Immigration and Membership Politics in Western Europe

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Germany

of policy preferences given similarly oriented governments, we observe in these two cases that citizenship orientations as policy starting points define distinct parameters of policy change, which result in differences of membership policy. Chapter 4 illustrated the effects of similar citizenship policy orientation on differently oriented governments at the point of adoption, and then convergence of government preferences and policy over time. This chapter illustrates the opposite. Additionally, both cases in this chapter are critical for assessing the restriction hypothesis. Germany stands as a “most-likely” case, where a restrictive citizenship policy starting point and a reputation of ethnocultural differentiation would suggest continuity of membership understandings, while the UK is a “hard” or “least-likely” case, where a traditionally liberal and ill-defined conception of national belonging is maintained.

To illustrate the strategic use of civic requirements to reinforce existing and divergent citizenship orientations, I begin each study by examining the content of citizenship policy as a formal institutional reflection of national belonging. The cases then move to an examination of political context and relevant actors at the point of initial policy adoption (t₀). I subsequently trace each case down the causal path from adoption to adaptation, drawing attention in particular to gaps between government preferences and opposition pressures. Germany, for example, is especially illustrative of the effects of opposition actors – at both the federal and sub-state levels – on altering government policies and preferences. In identifying divergence between Germany and the UK, I point not only to policy output (where the former maintains a far denser series of requirements) but also to outcome, where implementation reveals significant differences in both state-coordination/paternalism and difficulty.

GERMANY

Germany is an interesting and challenging case for analyzing both the adoption and adaptation of civic integration requirements. It bears a number of similarities to the cases of restrictive retrenchment discussed in Chapter 4, in that right-of-center parties have strengthened the content of a comparatively restrictive citizenship orientation through new requirements and investment in permanent residence. As such, integration requirements at permanent residence, including lengthy language and civic education courses and a culminating test at a high level of German (B1), effectively begin the process of communitarianism much earlier and insulate citizenship from large-scale demand. Thus, a one-dimensional view of outcomes, such as comparing aggregate CIVIX scores, would equate German membership policy formations as similarly restrictive to states characterized by retrenchment strategies.

While the end might look the same, Germany took a distinctive route to get there. As such, its path is indicative of more complexity and nuance than mere restriction. Several factors shaped this unique journey. First, in contrast to other restrictive citizenship cases, Germany experienced significant citizenship

INTRODUCTION

Just as similar citizenship orientations can constrain ideologically diverse governments into pursuing similarly restrictive membership policies, so divergent citizenship orientations can produce the opposite effect, where similarly oriented governments pursue different membership goals. To illustrate the enabling effects of the context of citizenship, it is useful to compare Germany and the United Kingdom. Both began the “civic turn” with prior experience in membership policy, where both practiced degrees of language assessment, and both replaced these practices with more rigorous assessment through civic integration instruments. Both expanded expectations of membership to all three stages of status. Both experienced similar political processes, where left governments formally adopted and first adapted civic integration. Moreover, these governments, while organized by parties on the left, were both significantly influenced by the right. Recall Figure 3.3, in which the German Social Democratic-led coalition with the Greens appeared decisively on the left but eventually moved to the center of the ideological spectrum by the point of first adaptation (t₁). In this same figure, we also see the UK’s New Labour begin from a position on the center-right. (This is not surprising given the role of self-modulation in a single-actor majoritarian system.) Finally, in this context, both stand out as among the more robust practitioners of civic integration today. But while they are both promoting state identity through civic integration, are they promoting the same identity?

This chapter illustrates the importance of the context of citizenship. Where a politics-centered, government-in-power hypothesis would predict a convergence

1 Debate began over adapting integration requirements in earnest in 2002. With every year until the 2005 election, where the left-led coalition was replaced (by the narrowest of margins) by a Christian Democrats-led government, which included the SPD, “rule” scores show the government moving more and more to the right. Thus, 2002’s score represents a conservative figure.
government's 2002 coalition agreement goal to "promote and also demand the integration of immigrants."}

The quintessential restrictive citizenship starting point

The introduction of membership requirements for citizenship in Germany immediately signals the "taken for granted" nature of citizenship as a membership category. With little in formal articulations on the parameters of membership in citizenship, Germany has still been considered by scholars to be one of the most internally coherent and historically enduring models of "ethnic" or "differentialist" citizenship in Europe, based on a "near total reliance" on the principle of jus sanguinis, or citizenship by parentage and descent. Until the 1999 reforms, Germany had maintained the same citizenship laws since 1913, a fact that Simon Green notes "epitomized the then ethnocultural nature of German citizenship," enacted in the Wilhelmine era, and surviving the Weimar Republic, National Socialism, the Cold War division of East and West Germany, and reunification. Moreover, the federal state successfully maintained this restrictive posture through reunification and large-scale immigration. In the 1977 Naturalization Guidelines, where Germany first recognized its responsibility to foster avenues of naturalization for non-ethnic German immigrants, it also maintained that "the federal Republic of Germany is not a land of immigration. It does not aspire to increase the number of its citizens through naturalization." To wit, Brubaker describes Germany as lacking a political culture that is "supportive of naturalization" where the process involves "not only a change in legal status, but a change in nature, a change

5 Marina Seveker and Anne Walter, "Country Report Germany," in The INTEC Project: Integration and naturalisation tests: The new way to European Citizenship (Nijmegen, the Netherlands: Centre for Migration Law, Radboud University, 2010), fn. 2.

6 Many scholars have since challenged many of Brubaker's characterizations, including Heike Hagedorn, "Republicanism and the politics of citizenship in Germany and France: Convergence or divergence?" German Politics Studies 1, no. 3 (2003), 243-272. Of course, it should be noted that Brubaker does not argue that German citizenship was first organic and Volkcentered; German citizenship was created in response to the need to coordinate admission and expulsion rules among states in a compact and economically integrated state-system (p. 27). Ethnicization and naturalization only occurred later on, during Wilhelmine Germany, to foment what is understood today as an "ethnocultural understanding of nation-state membership" (p. 52).


in political and cultural identity, a social transubstantiation that immigrants have difficulty imagining, let alone desiring.”

The 1999 Citizenship Act (implemented in 2000) was interpreted at the time as the first, significant break from this restrictive past. In short, this new law lowered the residency duration from fifteen to eight years and introduced a type of *jus soli* for children that created the opportunity to obtain citizenship for a child of foreign parents on the condition that one parent is a long-term resident (legal resident for eight years or in possession of a residence permit for three years). It also brought about a more facilitated naturalization process. However, alongside these liberalizing features, Germany retained a formal ban against the holding of dual citizenship and introduced the *Optionsmodell*, which obligates a child—upon reaching the age of majority (18)—either to pick German citizenship or to retain their foreign citizenship. If no declaration is made, the person loses German citizenship. This “option” certainly limits the inclusionary thrust of *jus soli*, and while the residence requirement was slashed in half, eight years of residence is still among the higher durations of residence in Europe. Some scholars have also since questioned the extent to which this liberalization is anything more than lip service, pointing to low naturalization rates and administrative barriers in the decade since passage.

A second question is whether this liberalizing change altered or opened up the concept of belonging that German citizenship conveys. Thomas Diez and Vicki Squire, for example, argue that despite these changes, “the notion of community linked ‘by blood’ remains the predominant concept both in legislation and . . . public discourse.” But if the facilitation of integration at permanent residence and citizenship reveals anything, it shows an important adjustment, that of opening up the promotion of belonging from among co-ethnics to, in principle, defining distinct parameters of belonging that are accessible to third-country nationals, i.e., immigrants without German ethnicity and heritage.

This opening of citizenship, whereby it is feasible to think of outsiders becoming insiders to German membership—at least on a theoretical level, is particularly evident when contrasting today’s membership requirements with previous practices. Germany stands in contrast to its European neighbors as the only early practitioner of formal membership requirements. Long before the “civic turn,” Germany had language “tests” and value commitments for citizenship and immigration. However, these requirements bore a number of differences to their contemporary counterparts. Beginning with citizenship, Germany introduced in 1977 a requirement for immigrants to demonstrate a “voluntary and lasting orientation toward Germany.” Ethnic German returnees were excluded from this provision, as they were already viewed to have German nationality and there was no standardized measurement of this orientation, in either language or knowledge, and it remained open to interpretation of practice by respective Länder. While directed toward non-German immigrants, the number of persons eligible for citizenship in this category was relatively insignificant. It was a nominal recognition that persons acquiring German citizenship should be connected to the community, but it was neutral in regard to individual skills or the nature of that connection. And because of the low number of applicants, it was more symbolic than anything else. It echoed the conflicting nature of the naturalization guidelines, maintaining principles of both inclusion through naturalization and exclusion through immigration.

In looking at historical membership conditions for residence and entry, Germany stands distinct from both other states and contemporary practice. Since 1978, administrative guidelines stipulate that basic knowledge of German and integration could be a condition under which permanent residence conditions could be issued. Basic oral German became a requirement with the Aliens Act of 1990. And, since 1997, ethnic German immigrants (predominantly from East and Central Europe) were tested on dialect/language to determine “Germaness” for the purposes of establishing eligibility to settle with access to citizenship. This policy came on the coattails of a near decade of immigration, with over two million German repatriates (*Auslander*) coming to a newly unified Germany, “many of whom did not speak German well (if at all) and could integrate into German society only with great difficulty.” As a “confirming feature” of eligibility, it invariably served as an important “filtering function,” proving to be an “insurmountable obstacle” for a majority of “ethnic German” immigrants. It was a policy for filtering “insiders,” not promoting integration for “outsiders.” In other words, it tested compatibility and was not concerned

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8 For extensive and detailed discussions on the 1999 Citizenship Act, see Simon Green, *The Politics of Exclusion: Institutions and immigration policy in contemporary Germany* (Manchester; New York: Manchester University Press, 2004); Kay Halbrunner, “Germany,” in EUDO Citizenship Observatory Observatory Country Reports (Florence: EUDO Citizenship, Robert Schuman Centre for Advanced Studies, EUI, 2012); Marc Morée Howard, *The Politics of Citizenship in Europe* (Cambridge: Cambridge University Press, 2009). Howard, for example, as a result of this change, records Germany’s Citizenship Policy Index score as significantly liberalizing from 0 to 2.04 out of 6 (p. 27).

9 Exceptions to allow for retention of other citizenships are given only if renunciation is not possible or if it creates economic disadvantages, to name only a couple of reasons. Swiss and EU children also are exempt.


12 Thomas Diez and Vicki Squire, “Traditionen von Staatlichkeit und der Internationalerisierung von Migration in Deutschland und Deutschland,” *Citizenship Studies* 12, no. 6 (2008), 568.


14 Independent Commission on Migration to Germany (Süssmuth Commission), *Structuring Immigration, Fostering Integration* (Berlin: Druckerrei Conrad GmbH, 2001), 177.
Examining politics: Germany and the United Kingdom

with getting immigrant newcomers off on the right foot. In passing this test, “ethnicity provides an edge that mere residence and payment of taxes does not.”\(^5\) These policies are distinct from contemporary practices of civic integration requirements, but they serve as legal precedent for the eventual extension of integration for immigrants.\(^6\)

This discussion of Germany’s citizenship policy and concept of belonging highlights the restrictive orientation of membership as a starting point for the adoption of civic integration policy. The line, however, is arguably moved with regards to analyzing policy adaptation, in which the 1999 Act increased access in principle. In fact, this periodization not only establishes temporal bookends, it also enables policy output from the first period to serve as policy input in the second.\(^7\) Despite strong indicators to suggest that liberalization did little to loosen German identity as an intransigent sense of belonging,\(^8\) the expansion of membership requirements to permanent residence shows how initial changes at citizenship created a new context for counterbalancing and restriction.

Membership policy adoption as a trade-off

Examining the context for citizenship policy liberalization – and when civic integration policy adoption first took shape – requires taking a brief view at immigration to Germany. For a country that before 2004 adamantly described itself as “not a country of immigration,” Germany has experienced perhaps the most voluminous waves of migration in Western Europe. Germany’s new demographic reality was shaped by a number of tributaries: Aussiedler who acquired German citizenship as ex-patriates or refugees of German descent; “late-comer” (Spätassisiedler) immigrants of German descent from former Soviet countries after 1993 (subjects of the German “dialect test”); and, perhaps most notable as a background factor, migrant workers and their descendants. In brief, once the ebb of German expatriates and refugees subsided in the immediate postwar period, the West German government initiated a series of bilateral agreements with countries, including Turkey (1961) and Yugoslavia (1968), to bring (mostly male) foreign workers into the domestic labor market. The idea behind guest-worker schemes was that laborers would be rotational, i.e., they would be mobile to fit the emerging and changing needs of various economic sectors – namely industrial to agricultural, and temporary. The failure of both of these assumptions underscores what is now known as the “guest-worker” myth.\(^9\) When economic migration ceased with the 1973–1974 oil shock, there were already approximately 2.6 million foreigner workers in Germany. And while labor migration ceased, other forms of migration became more popular, namely family reunification and asylum seekers (who might have otherwise come as guest workers). In other words, not only did immigrants not return voluntarily to their country of origin once the need for cheap labor subsided, but they brought their families for settlement. It was assumed that guest-worker schemes would yield a minimal social and political impact, as Germans largely considered immigration to be an economic issue.\(^10\) Alas, these families started to raise children – speaking German, socialized in German culture, and professionalized in the German economy – as second- and third-generation immigrants (i.e., children of foreigners) in Germany; they gained permanent residence but were blocked from access to citizenship.

The naturalization of non-national immigrants remained extremely low throughout the 1980s, resulting in an average naturalization rate of below 0.5 percent.\(^11\) By the end of the 1990s, with over 7 million foreign nationals living in Germany, naturalization rose incrementally from 1.02 percent in 1993 to almost 2 percent in 1999.\(^12\) This did not signal increased opportunities for citizenship as much as it did increased demand, where more migrants were completing the necessary duration of residence. In this diversifying picture, Green observes that “the notion of a prevailing elite consensus, especially over the symbolism of German citizenship, is difficult to sustain from the late 1970s onward” and, moreover, that “this lack of consensus means that the policy-making process, far from determining simply ‘fine details,’ actually plays a critical role in explaining policy output.”\(^13\) In this context Germany finally overhauls long-standing

\(^{11}\) Göktürk et al. describe some of the reasons that the guest worker scheme proved to be incorrect. When industrial concerns realized that the rotational design was too expensive (p. 10), new foreign workers were quietly brought in to meet needs outside city centers. Relatedly, where the costs of finding and retaining workers also were expensive and residency conditions of temporary workers were unclear, the inflow of guest workers subsided (and began to reverse) only with the 1966–1967 recession. In Deniz Göktürk, David Graebling, and Anton Kaes, Germany in Transit: Nation and Migration, 1955–2005 (Berkeley: University of California Press, 2007).


\(^{13}\) Green, “Much ado about not-very-much?” Assessing ten years of German citizenship reform,” 174.


\(^{13}\) Green, The Politics of Exclusion: Institutions and immigration policy in contemporary Germany, 10.
citizenship laws, through a process defined by significant contestation and bargaining. In recognizing the need to adapt citizenship, existing citizenship rules serve as a baseline in defining parameters of acceptable and possible change. Kay Hailbronner notes regarding debate preceding citizenship change that “There is in principle no dispute about the need to integrate large parts of the foreign population into Germany by inducing them to become German citizens ... There is no consensus, however, on the ways and conditions under which German citizenship should be acquired.”

Amidst broad agreement that something needed to be done, a significant liberalization of citizenship was passed as one of the first priorities of the newly elected SPD–Green coalition, which replaced the longtime conservative presence after the 1998 election. There were two clear objectives to the liberalization of citizenship: (1) to increase the number of naturalizations of permanent residents; and (2) to improve the integration of immigrants and their German-born children through citizenship. Politically, the new citizenship law not only reflected the ideological transitioning of governments, replacing a center-right coalition with a left one; it also culminated a protracted political process stretching over the past two decades. For example, as recently as the mid-1990s, and as evidence of the broad consensus behind citizenship change, the CDU/CSU (Christian Social Union in Bavaria) proposed a number of liberalizations to citizenship, including a reduction in residence and facilitating citizenship for children. This initiative was eventually abandoned because of disagreement among coalition parliamentarians, who held a slim majority in the Bundestag, as well as divisions within the CDU itself. However, in the meantime, both the SPD and the Greens had “developed broadly similar positions during their time in opposition.” This consensus made rapid citizenship reform possible once they were in power. Many have already written thorough accounts of the 1999 citizenship act; in particular, Green and Howard have provided a careful and lengthy account of the politics involved in this landmark policy change. Without repeating their description or insight, this section will focus on the way in which integration requirements factored into negotiations and, ultimately, policy outcomes.

44 Hailbronner, “Germany,” 3.
46 Green, The Politics of Exclusion: Institutions and immigration policy in contemporary Germany, 91.
47 Ibid., 96.

As context, Green points out that disputes over citizenship liberalization in the 1990s focused not on “finding the most rational policy solution in order to achieve an aim on which all parties in fact agreed” but were instead “dominated by largely symbolic issues such as national identity and integration, as well as by the perennial question of whether Germany was a country of immigration.” Therefore, while in principle both parties supported degrees of citizenship liberalization, they differed in terms of how integration was woven into that process. According to Ulrike Davy, the conservative position saw that “Naturalization was (and is) a final and formal step at the end of the process of integration: integrate first, then apply for naturalization.” By contrast, for liberals and others on the left, “naturalization should not be withheld until immigrants prove worthy of it; naturalization might considerably facilitate integration: naturalize, then integrate. Hence, immigrants should be able to obtain German citizenship at the earliest convenience.”

Yet the fulcrum of disagreement between government and opposition was over dual citizenship as a proxy for integration and loyalty, and not integration requirements per se. The liberalizing agenda of the left government stretched beyond previous proposals by the center right and created anxiety. Through an unprecedented petition campaign and regional elections in Hesse that shifted the balance in the Bundesrat, these center-right actors were able to block the introduction of dual citizenship. But blocking dual citizenship was the smaller prize. By mobilizing the population on an explicitly anti-foreigner agenda and winning the state of Hesse, the SPD–Green absolute majority in the Bundesrat was lost. And, as Green notes, “without this absolute majority, the new citizenship bill could not be passed, and a compromise with opposition parties would have to be sought.” One compromise was dual citizenship, and the adoption of the Optionsmodell brought in necessary support from the Free Democratic Party (Freie Demokratische Partei; FDP) in order to pass legislation.

A second compromise was integration requirements. The citizenship bill carried with it the first round of what Helen Hartnell describes as an “integration price tag,” namely introduction of language and loyalty. The new law required proof of integration to be assessed through “sufficient oral and written German language skills,” instead of inferred by demonstrating a “voluntary and lasting orientation.” These additions are described by Green as “small print,” added.

49 Green, The Politics of Exclusion: Institutions and immigration policy in contemporary Germany, 85.
51 In the end, the government created a type of temporary dual citizenship, where a person holds dual citizenship automatically at birth but is required to give one of the two up by age twenty-three.
52 Green, The Politics of Exclusion: Institutions and immigration policy in contemporary Germany, 98.
alongside other conservative markers to the new bill. He says that “while the Greens were certainly annoyed at this, their attention was quickly diverted” to the petition campaign in Hesse. In the end, the CDU/CSU ultimately opposed the citizenship bill in the Bundestag for not requiring enough integration, wanting to require knowledge of constitutional order alongside language in exchange for other concessions of liberalization. During parliamentary debate over the bill, CDU/CSU politicians decried the liberalizing reforms as giving away “naturalization for free.”

As the federal government did not articulate a standardized assessment level or instrument for German proficiency, the Länder authorities had substantial discretion. This led to varying practices across Germany, ranging from oral interviews to written exams. In addition to language, the 1999 reform also implemented a requirement of a declaration of loyalty – specifically a “commitment to democratic order and constitution.” However, this was not an amendment concerned with attachment to values and immigrant integration so much as it was strategically included to have legal grounds to exclude “those applicants from citizenship in which concrete suspicions […] cast doubt on their willingness to conform to Germany’s constitutional order […] – a provision targeted at applicants with extremist political tendencies.”

As a consequence, though integration was the sticking point for CDU/CSU support, they created a political situation in which the left governing coalition was both compromised into accepting integration conditions and penalized because they were not strong enough. Aside from the linguistic changes to the law itself, the integration requirements that were added in the 1999 Act made little difference to the acquisition of citizenship or to efforts to promulgate citizenship as a membership category. This weakness was ironically first created and then politically exploited by the CDU in the following years to politically position the SPD as weak on immigration and to bring about more restriction, specifically at the stage of permanent residence. In the end, a left government adopted integration requirements as part of the bargain to deliver more consequential policy liberalization. Thus, while this was a restrictive concession in and of itself, it was embedded as part of an overall, contained liberalizing strategy. A closer look at the process, however, shows that it was not produced merely because they were left per se and wanted to promote inclusion (as predicted by a government ideology approach), but rather because greater liberalizations for access came at a cost. This lends an

Germany’s first Immigration Act and robust integration adaptation

In extending membership requirements to permanent residence, we see more restrictive aims behind policy adaptation. New requirements erect formidable barriers of admission that effectively supersede naturalization. Indeed, this is where the heart of civic integration lies in the German case. And, unlike citizenship reform, new requirements for residence, including the mandatory language and civic orientation courses, were not foisted onto unwilling governing parties. In fact, these restrictions were developed and produced by the same left government that delivered citizenship liberalization. These divergent policy directions are not surprising. In fact, they are consistent with theoretical expectations discussed in Chapter 3: left governments pursue inclusive citizenship but exclusive immigration in a context of issue salience and, in particular, where institutional design strengthens opposition voices. Immigration and citizenship are related policy venues, of course, but are guided by distinct logics as they bear different associative costs.

After citizenship reform, “there was a discernible shift in emphasis onto integration in a broader sense.” Both the SPD–Green coalition and the CDU-led opposition showed keen interest in promoting integration for immigrants but, just as with citizenship, they differed over how to promote it. Manifesting in labor-market-resembling logics, the SPD and Greens believed “governments should take the lead in inclusion,” while the CDU/CSU believed “it was to be left to the individual foreigner alone.” As such, debate over how to “promote and also demand the integration of immigrants” began in earnest in 2000, defined by consensus of goal but not approach. Parties invariably reached broad agreement over integration courses, as subjects like labor migration and asylum grew in importance.

The Independent Commission on Migration to Germany, popularly known as the Süßmuth Commission, proposed in its 2001 report the creation of integration programs for immigrants. The commission’s purpose in setting integration requirements was to target poor language skills as an impediment to accessing the labor market and political participation. Drawing on the Dutch model, the Commission advocated adopting obligatory language training and integration courses, but not Dutch-style sanctions, recognizing that “due to the fact that different legal conditions apply in different cases, sanctions for failure to

36 van Oers, “Citizenship tests in the Netherlands, Germany and the UK,” 72-73. 37 Ibid., 72.
38 Green, “Much ado about not-very-much? Assessing ten years of German citizenship reform,” 176.
39 Green, The Politics of Exclusion: Institutions and immigration policy in contemporary Germany, 117.
40 Ibid., 116.
attend cannot be imposed against all immigrants.” These proposals were intended to be non-partisan in the hope of promoting cross-party consensus. As such, the commission had a cross-party membership, formed by Interior Minister Otto Schily of the SPD but chaired by former speaker of the Bundestag, CDU member Rita Süssmuth.

This occurred against the backdrop of a new discourse taking shape in Germany, advocated by Friedrich Merz, then leader of the CDU in the Bundestag, on promoting Leitkultur, or “guiding/lead culture.” Merz spoke of immigrants being required to accept German culture, which has its “foundation in the Constitution as the most important expression of German moral order guaranteeing the coherence of German society.” Where this definition resembles a type of constitutional patriotism, the interpretation by the CSU – the CDU’s Bavarian sister-party – was a little more assimilationist, where “adoption of ‘Leitkultur must [involve] more than just acquisition of the language and the recognition of laws’, it required ‘tolerance and consideration for the norms and customs’ of the native population.” As a strategy to gain political ground for the right and simultaneously weaken the SPD, the CDU set up an alternative immigration commission. This alternative, CDU-led immigration commission began to set a new tone for new criteria for permanent residence, not trusting that the SPD-led government could effectively handle the issue. The term “Leitkultur” was eventually dropped from the commission's final reports, but according to Hartwig Pautz, it had already fulfilled its role by “triggering a debate about identity that totally eclipsed the aims of the Süssmuth Commission.”

He continues: “Whereas the Süssmuth Commission’s intention was to provide practical guidelines for immigration and integration, such as a detailed programme concentrating on language acquisition, the CDU and CSU managed to shift the focus of the debate on to questions of national identity and to query the loyalty of non-European immigrants in particular.” By setting the tone of the discourse, the CDU/CSU opposition was also successful in setting the agenda itself. In terms of tone, while the left was “uneasy about the concept of a German ‘lead culture’, there was a “broad consensus that immigrants and aspiring citizens need to adapt to the legal, cultural and linguistic norms of the host nation, even if there is acute disagreement about what precisely these consist of.”

In the end, while both commissions diverged in terms of asylum and other areas, they were in agreement that the key to integration was in learning the host society language. They both produced similar proposals on this front, supporting the introduction of 600 hours of compulsory integration courses.

The 2004 Immigration Act (in force January 1, 2005) introduced a number of major integration policies for immigrants in obtaining permanent residence. Immigrants were required to demonstrate both oral (a requirement since 1990) and written language skills, obtained through attendance at an integration course (Integrationskurs), as well as knowledge of society, conveyed through a civic education course (Orientierungsberufen). The content of the orientation course touches on several themes including politics (e.g., voting system, welfare state), history (including Nazism), and individuals and society (e.g., education, child-raising, religious diversity). Integration requirements have evolved to include participation in an integration course of (at most) nine hundred units of language courses and forty-five units of civic orientation, culminating in both language and civic tests.

While representing an unquestionable new restriction for immigrants to obtain permanent residence, there are some elements of design that suggest requirements also aim to foster a modicum of integration. First, a migrant can obtain a one-year residency reduction toward citizenship if he or she successfully completes the integration course. Second, completion in a timely manner (within two years of eligibility) enables the immigrant to claim back half the costs of the course (see below). Finally, in contrast to Denmark, for example, permanent residence is slightly more connected to citizenship in that a migrant is exempt from the language requirement for citizenship if they complete it for permanent residence. Plans to exempt immigrants from the citizenship test with successful completion of the civic orientation course and test were introduced in 2012. This makes the German model closer in kind to the Dutch and British models than their more restrictive citizenship counterparts, in which citizenship is a reward for – and not a process of – integration. Defining belonging in citizenship through the conditionality of permanent residence effectively joins these membership categories together and diminishes distinctions between them. This makes permanent residence more difficult (an unsurprising outcome in that it is regulated by immigration policy), while simultaneously making citizenship

47 Green, The Politics of Exclusion: Institutions and immigration policy in contemporary Germany, 128.

48 The Immigration Act, of course, was about more than integration requirements as it was the first comprehensive legal framework for immigration policy in Germany. The primary objective – in which it had little success – was to increase the migration of highly skilled workers. Additionally, through parallel changes to the Residence Act there was consolidation of a number of resident statuses into two categories: temporary status and permanent status.

49 These examples are pulled from the official curriculum, “45 hours Germany.”

50 A migrant with sufficient German (defined at or above the B1 level) also does not need to complete the language course and may produce certification of proficiency instead of sitting for the standarized exam. The migrant is still required to attend the civic orientation component of the integration course and, since 2009, to take the culminating exam, unless they have certification of completing German secondary school. See Sevener and Waer, “Country Report Germany.”

44 Independent Commission on Migration to Germany (Süssmuth Commission), Structuring Immigration, Fostering Integration, 254.


46 Jan Palmowski, “In search of the German nation: Citizenship and the challenge of integration,” Citizenship Studies 12, no. 6 (2008), 559.
easier and, importantly, more inclusive in the long run, a more surprising and not an insignificant achievement.

However, alongside these reprieves—which we might call “positive sanctions”—there are a number of negative sanctions, including fines and the denial of a residence permit. Perhaps the most pervasive sanction is that third-country nationals who fail to attend these courses or pass the end-of-course exam could see a suspension of payment of social welfare benefits during their period of non-attendance. Even long-term residents could be obligated to attend courses if they received the long-term unemployment benefit (known as Hartz IV). This touches on a greater problem of structural dependency: while immigrants without permanent residence enjoy significant social and welfare rights, benefit utilization and a lack of economic self-sufficiency can affect an immigrant’s chances of obtaining both long-term statuses of residence and citizenship. So while immigrants benefit from policy arrangements earlier on, improving their footing and security in society, it can create a vicious dependency that makes status even more unattainable. In sum, welfare benefits became conditional on integration, while status became conditional on welfare independence. We also witness in this “rights and responsibilities” contract a compromise between approaches, where the government engages more actively in immigrant integration (as per left preferences) while also demanding more active participation from the immigrants (as per right preferences).

This mixed result but overall restrictive tone was produced not by accident or mutual preference, but out of necessity. By 2004, the CDU/CSU captured an overwhelming majority in the Bundestag. Therefore, support for the law was needed from both houses, severely weakening the extent to which the SPD–Green coalition could liberalize. Once the CDU had succeeded in mainstreaming elements of restriction into the SPD-led program, the only remaining discussion on integration was whether it was to be funded by the federal government or by the states. As a result of this gained political leverage by the right, as well as general antipathy in public opinion toward immigration—especially not exclusively from 9/11 and the connection of the assailants to Germany, this phrase of policy adaptation is comparatively restrictive. Here we also see another limitation to the ideological orientation of government approach. Governments operate in environments of concession and bargaining, particularly in federal systems with bicameral legislatures. While immigrants were certainly enabled to be self-sustaining in society through language and country knowledge, and integration opportunities were balanced with positive sanctions, a migrant’s ability to reap the benefits of integration was limited to their ability to succeed in the course. Integration requirements for permanent residence were able simultaneously to satisfy both liberal and restrictive demands.

The final stage to the unfurling of integration requirements in Germany occurs by returning to citizenship, standardizing language assessment, and introducing a naturalization test. The primary focus of civic integration in this case study, as well as other cases of restrictive citizenship orientation, observes the concentration of integration requirements for residence first and foremost. This is deliberate. Integration is very much tied to the issue of immigration, and in front-loading the expectations of integration to the acquisition of residence permits, German policymakers are able to create both the right and the duty to integrate. On the one hand, this can have the effect of improving an immigrant’s life chances, while on the other hand failure to achieve integration can produce decisive and enduring exclusion. All this vetting takes place outside of the realm of citizenship, which remains insulated from politics following the 1999 Act. This changed in 2006. But, again, it was not because the now-center government, comprising a CDU/CSU–SPD grand coalition, deliberately pursued language standardization and tests. Rather, these policies were reactively adopted to counterbalance more restrictive alternatives. Unlike residence, integration was not a central concern for citizenship and, as we shall see, its still-comparatively restrictive orientation remains unaffected by new requirements. This does not equate to liberalization of citizenship, but rather neutrality, even indifference.

If the 1999 Act could be classified by its liberalizing reform (symbolic if not in practice), the 2007 citizenship amendments might be described as standardizing and procedural. There were a number of factors that impelled the federal government into a decision on language assessment and citizenship tests. We see, again, integration requirements were not a proactive decision but rather a response to external and incremental pressures. First, there existed the need to standardize the level of language assessed for citizenship across the states. Originally, there was no specification of language level for citizenship, only that an applicant demonstrate “adequate” German. In a 2005 court decision, the Federal Administrative Court ruled that an applicant did not need to be able to write German provided that he or she was able to understand a simple text and dictate letters in German. This was not a standard across the Länder, where each state maintained discretion in practice. Second, there was a lingering problem of compatibility with other requirements. The Immigration Act introduced standardized language assessment for permanent residence at the B1 level. This was a higher target than was demanded in most Länder for citizenship, thus creating direct, upward pressure for reform.

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51 Course fees themselves can be seen as a type of sanction. According to the Federal Office for Migration and Refugees (BAMF), fees start at €792 (approximately $1070) but can cost more if immigrants require additional language training or take special courses. There are possible fee exemptions for the unemployed, those receiving social assistance, or those who demonstrate hardship. http://www.bamf.de (accessed September 25, 2013).

52 Michalowski, “Integration tests in Germany: A communitarian approach?,” 190.

In terms of knowledge assessment for citizenship, a groundswell of state-level practices foisted the issue onto the national stage. In addition to the absence of guidelines on assessing “adequate” German, states also had discretion in evaluating “commitment to basic liberal democratic order and constitution.”54 To this end, the Länder of Baden-Württemberg and Hesse both found the declaration of loyalty as required by the 1999 Act to be inadequate. The conservatively governed Land of Baden-Württemberg was the first to unveil a formal citizenship test on January 1, 2006. This interview test began to be referred to as a “Muslim test” because it asked leading questions for a specific profile. For example: “Shall a woman be permitted to be alone in public or to go on holiday on her own – what is your opinion about that?”55 Other questions inquired as to the applicant’s views on forced marriage, terrorism, women’s rights, and sexuality. Moreover, the test was explicitly and exclusively for applicants from Organization of Islamic Cooperation (OIC) countries as, according to a statement by the Interior Ministry in Stuttgart, “All Muslims are suspect.”56 This discriminatory focus was quickly taken back after protest. Later that year in Hesse, also a CDU-led Land, a similar citizenship test was proposed. In contrast to the interview, this exam would not only assess liberal values, but use a written exam to assess general knowledge of German history and culture. While never implemented, it set the tone for a discussion on national standardization.

In both of these cases, the CDU succeeded in setting a new agenda for testing. In raising the issue of assessment through state-level decisions, where the implementation of the Citizenship Law is relegated owing to Germany’s federal structure and can create a divergence of practices that could be constitutionally problematic, the question could no longer be ignored at the federal level. These independent state practices led to a meeting of CDU/CSU interior ministers that called for a national values test. This then led to a recommendation for a federal-level test by the Interior Ministers Conference (IMK) that produced a compromise to prevent further individual practices and naturalization “tourism.” Recommendations included the standardization of written and oral German assessment at the B1 level that would equalize language expectations of citizenship with that of permanent residence. No recommendations were made for the nature of citizenship testing, thus preserving state-level discretion on assessment.

54 “Freiheitlich demokratische Grundordnung” appears in § 10 ss. 1 No. 1 StAG Naturalisation Law.

Formal amendments to the Citizenship Law were made as part of a package of changes to implement a series of EU Directives in 2007. The government went further than the IMK recommendations by proposing a formal and standard citizenship test for all the Länder to assess “knowledge of the legal and social system and the way of life in the Federal territory.” It also required the new test for spouses of German citizens. Implemented in September 2008, the civic test requires an applicant to correctly answer 17 out of 33 multiple-choice questions. Thirty questions are derived from a general catalogue of naturalization test questions and assess three areas of knowledge: “living in a democracy,” “history and responsibility,” and “people and society.”57 The remaining three questions assess the Land of main residence. Test-takers can prepare for the exam through free on-line practice tests, tutorials, and obtaining copies of the catalogue of questions for both the general section and specific Land section. Finally, the law provides for citizenship courses as a way to prepare for the test, but these have not been implemented across all states because of lack of demand.58

The introduction of the citizenship test certainly makes naturalization more procedural if perfunctory by adding another requirement to the process. But does it make it more difficult? In cases of restrictive retrenchment, we see both citizenship and permanent residence become more difficult – thus preserving a restrictive orientation toward foreigners – through civic integration and other requirements. In the case of Germany, however, we do not see civic integration exclusively as a way to maintain exclusion but as also a means to update membership to the realities of intake in the context of liberalizing-oriented governments. Where there was significant pressure to liberalize citizenship across the ideological spectrum, integration requirements have offset this opening by transforming the effective barrier of admission from citizenship to permanent residence through robust integration programs and testing. The effect of cross-party and cross-institution politics has been to mitigate the degree of both proposed restriction and liberalization that can be achieved, resulting in contained liberalization for citizenship and moderate restriction for permanent residence.

Implementation and variegated effects on settlement and citizenship

This final section examines the extent to which these divergent policy outputs match up with policy outcomes. In this view, permanent residence is unambiguously the new, decisive barrier of membership. Despite disagreements about the actual degree of liberalization produced by the 1999 Act, one can see evidence that implementation of a mild citizenship test has neither eroded liberalizing
gains nor made citizenship more difficult. On average, 98.9 percent of applicants pass the German citizenship test.\(^59\) This is one of the highest rates in Europe and globally (the United States, for example, boasted a pass rate of 95.8 percent in 2010; Australia, 98.9 percent).

Alongside this minimal effect on citizenship acquisition—owing in large part to its negotiated origins and insulated position due to investments in permanent residence—we see language and country knowledge requirements successfully work to preserve an unequivocal shade of restriction through permanent residence. Pre-empting the filtering power once preserved to citizenship, permanent residence has been structured to be a consequential, prohibitive barrier to “promote and also demand” integration. Table 5.1 shows low pass rates of the language test among candidates for permanent residence. In the first few years we see significantly low pass rates among course graduates reaching B1 (between 38 and 44 percent), and among those who passed were mainly highly qualified migrants.\(^60\) It also shows that before the 2007 reforms to the integration program, course graduates were performing far worse on the language exam than those who did not complete the course. These figures have since improved, and as early as 2009 two-thirds of course graduates were passing the language exam at the B1 level.

These figures are far below the citizenship pass rate, leaving a large segment of immigrants in need of more language training and reaffirming the shift in authoritative barriers from citizenship to permanent residence. Still, in 2012, BAMF declared a great success for the integration course, which had been taken

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<th>2005</th>
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<td>14,824</td>
<td>59,952</td>
<td>43,853</td>
<td>78,163</td>
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<td>Pass rate among test</td>
<td>69.3</td>
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<td>67.4</td>
<td>47.9</td>
<td>45.2</td>
<td>49.9</td>
<td>53.8</td>
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<td>participants (%)(^a)</td>
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<tr>
<td>Pass rate among course</td>
<td>38.6</td>
<td>47.9</td>
<td>44.1</td>
<td>50.9</td>
<td>66.4</td>
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\(^a\) Percentages apply only to people who passed at the B1 level, as this is the required level for completing integration requirements for a permanent residence permit.

60 van Oers, “Citizenship tests in the Netherlands, Germany and the UK,” 75.
CONCLUSION

The German case lays out a number of points of comparison. First, in contrast to cases where integration requirements were decisive instruments for restrictive retrenchment in uncontested political settings (e.g., in Austria and Denmark), new integration requirements in Germany were achieved through political maneuverings and were part of a deliberate strategy to offset change. Center-right political actors, first in opposition and later in Land government, offered counterbalancing measures to maintain a comparatively restrictive orientation toward outsiders, through a strengthened permanent residence. Mandatory integration was a mechanism by which opposition or regional interests were pushed to the fore of political debates, setting a decisive agenda for new policy. Resulting from these political processes - between insiders and outsiders and across different levels of government - the design and the implementation of civic requirements are more moderate, though they still maintain the unmistakable hue of exclusion.

Second, and perhaps more consequential, we see a central preoccupation with requirements at permanent residence, through robust requirements and ties to non-utilization requirements. By comparison, citizenship remains relatively untouched, and new integration requirements reveal themselves to be nothing more than a neutral addition that neither liberalizes nor adds restriction, whereas permanent residence becomes a more decisive barrier of control. A strict path dependence approach might note this outcome as a result of stasis, missing the intervening story and unique processes of political maneuvering and bargaining.

5.1 Acquisition of citizenship in Germany, 2000–2011

In the end, Germany still maintains an exclusive understanding of belonging, in both law and practice, made ever more restrictive not by changes to citizenship per se but by conditionality established at earlier barriers of admission. Moreover, despite the significant liberalization to citizenship that occurred in 1999, we see that this change makes little difference if all the barriers preceding eligibility are so formidable. While, in principle, the act of articulating explicit contours of membership suggests accessibility, the wall is high and the road to it is long.

THE UNITED KINGDOM

The attachment of integration requirements to naturalization and the promotion of newly defined “British values” have been described as part of a “quiet citizenship revolution.” Like Germany, the UK has adopted membership requirements, namely the language and knowledge of life (KOL) test for settlement and citizenship. In addition, it adopted and adapted civic integration under a left government. Labour’s long run in government lasted from 1997 until the 2010 General Election. While this period was marked by escalating concerns about immigration, the issue was never central in an election. Nor did the Conservatives gain support in opposition on the issue in particular. More significant than opposition actors in the British system is the nature of institutional design itself. As such, in a single-actor institutional system, policies are made with a view to continually win over public opinion.

Despite similarities between Germany and the UK, we see significant divergence in the purpose, design, and outcome of new membership policies. Unlike its counterpart on the continent, the UK adopted and maintained a civic integration strategy for the purpose of promoting, not deterring, access to full membership through citizenship. In fact, even when restrictive political pressure was first present, following the 2005 General Election and until the 2009 introduction of the Borders, Citizenship and Immigration Act (BCIA), the ultimate abandonment of new restrictions is testament to the high price of change. And while neighboring effects, learning, and a change in government have recently made civic integration – a once stalwart model of positive citizenship promotion – more restrictive, differences persist which can largely be understood as a product of different conceptions of and objectives for belonging, as measured in citizenship policy orientation.

Despite recent restrictions, the UK still stands in contrast to previously examined cases on a number of related fronts. First, unlike Austria, Denmark, and Germany, which all adopted civic integration policy in the context of restrictive citizenship starting points, reflecting insular, ethnocultural concepts of membership, the UK started with a liberal citizenship policy, reflecting an inchoate concept of the “British citizen” that remains vague and is regularly

64 Ruth Kelly and Liam Byrne, “A common place” (London: Fabian Society, 2007).
The United Kingdom

an immigrant without seeming exclusionary or right-fisted. Tracing the causal path of membership policy in the UK reveals that civic integration can be more than one thing, given policy context and government preferences. It also shows that it can be more than one thing over time, where conditions and governments change.

Easy to join, but join what?

While civic integration is not the first attempt to positively define a sense of Britishness, John Greenwood and Lynton Robins point out that “its importance on today’s political agenda, however, suggests that previous initiatives have borne little fruit.”

The UK has maintained a historically liberal set of citizenship policies, typified by low-residence duration for naturalization (5 years; 3 years for spouses), allowance for dual citizenship, and the conferring of citizenship through jus soli at birth as a right. English has been a formal requirement for naturalization of non-British subjects since 1914, reaffirmed with the British Nationality Act (BNA) of 1981 (effective in 1983) that applicants demonstrate “sufficient knowledge of the English, Welsh or Scottish Gaelic language.”

The practice of assessing language, as in other states, was always ad hoc, and the successful completion of naturalization paperwork was often evidence of sufficiency.

This inclusivity is notably juxtaposed to what many scholars and politicians have identified as an incomplete and ill-defined concept of belonging in British citizenship. The United Kingdom is, first and by definition, the unification of multiple national communities. It sews together the different nations of England, Scotland, Wales, and Northern Ireland. Multiculturalism (and multiracialism) may have “officially” begun with the arrival of Jamaican immigrants on the Empire Windrush ship in 1948, but Britain has been multinational for much longer, precluding a shared national identity. Moreover, as Joppke notes, by virtue of Britain being a post-colonial state – where nation-centered concepts of


68 This 1981 language requirement did not apply to naturalizing spouses of British citizens, as reported in the House of Commons Written Answers, Hansard, 2 June 1997, column 3.

69 Also, similar to early Danish and German practices, language requirements were not instruments of immigrant integration. Citizenship, according to Randall Hansen, was fashioned to preserve different categories of membership based on subjecthood. Randall Hansen, Citizenship and Immigration in Post-War Britain: The institutional origins of a multicultural nation (Oxford: New York: Oxford University Press, 2000), 37-45.

70 Of course, the UK received non-European migrants before this much-publicized event. In fact, many of the migrants on the Empire Windrush were “returnees,” having fought with the Royal Air Force during World War II. See Leo Lucassen, The Immigrant Threat: The integration of old and new migrants in Western Europe since 1850 (Urbana: University of Illinois Press, 2005), 113.
immigration are eclipsed by liberal-state ones – citizenship “no longer can explicitly and directly reproduce and reinvigorate particular nationhood.”

Resulting from this inherent diversity as a starting point, even the 1948 BNA did not positively define a category of British citizenship as membership, but instead, as Randall Hansen describes, preserved connections of subjecthood with other Commonwealth states as they were breaking off to define their own categories of citizenship. Persons with British nationality were divided into three categories: “Citizen of the United Kingdom and Colonies” (CUKCs), “Citizen of Independent Commonwealth Countries” (CICCs), and Irish Citizens with British subjecthood. In sum, political and residence rights differed based on status and “almost the only common bond which the vast array of British ‘citizens’ throughout the world enjoy is allegiance to the Crown.”

The law established very little in terms of reflecting a common membership into citizenship for Britons; overseas subjects and Commonwealth citizens were even more removed from belonging than even European migrants to Britain, as the former groups were exempt from the oath of allegiance to the monarch. In fact, the 1981 Act was the first time a definition of a British citizen formally appeared, and it was for the purpose of creating a distinction with Commonwealth citizens.

Subjecthood obviated the establishment of membership through citizenship, or a sense of common belonging. As such, Caroline Sawyer refers to the British citizenship relationship as one of “individual rather than national membership.”

Brubaker also employs this type of distinction to contrast Britain to other European countries: “The concept of citizenship as membership of a legal and political community was foreign to British thinking. Legal and political status were conceived instead in terms of allegiance – in terms of the vertical ties between individual subjects and the king. The ties of allegiance knit together the British empire, not the British nation.”

As then-Prime Minister David Cameron said in 2011, in regard to the problem of Muslim extremism in Britain, “We have failed to provide a vision of society to which they feel they want to belong.” Moreover, the inclination of many Scots to vote in favor of independence only underlines the thinness of shared identity.

**MULTIPLE TRIBUTARIES TO CIVIC INTEGRATION POLICY ADOPTION**

A relatively accessible citizenship paired with a minimal definition of belonging enabled Britain to flourish in its postwar and post-Empire years into a multicultural society in both composition and policy. Britain today is significantly more diverse than it was 50 years ago. In 1961, non-whites comprised only about 1.5 percent of the population in England and Wales. By 2001, they comprised over 8 percent.

The increase in ethnic heterogeneity, coupled with official policies of multiculturalism, maintained diversity as a British reality, but as political events in the first years of the new millennium would highlight, the omission of promoting cohesion alongside this diversity – or balancing inclusion with a common civic identity – created a number of problems for Labour party policymakers. As a result, as Sawyer notes, “The atmosphere and rhetoric of recent general elections have [...] focused not so much on citizenship in the sense of nationality as either on citizenship in the sense of a conception of reciprocal rights and obligations (especially obligations) or else on the concept of Britishness.”

The first impetus for re-examining citizenship as a membership category was the period of significant demographic change in the 1980s and 1990s. On top of general changes in migration patterns during a period of economic booms and the continuation of family-based migration, asylum proved to be a significant demographic and political factor in defining the immigration agenda. By 2004, and after some high-profile incidents involving asylum, humanitarian-based migration accounted for 19 percent of total intake. This influx highlighted asylum as a divisive political issue not simply as an immigration matter but also because it impacted on settlement and welfare benefits. Consequently, “the category of ‘bogus asylum seeker’ has acquired particular resonance in British public debate.”

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72 Hansen draws this argument out by looking at Canadian citizenship. The Canadian government introduced a citizenship act that “would define Canadian citizens and declare that they possessed British subjecthood in consequence of their status as Canadian citizens” (emphasis added). It reversed the logic of allegiance. See Hansen, *Citizenship and Immigration in Post-War Britain: The institutional origins of a multicultural nation*, 37–45.


77 “The West Indian-born population of England and Wales was 171,796; Indian nationals numbered 26,575, and Pakistanis 19,250,” in Ceri Peach and Relations Institute of Race, *West Indian Migration to Britain: A social geography* (London; New York: Published for the Institute of Race Relations by Oxford University Press, 1968), xvii.


80 Politics were exacerbated in the summer of 2001 as pictures and stories of asylum seekers trying to reach Britain though the Channel Tunnel were splashed across the news. Newspapers ran headlines like “Stop the Invasion,” “We can’t take any more asylum seekers,” “Asylum invasion reaches 12,000 a month,” and “Asylum: we’re being invaded.” L. Schuster, “Asylum seekers: Sangatte and the Tunnel,” *Parliamentary Affairs* 56, no. 3 (2003), 511.

In May 2001, The Research, Development and Statistics directorate of the Home Office published a report titled “Migration: an economic and social analysis,” which looked at long-term consequences of large-scale migration to the UK. It noted the deep connection between a lack of English proficiency and social exclusion. The report also stressed the importance of citizenship in “strengthen[ing] good race and community relations.” Incoming Labour Home Secretary David Blunkett’s self-declared “first task” was to “get to grips with problems that affect social cohesion.” Thus, he and his policy advisor, Nick Pearce, began to devise plans to promote English language skills and common citizenship.

If overall immigration and the perceived lack of skills presented a prominent but diffuse cause for the civic identity agenda, the Northern Riots of 2001 provided a second, more acute impetus. In July 2001, violent clashes erupted between the police, and white and Asian youth in the towns of Oldham, Burnley, and Bradford. In response, the Community Cohesion Review Team was convened to investigate the causes of the violence. The team’s report (known as the Cantle Report) concluded that despite — or perhaps because of — the difference-friendly reception of newcomers and diversity under multiculturalism, “many communities operate on the basis of a series of parallel lives.” It further noted that there had been “little attempt to develop clear values which focus on what it means to be a citizen of a modern multi-racial Britain.”

Many scholars point to the Northern Riots as the sole impetus for the UK’s citizenship agenda, but it is imperative to contextualize this event among other pressures, recognizing that there was a confluence of factors. There was an overlap in theme and population, but Blunkett and Cantle were talking about distinct phenomena. Cantle’s report addressed policies on community cohesion, defined as connecting existing ethnic minority communities to other groups in society. Blunkett, drawing from the economic analysis report, focused on skills for immigrant integration, in other words, incorporating newcomers into society. However, timing, not design, would unite these agendas. Blunkett came to speak on his “English for passports plan” only a few weeks after the Northern Riots, obfuscating henceforth the different integration challenges of new immigrants and settled immigrants. While the differences between these agendas would eventually become evident in the institutional bifurcation of community cohesion (under the Department for Communities and Local Government) and citizenship and integration (under the Home Office), there was this period of what former Commissioner of the Council for Racial Equality Sarah Spencer describes as “regrettable overlap.”

Blunkett, for his part, was adamant to maintain a distinction: “We really needed to win people over that naturalization and integration was the obvious thing to do … We want integration and cohesion in its own right, because it is right for our society.” In other words, where a response to an event like the Northern Riots or 9/11 was widely expected and accepted, Blunkett saw he had some serious convincing to do, especially of the Liberal Left in his own party, that citizenship values and integration were important. And as integration became more and more linked to Muslim extremism in the post-9/11 climate, Blunkett asserted: “I used to say, ‘Rooting out terrorism is not the same thing as prioritizing integration and cohesion’.” In the end, September 11th proved a decisive catalyst to unite early initiatives. In a speech a couple weeks afterwards, Blunkett himself made the connection, identifying citizenship and immigration as a viable and popular strategy to combat cultural integration problems: “We must … do more to articulate and secure the common values that underpin our democracy. We have allowed parts of our society to become effectively segregated. Mutual understanding and respect have weakened, particularly among the young. We have done too little in the past to articulate our common values and democratic commitments, or to promote positive induction into citizenship for those settling here.”

Last, but certainly not least, perhaps the most pronounced influence on the introduction of civic integration requirements for immigrants seeking citizenship was the introduction of a statutory citizenship curriculum for schools in England. Here we see the UK as an interesting contrast to other states, as the ideational origin for new requirements was born from a problem of citizenship among British-born children, and not out of examining the immigrant integration problem. This only further reflects the vague understanding of citizenship that existed at the time, insufficient not only to newcomers but also to the native-born. Following New Labour’s 1997 landslide electoral victory at the helm of Tony Blair, one of its first initiatives was introducing citizenship studies into the National Curriculum. This citizenship design was guided by Sir Bernard Crick, an academician who later returned in a similar advisory capacity at the request of Home Secretary David Blunkett to transform the idea of “citizenship for schools” into “citizenship for immigrants” by way of promoting requirements for naturalization. By using similar experts for immigration, drawn largely from

83 Ibid., 31.
87 Ibid., 19.
91 Spencer, interview with the author.
93 Ibid.
Multiple tributaries to civic integration policy adoption

referring to the success of Jean Marie Le Pen in the first round of the French Presidential election that occurred only three days prior, on April 21, 2002. Despite the relative insulation of policymaking, fear of politicization was ever-present. In the 2002 local elections, the British National Party (BNP – the UK’s most prominent far-right party) gained three council seats in Burnley by capitalizing on racism only a year after that city’s three-day riot. The following year, the BNP became the second-largest party in the city, and the official opposition, by winning eight council seats.99 Thus, the ability of the far-right to gain electoral popularity by exploiting problems with integration cast a significant shadow over the tone of citizenship reform. For example, Keith Vaz, a Labour MP from East Leicester, stated “We should note what has happened in France and deal with it in the right way. We need to do several things, including confronting the far-right openly and positively . . . We have a particular responsibility as we have the largest settle[ed] black and Asian population in Europe, and need to continue our leadership role.”100

Opposition mainly came from pro-immigrant organizations. Compulsory English lessons were decryed as “linguistic colonialism” by the Joint Council for the Welfare of Immigrants (JCWI), and Blunkett even risked a potential “backlash from MPs in his own party.” 101 Yet, the debates in the parliamentary houses largely focused on the content, such as what “Life in the UK,” “British,” and “sufficient” really meant, rather than the requirements of the instruments of civic integration. For example, Lord Navnit Dholakia recommended getting rid of the “Knowledge of Life in the UK” requirement because “[t]here are legitimate concerns that such knowledge cannot be tested. Moreover, the Government have nowhere provided their definition of the term, ‘life in the United Kingdom.’”102

Here we see a second important distinction between the UK and other European states with regard to civic integration requirements. In addition to the educational roots of civic integration in the UK, membership requirements were introduced under a well-entrenched, left government, where policymakers were insulated not only from public mobilization but also from significant opposition or veto players. Consequently, references to keeping the public at the “heart of the changes” 103 and “maintain[ing] public confidence” appear all over this policy.104 Therefore, on the relatively non-politicized issue of

98 Hansard, House of Commons debates for 24 April 2002, column 375.
102 Hansard, House of Lords debate for 8 July 2002, column 440.
Multiple tributaries to civic integration policy adoption

flagging rates, particularly among long-term residents. Specifically, the group identified that applicants from New Commonwealth countries, the Middle East, and the rest of Asia are one-third more likely to naturalize than Old Commonwealth applicants. Also, evidence showed applicants from New Commonwealth countries are twice as likely to naturalize as Europeans after 6 years of residence. Hence, for the Advisory Group, the two paths to citizenship promoting language and "knowledge of life" in the UK, as well as the citizenship ceremonies, are specifically and explicitly designed to "incentivize" citizenship and encourage more people to acquire citizenship. In terms of how this directly translated to Home Office goals, policymakers did not seek wholesale increases in naturalization rates per se. Rather, to quote Blankett, it was to include values and skills of citizenship that would "promote the acceptable absorption of the uptake."

Restrictive adaptation: Failed attempts and ultimate success

The early days of membership policy in the UK are dramatically in contrast to those of states with restrictive citizenship policy starting points, in terms of both purpose and political process. Instead of beginning civic integration with permanent residence, using integration requirements to create an alternative and durable status to citizenship, in the UK we see citizenship prioritized first and foremost as the location of new requirements. And from the initial work of the Advisory Group through to the expansion of requirements to permanent residence, we see a divergence in strategy: not to make permanent residence more prominent but to diminish it.

Following the introduction of membership requirements to citizenship (implemented by November 2005) to promote a more meaningful naturalization process, the "knowledge of life and language" requirements were secondarily extended to the settlement stage in 2007. The catalyst in extending the language requirement to permanent residence is typically attributed to Tony Blair’s statement in reaction to the London Bombings of July 7, 2005, in which he states:

We should share a common language. Equal opportunity for all groups requires that they be conversant in that common language. It is a matter both of cohesion and of justice that we should set the use of English as a condition of citizenship. In addition, for those who wish to take up residence permanently in the UK, we will include a requirement to pass an English test before such permanent residency is granted.114

However, the groundwork for a settlement test appeared as early as the 2002 White Paper, in which the government recognized that it was “necessary for all those who are seeking long term resident status to be provided with the opportunity (where they do not already have the capacity) to receive language training and to receive an easy to understand and practical guide in the form of both print and video, about Britain and its institutions relevant to an understanding of the society they are entering.”

This reflects the reality that— even after the “citizenship revolution”—immigrants may still not see incentives to naturalize but still require integration as permanent participants in the national polity. For example, in 2005, approximately 160,000 persons obtained citizenship, while 800,000 obtained permanent residence.

There also were political circumstances that began to shift the balance of rhetoric in a more restrictive direction. While immigration played no significant role in the 2001 General Election, it increasingly moved to become a central political issue. After Michael Howard became leader of the Conservatives in 2003, immigration became one of the keys areas where he and the Conservative Party managed to score some points against Tony Blair, forcing, for instance, the Labour government to concede that the UK’s asylum system was broken. Immigration then became a key plank of the Conservative Manifesto in 2005, with Blair and others in Labour accusing the Tories of exploiting the immigration issue, in part because they were afraid it was winning them votes. The success of the far-right British National Party (BNP) in the 2002 local council elections also played a key role in raising the profile of migration. Finally, the change in Labour leadership from Tony Blair to Gordon Brown is also significant for tracing a change in tone. Derek McGhee identifies new civic requirements for permanent residence as marking a decisive shift to a different phase in civic attitude, from David Blankett’s “model of civic assimilation” to Gordon Brown’s broader “model of civic nationalism with its post-77 emphasis on loyalty, duty and responsibility.”

It is suggested that this nationalistic turn by Brown was strategic, to downplay “his own Scottishness, to allay English fears about his suitability to be Prime Minister.”

Indeed, the London terrorist attack is the apex of a second phase of British immigration politics, where issues of diversity and citizenship play a far more visible role in political rhetoric and underscored a succession of policy changes to “manage migration” that began with the 2005 Five-Year government strategy, “Controlling Our Borders: Making Migration Work for Britain,” which extended language and “knowledge of life” requirements for spouses and applicants seeking Indefinite Leave to Remain (i.e., permanent residence).

In 2008, the Green Paper “Path to Citizenship” laid out a radical reimagining of citizenship and its connection to permanent residence. Noting the disparity between acquisition of residence versus citizenship, this proposal set the groundwork for the 2009 Borders, Citizenship and Immigration Act (BCIA) that raised the residency duration from five to eight years and reconceptualized the progression from temporary residence to citizenship, where permanent residence was eliminated as a middle status and reserved only for those whose sending country does not grant dual citizenship. This necessitated an interim stage called “probationary citizenship.” One could exit this purgatory stage and get a reduction in residency through “active citizenship,” which included participation in “community service,” “improving command of English,” “working hard and paying taxes,” and “obeying the law.” The central purpose of this new restriction was a “vehicle for increasing public confidence” in immigration policy, namely the introduction of a managed migration scheme. In this restrictive-hued policy, we see a much stronger and explicit connection between issues of citizenship and immigration than in the initial civic integration legislation of 2002.

This new policy highlights conditions of a contained restriction strategy where a traditionally liberal citizenship orientation can become more restrictive, or in the words of Home Secretary Jacqui Smith, reformed “in order to reinforce our shared values.” Bowing to political pressures in a post-77 climate and the politicization of integration as a result, Labour leaders reformed the process of citizenship to uphold that “alongside strengthening the rights of citizenship, citizenship must be earned.”

There is also a keen sense in the Green Paper that a potent mechanism behind the overhaul was awareness of other European practices: chapter 2 of the document is dedicated not only to “the view of the British public” but also to “what other countries are doing.” These new proposals represent the first attempt at restriction, to transform instruments of inclusion into devices of control. In the end, however, the Conservative-led coalition government decided against implementation of these requirements, rejecting them not because public opinion on immigration had changed but because these Labour-led reforms were “too complicated,

120 McGhee, “The paths to citizenship: a critical examination of immigration policy in Britain since 2001,” 55.
121 Home Office, “The path to citizenship. Next steps in reforming the immigration system,” 5.
122 Ibid., 11.
123 Also see Dora Kostakopoulou, “Matters of control: Integration tests, naturalisation reform and probationary citizenship in the United Kingdom,” Journal of Ethnic and Migration Studies 36, no. 5 (2010), 834.
bureaucratic and, in the end, ineffective." This highlights two dimensions of abandoned restriction: (1) The Conservatives were only symbolically pressing the immigration issue for electoral gain, abandoning avenues of real restriction once in power; and (2) immigration is a salient political issue and vote-getter, but citizenship is not seen as a meaningful part of this electoral platform. The abandonment of these proposed restrictions is also evidence of a public-oriented majoritarian government being sensitive to opposition before policies even enter politics, i.e., at the stage of planning. For example, in response to the government’s 2008 “Path to Citizenship” Green Paper, a majority of respondents opposed the condition of active citizenship as a requirement for the acquisition of permanent residence or British citizenship. The government took this opposition seriously in underscoring the abandonment of probationary and earned citizenship.

Finally, it is worth considering that in the comparative scope of civic requirements, and despite the clearly restrictive tone of these new requirements for permanent residence, there is some evidence to suggest that these additions were not designed to be entirely exclusionary in the first place. As Bernard Ryan points out, this policy was not to restrict access to citizenship per se, but to “favour direct progression to British citizenship” as opposed to stopping incorporation at permanent residence. In other words, the requirements to “earn” citizenship may have constituted new restriction, but it did so to promote a decidedly inclusive objective. “Active citizenship” requirements would have added an extra burden to the process of naturalization, but in doing so it would have also lessened the new, considerably restrictive residency period (from 8 to 6 years). In sum, and unlike cases of restrictive retrenchment, requirements did not create an alternative status and impediment to citizenship but rather, in Gordon Brown’s words, “enough of a distinction between those who want to reside here temporarily and those who want to become full British citizens.” This provides further evidence for the point that not all requirements in the “civic turn” are created equal: additions in restrictive settings can be quite different to additions in liberal ones.

Whereas this first wave of attempted restriction by Labour was ultimately abandoned, a second series of efforts, this time by a new Conservative–Liberal Democrat coalition, would prove to be more successful. Public dissatisfaction with the way Labour handled immigration was “significantly worse than for their handling of the economy even in the midst of the financial crisis,” so much so that it supported defection from supporting incumbents in the 2010 General Election. Therefore, in this context, the Conservatives needed to assert their credentials and competence in immigration control. And while Liberal Democrats served as junior partners in the coalition, and held drastically different views of immigration, James Hampshire and Tim Bale point out that the Conservatives set the agenda. As such, Bale interprets Conservative strategy as one that “dialed down the rhetoric but pumped up the policy.”

As part of an overall goal to reduce immigration to the “tens of thousands” by 2015, the coalition government introduced a series of changes that emphasize language and integration. Perhaps the most consequential of these Conservative-led changes was the introduction of an English language qualification alongside the “Life in the UK” knowledge test as a condition for settlement and naturalization. Introduced in the 2011 Consultation, “Family Migration,” this new requirement (effective from October 28, 2013) mandates that all applicants hold a speaking and listening qualification in English at the B1 level or higher, thus eliminating the ESOL qualification as an alternative route to fulfilling the “knowledge of life and language” requirement, as well as the one-step improvement below the B1 level. This was a reflection of a type of public skepticism of multiculturalism that gave increasing support for policies that would promote, even compel, integration. This change had a moderate impact on settlement and naturalization – as approximately 20 percent of immigrants used the ESOL qualification to meet the knowledge and language requirement – and even less impact as an immigration policy. On the other hand, it does send a strong signal to a skeptical public that the government is active on the issue of integration. Even the new English language requirement for entry – a policy that can actually limit immigration – was couched in integrationist terms: “everyone coming to this country must be ready to embrace our core value and become a part of their local community.” Aside from public opinion, these changes were also made in the context of financial and administrative pressures. For example, in the

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shadow of the 2015–2016 spending review, Chancellor George Osborne indicated that welfare claimants who do not speak English could have benefits cut if they fail to attend a language course. This change is estimated to affect approximately one million people.133

Finally, the Conservative-led government made some important changes to the content of the “Knowledge of Life in the UK” test. When the test was originally adopted in 2005, New Labour intentionally designed the test to avoid history and culture. In fact, policymakers and test writers were deliberate in distinguishing the citizenship test from the so-called “cricket test,” in which Conservative politician Norman Tebbit suggested that immigrants who cheer for their native country rather than England in cricket are not sufficiently integrated. After a number of updates, history content was eventually included, but the test became primarily oriented around practical information and facts to enable “active citizenship” as it came to be called. It was this test that the Conservatives replaced in March 2013, excising the existing test of “Labour spin”134 and installing a new exam that places more emphasis on British history, achievements, and culture, with questions ranging from the number of seats in the Welsh Assembly to famous British films. Education Secretary Michael Gove framed the content change as follows: “if we can develop a better understanding of our past – how institutions have evolved and changed – then we’ll have a better understanding . . . of how institutions can give expression to our shared sense of identity.”135 Mark Harper, Minister for Immigration, provided a decidedly more colorful rationale, noting the new test “stripped out mundane information about water meters, how to find train timetables, and using the internet. The new test rightly focuses on values and principles at the heart of being British. Instead of telling people how to claim benefits it encourages participation in British life.”136 Here we see a logic to content that really differs from other states, the Netherlands in particular. Whereas a significant portion of the integration test in the Netherlands is preoccupied with everyday knowledge, the new British test deliberately opted against this kind of content in favor of more history and culture.

In contrast to civic integration policy adoption, these adaptations represent a clear departure from earlier purpose. The initial adoption of the test and ESOL course routes to citizenship, and later to settlement, were clearly designed to promote naturalization, incentivizing citizenship by adding meaning. Later changes, including elimination of the course-route, the addition of an English language qualification at a higher level, and revisions to the citizenship test, indicate more conditionality and, as a result, more exclusion. This change in purpose is mirrored in change of rhetoric. For example, Umero and Modood look at discourse employed by Conservative Prime Minister David Cameron, who “said in opposition that to ‘strengthen Britishness’ immigrants must learn English and those now applying to join their partner in the UK ‘must demonstrate basic command of English’ but in government this is not justified by referring to Britishness.”137 One reading of this shift is that while membership promotion and inclusion may be a motivation behind policy adaptation, immigration control and restriction prove to be more rhetorically popular. The growing populacy of the United Kingdom Independence Party (UKIP), which is now as much xenophobic as it is Euroskeptic, has only further impelled major parties to reassert their credentials on immigration.

### Interpreting performance data

Turning from policy design to policy outcome, the practice of British civic integration policy maintains an overall liberal citizenship orientation. However, the UK is also liberal in a second sense, as laisser-faire with maximal autonomy for the individual. The pass rate for the “Life in the UK” test for citizenship is low in comparison to other states at 68.6 percent. One interpretation of this pass rate is that it is a significant barrier. However, it also directly raises questions about what a “fair” citizenship test looks like. States have the prerogative to ask immigrants to complete requirements for citizenship, but there is no sense about what a fair or unfair test resembles. The opposite of an easy test with a 99 percent pass rate (e.g., Germany) is not necessarily a hard test where the pass rate is anywhere lower than total inclusion and perfunctory assessment.

In the British design, we see pass rates for citizenship as lower than in other countries, but there is insufficient evidence to support a claim that this is the result of test design and not individual self-assessment. For instance, until October 2013, immigrants seeking permanent residence or citizenship could either complete the “Knowledge of Life in the UK” test (offered at the B1 equivalent level) or attend courses including language and civic content to proceed at their own pace, required only to improve one level, e.g., A1 to A2. In making this choice, immigrants in the UK self-assessed their language ability. The Home Office formally collects information on how many applicants for Indefinite Leave to Remain (ILR) met the requirement via the course route versus the KOL test. Table 5.2 presents these numbers. We see a majority of applicants take the test route to settlement: 93 percent (2008), 83.5 percent (2009), and 82.3 percent (2010). And while the Home Office does not formally collect this information for citizenship, “on the one or two occasions [the Home Office] has asked caseworkers to keep a ‘five bar gate’ type tally of cases passing over their

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134 Jack Grimston and David Leppard, “God Save the Queen test for migrants,” The Times (UK), July 1, 2012 (accessed October 2, 2013).


137 Umero and Modood, “Inclusive Britishness,” 34.
TABLE 5.2. Number of grants of settlement by integration requirement

<table>
<thead>
<tr>
<th>Requirement</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grant ILR - ESOL</td>
<td>5,879</td>
<td>16,175</td>
<td>17,607</td>
</tr>
<tr>
<td>Grant ILR - KOL</td>
<td>78,138</td>
<td>81,870</td>
<td>81,688</td>
</tr>
</tbody>
</table>

The overwhelming use of the test route as opposed to the course route was presumably because it was less time consuming and cheaper, even if a migrant is not sufficiently prepared (i.e., at the B1 proficiency level). However, the laissez-faire approach toward assessment, where the immigrant self-evaluated their ability to take the test, artificially inflates the fail rate. For example, the inability to read the exam study guide, which is written at the B1 level, will render the immigrant unable to adequately prepare for the KOL test. In fact, the most typical reason for test failure is not confusing content, but lack of language proficiency. Moreover, these figures do not convey how many times a test was taken by a single applicant. The increase in the ESOL course usage over time suggests slight learning effects, that is, both a possible option for fulfilling the language and knowledge requirement as well as a more feasible route for obtaining settlement for those with limited English. Yet, the pass rate of the KOL test for settlement is at 77 percent in 2011, which is higher than citizenship. It is also higher than pass rates of the integration test in Germany among both test participants that take the course (67.6 percent in 2011) and participants who do not (53.8 percent).

The 2013 changes eliminated the course option for both settlement and citizenship. Under new rules, every migrant must obtain B1-level proficiency in English-speaking and listening and pass the KOL test. Migrants are encouraged to take an optional class to improve their English and prepare for the exam, but it no longer counts as a substitute for the exam. This brings the British policy directly in line with the Dutch design, but with a more simplified test. It also seems that while this only affects a small number of applicants, it is not insignificant in terms of principle.

In terms of citizenship, the effects of the KOL test on citizenship acquisition are ultimately low, despite the low pass rate. As Table 5.3 shows, on average only a small percentage (2.7 in 2009) of applicants for citizenship are rejected annually for reasons of insufficient language or knowledge of life in the UK. Acquisition of citizenship actually doubled in the period between 2000 and 2007. This suggests

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158 FOI #20784. December 8, 2011. On file with the author. 159 Ibid.
that applicants for citizenship are taking the test more than once to meet the requirement, at a price of £50 ($80) each attempt.

Finally, it is interesting to reflect on the number of persons taking the test for citizenship versus settlement in light of the initial goal of civic integration adoption: to promote naturalization. Since the “Life in the UK” test was introduced in November 2005 for citizenship, 741,938 have taken the test. This is in contrast to the 506,706 who have taken it for settlement purposes since the requirement was expanded in April 2007. This is still a significant number of immigrants taking the test to seek permanent residence instead of citizenship. As the requirements are equivalent, this does not suggest that holders of permanent residence will not become citizens, as indefinite leave to remain is not a requirement for citizenship. However, it remains an open question what might impel someone to take further steps for naturalization in light of additional fees and full entitlement at permanent residence to welfare benefits.

CONCLUSION

Over the timeline of civic integration policy in the UK, we witness two distinct but parallel logics. First, there is the prominent and continued emphasis on inclusion and citizenship promotion. This manifests not only in the conditions of policy adoption but also in laissez-faire preparation. Moreover, the UK maintains a fluid, coordinated system where the status of permanent residence is not seen as a solution but instead the source of the problem. Through elite-level idea entrepreneurship in a context where citizenship is de-politicized, integration tests are promoted to establish common values and knowledge that can support cultural diversity, not to subsume multiculturalism. To that end, the UK is a critical case for challenging the “cultural assimilation” hypothesis, where scholars interpret requirements as a type of cultural instrumentalism in which the “ideas of ... citizenship ... are increasingly dependent on a reassertion of the need for cultural homogeneity and the demand for assimilation.” As such, Meer and Modood describe these policies not as assimilationist but as representative of a “civic-rebalancing.” Moreover, the fact that Labour-designed restrictive policies to create a decisive path from temporary residence to citizenship were ultimately rejected – by a Conservative-led coalition no less – is illustrative that costs of policy change are high, endowing citizenship with continued relevance.

On top of this promotion, we witness a second, recent turn toward restriction. This does not diminish the inclusive thrust of promoting common identity and citizenship, but addresses pressures for migration control in a different political context. Where policy was adopted in an insulated, de-politicized environment of general cross-party consensus, policy adaptation has come about in a far more politicized and polarized environment in which integration is no longer tied to debates on citizenship but rather migration control. Moreover, UKIP’s rising prominence only exacerbates political polarity. From a comparative perspective, this change could be viewed as a type of regularization, bringing the UK in line with other state practices and possibly even a result of learning effects. However, it also represents unambiguous restriction for immigrants who do not possess English proficiency or who will be challenged in doing so. In the end, it is hard to imagine British identity becoming thinner or “lighter” than what it started with, which was essentially a legal concept of belonging void of membership altogether. Therefore, the questions remain at what point are British policymakers “normalizing” membership by overcoming a content deficit and at what point do these additions amount to exclusion.

Examining Germany and the UK side by side has revealed a number of important observations. Both have undergone a ‘civic turn’ in translating implicit or inchoate definitions of membership into formally articulated and standardized measured benchmarks. And, by the very nature of requirements being conditional aspects of status acquisition, these membership additions include some and exclude others. On the whole, however, these states have each articulated definitions of state identity for different reasons, under different conditions, and – through differences in design and sequencing – to different effect.

In Germany, we see integration additions achieved through conservative political leveraging, as well as oppositional and state-level politicization. Light and externally provoked changes to preserve restrictive citizenship bookend concentrated changes at permanent residence, in which comprehensive courses and testing became formidable barriers. Moreover, through linkages with benefit utilization and additional conditions between settlement and citizenship (the “chain of conditionality”), integration criteria only elongate time spent obtaining permanent residence and, potentially, preserving dependency. In sum, Germany has interpreted a new and closer role for the state in relation to the immigrant by managing coordination, in which exclusive membership is promoted and preserved through instrument design and settings.

By contrast, the UK introduced a citizenship test for the purposes of increasing naturalization, with the hopes that potential citizens would see the benefits of full membership and not remain permanent residents. In contrast to Germany and other European countries, politicization over immigration inevitably followed political choices not made in defence against Conservative pressure but,
rather, by the Labour government itself. Extension of the test to settlement and attempted restrictions through “probationary citizenship” were attempts by Labour to appear “in control” over the issue of immigration, a perennially disappointing source of public frustration. And Conservative-led changes that make the test more difficult (removing the course-based route and changing test content) ultimately pale in comparison to the effects of self-assessment, where misperceptions of ability or preferences for expediency produced low test results. However, because the British approach to civic integration asserts a minimal role for the state in coordinating or facilitating integration directly – prizing and preserving, instead, a laissez-faire approach – it produces outcomes that may resemble those of Germany on the surface.

What is the analytical purchase gained by comparing these two systems? If they both produce varieties of restriction in the end, is it not sufficient to conclude that these are two states that have adopted requirements simply to promote exclusion and limit immigration? No, because as this paired comparison shows, we see different outcomes stemming from different designs, produced out of different causal paths. Germany’s approach yields restriction from dense, state-coordinated requirements in which requirements are tied to benefit utilization, while the UK’s restriction is produced primarily from errors of self-assessment. This outcome was arguably unintentional, where public and private statements by policymakers explicitly support the interpretation that knowledge and language aimed to promote, not hinder citizenship. But, also, where a liberal integration scheme is consistent with – and not a departure from – other institutional configurations, the “market,” and not coordinative efforts and government facilitation, determine outcomes. As such, these cases are marked by significant causal equivality.

Chapters 4 and 5 illustrated the effects of citizenship orientation on government behavior, contextualizing ideologically informed preferences with parameters of membership to produce both similarities (Chapter 4) and differences (Chapter 5) of policy design. Chapter 6 pushes beyond initial conditions to emphasize it is not merely the presence of certain settings but also how they operate, i.e., causal mechanisms, that determine policy outcome. It makes this case by examining the final paired comparison of the book: the Netherlands and France.

This chapter presents the book’s third and final paired comparison. Whereas Chapter 4 illustrated the effects of the legacy of citizenship by observing shared and constrained decisions in the adoption of integration policy by differently oriented governments, and Chapter 5 illustrated the differentiated effects of the context of citizenship on policy evolution under similar, left-oriented but right-influenced governments, this chapter illustrates how even when both conditions – the context of citizenship and the ideology of governments – are similar we can still observe different civic integration outcomes as a result of causal mechanisms. Causal mechanisms characterize the process by which conditions produce outcome. As such, qualitative methodologists maintain that it is not sufficient to identify relevant conditions to account for certain outcomes; strong explanation requires identifying how these conditions interact to produce certain outcomes of interest.

The Netherlands and France serve as rich case studies for examining the way in which different causal mechanisms can produce divergent policy, despite similar causal conditions. Beginning with these similarities, both the Netherlands and France have added not only civic integration requirements to permanent residence and citizenship in the context of a liberal qua inclusive citizenship, but also vibrant immigration politics where the role of far-right parties is pronounced. They also maintain similar political stories. Left governments introduce mild, non-coercive, and uncontested versions of civic integration policy. Right parties then come to power, in a context conducive to a strong rightist influence, whereby instruments get “repurposed” into mechanisms of exclusion as civic requirements constitute real, decisive barriers to status (particularly permanent residence).

Nevertheless, differences in both design and practice can be observed as a result of how these political actors operate in context. In the Netherlands, a policy instrument of integration – crafted by a left-led coalition – quickly becomes an entrenched instrument of immigration control in the context of a broad consensus for restriction and under successive right coalitions that