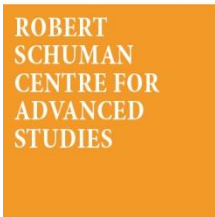




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Membership and/or rights? Analysing the link between  
naturalisation and integration policies for immigrants in  
Europe

Thomas Huddleston and Maarten Peter Vink



European University Institute  
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## **Abstract**

Traditionally, there are two contrasting views on the way in which European states instrumentalise naturalisation, residence, and rights policies as part of a broader agenda of immigrant integration. First, the 'complementary' view sees access to membership as a complementary strategy to access to rights. Second, the 'alternative' view sees the granting of social and political rights, independent of citizenship status, as an alternative to granting access to formal membership through naturalisation. Whereas there are theoretical and normative reasons to support either perspective, surprisingly, there has been no systematic comparative work on how in practice states instrumentalise membership and rights for immigrants. In this paper, we analyse the relation between naturalisation and integration policies in 29 European states. We find strong empirical evidence in Europe that extending membership and rights are generally used as complementary strategies of immigrant incorporation. Naturalisation policies are not simply one of several integration policy alternatives. Hence states with inclusive naturalisation policies also tend to be inclusive in terms of extending rights to foreigners in diverse areas of public life, such as political participation, anti-discrimination, education, labour market access and family reunion. We conclude that naturalisation policies are at the heart of a state's integration policy and one of the best predictors of its overall approach to integration. Exclusive naturalisation policies signal the lack of an inclusive immigrant integration agenda.

## **Keywords**

Citizenship; immigrant integration; naturalisation; comparative analysis.





## 1. Introduction\*

How are naturalisation policies related to immigrant integration policies in Europe? Integration debates focus not simply on access to formal membership through naturalisation, but also on a wide array of statuses, rights, support, and opportunities that influence immigrants' participation in society. Traditionally, there are two contrasting views on the way in which European states instrumentalise naturalisation, residence, and rights policies as part of a broader agenda of immigrant integration. Firstly, the 'complementary' view believes that naturalisation policy is at the heart of a state's national integration policy. Access to national citizenship is seen as a necessary complementary strategy to extending rights and opportunities to foreigners. All of these integration policies—naturalisation, long-term residence, political participation, and so on—are supposedly shaped by the state's underlying approach to immigrant inclusion. Secondly, the 'alternative' view sees naturalisation policy as one of the various integration policy alternatives. The 'alternative' view sees the granting of social and political rights, independent of citizenship status, as an alternative or substitute to granting access to formal membership through naturalisation. Within a state's national integration policy, full participation can be promoted through naturalisation or long-term residence or political participation or employment or education—and the list goes on. Contradictions or trade-offs may even arise between two areas; most notably, should the state grant political rights to foreigners or facilitate their naturalisation? Whereas there are theoretical and normative reasons to support either perspective, surprisingly, there has been no systematic comparative work on how in practice states instrumentalise membership and rights for immigrants.

Our aim in this paper is thus to contribute to the literature on the relative importance of naturalisation policy for integration by exploring the hidden links between naturalisation and integration policies in 29 European states. Building on the most comprehensive and rigorous datasets on naturalisation and integration policies, this paper analyses bivariate correlations between naturalisation policy and six areas of integration policy: labour market mobility, family reunion, education, political participation, long-term residence, and anti-discrimination law. The core of this analysis explores the dimensionality of naturalisation and integration policy with Categorical Principal Component Analysis (CATPCA). Our conclusion summarises the findings and considers the future implications for research and policy debates.

## 2. Theorising the link between naturalisation and integration policies

### *The overall link between naturalisation and integration policies*

The academic literature on naturalisation and integration policies has always been intertwined. Since its beginnings in the twentieth century, immigration studies have turned to naturalisation as the key area of integration (e.g. Walzer 1983, Hammar 1985, Brubaker 1992, Castles 1995, Aleinikoff and Klusmeyer 2002, Bloemraad 2006). Political theorists such as Brubaker (1992), Bauböck (2007), and Hansen (2009) could be called 'naturalisationists' in the sense that they attach great importance to naturalisation for understanding integration processes and policies. Their work draws on broader theories of democracy that have traditionally spoken of citizens and national citizenship as the fundamental status for the preservation and use of civic and political rights. Full citizenship rights are conditional upon an individual process of application for formal membership, whereby the state determines who is a national citizen. By extension, national citizenship is seen as the best guarantor of immigrants' citizenship rights, equal treatment, and recognition in society. Many naturalisationists

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\* We heartily thank Rainer Bauböck for his valuable comments on an earlier draft of this paper.

conclude that naturalisation should be promoted and facilitated in a welcoming country of immigration. The radical proposal from the naturalisationists camp (Rubio-Marin 2000) would be to require automatic naturalisation of all long-term residents because shared national citizenship is vital for democratic cohesion. These theorists pay particular attention to naturalisation as full political membership, political rights, and greater access to political power. The democratic inclusion of immigrants is emphasised as one of the guiding principles behind both integration and naturalisation policies (Bauböck 2005). In that sense, naturalisation is presented as a means—but not necessarily the end—of the immigrant integration process, which evolves with the changes in the distribution of opportunities and power within society (i.e. the societal integration or inequalities agenda).

‘Naturalisationists’ have been challenged by so-called ‘post-nationalists’ or, perhaps more fitting in this context, ‘post-naturalisationists’, who downplay the symbolic and practical importance of national citizenship. These theorists observe that European liberal democracies, or at least their educated elites, are in the process of constructing a civic culture based on residence and not on nationality. Most social and economic rights have been decoupled from nationality through European integration and the global human rights framework (Soysal 1995 and Joppke 2010). This rights framework in Europe is often cited as ‘the’ explanation for the low naturalisation rates among immigrants who are citizens of EU Member States or developed states such as the US or Canada. These theorists point to these free-moving citizens (and often are ones themselves) as evidence of the insignificance of national citizenship for most people, including immigrants. Their work associates naturalisation with the history of nationalism (Kostakopoulou 2003) and the potentially ‘illiberal’ powers of the state (Guild et al. 2009). These theorists want to devalue national citizenship by disconnecting rights from nationality status and deriving them from legal residence. In lieu of naturalisation, they advocate for the extension of all national citizenship rights, including national voting rights, to all legal residents, under the banner of residence-based citizenship or a rights-based approach. The radical proposal in the post-naturalisationist camp would be automatic civic registration for all law-abiding legal residents (Kostakopoulou 2006, 2010). In such proposals, citizenship rights would be collective rights of all residents and membership would be self-declared by all those who wish to be, say, British or French. National citizenship would be a legally inconsequential form of membership. As a result, naturalisation would be neither a means nor end of the integration process, since all residents would already have the legal means for societal integration.

While there are theoretical and normative arguments supporting either perspective, there is surprisingly little theory or empirical study of the relationship between naturalisation and integration policies for immigrants. Two generally contrasting views have emerged on the ways in which European states instrumentalise citizenship and other targeted policies to reflect their broader approach to immigrant integration.

The ‘alternative’ view sees granting economic, social and political rights, independent of national citizenship, as an alternative to granting access to formal membership through naturalisation. Post-naturalisationists and even a few naturalisationists end up inadvertently in the ‘alternative’ camp. Building their arguments for facilitated naturalisation or residence-based citizenship, they tend to cast their approach as the ‘better’ alternative to the other, as if governments faced a trade-off or choice between the two. Post-naturalisationists consider the extension of rights as an ‘alternative’ to naturalisation, but rarely consider whether the extension of rights to foreigners is related to immigrants’ opportunities to naturalise. As we will see, this approach to equal rights for foreigners as an ‘alternative’ to naturalisation is similar to the so-called ‘denizenship’ model where states grant equal economic, social, and (certain) political rights to foreigners, but without facilitated naturalisation. The ‘naturalisation as alternative’ logic can also be found among a few naturalisationists, including Pickus 1998 and Schuck 1989, who argue that extending residence-based rights devalues national citizenship by reducing immigrants’ incentives for naturalisation. As we will see, this approach has much in common with the so-called ‘republican’ model, which privileges naturalisation over equal rights for foreigners.

The ‘complementary’ view sees access to membership through naturalisation as a complementary strategy to extending rights to foreigners. The complementary view is often held among ‘naturalisationist’ theorists and comparative legal scholars and political scientists. A general link between states’ naturalisation and integration policies has been conceptualised by several ‘naturalisationist’ theorists, including Aleinikoff and Klusmeyer, Bauböck, Carens, and Hammar. Both naturalisation and residence-based rights for foreigners enhance the equal treatment, rights, and participation of immigrants. Moreover, equal rights for foreigners means that naturalisation will not be an instrumental choice for immigrants simply seeking equal rights. Instead, equal rights for foreigners strengthen the voluntary commitment that immigrants make to their country of residence through naturalisation (Bauböck 1994). Beyond the political theorists, legal scholars regularly take a state’s naturalisation requirements and tests as the frame for contemporary ‘integration’ debates where immigrants are expected to act as the ‘ideal citizen’ (Carrera 2009, van Oers et al. 2010, Anderson 2013). Moreover, comparative political scientists regularly select naturalisation requirements as the main indicators for a state’s broader approach to integration. Within the on-going debate about so-called ‘national models of integration,’ certain naturalisation requirements are interpreted to be proxies for national political philosophies of assimilation, multiculturalism, republicanism, and so on. The results of these indicators are invoked both in arguments for the existence of national models of integration (Hammar 1985, Brubaker 1992, Castles 1995, Banting and Kymlicka 2012) and against their existence (Favell 2003 and Bertossi and Duyvendak 2012). Comparative political scientists also point to these results as evidence of integration policy convergence across Europe (Joppke 2007a, Carrera 2009, and Banting and Kymlicka 2012) or of divergence (Jacobs and Rea 2007 and Koopmans et al. 2012).

Whatever one’s position in these comparative political science debates, it is striking how most participants readily assume a strong positive link between states’ naturalisation policies and their integration policies in other areas of public life. But even in the comparative empirical studies, the links between the two are usually mentioned in passing, not as an explicit finding with an underlying theory. Indeed, most of these international policy indicators or indexes focus solely on naturalisation policies (e.g. Howard et al. 2009, Goodman 2010, Janoski 2010, and Koning 2011). So far, around half-a-dozen measured naturalisation and other integration policies (Waldrach et al. 1997, Huddleston et al. 2010, Ruhs 2011, Banting and Kymlicka 2012, Koopmans et al. 2012, IMPALA and IMPIC forthcoming). Of these, only the 2010 MIPEX (Huddleston et al. 2010) started to investigate correlations between naturalisation and other integration policies. As a result, integration researchers often focus on naturalisation at the expense of other integration policy areas.

The ‘alternative’ vs. ‘complementary’ view regularly resurfaces in the integration debate, for instance in the latest EUDO-Citizenship Forum debate: *‘Should EU citizens living in other Member States vote there in national elections?’* (Bauböck, Cayla and Seth 2012), which discussed the proposed ‘Let me Vote’ EU Citizens’ Initiative. Most contributions slid into the ‘naturalisation as alternative’ logic. Either naturalisation was presented as the established and realistic path to full national membership and rights (Bauböck, Brun, and Owen), or extending national voting rights was seen as the preferable alternative means to remedy the democratic deficit (Kochenov, Kostakopoulou, and Wilhelm). Only a few contributors adopted the ‘naturalisation as complementary’ argument, sometimes as a compromise position. Groenendijk advised not to raise the two issues ‘in isolation.’ Going further, MEP Swoboda saw the two as ‘closely interlinked, in a possibly virtuous dynamic.’ Barbulescu boldly opposed the ‘naturalisation as alternative’ logic based on empirical observations:

“Most contributions in this forum have presented enfranchisement by naturalisation and by voting rights as mutually exclusive alternatives. In fact, the two options tend to go hand in hand with each other. For instance, those Member States that have a more open access to citizenship also give long-term residents the right to vote in local elections.”

The main hypothesis of this paper is that naturalisation policies are ‘complementary’ to integration policies across the 29 European states studied. A strong positive relationship is assumed across Europe

between a state's openness on membership (ordinary naturalisation law) and its approach to equal rights and equal treatment (integration policies). Naturalisation policies and integration policies will be used by policymakers as complementary integration strategies, rather than as alternative ways to include immigrants in the polity. Integration and naturalisation policies will have a certain internal coherence and thus can be categorised in terms of an inclusive vs. restrictive approach. Changes in naturalisation policies are expected to reflect and shape changes in integration policies. States that embrace the objective of comparative rights, responsibilities, and opportunities for immigrants and nationals will grant equal rights for foreigners in various areas of life and facilitate the ordinary naturalisation of foreigners. States that reject this equal treatment approach will have more restrictive naturalisation and integration policies. This paper hypothesises that so-called 'republican' or 'denizen' models are exceptions rather than the rule across Europe, due to specific political circumstances in these outlier states (e.g. history of immigration, political philosophy on immigrant integration or broader policies on minorities). Drawing on the literature, this paper also theorises several underlying links between naturalisation policies and specific integration policies, such as political participation, anti-discrimination, and family reunion, and, to some extent, long-term residence.

### *Political rights for foreigners*

Facilitating naturalisation and political rights for foreigners are sometimes seen as 'complementary' strategies for the political empowerment of immigrants. Both policies affect the franchise and the democratic deficit (Hammar 1990), reflecting the principles of 'territorial inclusion' (Bauböck 2005) and European principles of integration, according to the Council of Europe and European Commission.<sup>1</sup> In contrast, the restriction of these rights would reflect an 'ethnic nationalist' or 'exclusionist' approach (Bauböck 2005). In these states, a politically active foreign population is seen as a potential threat to the democratic order and legitimacy of the state. As such, political rights are reserved for foreigners who pass the restrictive integration requirements for naturalisation.

Not all states fit within this spectrum of 'territorially inclusive' and 'exclusionist' states. In between the two lies the 'republican' model, which privileges naturalisation over political rights for foreigners in order to guarantee equal and full membership for members of the electorate (Bauböck 2005). Policies ascribed to this model preserve the value and incentives for naturalisation through a facilitated naturalisation policy and a significant 'rights gap' between foreigners and national citizens. Democratic inclusion comes solely through naturalisation and multiple nationality. Conversely, a 'denizenship' model is ascribed to states with political rights for foreigners but without citizenship reform. Policies ascribed to this model preserve a link between national citizenship and national belonging defined in ethno-national terms through a reduction in the rights gap between foreigners and national citizens. Foreigners can easily become long-term residents and even voters at local levels, but not national citizens. Several policy goals can be attributed to this approach: to reduce immigrants' incentive to naturalisation, to deflect criticism of a restrictive policy framework, and to signal to the population that naturalisation is reserved for culturally assimilated immigrants. 'Republican' and 'denizenship' regimes face obstacles shifting to a 'territorially inclusive' approach. Politicians in states granting immigrant voting rights may use them as a justification for restrictive naturalisation laws (e.g. Baltic and Central European states), while those in states facilitating naturalisation may oppose voting rights with the same argument (e.g. Canada, France, and the US). Advocates may be forced to make a pragmatic 'false choice' to promote one over the other, as in political debates previously in Belgium (Jacobs 1999) and currently in France and Italy. Empirically, Groenendijk (2008), Andrès (2013), and Pedroza (2013) have used qualitative methods to approximate a relationship between inclusive

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<sup>1</sup> For more, see the Council of Europe's 1992 Convention on the participation of foreigners in public life at local level and the 1997 European Convention on Nationality as well as European Commission (2005), A Common agenda for integration – framework for the integration of third-state nationals in the European Union, Brussels, Belgium, COM/2005/0389 final.

political participation and naturalisation policies. Huddleston (2009) and Arrighi (2013) note not only a correlation between naturalisation and political participation policies, but also a few outlier states with ‘mutually exclusive’ regimes, i.e. citizenship-based regimes in France and Germany vs. denizenship-based regimes in Estonia, Denmark, Hungary, Lithuania, and Slovenia. Notwithstanding these outliers, this paper theorises a generally positive relationship across Europe; the more states promote political rights for foreigners, the more they also tend to facilitate the naturalisation of foreigners.

### ***Anti-discrimination law***

At first glance, the idea of a link between anti-discrimination and naturalisation laws seems counter-intuitive. EU anti-discrimination law does not cover nationality discrimination against non-EU citizens (De Schutter 2009). Hardly any European states address discrimination within the naturalisation procedure (Huddleston 2013). Indeed, the 1965 UN Convention on Racial Discrimination goes so far as to state in Article 1.3 that “*nothing in this Convention may be interpreted as affecting in any way the legal provisions of states parties concerning nationality, citizenship, or naturalisation, provided that such provisions do not discriminate against any particular nationality.*” Theoretically, there could even be a negative relationship between naturalisation and anti-discrimination law. Facilitated naturalisation is arguably not necessary if all residents are strongly protected from discrimination based on race/ethnicity, religion, and nationality/citizenship. Alternatively, states facilitating naturalisation could argue that this is a sufficient legal guarantee for equal treatment.

Several scholars observe a hidden link between facilitating naturalisation and promoting anti-discrimination. For Goldston (2006), both express principles of equal treatment and ‘genuine and effective links.’ Joppke (2007b) sees them as ‘logically complementary’ components of horizontal convergence based on liberal democratic principles. Facilitated naturalisation ensures that citizenship is no longer seen in nationalistic terms as cultural assimilation, while strong anti-discrimination laws help individuals fight unequal treatment based on ethno-nationalistic concepts of race and ethnicity. Similarly, De Schutter (2009) argues that prohibitions of nationality discrimination in EU law and the majority of EU Member States put pressure on governments to eliminate unequal treatment between foreigners and nationals, which could constitute indirect discrimination if nationality serves as a proxy for race, ethnicity or religion. Similar domestic political pressures may also drive reforms of anti-discrimination and naturalisation law; “*the institution of citizenship strongly frames the process of problematisation of racial discrimination*” (Gehring 2009). Restrictive naturalisation maintains the frame of the immigrant as a foreigner, without a legitimate claim to recognition and equal treatment (Hansen and Weil 2001). In these societies, integration problems may be seen as a sign less of discrimination from the receiving society than of immigrants’ inability or unwillingness to integrate (Gehring 2009). Facilitated naturalisation leads to more naturalised citizens with a greater entitlement to equal treatment, which creates greater pressure for effective anti-discrimination laws. Koopmans (2005) finds that pro-immigrant and anti-racist mobilisation is strongest in states with inclusive citizenship laws. In this sense, the promise of equal citizenship makes real-life examples of unequal treatment more problematic for society.

### ***Family reunion for non-EU citizens***

Recent trends have been identified on the restriction of family reunion for non-EU citizens (MIPEX 2010) and even for national citizens (Strik et al. 2013). In addition, a link is often made between restrictions of naturalisation and family reunion laws. States transpose requirements for naturalisation onto family reunion in the form of language/integration tests and economic resource requirements (Carrera 2009, Van Oers 2010). Similarly, states reinforce the naturalisation requirements for spouses of national citizens (Goodman 2010) in keeping with their family reunion requirements, such as integration tests and the fight against fraud and ‘marriages of convenience’ (Kofman 2004, Block and

Bonjour 2013). The presumed link between naturalisation and family reunion laws may be driven by similar political discussions of restricting marriage migration, including for the second generation (Goodman 2011, Wray 2013, Strik et al. 2013). These restrictions also aim to remove incentives for immigrants to naturalise in order to sidestep restrictive family reunion laws (Cinar 2010). This paper therefore assumes a strong positive relationship between naturalisation policies and family reunion policies for non-EU citizens.

### ***Long-term residence policies as an alternative?***

Traditionally, facilitating access to long-term residence in Europe has been seen as an ‘alternative’ to facilitating naturalisation. In the 1970s, the end of the *Gastarbeiter* systems created greater access to long-term residence and equal rights for foreigners, but not necessarily to facilitated naturalisation. Long-term residence has been designated positively as ‘denizenship’ (Hammar 1990) or negatively as a discriminatory form of second-class citizenship (Groenendijk 2006). This perceived negative relationship between national long-term residence and naturalisation policies has been reinforced through debates about the EU long-term residence directive 2003/109/EC. The directive aimed to create a clear path to long-term residence and an EU ‘civic citizenship’ (Commission 2003) in opposition to restrictive naturalisation laws (Bauböck 2005). EU long-term residence has thus been debated as either a ‘bad’ or ‘good’ alternative to EU citizenship. Atikcan (2006) regrets that the Maastricht Treaty did not base EU Citizenship on long-term residence and decries EU long-term residence as ‘Union Denizenship.’ Whereas Acosta Arcarazo (2011) sees it more favourably as a potential ‘subsidiary form’ of EU citizenship, which could bridge the rights gap between EU and non-EU citizens at EU level.

Other legal scholars tend to favour the idea of a positive (e.g. complementary) relationship between long-term residence and naturalisation policies, as a reflection of a state’s overall approach to legal integration. Groenendijk (2004) argues that a state adopts either inclusive or restrictive requirements for both, depending on whether legal status is seen as a means to promoting integration or a reward for completed integration. For example, Groenendijk, Guild and Dogan (1998) grouped together states with liberal naturalisation and long-term residence policies (France, Netherlands, and UK) and those with restrictive policies (Austria, Germany, and Switzerland). Weil (2001) expected more inclusive requirements for long-term residence and naturalisation across Europe, as states recognise themselves as countries of permanent immigration. In contrast, Carrera (2009) and van Oers (2010) expect convergence around more restrictive requirements. Long-term residence policies are presented as a reproduction of naturalisation policy, especially in terms of language and integration tests. The EU long-term residence directive is seen as promoting national(istic) concepts most visible in naturalisation policies (Guild et al. 2009).

Given that these scholars have identified trends towards liberalisation, restriction, and something in between, it is not surprising that other scholars do not see a consistent relationship across Europe. EU long-term residence may have led to greater harmonisation of national long-term residence policies, while greater variation may remain in states’ ordinary naturalisation policies in the absence of EU standards. In addition, harmonisation on long-term residence is uneven. Some national legal frameworks are more susceptible than others to European legal trends, depending on the legal and political context (Groenendijk 2005). Setting EU standards may simultaneously lead to greater openness and greater restriction (Commission 2011). An empirical comparison of long-term residence and naturalisation policies (Huddleston 2009) led to more than just two ‘liberal’ vs. ‘restrictive’ categories of states, depending on the restrictiveness of the requirements and rights for both statuses: residence-based citizenship; civic citizenship without democratic citizenship; facilitated national over civic citizenship; facilitated civic over national citizenship; second-class citizenship; and exclusionary citizenship. Depending on the state, the relationship between long-term residence and naturalisation policies may be positive, negative, or insignificant. As a result, this paper hypothesises that, unlike

other integration policy areas, long-term residence policies are not related to naturalisation policies across Europe.

### **3. Data**

The Migrant Integration Policy Index (MIPEX) offers the most extensive, rigorous, and referenced policy indicators on national integration policies. The MIPEX measures policies in seven areas: labour market mobility, family reunion, education, political participation, long-term residence, access to nationality, and anti-discrimination (see Table 1 for a list of variables). Other recent comparative policy indexes offer fewer and less detailed indicators in these areas (see Waldrauch et al. 1997, MIPEX 2004, 2007, 2010, Ruhs 2011, Banting and Kymlicka 2012, Koopmans et al. 2012, IMPALA forthcoming, IMPIC forthcoming). For each of the seven policy areas, MIPEX identifies the highest standards aimed at achieving equal rights, responsibilities and opportunities for all residents. The highest standards are drawn from Council of Europe Conventions or European Union Directives. Where only minimum standards exist at international level, European-wide policy recommendations are used from international research and NGOs. The MIPEX results for 2004, 2007, and 2010 have been used for comparison and evaluation by political scientists and sociologists as well as advocates and policymakers.<sup>2</sup> The 2010 dataset covers the situation as of 1 June 2010 in the 27 EU Member States at the time, Norway, Switzerland, Canada, and the United States.

Each MIPEX policy indicator is a question relating to a specific policy component of one of the seven policy areas. For each answer, there are three options. The maximum of three points is awarded when policies meet the highest standards for equal treatment. Comparative researchers design each set of indicators and national independent legal experts collect and anonymously peer review the data at national level. MPG's central research coordinator conducted a check of the clarity and consistency of the experts' answers as well as a validity check against external comparative policy sources. The central research coordinator undertook the scoring of indicators by converting the initial 1, 2, 3 scale into a 0, 50, 100 scale for dimensions and policy areas, where 100% is the top score. Within each of the seven policy areas, the indicator scores are brought together in a simple average to give one of four dimension scores which examine the same aspect of policy. The four dimension scores are averaged together to provide a score for each of the seven policy, which, averaged together one more time, lead to the overall MIPEX score for each state.

The comparative analysis of ordinary naturalisation policies uses, in addition to the MIPEX Access to Nationality indicator, a combined indicator measuring both the law (CITLAW) and administrative procedure (CITIMP). This indicator (CITLAW\_CITIMP) is based on new publically-available indicators within the EU Democracy Observatory on Citizenship (<http://eudo-citizenship.eu>). These indicators measure the situation as of 31 December 2011 based on a common typology, comprehensive qualitative database, and expert state reports (CITLAW) as well as questionnaires to national independent legal experts (CITIMP).<sup>3</sup> Both sets of indicators drew inspiration from the existing MIPEX indicators on Access to Nationality, but since they have been independently constructed, they can serve as validating measure (see e.g. Helbling 2013 on the importance of validating citizenship and integration policy indicators). The two datasets include the same states as MIPEX as well as a half-a-dozen non-EU European states (Croatia, Iceland, Macedonia, Montenegro, and Serbia). Both sets of indicators included many additional aspects of naturalisation not covered by MIPEX and coded applying a 0-to-1 coding scale. This report measures ordinary naturalisation

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<sup>2</sup> Check out the different public uses of MIPEX <http://www.mipex.eu/use> and specifically the research uses of MIPEX <http://www.mipex.eu/use?tg=59&st=All&ct=All>

<sup>3</sup> For this typology, see Bauböck et al (2006a, 2006b, 2007); and in particular Waldrauch (2006a, 2006b). For the methodological reports behind the CITLAW and CITIMP indicators, please see Jeffers, Honohan, and Bauböck (2012) and Huddleston (2013).

policies through a simple average of the CITLAW combined indicator on the ordinary naturalisation law (ANATORD) and the overall indicator on ordinary naturalisation administrative procedures (CITIMP). The averaging of the law and the procedure is necessary to capture both the legal and administrative obstacles to ordinary naturalisation. After all, some states have many legal obstacles but few procedural obstacles, while others have few legal obstacles but many procedural obstacles (Huddleston 2013). Hence, any comprehensive indicator measuring the inclusiveness of naturalisation policies needs to include both aspects because formal requirements as well as implementation can be viewed as ways to facilitate or restrict the access to citizenship for immigrants.<sup>4</sup>

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<sup>4</sup> The resulting CITLAW\_CITIMP average correlates highly with the MIPEX indicator on Access to Nationality ( $r = .711$ , see Table 2 below). The correlation is not perfect, since the MIPEX-AN indicator also includes access to citizenship for second and third generation immigrants, whereas CITLAW\_ANATORD and CITIMP are focused exclusively on first generation immigrants.



Table 1 lists all variables included in our analysis, covering variable labels and a brief description of what is measured by these variables.

**Table 1. List of variables**

MIPEX – Measure of inclusiveness of national integration policies. This variable is the simple average of seven policy areas: labour market mobility, family reunion, education, political participation, long-term residence, access to nationality, and anti-discrimination

MIPEX\_AN – Measure of inclusiveness of access to nationality for ordinary immigrants and their descendants. This variable is the simple average of four dimensions, composed of twenty indicators: eligibility (residence requirements for first generation and presence of *ius soli* for second and third generation); conditions (inclusiveness of language, integration, economic resource, criminal, and good character requirements as well as time limit and fees); security of status (level of discretion and judicial oversight in the procedure and limits on loss of citizenship); dual nationality (right to dual nationality for the first and second generation).

MIPEX\_PP – Measure of the political opportunity structure for non-EU citizens. This variable is the simple average of four dimensions of political participation, composed of 15 indicators: electoral rights (passive and active voting rights at regional and local level); political liberties (right to form political associations, political parties, and media); consultative bodies (presence and strength at national, regional, and local level); implementation policies (presence of state information campaigns on political rights and funding for immigrant political associations).

MIPEX\_LMM – Measure of the inclusiveness of labour market policies for non-EU citizens. This variable is the simple average of four dimensions of labour market mobility, composed of 16 indicators: access (equal legal access to all job sectors); access to general support (equal legal access to employment services, education, training, and recognition of qualifications); targeted support (policies to address specific needs of unemployed immigrants); workers' rights (equal rights in terms of social security, working conditions, and unions).

MIPEX\_ED – Measure of the inclusiveness of the national educational system for immigrant pupils. This variable is the simple average of four dimensions of targeted education policies, composed of 21 indicators: access (equal legal access to all levels of the education system); targeting needs (strength of targeted policies on language learning, additional training, teacher, and financial resources); new opportunities (strength of policies on immigrant languages and cultures, school integration and immigrant parental outreach); intercultural education (strength of state support of curriculum on the appreciation of cultural diversity).

MIPEX\_LTR – Measure of inclusiveness of access to long-term residence for ordinary non-EU citizens. This variable is the simple average of four dimensions, composed of seventeen indicators: eligibility (residence requirements); conditions (inclusiveness of language, integration, and economic resource requirements as well as time limit and fees); security of status (level of discretion and judicial oversight in the procedure); rights associated (equal economic and social rights as nationals)

MIPEX\_AD – Measure of the strength of anti-discrimination law on the grounds of race/ethnicity, religion/belief, and nationality/citizenship. This variable is the simple average of four dimensions of anti-discrimination law, composed of 26 indicators: definitions and concepts (definitions on all three grounds includes direct, indirect, multiple by association, based on assumed characteristics, as well as application to public and private sector); fields of application (prohibition of discrimination on all three grounds in all areas of life); enforcement mechanisms (access to multiple procedures and strength of procedural supports to victims); equality policies (powers of equality body and role of state in promoting equality).

MIPEX\_FreU – Measure of inclusiveness of right to family reunion for ordinary non-EU citizens. This variable is the simple average of four dimensions, composed of twenty indicators: eligibility (residence requirements and inclusiveness of definition of the family); conditions (inclusiveness of pre-departure, language, integration, and economic resource requirements as well as time limit and fees); security of status (level of discretion and judicial oversight in the procedure); rights associated (equal economic and social rights as sponsor and access to a residence permit autonomous of the sponsor).

CITLAW\_CITIMP – Measure of inclusiveness of access to nationality for ordinary immigrants and their descendants. The variable captures both the inclusiveness of the legal eligibility criteria (i.e. residence, language, integration, economic resources, criminal record/good character, and renunciation of foreign nationality) as well as the inclusiveness of implementation measures (i.e. promotion activities, documentation requirements, administrative discretion, bureaucratic procedures, and judicial review). The variable is calculated as the arithmetic mean of scores for CITLAW Indicator 'ANATORD' and CITIMP Indicator 'CITIMP'.

#### 4. Analysis of the links between naturalisation and specific integration policies

We start our analysis with an exploration of the bivariate correlations between ordinary naturalisation policies and various integration policies based on the hypotheses presented in section 2. Correlations were checked between the integration policy indicators (MIPEX) and both the two variables for ordinary naturalisation (CITLAW\_CITIMP and MIPEX\_AN). The bivariate correlation analysis largely confirms our hypotheses about the hidden links between ordinary naturalisation policies and specific integration policies. These correlations are presented in Table 2 below.

**Table 2: Correlation matrix (all variables included in the analysis)**

MIPEX_AN	MIPEX_PP	MIPEX_LMM	MIPEX_ED	MIPEX_LTR	MIPEX_AD	MIPEX_FreU	
MIPEX_AN	1						
MIPEX_PP	,717**	1					
MIPEX_LMM	,532**	,567**	1				
MIPEX_ED	,651**	,714**	,696**	1			
MIPEX_LTR	,123	,085	,518**	,295	1		
MIPEX_AD	,577**	,308	,254	,253	,010	1	
MIPEX_FreU	,418*	,206	,606**	,426*	,643**	,370*	1
CITLAW_IMP	,711**	,595**	,554**	,620**	,211	,451*	,507**

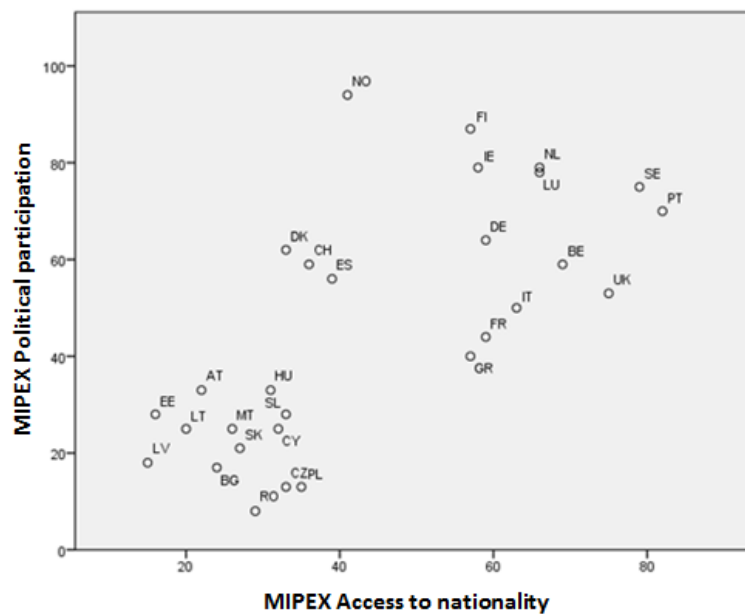
\*. Correlation is significant at the 0.05 level (2-tailed); \*\*. Correlation is significant at the 0.01 level (2-tailed).

N = 29

We start by exploring the strongest bivariate correlation between ordinary naturalisation policies and integration policies, namely with participation policies for non-EU citizens. Figure 1 shows that states with restrictive naturalisation policies, such as Austria, Cyprus, Malta and the EU Member States in Central Europe, tend to grant fewer political rights. The more states facilitate the naturalisation policy, the more they also tend to grant political rights (i.e. a majority of EU-15 states, such as Benelux states, Sweden, Portugal, and the UK).<sup>5</sup> Interestingly, the relationship with naturalisation policies is strong for most dimensions of political participation policies measured in MIPEX, with the notable exception of electoral rights. Whether or not a state grants voting rights does not seem to affect naturalisation. The absence of a statistically significant relationship across Europe is due to outliers corresponding to Arrighi's 'denizenship-based regimes' and republican 'citizenship-based regimes.' Electoral rights are facilitated over naturalisation in Denmark and Switzerland, and, to a certain extent, Finland, Norway, and The Netherlands. Naturalisation is facilitated over electoral rights in France and Germany.

<sup>5</sup> Note that the UK policy scores reflect the situation after the retraction of the restrictive 'earned citizenship' legislation on naturalisation and permanent residence.

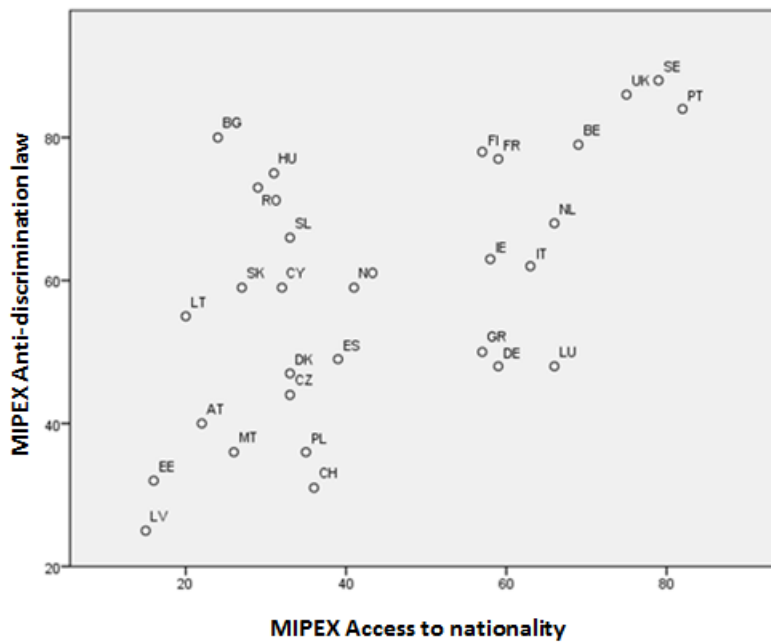
**Figure 1. Relationship between naturalisation and political participation policies**



A moderately strong positive relationship emerges between ordinary naturalisation policies and anti-discrimination laws across Europe. States with facilitated naturalisation policies tend to have stronger anti-discrimination laws on the grounds of race/ethnicity, religion, and nationality. In particular, states with more inclusive naturalisation laws tend to have stronger enforcement mechanisms for their anti-discrimination laws. This relationship is not as strong as expected due to several major outliers in Central Europe with strong anti-discrimination laws but restrictive ordinary naturalisation. These states have strong anti-discrimination laws due to their large Roma and national minority populations, whereas the naturalisation policy is rather restrictive for ordinary immigrants, even if several maintain very inclusive naturalisation policies for their co-ethnics.<sup>6</sup>

<sup>6</sup> See CITLAW indicators for Bulgaria, Hungary, Romania, and Slovakia: <http://eudo-citizenship.eu/indicators>

**Figure 2. Relationship between naturalisation policies and anti-discrimination laws**

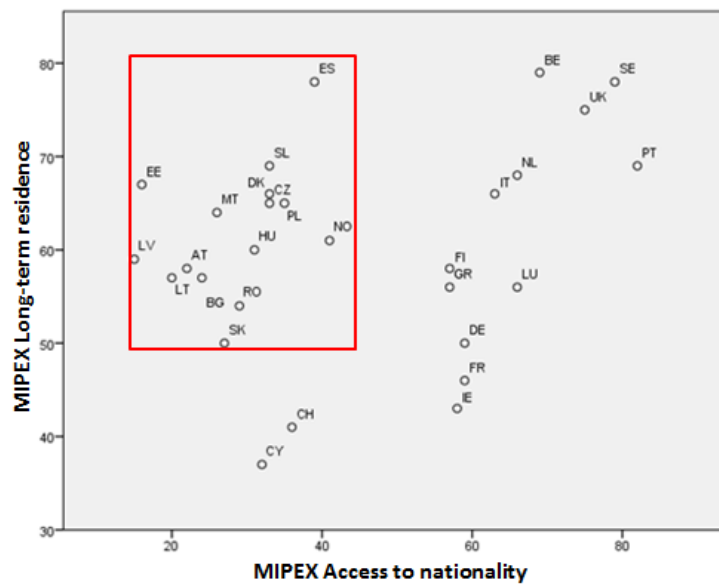


Ordinary naturalisation policies are somehow related to non-EU family reunion policies, but not as expected. Overall, family reunion and naturalisation policies tend to be either generally inclusive (e.g. Belgium, Portugal, and Sweden) or restrictive (e.g. Austria, Bulgaria, Denmark, and Switzerland). Looking in detail, the dimensions most strongly correlated with naturalisation policies are the security of status and rights associated with family reunion; states that facilitate naturalisation tend to grant a secure and equal legal status to reunited families. Contrary to expectations, no correlation emerges between ordinary or family-based naturalisation policies and the eligibility or conditions for non-EU family reunion. In other words, restrictions of ordinary or family-based naturalisation are not generally related to restrictions of non-EU family reunion.

In addition to these positive correlations, moderately strong relationships emerged between ordinary naturalisation policies and several targeted employment and education policies, as measured by MIPEX. States with more inclusive naturalisation policies also tend to provide greater rights and access to general training for non-EU workers as well as more targeted education policies for immigrant pupils, especially strong intercultural education programmes and strong support to access the education system. A few outliers arise here and there; states such as Ireland and the UK tend to facilitate naturalisation without many targeted policies on employment and education, while Austria and Estonia tend to provide many strong targeted policies without facilitating naturalisation. These relationships may be related to the findings on political participation policies; states facilitating naturalisation often do more to consult immigrants and support their participation through information campaigns and financial support for their NGOs. More generally, states that facilitate naturalisation also tend to provide more equal rights and targeted support to foreigners.

As expected, the relationship between ordinary naturalisation policies and long-term residence policies is ambiguous. Long-term residence emerges as the one integration policy area in MIPEX that is not correlated with naturalisation policies. The relationship is visualised in Figure 3 below:

**Figure 3. Relationship between naturalisation and long-term residence policies**



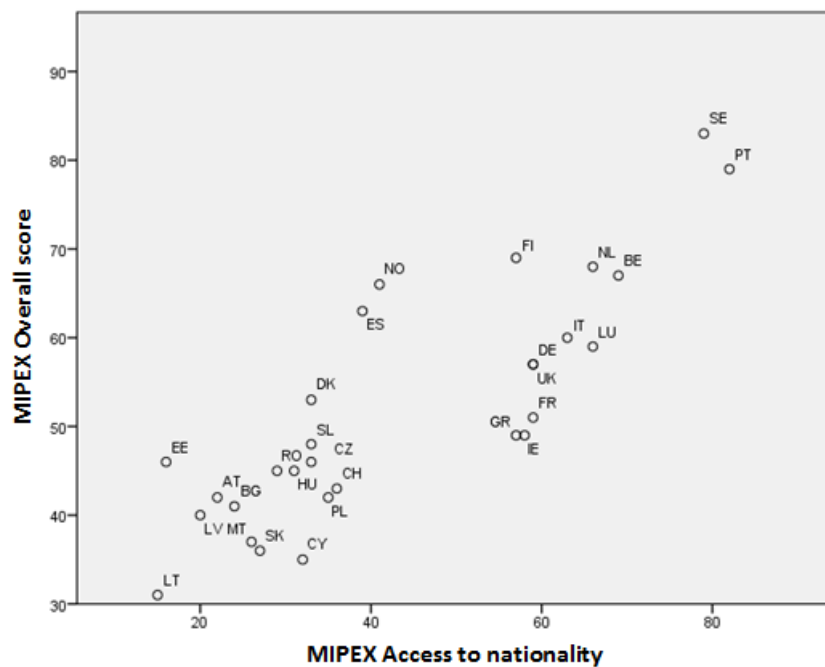
Overall, whether or not states across Europe facilitate long-term residence seems to have little to do with their naturalisation policies. Looking deeper into the dimensions of both policies, states with more restrictive long-term residence conditions do tend to have slightly more restrictive naturalisation conditions, according to MIPEX, and more demanding integration assessments, according to CITLAW. However these relationships are not consistent across CITLAW/CITIMP and the MIPEX Access to Nationality indicators. The only dimension of long-term residence related to naturalisation policy is the security of long-term residence. States with a more discretionary and insecure long-term residence status tend to also have restrictive naturalisation policies. This list of states includes most Central and South-eastern European states, Austria, Denmark, and Switzerland. In contrast, states that grant a more secure long-term residence status also tend to have inclusive naturalisation policies. This list includes most Western European states, such as most Benelux and Nordic states, France, Germany, Portugal, and the UK.

Looking in greater detail at the outliers in Figure 3, two distinct patterns between naturalisation and long-term residence policies emerge across Europe. Long-term residence emerges as some sort of substitute or alternative for naturalisation in the 15 states highlighted in red, mostly Central European countries, new countries of immigration (e.g. Malta and Spain) as well as Austria, Denmark, and Norway. All these states generally restrict ordinary naturalisation, independent of their long-term residence policy. For example, even though states such as the Czech Republic, Denmark, and Poland facilitate long-term residence more than Bulgaria, Romania, or Slovakia, they all restrict ordinary naturalisation to a similar degree. The distinction between these states is whether the long-term residence policy provides a 'good' or 'poor' substitute for full national citizenship rights. While in the 14 other European states, mostly in Western Europe, a slightly positive relationship seems to emerge between long-term residence and naturalisation policies. Both long-term residence and naturalisation are generally restricted in Cyprus, Switzerland, Ireland, France, and Germany and facilitated in Belgium, Portugal, Sweden, and the UK. In these 14 states, long-term residence and naturalisation policies are used as complementary strategies for regulating access to a secure residence status. From these two patterns, long-term residence policies seem unrelated to the restrictive naturalisation policies in new immigration destinations mostly in Central Europe, while long-term residence policies generally reflect the naturalisation policy in many established immigration destinations in Western Europe.

### 5. Analysis of the overall relationship between naturalisation and integration policy

The main thrust of our analysis of the overall relationship between naturalisation and integration policy begins with an exploration of the bivariate correlation between the overall MIPEX indicator (measuring the overall inclusiveness of integration policies) and the MIPEX sub-indicator for Access to Nationality (measuring the inclusiveness of citizenship policy). Figure 4 below shows the strong and positive correlation ( $r = .836$ ) between both indicators, which can be interpreted as empirical support for the view that access to membership through naturalisation is a complementary—rather than an alternative—strategy to the extension of rights to foreigners. In other words, the more inclusive naturalisation policy is in a state, the more inclusive we would also expect integration and residence policies to be in that state (e.g. Portugal and Sweden). Vice versa, states with restrictive naturalisation policies also tend to have restrictive integration and residence policies (e.g. the Baltic states, Austria, Bulgaria, Cyprus, Malta, and Slovakia).

**Figure 4. Relationship between naturalisation and integration policy in 29 European states**



The correlation illustrated in Figure 4 is of course partly endogenous as the MIPEX Access to Nationality is a sub-indicator of MIPEX Overall. However, Table 3, which presents the correlations between the MIPEX overall score and the seven MIPEX policy areas, shows that, in fact, the correlation between the MIPEX Overall and MIPEX Access to Nationality is the strongest bivariate correlation.

**Table 3: Correlation matrix between MIPEX overall score & seven integration policy areas**

	MIPEX Overall
MIPEX_AN	,836**
MIPEX_PP	,787**
MIPEX_LMM	,828**
MIPEX_ED	,826**
MIPEX_LTR	,447*
MIPEX_AD	,566**
MIPEX_FreU	,666**
CITLAW_IMP	,748**

The six other policy areas are less strongly related to the overall score for the inclusiveness of integration policies (MIPEX). Compared to the correlation between the overall score and access to nationality, the correlation with the overall score are nearly as strong for political participation policies for non-EU citizens (MIPEX-PP), non-EU labour market mobility policies (MIPEX-LMM) and targeted educational policies for immigrant pupils (MIPEX-ED). A positive, significant, but somewhat less strong correlation with the overall score also emerges with the long-term residence policies for non-EU citizens (MIPEX-LTR), the anti-discrimination laws (MIPEX-AD), and the family reunion policies for non-EU citizens (MIPEX-FreU).

In order to analyse whether there is a single statistical dimension that represents most of the variation in our two naturalisation policy indicators (MIPEX\_AN and CITLAW\_CITMP) and the six other MIPEX integration policy areas for the 29 European states studied, we continue the analysis on the basis of these separate indicators. We thus analyse whether or not a strong underlying dimension structures the variation in both naturalisation and integration policies, as hypothesised by the complementary perspective. We approach this question through Principal Component Analysis (PCA), though given our dataset of ordered categorical data, it would be erroneous to use standard PCA, which assumes linear relationships between numerical variables. For that reason, Categorical Principal Component Analysis (CATPCA) is used for this analysis, which allows variables to be scaled at different levels and works with modelling non-linear relationships (Linting et al. 2007). A spline ordinal scaling level is selected for all variables, which implies that the information in the observed variable is preserved in the optimally scaled variable for both the grouping of objects in categories and the order of these categories. Unlike linear PCA, CATPCA does not assume that there are equal intervals between consecutive categories. Nonlinear and linear PCA are very similar in objective, method, results, and interpretation and the output of the CATPCA analysis can be interpreted in a largely similar manner as standard PCA (Linting et al 2007: 27-28). We therefore present component loadings, which can be understood as indicators for relations between the included variables and the underlying dimension(s).

**Table 4: Component loadings**  
**Principal component analysis for categorical data (CATPCA)**

	<i>Dimension</i>	
	<i>1a</i>	<i>1b</i>
MIPEX_LMM	,920	,922
MIPEX_ED	,910	,918
MIPEX_PP	,596	,595
MIPEX_LTR	,681	,665
MIPEX_AD	,836	,837
MIPEX_FreU	,847	,843
MIPEX_AN	,921	
CITLAW_CITIMP		,914
Cronbach's Alpha	,921	,920
Percentage of variance accounted for	67,96	67,64

N = 29

Variable principle normalisation

Sources: MIPEX, EUDO CITIZENSHIP

Table 4 shows the component loadings of the CATPCA analysis with the number of dimensions in the solution set at one. The results displayed represent two separate analyses, with the use of the two alternative citizenship policy indicators in models 1a (MIPEX-AN) and 1b (CITLAW-CITIMP). As is clear from both the component loadings of the individual indicators, as well as the measure for the overall cohesion of the two alternative dimensions, there is no substantive difference between using either of these two indicators of citizenship policy.<sup>7</sup> We thus continue the discussion of the results on the basis of model 1a, but could equally have opted to discuss model 1b.

Firstly, this output highlights that there is a single dimension underlying naturalisation and integration policies. The high Cronbach's alpha score (.921) confirms the strong internal consistency of this dimension and the explanatory variance indicates that the model is also empirically relevant, accounting for 68 percent of variation in the scores for the seven indicators included in the model, across these 29 European states. Secondly and more substantively, the analysis confirms the 'complementary' perspective which holds that policy-makers across Europe see naturalisation and integration policies as complementary strategies of immigrant inclusion (or exclusion) and do not generally use these policies as alternative strategies. In other words, relating to the title of this report, membership *and* rights do not appear as different paths to inclusion. Rather, membership and rights often come together or else they are not available at all.

Finally, an examination of the scores of individual states along this underlying dimension identifies two very clear outliers. Sweden offers by far the most inclusive integration policies in Europe, measured systematically across the seven naturalisation and integration policy. The naturalisation and integration policy in Portugal is also clearly demarcated from the rest of Europe though to a lesser extent. Following these two outliers, a middle group of states emerges with overall moderately inclusive policies, as measured by these seven indicators, namely Spain, Belgium, Finland, the Netherlands and Luxembourg. The more restrictive end of the continuum is represented by Austria, the Baltic States, Bulgaria and Cyprus. These states consistently score on the exclusive side on all seven indicators.

<sup>7</sup> Alternative analyses were also run with dimensions set at two and three, respectively, but these analyses did not produce sufficiently consistent additional dimensions (Cronbach alpha scores < .6).



## **6. Conclusion**

This paper has found a strong coherence across Europe between various integration policies and naturalisation policies, with naturalisation policies emerging as strongest predictor of these states' overall approach to integration. Whether a state adopts an inclusive vs. restrictive ordinary naturalisation policy usually reflects its policies in all six other MIPEx areas. These results confirm the importance accorded to naturalisation by the so-called 'naturalisationist' theorists and by empirical researchers who use naturalisation to explain differences in integration policies and processes across Europe. Ordinary naturalisation policies are generally at the heart of a state's integration policy.

These empirical results provide support for the 'complementary' view on extending membership and rights to immigrants. No contradiction emerges between facilitated naturalisation and residence-based citizenship. For example, there is generally no trade-off between facilitating naturalisation and political participation policies for foreigners. Instead, countries granting more political rights to foreigners tend to have more inclusive naturalisation policies. This is important, first of all because it has been shown that inclusive naturalisation policies positively affect naturalisation rates among immigrants (Vink, Prokic-Breuer and Dronkers, 2013). Furthermore, inclusive naturalisation policies are generally related to strong anti-discrimination laws that promote equal treatment and fight discrimination on the grounds of race/ethnicity, religion, and nationality/citizenship. Long-term residence does appear to function as a 'good' or 'bad' substitute for naturalisation in many new countries of immigration and Central European states. Yet long-term residence and naturalisation policies do seem positively related in most established Western countries of immigration. In addition, voting rights for non-EU citizens are not used as a substitute for naturalisation. Immigrant voting rights are generally unrelated to naturalisation policies across Europe, due to a few 'denizenship-based' and republican 'citizenship-based' regimes, which facilitate one but not the other. Overall, the empirical results largely debunk the 'alternative' view. No European state studied consistently facilitates equal rights without also facilitating naturalisation. Naturalisation policies are not simply one of several integration policy alternatives. On the contrary, an inclusive naturalisation policy is part of a comprehensive integration policy promoting equal rights and opportunities for all residents, including both naturalised and non-naturalised immigrants. In contrast, a restrictive naturalisation policy usually reflects a weak state commitment to equal treatment and rights for immigrants, whether naturalised or non-naturalised.

These results also have implications for future academic research and debates among naturalisationists and post-naturalisationists. Naturalisationists may be interested to explore the potentially mutually reinforcing relationships between naturalisation policies and other areas of integration policy. The immigrant electorate may also play a role in the policy dynamics behind reforms of both naturalisation and integration policies.<sup>8</sup> Post-naturalisationists may wish to consider whether and how to incorporate naturalisation into their broader theories about the extension of rights and the electorate. On their own, arguments against the relevance of naturalisation may undermine support for the broader argument for equal rights and membership. Naturalisation may be a desirable choice for various types of immigrants and for the general public to promote integration in a country of immigration. Critiques of the current naturalisation debate can focus on the changing nature and meaning of naturalisation and national citizenship within a liberal democracy, looking beyond Europe to traditional and other new countries of immigration.

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<sup>8</sup> For more on the potential impact of naturalised immigrants on the extension of citizenship rights, see or non-naturalised) Koopmans et al. (2012). For an example of the impact of local immigrant voting rights on municipal social policies in Sweden, see Vernby (2013).

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