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Full membership or equal rights? The link between naturalisation and integration policies for immigrants in 29 European states

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Abstract

Traditionally, there are two contrasting views on the way states can use naturalisation and immigrants' rights policies to set out their broader agenda of immigrant integration. First, citizenship acquisition can be seen as *complementary* to the granting of social and political rights to immigrants, as a necessary step in the process of full integration in the political community. Whereas granting access to formal membership through naturalisation may instead be seen as an *alternative* to granting social and political rights, independent of citizenship status. In this paper, we analyse the relation between naturalisation and integration policies in 29 European states, looking at immigrants' rights in several areas of public life, such as political participation, anti-discrimination, education, the labour market and family reunion. We find strong empirical evidence in Europe that extending membership and rights are generally used as complementary, rather than alternative, means to immigrant integration. While our analysis does not invalidate the 'alternative' view as a normative stance, it does suggest that it comes with political constraints as, in practice, it is rarely practiced in Europe.

Keywords: Citizenship; Immigrant integration; Immigrant rights; Naturalisation; Political participation; Anti-discrimination; Education; Labour market; Family reunion; Comparative analysis

Introduction

How are naturalisation policies related to immigrant integration policies in Europe? Integration debates are not simply focused on access to formal membership through naturalisation, but also on a wide array of other statuses, rights, support, and opportunities that influence immigrants' participation in society. Within a state's approach to immigrant integration, equal rights can be granted through naturalisation as a national citizen or through the extension of long-term residence, political rights, equal opportunities policies in employment and education—and the list goes on. Contradictions or trade-offs can be conceptualised between naturalisation and other integration policies; most notably, should the state grant civic, socioeconomic and political rights to foreigners or, by contrast, facilitate their naturalisation? Traditionally, introducing conceptual labels that in our view best capture these distinctions, there are two contrasting views on how European states can use naturalisation, residence, and immigrants' rights policies to set out their broader agenda of immigrant integration. Firstly, the 'complementary' view holds that a state's naturalisation

policy is at the heart of its national integration policy. Access to national citizenship is seen as complementing the extension of rights and opportunities to foreigners and as a necessary step towards full inclusion. All of these policies—naturalisation, long-term residence, political participation, and so on—must conform to the state's underlying approach to immigrant integration. Secondly, the 'alternative' view sees naturalisation policy as an alternative or an exception – or a policy area apart from other areas of integration policy. The 'alternative' view sees the granting of equal social and political rights, independent of citizenship status, as an alternative or substitute to granting access to formal membership through naturalisation; hence, not as a necessary step towards full inclusion.

The 'alternative' vs. 'complementary' views regularly surface, not only in political discourse, but also in scholarly debates about immigrants' rights. For instance, when a EUDO CITIZENSHIP Forum debate (Bauböck et al. 2012) 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.”

Whereas there are theoretical and normative reasons to support either perspective, surprisingly, there has been no systematic comparative work on how in practice states use membership and rights for immigrants to define their approach to integration. Our aim in this paper is to contribute to the literature on the relative importance of naturalisation policy for integration by exploring the links between naturalisation and integration policies in 29 European states. We do so by analysing indicators of naturalisation policy and six areas of integration policy: labour market mobility, family reunion, education, political participation, long-term residence, and anti-discrimination law. The paper is structured as follows. First, we discuss the state of the art and present our hypotheses. Then we introduce data and methodology and, subsequently, analyse the relation between these indicators in a categorical principal component analysis. Our conclusions summarise the findings and consider the implications for research and policy debates.

Theorising the link between naturalisation and integration policies

The academic literatures on naturalisation and integration policies have always been intertwined. Since its beginnings in the twentieth century, immigration studies have turned to naturalisation in order to define a country's approach to integration (e.g. Walzer, 1983; Hammar, 1985; Brubaker, 1992; Castles, 1995; Aleinikoff and Klusmeyer, 2002; Bloemraad, 2006). Political theorists such as Brubaker (1992), and Hansen (2009) attach great

importance to naturalisation policies as an indicator for understanding broader integration policies and processes. Full citizenship rights are conditional upon an individual process of application for formal membership, whereby the state determines which foreigners deserve to become national citizens. By extension, national citizenship is seen as the best guarantor of immigrants' citizenship rights, equal treatment, and recognition in society.

This stream of the literature can be seen as defining the 'complementary' view of integration and naturalisation. In this view, both naturalisation and residence-based rights are necessary for the equal treatment, rights, and participation of immigrants (e.g. Aleinikoff and Klusmeyer, 2002; Bauböck, 2005a; Carens, 2005; Hammar, 1990). Moreover, equal rights for foreigners mean 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). Comparative political scientists also regularly use a state's naturalisation requirements as their main indicator of its broader approach to integration. For example, the on-going debate about so-called 'national models of integration' has interpreted certain naturalisation requirements as signs of a state philosophy of assimilation, multiculturalism, or republicanism. The classification of countries' naturalisation requirements are invoked both in arguments for the existence of national models of integration (Hammar, 1985; Brubaker, 1992; Castles, 1995; Banting and Kymlicka, 2013) and against their existence (Favell, 2003; Bertossi and Duyvendak 2013). Scholars also point to naturalisation policies as evidence of integration policy convergence across Europe (Joppke 2007a; Carrera 2009; Banting and Kymlicka, 2013) or divergence (Jacobs and Rea, 2007; Koopmans et al., 2012).

What these scholars have in common is that naturalisation forms an essential part of a general approach to integration in a welcoming country of immigration. Normatively, the most radical proposal (Rubio-Marin, 2000) is to require automatic naturalisation of all long-term residents because a shared national citizenship is so vital for democratic cohesion. These theorists pay particular attention to naturalisation as full political membership, political rights, and greater access to political power. Their work draws on theories of democracy that have traditionally spoken of citizens and national citizenship as a fundamental status for the preservation and use of civic and political rights. The democratic inclusion of immigrants is emphasised as one of the guiding principles behind both integration and naturalisation policies (Bauböck, 2005a). 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 (e.g. debates on inequality, on the welfare state and social policy, on ethnic minorities and diversity, and so on). Only a few scholars of naturalisation, including Schuck (1989) and Pickus (1998) argue that naturalisation should be the exclusive path to equal social and political rights. They 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.

This complementary view of integration and naturalisation has been criticised by post-nationalists who downplay the symbolic and practical importance of national citizenship for defining a country's approach to integration. These critiques generally justify their position in terms of post-nationalism by associating naturalisation with the

history of nationalism (Kostakopoulou, 2003) and the potentially 'illiberal' powers of the state (Guild et al., 2009). These theorists observe that European liberal democracies, or at least their educated elites, are in the process of constructing a civic culture based no longer on nationality but on residence. Though observers have different normative evaluations of this process, few would contest that most social and economic rights have been decoupled from nationality through the development of European integration and the global human rights framework, though observers have (Bauböck 1994; Soysal, 1994; Jacobson 1996; Joppke, 2010). Especially from Soysal's postnational perspective, the extension of equal rights to foreigners, independent of national citizenship, is seen as a conscious 'alternative' or substitute to naturalisation.

From this perspective the rights framework for immigrants should be furthered through normative claims under the banner of a residence-based citizenship or rights-based approach. The best example is provided by free-moving EU citizens who generally have low naturalisation rates in their country of residence. Their situation underlines, on the one hand, the effectiveness of EU citizenship and the rights framework in Europe and, on the other, the insignificance of national citizenship in the lives of most people, including immigrants. In lieu of naturalisation, some advocate for the extension of all citizenship rights, including national voting rights, to all legal residents. 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 –but not full– political rights to foreigners, but without facilitated naturalisation. The most radical proposal in this camp is the automatic civic registration for all law-abiding legal residents (Kostakopoulou, 2006, 2010). According to such proposals, citizenship rights would be collective for all legal residents and membership would be self-declared by those who wish to claim it. National citizenship would be a legally inconsequential form of membership. As a result, naturalisation is seen as neither a means nor end of the integration process, since all legal residents should have the legal means for societal integration. Such a view also chimes with those who observe that stricter naturalisation requirements and the introduction of civic integration tests increasingly impose illiberal conditions for naturalisation where immigrants are expected to act as the 'ideal citizen' (Carrera, 2009; Van Oers et al., 2010; Anderson, 2013).

While there are theoretical and normative arguments supporting either perspective, there is surprisingly little empirical study of the relationship between naturalisation and integration policies for immigrants. Both camps rarely consider whether the extension of rights to foreigners is also more likely in countries where immigrants have greater access to naturalisation. Even in comparative empirical studies, the links between naturalisation policies and integration policies are more often assumed than tested. We find both international policy indicators or indexes focused on naturalisation policies (e.g. Howard 2009; Goodman, 2010; Janoski, 2010; Koning, 2011), as well as those measuring both or either naturalisation and other integration policies (Waldrauch and Hofinger 1997; Huddleston et al., 2010; Ruhs, 2011; Banting and Kymlicka, 2013; Koopmans et al., 2012; see also Helbling 2013 for a more general discussion). Most of these works focus either descriptively on a trend analysis or use policy indices to understand cross-national variation. The only analysis of these indexes linking citizenship and a variety of integration policies (Huddleston 2009) creates basic indicative country clusters without any quantitative analysis.

The main hypothesis of this paper is that, empirically, naturalisation policies are 'complementary' to integration policies. 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 opportunities (several areas of integration policy). This paper hypothesises that naturalisation policies and integration policies are used by policymakers in a complementary fashion with a certain internal coherence in terms of a generally 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, education and labour market mobility 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, 2005b) and European principles of integration, according to the Council of Europe and European Commission.¹ In contrast, the restriction of these rights would reflect an 'ethnic nationalist' or 'exclusionist' approach (Bauböck, 2005a). 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 linguistic and social 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 all members of the electorate (Bauböck 2005b). Policies ascribed to this model preserve the singularity and incentive of naturalisation through a facilitated naturalisation policy and a significant 'rights gap' between foreigners and national citizens. Conversely, a 'denizenship' model is ascribed to states with political rights for foreigners but without facilitated naturalisation. 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 access to national citizenship is restricted. Empirically, Groenendijk (2008), Andrès (2013), and Pedroza (2013) have used qualitative methods to approximate a relationship between inclusive political participation and naturalisation policies. Huddleston (2009) and (Arrighi et al. 2013) note not only a correlation between naturalisation and political participation policies (where the

state encourages participation through local franchise, consultative bodies and/or proactive information campaigns), 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, we theorise 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, national origin and nationality status. Alternatively, states facilitating naturalisation could argue that this is a sufficient legal guarantee for the equal treatment of all citizens and potential citizens.

Several theorists observe, however, a hidden link between facilitating naturalisation and promoting anti-discrimination. This relates to the observation that victims of discrimination need to be empowered not only by laws, but these laws crucially should be enforced and used. In other words, without independent equality bodies and NGOs to help immigrants throughout the proceedings and states adopting positive duties and actions to raise awareness within public institutions, anti-discrimination remains a dead letter. For Goldston (2006), both naturalisation and anti-discrimination 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 national law in most EU Member States and in EU free-movement law 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 policies maintain 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 thus be seen less as a result of discrimination by the receiving society than as a result of immigrants' inability or unwillingness to integrate (Gehring, 2009). In contrast, a facilitated naturalisation policy leads to more naturalised citizens with a greater entitlement to equal treatment, which

creates greater pressure for effective anti-discrimination laws. (Koopmans et al. 2005) observes 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. We thus expect a positive correlation between inclusive naturalisation and anti-discrimination laws.

Family reunion for non-EU citizens

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 et al. 2010). Similarly, states reinforce the naturalisation requirements for spouses of national citizens (Goodman, 2010) in keeping with their family reunion requirements, such as integration requirements and the fight against fraud and 'marriages of convenience' (Kofman, 2004; Strik et al., 2013, 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). We therefore assume a positive relationship between naturalisation policies and family reunion policies for non-EU citizens.

Education and labour market mobility

Links are also likely between a country's naturalisation policy and its policies in specific areas of life, such as education and employment. The assumption is that the states that facilitate naturalisation also tend to facilitate equal rights and targeted support for immigrants in all areas of life. MIPEX looks specifically at labour market mobility and education policies as these areas are often deemed as the most important for integration by policymakers and academics, as witnessed for example by the EU's 2004 Common Basic Principles on Immigrant Integration Policy. Employment and education are both areas where targeted policies are often developed in reaction to data on immigrants' integration outcomes (see Huddleston and Dag Tjaden 2013). We argue that immigrants' position on the labour market or in schools is influenced not only by their legal status (i.e. guaranteeing equal rights for immigrants as for national citizens), but also by the support targeting their specific needs (i.e. guaranteeing equal opportunities for immigrants as a vulnerable group among many). States aiming to guarantee equal opportunities for immigrants will therefore not only facilitate naturalisation and equal rights for immigrants, but also adopt targeted policies and support mechanisms. Both naturalisation and targeted policies are conceived of as possible solutions to immigrants' under-representation in various areas of life. Indeed, several empirical studies have considered the relationships between naturalisation policies/rates and, respectively, education outcomes (e.g. Dronkers and Fleischmann 2010) or employment outcomes among immigrants (e.g. Steinhardt 2012; Helgertz et al. 2014). Moreover, as citizenship reforms increase the number of immigrant citizens and voters, policymakers may become more attentive and reactive to immigrants' specific needs through the development of more targeted integration support, as suggested by Koopmans et al. 2012. While this paper does not come down on whether naturalisation and targeted

integration policies are developed concurrently or consecutively, we expect a positive dynamic to emerge between these policy areas.

Long-term residence policies

Traditionally, facilitating access to long-term residence in Europe has been seen as an 'alternative' to facilitating naturalisation. Long-term residence is a status that gives access not only to secure residence rights, but also to equal treatment on many aspects of socio-economic rights, and stronger family reunification rights. In this sense, long-term residence status may be viewed as a significant step towards full inclusion through naturalisation or, in its strongest manifestation (e.g. Green Card in the US), as an alternative for naturalisation. In the 1970s, the end of the *Gastarbeiter* systems resulted in access to long-term residence and greater rights for foreigners, but rarely 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). A 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' (European Commission 2003) in opposition to restrictive naturalisation laws (Bauböck, 2005b). EU long-term residence has thus been debated in terms of 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.

The 'alternative' view of long-term residence is challenged by other scholars who see both long-term residence and naturalisation policies as a reflection of a state's overall approach to legal integration. (Groenendijk, Guild and Dogan 1998) and Groenendijk (2004) argue that a state's approach to long-term residence and naturalisation depends on whether the government sees legal status as a means to promoting integration or a reward for completed integration. Weil (2001) expects more inclusive requirements for both long-term residence and naturalisation across Europe, as states recognise themselves as countries of permanent immigration. Carrera (2009), Guild et al. (2009) and (Van Oers et al. 2010) view long-term residence policies as a reproduction of naturalisation policy and expect convergence around more restrictive requirements, especially in terms of language and integration tests, due to nationalistic tendencies in Europe.

Given the contradictory trends towards liberalisation and restriction in citizenship policies in Europe (Vink and De Groot, 2015), it is not surprising that 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 may be uneven as some national legal frameworks are more susceptible to European legal trends, depending on the legal and political context (Groenendijk, 2004). Setting EU standards may simultaneously lead to greater openness and greater restriction (European Commission 2011). An empirical comparison of long-term residence and naturalisation policies (Huddleston, 2009) led to a more diverse picture than just 'liberal' vs. 'restrictive' categories of states, depending on the restrictiveness of the requirements and rights for both statuses.

Depending on the country, the relationship between long-term residence and naturalisation policies may be positive, negative, or insignificant. As a result, we hypothesise that, unlike other integration policy areas, long-term residence policies are not coherently related to naturalisation policies across Europe.

Data

In this paper we draw on data from two sources: the Migrant Integration Policy Index (MIPEX) and the 'Citizenship Law' (CITLAW) and 'Citizenship Implementation' (CITIMP) indicators developed by the EUDO CITIZENSHIP Observatory. We discuss both sets of indicators below.

MIPEX offers a comprehensive set of policy indicators on national integration policies in seven areas: labour market mobility, family reunion, education, political participation, long-term residence, access to nationality, and anti-discrimination (see Appendix Table 4 for a full list of variables). 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 by political scientists and sociologists as well as advocates and policymakers.² 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 relates to a specific policy component of one of the seven policy areas. The maximum of 100 points is awarded when policies meet the highest standards for equal treatment, whereas scores of 50 or 0 are attributed if these standards are only partially met, or not at all. 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. Within each of the seven policy areas, the indicator scores are averaged to give one of four dimension scores that examine the same aspect of policy. The four dimension scores are averaged to provide a score for each of the seven policy areas.

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).³ 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 (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 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.⁴

Table 1 presents descriptive statistics of all variables included in our analysis (see also Appendix Table 5 for the complete correlation matrix).

Analysis

We start our analysis by exploring the bivariate relations between naturalisation policies and integration policies in the 29 European states of our sample. Table 2 provides the correlation matrix with all 8 variables described above. First of all, we find positive and significant relations between naturalisation policy and five out of six integration policies: political participation, labour market mobility, education, anti-discrimination and family reunification. This implies that naturalisation policies and, for example, family reunification policies tend to be either generally inclusive (e.g. Belgium, Portugal, and Sweden) or restrictive (e.g. Austria, Bulgaria, Denmark, and Switzerland). Countries granting more political rights to foreigners tend to have more inclusive naturalisation policies. In addition, voting rights in local and regional elections for non-EU citizens are not used as an alternative to facilitated naturalisation, except in a few ‘denizenship-based’ regimes (particularly Denmark and Switzerland) vs. republican ‘citizenship-based’ regimes (France). States with more inclusive naturalisation policies 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. States with more inclusive naturalisation laws also tend to have stronger anti-discrimination laws on the grounds of race/ethnicity, religion, and nationality and stronger enforcement mechanisms for these laws.

Long-term residence emerges as the one integration policy area in MIPEX that is not correlated with naturalisation policies. Access to both long-term residence and

Table 1 Descriptive statistics

Variabel		N	Mean	Std. Dev	Min	Max
MIPEX_LMM	Labour market mobility	29	57.14	19.70	21	100
MIPEX_ED	Education	29	40.07	17.98	12	77
MIPEX_PP	Political participation	29	46.07	25.29	8	94
MIPEX_LTR	Long-term residence	29	58.90	11.80	31	79
MIPEX_AD	Anti-discrimination	29	58.52	18.14	25	88
MIPEX_FreU	Family Reunification	29	59.55	14.75	34	91
MIPEX_AN	Access to Nationality	29	43.66	19.46	15	82
CITLAW_CITIMP	Citizenship law and implementation	29	1.506	.13	1.29	1.78

Table 2 Correlation matrix

	MIPEX _AN	MIPEX _PP	MIPEX _LMM	MIPEX _ED	MIPEX _LTR	MIPEX _AD	MIPEX _FreU
MIPEX_AN	1						
MIPEX_PP	,717 ^b	1					
MIPEX_LMM	,532 ^b	,567 ^b	1				
MIPEX_ED	,651 ^b	,714 ^b	,696 ^b	1			
MIPEX_LTR	,123	,085	,518 ^b	,295	1		
MIPEX_AD	,577 ^b	,308	,254	,253	,010	1	
MIPEX_FreU	,418 ^a	,206	,606 ^b	,426 ^a	,643 ^b	,370 ^a	1
CITLAW_IMP	,711 ^b	,595 ^b	,554 ^b	,620 ^b	,211	,451 ^a	,507 ^b

^asignificant at the 0.05 level (2-tailed); ^bsignificant at the 0.01 level (2-tailed)
N = 29

naturalisation are generally restricted in Cyprus, Switzerland, Ireland, France, and Germany and facilitated in Belgium, Portugal, Sweden and the UK. However in another group of countries, long-term residence emerges as some sort of alternative to a generally restrictive naturalisation policy. These countries include Austria, Denmark, Norway, many states in Central and Eastern Europe as well as new migration countries such as Malta and Spain. In other words, whether or not states across Europe facilitate long-term residence seems to have little to do with their naturalisation policies. These outlier countries (from the ‘complementary’ perspective) maintain what can be considered a denizenship model, in support of the alternative thesis, whereby policy has facilitated foreigners’ access to economic, social, and some political rights, but withholds access to nationality. These outliers include a large number of new countries of immigration, where long-term residence policies may have improved due to EU law, but naturalisation policies remain unchanged due to a more ethno-nationalist approach to nationality (Huddleston 2009; cf. Vink and Bauböck 2013).

Naturally, since these correlations are not perfect, a case-oriented analysis would highlight typical cases and outliers. For example, states that fit the ‘complementary’ perspective well, such as Ireland and the UK, facilitate naturalisation in general and have many targeted policies on employment and education, while states as Austria and Estonia have restrictive naturalisation policies but nevertheless provide many targeted policies for immigrants in specific domains. In Central Europe several states with restrictive naturalisation policies also have strong anti-discrimination laws, mainly in response to external pressures to accommodate large Roma and national minority populations.⁵ Yet, overall, the pattern is clearly one of supporting the ‘complementary’ perspective: states with inclusive naturalisation tend also to have inclusive integration policies, while those with restrictive naturalisation policies generally are restrictive in other domains of integration policy (and do not ‘compensate’ for exclusive naturalisation by having inclusive integration policies). These positive relations hold irrespective of whether naturalisation policy is measured by MIPEX-AN or by CITLAW-CITIMP, which strengthens the validity of the measured bivariate correlations.

While these bivariate correlations are indicative of relations between naturalisation and integration policies, we subsequently apply Principal Component Analysis (PCA) to measure whether there is a single underlying dimension, as hypothesised by the complementary perspective, that structures the variation in naturalisation policy and

the six other integration policy areas for the 29 European states studied. 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, we use Categorical Principal Component Analysis (CATPCA), 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. This 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 3 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). There is no substantive difference between using either of these two indicators of citizenship policy.⁶ This conclusion 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. We continue the discussion of the results on the basis of model 1a, but emphasise the similarity with model 1b.

This result reveals a single dimension underlying naturalisation and integration policies. The high Cronbach’s alpha score (.921) confirms the internal consistency of this dimension and the explanatory variance indicates that the model is empirically relevant, accounting for 68% of variation in the scores for the seven indicators included in the model, across these 29 European states. Substantively, the analysis confirms the ‘complementary’ perspective, which holds that policymakers across Europe use naturalisation and other integration policies in a complementary fashion promoting either immigrant inclusion (or exclusion). Naturalisation and other integration policies are

Table 3 Component loadings

	<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
% of variance accounted for	67,96	67,64
N	29	29

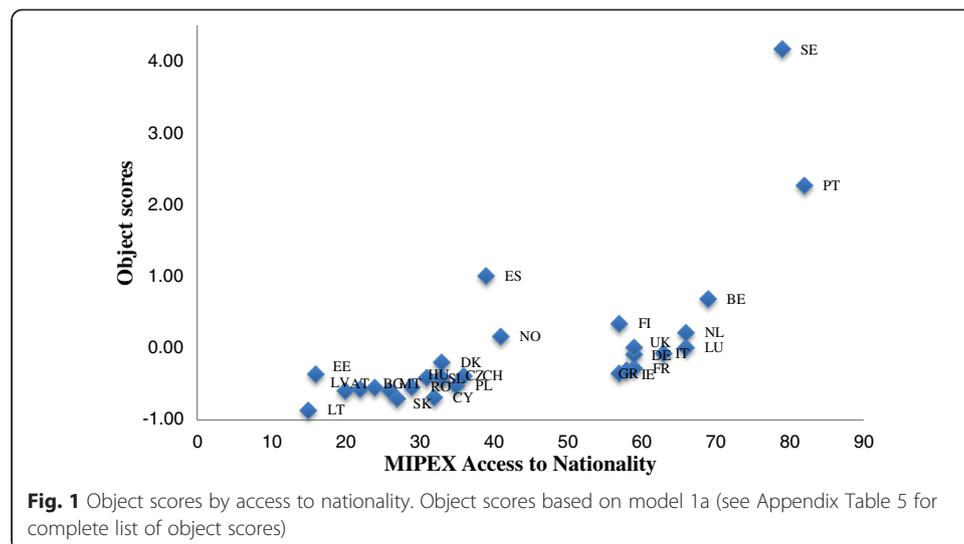
Principal component analysis for categorical data (Variable principle normalisation)
Sources: MIPEX, EUDO CITIZENSHIP

generally not used as alternatives or substitutes. The more states facilitate naturalisation policy, the more they also tend to grant, for example, political rights (i.e. a majority of EU-15 states, such as Benelux states, Sweden, Portugal, and the UK).⁷ Vice versa, states with restrictive naturalisation policies, such as Austria, Cyprus, Malta and the EU Member States in Central Europe, tend to grant fewer political rights. Notably, this goes also for long-term residence policies, despite out expectations that these would not be clearly associated to naturalisation policies and other integration policies. Whereas we earlier found no significant bivariate correlation with naturalisation policies, when running a component analysis –which provides a broader analysis of associations between the complete set of policy indicators- we find that also naturalisation is strongly and positively associated with the underlying dimension of ‘immigrant inclusion’ policies. In other words, membership through citizenship *or* through rights do not appear as different paths to integration. Rather, citizenship *and* rights often come together or else they are both restricted.

Figure 1 plots the object scores for each country (indicating how each case scores along the underlying dimension of inclusion in naturalisation and integration policies) against the inclusiveness of its naturalisation policy. The Figure highlights two main clusters of countries: in the bottom-left side of the graph a large cluster of Central and East European countries plus countries such as Austria, Cyprus, Denmark and Malta, characterised by restrictive naturalisation and integration policies; in the right side of the graph a cluster of Western and Southern European countries, characterised by moderately to highly inclusive naturalisation and moderately inclusive integration policies. Furthermore, we see two states in the upper-right side of the graph, Sweden and Portugal, which systematically more inclusive naturalisation and integration policies than other states in Europe. Their inclusive naturalisation policies are fully complementary to their overall inclusive integration policies. Countries such as Norway and Spain, finally, are characterised by relatively restrictive ordinary naturalisation policies, given their overall moderately inclusive integration policies.

Conclusion

This paper has found a strong coherence across Europe between various integration policies and naturalisation policies, with naturalisation policies emerging as the strongest



predicator of these states' overall approach to integration. Whether a state adopts an inclusive vs. restrictive ordinary naturalisation policy usually reflects its policies in six other integration policy areas. These results confirm the importance accorded to citizenship by scholars who see naturalisation as an integral part of integration policies, 'complementing' policies focused on anti-discrimination, labour market mobility, education, family reunification, political participation and -even- long-term residence for immigrants across Europe. While this might not be obvious historically, our findings suggest that ordinary naturalisation policies today 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. This is important because it has been shown that inclusive naturalisation policies positively affect naturalisation rates among immigrants (Vink et al. 2013). Overall, the empirical results largely debunk the 'alternative' view as overall the 29 European states included in this study consistently do not facilitate equal rights without also facilitating naturalisation. In other words, 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. While, perhaps, it is intuitive to many that inclusive (or exclusive) naturalisation and integration policies often go together, so far this has not been tested empirically in a systematic manner.

These results also have implications for future academic research and debates about the development of citizenship policies in the context of ongoing debates on integration. Supporters of the complementary view of citizenship may be interested to explore the potentially mutually reinforcing relationships between naturalisation policies and other areas of integration policy. Also, given that the alternative view does not receive empirical support, in the sense that we do not find evidence for states practicing either inclusive naturalisation policies or inclusive integration policies, supporters of this view may consider what are political constraints underlying this model. For example, the immigrant electorate may also play a role in the policy dynamics behind reforms of both naturalisation and integration policies.⁸ Supporters of residence-based citizenship may wish to consider whether and how to incorporate naturalisation into their broader theories about the extension of equal social and political rights to foreigners. 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.

Appendix

Table 4 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_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_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’

Table 5 Object scores (corresponding with Table 3)

Case	Dimension	
	1a	1b
AT	-568	-558
BE	.688	.577
BG	-549	-512
CY	-686	-688
CZ	-416	-386
DK	-197	-238
EE	-362	-294
FI	.342	.433
FR	-278	-351
DE	-085	-163

Table 5 Object scores (corresponding with Table 3) (*Continued*)

GR	-.349	-.437
HU	-.411	-.420
IE	-.307	-.363
IT	-.070	-.250
LT	-.867	-.788
LV	-.594	-.567
LU	.010	.029
MT	-.591	-.503
NL	.217	.237
NO	.164	.286
PL	-.522	-.528
PT	2.271	2.294
RO	-.542	-.500
SK	-.701	-.708
SL	-.405	-.366
ES	1.008	.949
SE	4.174	4.191
CH	-.387	-.443
UK	.011	.068

Endnotes

¹For 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.

²Check out the different public uses of MIPEX http://www.mipex.eu/news?news_type=2 and specifically the research uses of MIPEX.

³For 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 et al. 2012) and Huddleston (2013).

⁴The resulting CITLAW_CITIMP average correlates highly with the MIPEX indicator on Access to Nationality ($r = .711$, see Table 2). 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. MIPEX-AN and CITLAW-CITIMP also are measured at different moments in time, respectively 1 January 2010 and 31 December 2012.

⁵See CITLAW indicators for Bulgaria, Hungary, Romania, and Slovakia: <http://eudo-citizenship.eu/indicators>.

⁶Alternative analyses, available upon request, were also run with dimensions set at two and three, respectively, but these analyses did not produce sufficiently consistent additional dimensions (Cronbach alpha scores $< .6$).

⁷Note that the UK policy scores reflect the situation after the retraction of the restrictive ‘earned citizenship’ legislation on naturalisation and permanent residence.

⁸For 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).

Competing interests

The authors declare that they have no competing interests.

Authors' contributions

TH and MPV contributed equally to the theoretical framework, the empirical analysis and to the drafting of the manuscript. All authors read and approved the final manuscript.

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