They provide interpreting and translating services and mother-tongue classes, as well as support for ethnic community cultural organisations. Australia has a 'national policy on languages', concerned with both community languages and languages of economic significance. Multicultural radio and television are funded by the government. Canada, Sweden and Australia all have multicultural education policies.

In the USA, monolingualism is being eroded by the growth of the Hispanic community. This has led to a backlash in the form of 'the US English movement' which has called for a constitutional amendment to declare English the official language. Despite official rejection of linguistic pluralism, it has proved essential to establish a range of multi-lingual services. Monolingualism is also the basic principle in France, Britain, Germany and the Netherlands. Nonetheless all these countries have been forced to introduce language services to take account of migrant needs in communicating with courts, bureaucracies and health services. The multilingual character of inner-city school-classes has led to special measures for immigrant children, and to a gradual shift towards multicultural education policies.
VII. Conclusions

The cross-national comparison of migrant integration can be summed up by saying that in all countries there are major groups which do not quickly become integrated into mainstream society. Ethnic group formation takes place everywhere, but under conditions which vary considerably. This leads to different outcomes: in some countries ethnic groups become marginalised and excluded minorities, in others they take the form of ethnic communities which are accepted as part of a pluralist society.

Exclusion is most severe in the former 'guestworker' countries like Germany and Switzerland. Multicultural models are to be found in countries with explicit policies of permanent settlement and pluralism: above all Australia, Canada and Sweden. The USA, as a permanent settlement country without multicultural policies, comes close to the pluralist model, but without its explicit political goals. The Netherlands also comes close to the multicultural model, though in a weaker form. Between the extremes of exclusion or multiculturalism are countries like France and Britain, which recognise the reality of permanent settlement, but are unwilling to accept pluralism as a long-term perspective. However, there are important differences between France and Britain, particularly with regard to the role of the state in managing cultural difference. France continues to emphasise political integration through citizenship as the key to integration, while some British policies do tacitly acknowledge the need for special social and cultural policies for minorities.

The reality in each country is much more complex and contradictory than our brief account can show. Nonetheless some general conclusions emerge. The first is that policies of temporary migrant labour recruitment are almost certain to lead to permanent settlement and formation of ethnic groups. No state which bases its policies on the rule of law and human rights can prevent this development. Countries which have recently begun to make use of migrant labour, both in Southern Europe and in East and Southeast Asia would do well to reflect on this.

The second conclusion is that the character of the ethnic groups will, to a large measure, be determined by what the state does in the early stages of migration. Policies which try to deny the reality of immigration by tacitly tolerating large-scale illegal movements lead to social marginalisation, minority formation and racism. Policies which try to maintain a permanent division between foreigners and nationals, by denying rights to the former and preventing them from acquiring citizenship, also lead to a divided society. The best chance for successful settlement and peaceful
interaction between ethnic groups lies in policies which accept permanent settlement and family reunion, and make it easy for immigrants to become citizens.

A third conclusion is that ethnic groups arising from immigration need their own associations and social networks, as well as their own languages and cultures. Policies which deny legitimacy to these lead to isolation and separatism. Cultural rights should therefore be recognised as part of citizenship, along with the more customary civil, political and social rights.

A fourth conclusion is that successful integration requires active policies from the state. These include settlement services, such as initial accommodation, help in finding work and language courses. Social policies are also needed to provide for the special needs of migrants over long periods: measures in education, health and social services, provision of interpreter and translation facilities, and the provision of aged-care for people of migrant background. Migrant women are often particularly disadvantaged and need special services and amenities. The guiding principle of social policy should be that its long-run aim is to not provide separate systems of service provision, but rather to change mainstream systems to respond to the needs of a culturally diverse population. Finally, the state needs to introduce legislation to help remove barriers which prevent full participation of migrants in society. This includes anti-discrimination and equal opportunities measures, as well as laws to combat racist violence and vilification. Special agencies are needed to monitor the implementation of such measures.

All these conclusions share the general implication that policies of multiculturalism offer the best perspective for successful migrant integration. European observers have often asserted that the experience of the 'traditional immigration countries' has little relevance for them, but this claim appears increasingly dubious. European labour importing countries have become countries of permanent settlement, whatever their original intentions. They therefore need to look to the models expressly developed to integrate permanent settlers, rather than cling to myths of temporariness. Moreover, the Swedish case shows that a multicultural model can be implemented in a European country with monocultural traditions.

The same applies to the newer countries of immigration, such as Italy, Greece, Spain, Japan and some of the fast-growing Southeast Asian countries. Some governments have tended to take a laissez-faire approach, tolerating entries of undocumented workers, because employers need the labour. Others have set up 'guestworker'
systems for temporary labour recruitment. Since there has been no official expectation of settlement, social policies and legal frameworks to support integration have been largely absent. The result has been growing marginalisation of migrants, to the point where in some countries shanty-towns are visible around big cities and beggars are common. This feeds into extreme-right propaganda, and leads to hostility towards migrants. The parallels with earlier developments in countries like France and Germany are obvious.

However, it would be wrong to think that multicultural models offer easy answers for Western Europe, or for new countries of immigration. The growth of racist violence and the success of extreme-right mobilisation around issues of immigration and cultural difference make it very hard for governments to move towards improvements in migrants' rights or to accept the perspective of cultural pluralism. The central problem is the fear caused by the growing pressure for migration from poor areas with growing populations to rich areas with stagnant populations. It is becoming clear that successful integration of existing migrants depends on the development of international policies which will help narrow the North-South and East-West gaps, and thus reduce the need for migration. This is an issue that goes beyond the scope of the present paper.
Bibliography


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