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Immigration, Asylum and Citizenship: Britain and Germany Compared

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Immigration, Asylum and Citizenship: Towards an Agenda for Policy Learning Between Britain and Germany

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**Anglo-German Foundation
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IMMIGRATION, ASYLUM AND CITIZENSHIP

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Preface

This report is one of six commissioned by the Anglo-German Foundation in an effort to give added focus to its work in supporting comparative research and discussion of key issues facing policy-makers in both the public and the private sector in Britain and Germany.

Topics were selected for their relevance in both countries, and for their potential to yield policy-learning dividends. Authors were selected for their expertise in the 'state of the art' in Britain and Germany. They were asked to review current knowledge, and to identify gaps in that knowledge, which might form an agenda for future bilateral research and discussion.

The Foundation's Board of Trustees will use the reports, and the reaction and comments they generate, to assess the potential of each topic as an area of focus for future investment by the Foundation.

1 Introduction

Since the end of the Second World War, immigration has emerged as one of the defining social phenomena of western European societies. It has posed a fundamental challenge to the traditional way in which societies are organised along national lines, both in terms of defining formal membership (via nationality or *Staatsangehörigkeit*) and the allocation of substantive membership (via citizenship rights or *Staatsbürgerschaft*).¹ Politically too, questions of immigration, for instance in terms of asylum seekers or the integration of migrants, are rarely far from the headlines in either the UK and Germany.

Yet as with all social phenomena, the simple term 'immigration' fails to do justice to the wide range of issues that this policy area entails, most of which are quite discrete from one another and which, crucially, require different policy responses. Indeed, one of the key problems in immigration policy is that politicians of all persuasions have frequently failed to make adequate differentiation between different groups of migrants and the very different policy responses they require. The main groups of immigrants to the UK and Germany since 1945 have been war refugees, labour migrants, ethnic Germans and asylum seekers, as well as the dependants of all three groups. Each of these groups comes with a very different set of experiences, needs and backgrounds. Even within these groups, the situation is far from homogeneous: nationality, socio-economic background, gender and education are just four of the factors which determine the parameters of immigrants' lives in their new homes.

Simultaneously, 'immigration' is often taken to refer to all stages of the migratory process, from the arrival at borders to the granting of entry, the establishment of residence, the process of settlement (*Verfestigung des Aufenthaltes*), the granting of citizenship and the integration of immigrants into society. Yet these too are discrete issues: the German-born child of a labour migrant is thus in an entirely different social and legal situation to that of a newly-arrived asylum seeker in the UK.

This diversity is also borne out in the focus of academic research, which has seen major contributions by all the main disciplines in the social science. Thus political science has focused on policy analysis and governance issues; political theory has considered the impact of immigration for the structure of the state; sociology has examined the integrative process for migrants; and economics has addressed the sensitive question of the impact of immigration on the labour market. Contributions to the study of migration are also made by urban geography, demography and public administration. Finally, law plays an important role in policy analysis, especially in Germany, where the principal journal in the area of immigration studies, the *Zeitschrift für Ausländerrecht (ZAR)*, is in fact a legal journal. By contrast, academia in the UK has traditionally taken a broader view, as illustrated by the title of the main British journal in the field, the *Journal of Ethnic and Migration Studies (JEMS)*.

¹ In English, this formal differentiation between nationality and citizenship as outlined is rare, with citizenship invariably being used as a generic term. This practice will be employed in this report.

What rapidly emerges, therefore, is a mosaic of different groups, policies and academic disciplines which are subsumed within the term 'immigration'. This complexity, and sometimes confusion, is reflected in the range of terms and definitions that are sometimes used. Thus in German, terms such *Gastarbeiter*, *ausländische Mitbürger* and, more recently, simply *Ausländer* usually describe the legal status of non-Germans and not the reality of their permanence in German society (cf Faist, 1994). This is better recognised in the UK, where we talk of ethnic minorities, and only rarely use the technical term 'aliens'. By contrast, the UK's terminology by definition ignores the fact that around 4 per cent of the population nonetheless does not hold British citizenship. Moreover, the generic term 'immigrant', although used in this report for convenience, properly applies to only relatively few people, as it excludes everyone who is born in a country. This in turn includes a large proportion of those who fall under the categories of 'ethnic minorities' and *Ausländer* in the UK and Germany. In particular, the German situation is further complicated by the fact that children of immigrants born in Germany remained legally foreign, a paradox that the new citizenship law of 2000 has only just begun to address.

It is against this complex background of a very diverse policy area that this report aims to identify a common British-German research agenda. This British-German comparative context has been conspicuously under-researched in recent years. European comparative studies have tended to examine either Britain and France or France and Germany (Favell, 2001; Hagedorn, 2001; Brubaker, 1992; Edey, 1987), or even to place the two countries in a necessarily less detailed multi-country context (Hansen and Weil, 2001; Angenendt, 1999; Cesarini and Fulbrook, 1996; Thränhardt, 1996; Brubaker, 1989; Joppke, 1998).

Of course, there have been a number of stimulating academic single country analyses, but these have equally understandably focused on providing macro-analyses of the immigration question (eg Green, 2001; Hansen, 2000; Spencer, 1997; O'Brien, 1996; Layton-Henry, 1992). This has been particularly true of the German-language academic literature, which with few exceptions has tended to be introspective, frequently normative and usually focused on the presentation of facts, either for their own sake or explicitly for political educational purposes (eg Münz et al, 1997; Bade, 1994; Bischoff and Teubner, 1992; Knight and Kowalsky, 1991). Public bodies have played their part in sponsoring detailed research into migration. In Germany this has been mainly on the part of party foundations such as the Friedrich-Ebert-Stiftung, which has a well-established research programme into migration (eg Friedrich-Ebert-Stiftung, 1998). In the UK, the Home Office's Research Development and Statistics Directorate has since the mid-1990s been conducting extensive and detailed research into various aspects of the migration process. In particular, the outstanding survey of the economic and social impact of migration by Glover et al (2001) deserves to be mentioned here as an output of such research.

The Anglo-German Foundation's decision to approach migration from this specific comparative focus is therefore very timely. Yet both the UK and Germany have large and stable minority populations (circa 6 per cent in the UK and 9 per cent in Germany), and in recent years have emerged as the main destinations for new immigration within the European Union (EU). This is particularly so in the case of asylum seekers: the two countries have had the highest number of applications in the EU for a number of years. In addition, labour migration between the late 1950s and early 1970s constitutes the rump non-white population in both countries. Although this came from different sources (the Commonwealth in the case of the UK and the Mediterranean in the case of Germany), the challenge of integrating this and subsequent generations is one which is

faced by both countries, irrespective of the definitions used in official discourse. In both countries, the non-white population, regardless of their nationality, tends to have higher unemployment rates and lower incomes than the indigenous population. Moreover, the Stephen Lawrence case and the Macpherson report have highlighted the existence of indirect discrimination and institutional racism in the UK, which is likely to exist in Germany too. Recently, both countries have been exploring ways of managing labour migration to counteract skills shortages – there is much common political ground between the two countries in this area.

However, for all the similarities between the UK and Germany, there are also considerable differences, which in turn creates potential for policy learning. A crucial structural difference is that most of the ethnic minorities in the UK have British citizenship: even if they formally remain aliens, they are included in the political process via the right to vote, which is granted to all Commonwealth citizens. Despite the reform of nationality law in 2000, this is not the case in Germany, where most immigrants and their offspring have been excluded from the political process by a historically restrictive nationality law. The impact of this exclusion should not be underestimated: by being denied political suffrage, not only are *Ausländer* excluded from participating in the democratic process, but politicians have little incentive to take account of their concerns. By contrast, Germany has long spent considerable sums on the integration of its immigrants. These sums have not been matched by the UK.

The development of a specific British-German research agenda in migration therefore comes at a time when the interests of the two countries in this field are converging, as illustrated by the immigration bill (*Zuwanderungsgesetz*) currently before the *Bundestag* and by the recent White Paper in the UK (Home Office, 2002). The structure of this report will reflect this convergence by focusing on four main areas of particular relevance to the UK and Germany in which further research could be concentrated: labour migration, asylum seekers, naturalisation and integration, and governance. For each area, the report will outline the context in the two countries, outline existing research and discuss possible directions for future inquiry. The report is of course necessarily selective in its focus, and gives priority to those research issues which might fall under the rubric of 'applied policy research'.

However, the report will begin by arguing that the main macro-theories of immigration have not been able to adequately capture the diversity and complexity of migration anywhere, let alone the specific context of a British-German comparison. This overview is still appropriate, as much of the research on immigration has been undertaken by scholars based elsewhere in the world, especially in the United States. The specific questions concerning the UK and Germany must, therefore, also be placed within a wider context.

2 Macro-theories of immigration

The problem of how to react to the challenge posed by migration is of course not restricted to the UK and Germany. All governments in the western world have struggled to formulate policies that can cover the many nuances of burgeoning international migration. Indeed, many of the challenges currently faced by governments arise out of policy concepts which have not adequately addressed the realities of migration: Germany's long insistence that it was not "a country of immigration" (*kein Einwanderungsland*) is an example of such a policy, and the riots in Bradford and elsewhere during 2001 are examples of the results such policies can have.

At the same time, the degree of control exercised by any one government over migration is almost by definition limited. Globalisation, in the form of economic interdependence and travel, combined with continuing poverty and conflict in many areas of the developing world, creates pressures which individual countries can only partially resist: hence stricter controls on entry and asylum cannot alone dissuade potential migrants from risking their lives in order to reach the EU. On the other hand, the EU itself is gaining competencies in the area of asylum and immigration policy. Indeed, the EU itself creates a two-class system of immigrants, by differentiating strongly between EU and non-EU citizens. Thus 25 per cent of *Ausländer* in Germany, and the largest national group in the UK (the Irish) are exempt from immigration controls because they hold the nationality of another EU member-state.

How, then, does academic research seek to explain the global phenomenon of migration? While many policy-makers have tended to view international migration as an issue primarily for the recipient country, academic scholarship at the macro-level has instead focused on the countries of origin – in other words, the 'push factors' which encourage immigrants to leave their homes in the first place (Massey, 1999). There are six main theories vying for validation.

First, the 'neo-classical' theory, based on orthodox economics, posits that migration is an expression of mankind's desire to better itself (Arango, 2000). Thus, as developing economies industrialise, wage differentials encourage people to seek work in urban areas even if there are no jobs. The more adventurous will seek work in developed countries for the same reason, thereby explaining labour migration flows to Europe in the 1960s and 1970s. At a macro-level, the theory argues that temporary demand is thus satisfied in the recipient countries, while at a micro-level, the decision to move from low-wage to high-wage countries can be explained using rational choice theory (Todaro, 1976). The impact of migration on the labour market will eventually produce more or less equal wage economies. This theory, however, both fails to explain the increasing heterogeneity of migration since the 1970s and why voluntary labour migration is, in fact, relatively small compared to other forms of migration.

Second, the so-called 'new economics of labour migration' views international migration as an opportunity for migrants to manage risk and overcome market failures in the home economy. By working abroad temporarily, migrants build up earnings and return money home through remittances or lump sum transfer. Like neo-classical theory, this is therefore

based on rational choice decision-making, and has been modified to include the migrant family in the analysis. Like the first model, the new economics of labour migration only concerns itself with the causes of migration on the sending side, and focuses heavily on labour migration (Massey, 1999).

Third, the 'world systems theory' alternatively sees the recent trends in international migration as a result of the displacement caused by economic globalisation, as the capitalist system has penetrated more and more into developing economies (Portes and Walton, 1981). Globalisation at the same time has created a more mobile population of workers who seek new ways of earning incomes. Thus, world systems theory argues that migration serves to reinforce international inequalities rather than to alleviate them, since migration is sponsored by multinational corporations who are looking for lower wages (as salaries have increased in the West). With the substitution of traditional practices in agriculture and manufacturing as companies relocate their production to developing countries, the indigenous populations lose their traditional way of life and move to the cities, where unemployment is high. Uprooted and unemployed they are more prone to move abroad and fill cheap labour jobs in developed economies. For Saskia Sassen, this means that migration is, in effect, a global labour supply system (Sassen, 1988). While this theory may offer one explanation of international migration at a global level, it too is undermined by its failure to account fully for the diversity in migration flows between immigration and emigration countries.

By contrast, the fourth theory, the 'dual labour market theory', focuses on so-called 'pull factors' from the point of view of the recipient country, by pointing to the internationalisation of demand for labour (Piore, 1979). The theory notes that many jobs in global cities are rejected by natives, as they are seen to offer no real prospect of advancement, as well as low pay and little stability. These posts are thus hard to fill and employers turn to immigrants. This is offered as an explanation of continuing demand for foreign labour despite structural unemployment in receiving countries. Connections are then made to developing countries, which then provide ongoing source of labour. The theory nevertheless falls down on its inability to explain why immigrants in recent years have come to Europe on their own initiative. Furthermore, it does not account for the fact that similarly rich countries (eg Denmark and Switzerland) experience quite different levels of immigration.

Social capital theory has been influential in the development of the fifth main theory on 'migration networks', which also takes 'pull factors' as its starting point. As immigration streams begin and migrant networks grow, further immigrants are attracted from the same country of origin because of the existence of friends and family and fellow nationals. Migrant networks are therefore "sets of interpersonal relations that link migrants with relatives, friends and or fellow countrymen at home" (Arango, 2000, 306). Migration networks have a multiplier effect – so-called "chain migration". In the British-German context, this is clearly a very interesting theory: there can be little doubt that the existence of large communities from the Indian subcontinent, as well as from Turkey and the former Yugoslavia in Germany, has a magnetic effect on future potential migrants. In addition, recent (as yet unpublished) research by Zig Layton-Henry on the existence of transnational communities has shown that these play a much stronger role in Germany than in the UK.

An extension of this theory is found in the concept of 'cumulative causation', a model that sees migration is a self-sustaining and self-perpetuating phenomenon. Massey (1999) has

identified several factors that are responsible for this self-perpetuation. While he argues that the most important process is the expansion of migrant networks, other factors that induce migration are relative deprivation, the development of a culture of migration, and the stigmatisation of jobs usually performed by immigrants. Massey also argues that international migration can be defined by combining these theories: world systems theories and social capital theory explain how structural links emerge to connect areas of origin and destination, neo-classical microeconomics and the new economics of labour migration deal with the motivations of people who become international migrants, and the theory of cumulative causation and migrant networks show how international migration promotes changes in personal motivations and socioeconomic structures to give immigration a self-perpetuating and dynamic character.

Yet despite Massey's combinational approach, academic research has so far failed to provide a comprehensive and integrated approach to international migration. This has four main reasons:

- Migration is a relatively new topic in research terms, and major studies were only undertaken from the late 1980s onwards. In particular, there is a corresponding lack of interdisciplinary and comparative work. Many of the first texts on migration in Europe were primarily concerned with sketching out the structures of the issues and policies (Collinson 1993a, 1993b; Castles and Miller, 1993).
- Migration is too diverse and multifaceted to be covered by a single theory that can provide accurate predictions (Arango, 2000).
- There is a need for more empirical work on meso-level theories of integration (such as migrant networks and cumulative causation theory) to bridge the gap between macro- and micro-level theories (from both the perspective of the recipient country and the origin country, but also from the perspective of the individual migrant).
- There needs to be a better link between academic theory and policy solutions, especially on such an emotive political issue, where ad hoc decisions are common. There is also a need for a public debate to prevent the populist use of immigration by politicians.

At the same time, the six theories outlined above have only limited value for understanding migration to the UK and Germany. For all the theorising about the rational decisions of migrants, the real motivations, especially of asylum seekers, remain shrouded in mystery. Why are the UK and Germany the most popular destinations for asylum seekers in the EU? What is the relationship between migrant networks and the host society, and how can these help promote integration? Indeed, what role does the state have in the crucial area of promoting integration, and what policies are best suited to this? Perhaps most pertinently in the context of the current debate, is managed labour migration really possible during high periods of unemployment? It is this question which the report will turn to first.

3 Labour migration

3.1 Context

It is perhaps surprising that labour migration should return to the political agenda in the early 21st century, given that unemployment in Germany has once again exceeded the 4 million mark. Even in the UK it remains around the 1 million level. Indeed, it was the very prospect of higher unemployment in the early 1970s that ended the previous system of organised labour migration, which had seen millions of workers from the Commonwealth and the Mediterranean countries arrive in Britain and Germany to seek work. Although there have been some significant exceptions to this policy in both countries, notably for seasonal and very high-skilled labour, official policy has consistently maintained that further labour migration, especially by semi- and low-skilled labour, should be prevented to safeguard jobs and to avoid social unrest. Germany's policy in particular was characterised by the maxim that it was not a country of immigration (*Deutschland ist kein Einwanderungsland*).

What, then, has caused this *volte face*? The answer lies in a combination of demographic developments and skills shortages. The simultaneous decline in birth rates and increase in life expectancy poses considerable challenges not only for pension provision, but also for the financing of other public services, including healthcare. In an influential study published in 2000, the United Nations Population Division calculated that in order to keep the Potential Support Ratio (PSR), which expresses the relationship between the number of people in work to those who are not, constant in 2050, the UK and Germany will require net migration of around 1 million and 3.4 million people respectively annually (United Nations, 2000).

At the same time, both countries are experiencing skills shortages in key strategic sectors. Here the focus has been on new technologies: Germany introduced its so-called 'green card' programme aimed at recruiting IT specialists in 2000, with an initial quota of 20,000 work permits limited to five years.² Yet by late 2001, only about half of these had been allocated. By contrast, the UK has always allowed the possibility of elite labour migration, and the number of work permits issued has been rising steadily over the past ten years to reach levels last seen in the 1960s. Even so, the Home Office unveiled its new Highly Skilled Migrant Programme (HSMP) in October 2001, which introduces a points-based system akin to that used in Australia. Germany too is including a points-based entry system in its immigration bill. But even though there are shortages of skilled labour throughout industry in both countries, there is also considerable spare capacity for unskilled labour, for instance in hotels and restaurants. While the immigration of high-skilled labour is relatively uncontroversial, the possibility of low-skilled migrants raises the question of whether this might create competition for jobs with the indigenous population.

² The term 'green card' is, of course, a misnomer, as it does not grant permanent residence. Instead, the German system corresponds to the H1-B visa in the United States.

3.2 The state of research

Considerable empirical research has so far focused on examining the demographic and economic need for immigration. Here, the evidence is unambiguous, even if the conclusions do not always match those of the United Nations. The Statistisches Bundesamt has calculated that the German population will decrease from 82 million to 65–70 million by 2050. In addition, the ratio of those over retirement age to those of working age will increase from 40:100 to around 75:100 by 2050 (Statistisches Bundesamt, 2000). As a result, the German demographer Rainer Münz (2001) offers three alternatives to keep the size of the workforce stable: a) to increase the age range of the workforce, b) to include more women in the workforce, c) permit immigration from abroad. Münz calculates that about 400,000 immigrants a year would be needed to maintain the current size of the working population. However, Josef Schmid urges caution in viewing immigration as a panacea for labour and skills shortages (Schmid, 2001).

For the UK, the Government Actuary's Department has calculated that the UK population will in fact rise, peaking at about 65 million in 2036 then beginning to fall. While the number of pensioners is predicted to increase to around 12 million by 2011, the increase in pensionable age for women means it will remain stable thereafter (Government Actuary's Department, 1999). Crucially, this increase in population is currently accounted for by net migration.

In the field of labour migration itself, the focus of academic research has been on its economic impact, which is characterised by two main approaches:

- The 'virtuous circle', which predicts that immigrants will both create economies of scale and increase multiplier effects, resulting in a positive-sum game. Thus immigration tends to be good for economic growth, irrespective of domestic unemployment (Borjas, 1990).
- The 'vicious circle', which argues that immigrants depress wages, replace jobs and increase poverty, leading to a zero-sum game.

So far, the overwhelming evidence from economic research supports the first thesis. Already, the beneficial impact of *Gastarbeiter* migration to Germany in the 1960s and early 1970s has been well documented (Spencer, 1994). More recently, a comprehensive study of the economic and social impact of migration for the Home Office in 2001 argued that a 1 per cent increase in immigration would lead to a 1.25–1.5 per cent increase in GDP (Glover et al, 2001; Johnson and Zimmermann, 1994). Therefore, migration is economically beneficial in a well functioning labour market and will not harm local labour, as long as migrant skills complement rather than substitute those of the existing workforce. This supports the notion that skilled migrant labour can always be accommodated in the domestic labour market. Frogner (2002) differentiates further between skills shortages (shortages of individuals with required skills in an accessible labour market) and skills gaps (lack of skills within the existing workforce of a firm). In 1999 and 2001, she maintains that there were about 100,000 skills shortage vacancies in the UK, concentrated in the professional and skilled trades (56 per cent) – IT, technical and engineering jobs, for example. This is borne out in the latest Employers Skills Survey (see Annex C1 in Home Office, 2002).

Bauer (2000) goes on to argue that the key to the economic viability of migration lies in the skills levels of migrants (also Borjas, 1995). While immigrants do create indirect social costs, these actually decrease the better qualified a migrant is. Therefore, while an influx of unskilled workers from the accession countries would create more unemployment in Germany and the EU, qualified migrants would have a positive effect.

From the perspective of globalisation, Salt (1997, 3) argues that "modern industries and services increasingly rely upon the acquisition, deployment and use of human expertise", which, when unavailable locally, is imported from abroad. This process is dependent on internal labour markets developed by employers (within their own corporate structures) as well as on institutional frameworks developed by governments. Internal markets are formed as multinational companies transfer their employees. The increase in flows of highly skilled workers thus reflects the increases in world trade and flows of investment capital. Governments have helped facilitate this change by making work permits easier to obtain. This is especially the case in the USA, Canada and Australia, which have developed programmes for attracting skilled workers (Salt, 1997; Borjas, 1990). Even though the extent of highly-skilled labour migration is low compared to migration as a whole (excluding asylum seekers), it is growing at a faster rate than less skilled migrant workers. In consequence, developed countries increasingly exchange highly-skilled workers ('brain gain' and 'brain drain'), while less developed countries experience only a brain drain as they are increasingly drawn into these networks (Salt, 1997). However, Salt predicts a stabilisation of these flows due to greater use of overseas subsidiaries ('global sourcing'), increased use of air travel and IT. Crucially, Salt argues that as skilled migration increases, the international recognition of professional qualifications will become more pressing (Salt, 1997), an area where he argues the UK and in particular Germany have been left behind.

By contrast, the impact of unskilled migration has often been discussed in the context of the forthcoming enlargement of the EU. This has been a particular concern for Germany, which, fearing an influx of low-skilled, low-wage workers from central and eastern European countries (CEECs), has insisted on long transitional periods before free movement of labour is granted to the applicant countries. However, there is little evidence to support this view (Straubhaar, 2001, 7; Bauer, 2000; Grabbe, 2000, 520–524; *The Economist*, 6 May 2000), although Bauer does recognise that the risk of unemployment rises if there is a lack of economic demand and labour market rigidities exist, which in turn increases the potential for the substitution of native by migrant labour. This would support the notion that the UK, with its strongly deregulated labour market, is in fact better placed to reap the economic benefits of migration than Germany is.

Indeed, Straubhaar (2001) underlines the argument that unskilled labour will also be needed in the EU, even though skilled labour will be more necessary. He maintains that the major current problem with the EU labour market is that there is too little rather than too much migration, with only around 2 per cent of EU citizens resident in a second EU member state.

3.3 Potential research areas

The key message that emerges from the above summary of current research is that labour migration is both necessary and economically beneficial. This is especially the case with high-skilled migration, which is moreover needed to make up shortfalls within domestic economies, but even potentially for unskilled migration, provided it does not compete with the indigenous population for jobs.

This raises a number of questions which merit further investigation. First, more specific research is needed on the real impact of both skilled and unskilled labour migration on jobs and economic growth. Such research should focus on specific geographic areas, in the recognition that free movement of labour rarely exists even in a domestic market: house prices, family and emotional ties are just three of the main hindrances to full labour mobility. Here the potential for policy learning between the UK and Germany is particularly strong, given that migrants and their descendants tend to be concentrated in urban industrial areas in both countries. It should also focus on specific sectors, such as teaching and nursing, where retention has been poor: how does migrant labour impact on those who have left the sector only because of poor working conditions? Such research could lead to a reevaluation of the nature of competition between migrant and indigenous labour for both skilled and unskilled employment.

Second, the question of where labour begins to compete with indigenous labour needs to be more closely defined, given that this is the crucial factor in determining whether migration is economically beneficial or not. A particularly important factor here is the high unemployment rate among ethnic minorities and *Ausländer*, which tends to be twice the national average: to what extent can and should such people be retrained to fill skills shortages? For the same reasons as above, geography is a second potential independent variable alongside the actual job performed.

Third, more research is needed into the question of how labour market structures and economic policy needs to be reformed to maximise the potential economic benefits of migration. Such research could link in well to ongoing work on labour market reform.

4 Towards a manageable asylum system?

4.1 Context

If economic considerations dominate discussions about labour migration, then the discussion about asylum, as first regulated in the 1951 Geneva Convention, is defined by the political desire to be seen to be tough on so-called 'bogus' asylum seekers, as applications have risen during the last 20 years. Already in 1980, the number of applications in Germany exceeded 100,000, reaching a peak of 438,000 in 1992 before falling back to their current level of approximately 90,000 per annum. In the UK, applications have risen dramatically in the past few years, even exceeding the number of applicants in Germany in 2000. The increase in applications has also been accompanied by a burgeoning industry in people trafficking.

It is certainly likely that many applications are made for economic rather than political reasons, and it is probably no coincidence that applications first increased after the end of organised labour migration to Europe in the early 1970s. Whether such applications are actually bogus is a different question, not least because it is unclear where economic persecution ends and political persecution starts.

This large number of applications has arguably plunged European asylum systems, but particularly those of the UK and Germany, into crisis. Under pressure of numbers, massive backlogs of applications have arisen, with average processing times of up to two years in 1999 (Fiddick, 1999). This has made speed of the essence and inevitably relegated the question of whether an adequate examination of an individual case, as required by the Geneva Convention, can still be guaranteed. Recognition rates are low in the UK (averaging around 25 per cent), and almost negligible in Germany (under 10 per cent). Yet, apart from often being prohibitively expensive, removing failed applicants is very difficult for a number of reasons: for instance, it may not be possible to prove the country of origin of a failed applicant, or that country may refuse to grant that person entry. In both Britain and Germany, there have also been cases of death during removals. As a result, a considerable backlog of rejected asylum seekers, who remain in country over many years in a state of limbo, has accumulated. Indeed, the situation is such that once entry has been achieved, an asylum seeker probably has a reasonable chance of obtaining permanent residence irrespective of the outcome of his or her asylum application. This inability to remove failed asylum seekers is arguably the Achilles heel of the entire system, as it undermines the credibility of a state's attempts to secure its borders.

Partly to keep costs in check, and partly to act as a deterrent, levels of financial support for asylum seekers have also been kept deliberately low in both countries, and systems such as vouchers, payments in kind and dispersal are now commonly used. The social situation of asylum seekers is therefore poor in both countries.

4.2 The state of research

Given that the asylum seekers probably fill more newspaper column inches than any other aspect of migration, it is surprising that we know, in fact, very little about them. Most of the existing research has focused on understanding the issues and categorising policy responses (eg Bloch and Levy, 1999; Münch, 1992; Angenendt, 1997). Moreover, as in other areas, the German literature has frequently focussed on making the normative case in favour of a liberal asylum and immigration policy (eg Nuscheler, 1995). The structures and nature of the EU's asylum system has also come under scrutiny in several journal articles (Selm-Thorburn, 1998; Koslowski, 1998; Boswell, 2000).

Yet applied research that can help make better policy has been scarce, not least because of the intrinsically normative nature of this area. Christina Boswell's report for the Anglo-German Foundation on dispersal practices in the UK and Germany thus stands out as a beacon in an otherwise barren research landscape (Boswell, 2001). Other examples include Münz (2001), who echoes the widespread assertion among academic research that an EU-wide regulated migration policy with an EU equalisation mechanism is the only feasible solution to the asylum crisis outlined above. This complements some very recent and innovative work by Eiko Thielemann at the LSE on the theory and practice of burden-sharing in the EU.

4.3 Potential research areas

Because of the lack of detailed research into asylum seekers, there is considerable scope for research in this field. This can be divided into three main areas. First, the motives of asylum seekers remain shrouded in mystery. What precisely makes asylum seekers choose to the EU, often risking their lives in the process? More importantly, why do more of them choose the UK and Germany than any other EU member-state? Can this choice be explained through migrant networks alone, or are other factors, such as language, access to the labour market and freedom of movement, or just chance, at play? Furthermore, are the UK and Germany perceived to be liberal, welcoming societies, and is this a factor in deciding to seek asylum here? This is a challenging research area, in which considerable difficulties in obtaining information would have to be surmounted: asylum seekers are understandably reticent about discussing their motives.

Second, how effective are existing policies for the processing of asylum seekers? What practical alternatives are there to the voucher and/or payments in kind (*Sachleistungen*) systems? What is the impact of allowing asylum seekers access to the labour market? Does this promote their integration and help the economy meet labour shortages, or does it encourage economic migrants to seek political asylum? Is this permission to work not economically counterproductive if rejected asylum seekers are then removed from their jobs and deported home?

Third, what is the effectiveness of individual government policies? How practical are carriers' liability sanctions, which fine airlines for transporting passengers without valid documentation, and how rigorously are they enforced? How can removals be made safer, cheaper and more effective? What role is there for an integrated asylum and international development policy?

5 Naturalisation and integration

5.1 Context

Although naturalisation and integration have attracted considerable scholarly attention over the past 20 years, it is only in recent years that they have moved to the centre of the political agenda, a development which was confirmed by the events of 11 September 2001. The focus of naturalisation and integration policy is the broadest of the substantive policy areas discussed here, covering as it does not only the philosophical aspects of citizenship and multiculturalism, but also inclusion policies, anti-discrimination policies and naturalisation policies.

In their approaches to integration, Germany and the UK come from very different starting points. The UK's expansive definition of citizenship, which operated until 1948, has traditionally meant that naturalisation of immigrants has always been a low-key affair, with few formal requirements and a liberal tolerance of dual citizenship (cf Hansen, 2000). At the same time, the UK has always pursued a policy of *laissez-faire* multiculturalism, backed up by the most comprehensive anti-discrimination legislation in the EU. However, by the 1990s, the tensions in this policy were becoming all too obvious, as Adrian Favell argues in his thought-provoking comparison of philosophies of integration in the UK and France (Favell, 2001). The Stephen Lawrence case and the persistent social marginalisation of ethnic minorities has led other commentators, notably Bhikhu Parekh (2000) to propose a much more proactive form of multiculturalism, in which difference is not only tolerated, but actively celebrated (see also Runnymede Trust, 2000). Against this background, the concept of migrant networks as a basis for promoting integration is not, on its own, sufficient.

By contrast, Germany's tradition of citizenship and integration has been highly exclusive, and built around an ethnocultural definition of membership (Green, 2000). This exclusive definition found expression in the highly restrictive implementation of citizenship policy and some of the lowest naturalisation rates in the EU, which throughout the 1980s failed to rise above a meagre 0.5 per cent.³ Citizenship presupposed a high level of formal integration, and it was not until 2000 that a substantially amended version of the citizenship law came into force. The 'backlog' of naturalisations (ie those who could apply but who have chosen not to because of the restrictive law) has thus yet to be cleared.

However, at the beginning of the 21st century, both the UK and Germany are grappling with the problems of integration. In both countries, a vibrant minority subculture has developed in many cities. Unemployment among ethnic minorities and *Ausländer* is high, language skills are often patchy, and educational achievements correspondingly low, especially in Germany, as the recent OECD Pisa study has starkly revealed. Consequently, the proposed *Zuwanderungsgesetz* and the Home Office's recent White Paper (Home

³ The naturalisation rate expresses the proportion of the alien population which is granted citizenship in any given year.

Office, 2002) include formal measures to promote the practical integration of immigrants. Politically, too, the question of integration has been particularly sensitive, from Norman Tebbit's infamous cricket test to the recent discussion in Germany over the existence or otherwise of a *Leitkultur* (for a critique, see Klusmeyer, 2001).

5.2 The state of research

As is to be expected, there is an extensive body of research on the issue of integration, and on national models of it. This research can be categorised into four main areas.

First, the links between immigration and concepts of citizenship has enjoyed considerable academic attention (Castles and Davidson, 2000; Delanty, 2000; Brubaker, 1992), which has argued that immigration has not only challenged existing concepts of the state (as in France), but also given rise to completely new issues, such as dual citizenship. Other contributions have argued that so many of the civil and social rights originally identified in Marshall's definition of citizenship (1992) have been granted to immigrants that the "limits of citizenship" have been reached (Soysal, 1994). While such an assertion is probably premature, this work does underline the extent to which the boundaries of citizenship have been blurred.

Second, nationality law has also come under scrutiny. For instance, Bauböck (1994) and Hansen and Weil (2001) examine the impact of migration on naturalisation policy in cross-national edited volumes, while Hansen (2000) and Green (2000) focus on UK and German nationality law in particular. More recently, the Home Office has been conducting its own research into the links between naturalisation and integration, which is currently still ongoing (Green, 2002). Among the German-language literature, the focus has often been historical (eg Hoffmann, 1992; Klein, 1997) or legal (eg Hailbronner, 1999; Renner, 1999), although Heike Hagedorn's superb analysis of naturalisation policy and practice in France and Germany deserves separate mention (2001).

Third, the very definition and nature of integration has itself posed challenges. Recently, Dietrich Thränhardt (2000) has undertaken a broad analysis of concepts and definitions of integration, arguing that the multicultural idea failed in Britain because the acceptance of different cultural identities has led to the reinforcement of cultural divisions and tensions. He thus echoes the sentiments of Parekh (2000), who pleads for a redefinition of the British version of multiculturalism. Based on the German example, Friedrich Heckmann (cited in Martin, 1998) has proposed that integration be considered within four dimensions:

- *structural* (legal status, the level of education and labour market status, which for instance creates major obstacles in Germany);
- *cultural* (the adjustment of immigrants to the value of the host society and simultaneous adaptation by the indigenous population to immigrants. While language has become less of a problem with the second generation, key cultural differences remain);
- *social* (contacts between foreigners and natives – data suggest that more than half the foreigners in Germany have German friends);

- *identity* (asking foreigners who they are – in 1995 only 11 per cent of the foreigners considered themselves German).

Thus, the challenge remains for governments in the UK and Germany to formulate comprehensive integration policies to cover all of these areas. Here a major research gap exists: while Favell (2001) and Weil and Crowley (1994) compare models of integration in the UK and France, nothing similar is available for a UK-German comparison.

Fourth, both popular and policy responses to permanent immigration and the perceived challenge to national homogeneity this creates have also been extensively studied. Of course, the notion of a real existing national homogeneity has never been anything more than an illusion. Thus, Klusmeyer observes that the *Leitkultur* concept “rests on a Romantic [and ethnocultural] understanding of culture that obscures fundamental internal differences within majority culture and further marginalises minorities” (Klusmeyer, 2001, 519). Elsewhere, Rubio-Marin (2000) points to the moral imperative of fully integrating immigrants into German society, while work by Chapin (1997), Kurthen et al (1997) and Watts (1998) examines the impact of immigration on xenophobia, violence and the extreme Right politically.

A fifth category has been the emphasis on the social challenge of integration, which was underlined by the report into the causes of the race riots in Bradford, Oldham and Burnley in 2001. Glover et al (2001) argue that, unlike Canada, the UK has no specific objectives for social & economic integration of migrants. They point, in particular, to the lack of attention paid to induction into the labour market and language training. Along with Model (1997), they also discuss the many problems of immigrants in gaining access to the labour market, an argument echoing earlier work by Layton-Henry (1992), who points to the lack of integration of the children of migrants into the education system, which in turn creates barriers to their full integration into the jobs market.

In terms of job discrimination of ethnic minorities in the UK, Leslie et al (1998), using 1991 census data and the Labour Force Survey, propose that UK-born ethnic minorities have better earning prospects than migrant ethnic minorities, though unemployment rates remain high for this group (see also Model, 1997). Leslie et al argue that policy should concentrate more on putting UK minorities into work than on pay discrimination at work. However, they also point to the diversity of experience (eg the particular exclusion of the Bangladeshi/Pakistani community). In this important area, the outcome of the ongoing work by Steve French on racial discrimination at the workplace, also sponsored by the Anglo-German Foundation, will be highly relevant.

5.3 Potential research areas

As in the other areas covered in this report, the amount of applied research available on integration is relatively low. Nonetheless, the potential for policy learning is especially high in this area. Neither the existing Race Relations Act in the UK, nor the discussion about institutional racism and indirect discrimination has any equivalent in Germany, although it is almost certain that similar patterns of discrimination do exist there. Of course, there are major impediments to comparing career developments in the two countries, as nationality constitutes a watershed boundary: non-Germans cannot acquire

the civil service status (*Beamten*) necessary for career advancement in public service. One possible focus for major research might therefore be to analyse the extent of structural discrimination, for instance by law enforcement agencies. Are the patterns of stop-and-search in the UK, which target black youths disproportionately highly, replicated in Germany?

Even with its extensive anti-discrimination legislation, the UK's experience has shown that legislation is not enough and that integration includes practical aspects such as housing and jobs. The provision for legal equality which in practice can easily be circumnavigated, is simply not enough. Indeed, Glover et al (2001) emphasise that civil society also plays an indispensable role in integration. Much more research needs to be undertaken into how this can best be promoted and coordinated.

A second area for possible research is the effectiveness and structure of formal integration programmes. Both the UK and Germany are considering the introduction of language and citizenship classes, based on experience in Australia, Canada and the Netherlands respectively. While the format and structure of such programmes are the subject of ongoing research by the Home Office, little consideration has so far been given to the impact of naturalisation on minorities/*Ausländer* themselves. What does it mean to them to become German or British? What would they like to see in the form of ceremonies and integration classes? How important is dual citizenship to them? Such considerations have rarely been included in research, and could be undertaken using focus groups.

Finally, key policy responses also require further analysis. So far, there has been no adequate answer to the question why Germany is so implacably opposed to dual citizenship, an issue which is met with indifference in the UK. Can the entire system of residence for aliens be simplified in such a way that entry, settlement and naturalisation are a seamless transition, rather than a set of different hurdles to be cleared?

6 The governance of migration

6.1 Context and state of research

The final research area to be discussed is the area of governance. How can the challenges of migration be met by an effective governmental response? Within this area, there are a number of themes, which also build on the above sections and which exceptionally justify the combination of the sections on context and the state of research.

The growing concern with the management of migration flows has matched the increase in international migration more generally (Cornelius et al, 1994). Thus Koslowski (2000) points to the fact that the share of migrants in the global proportion has grown from 2.08 per cent in 1975 to 2.28 per cent in 1990. Koslowski also stresses that migration is a key question for governance because it challenges the borders of the nation state, creating permeability which questions traditional definitions of the nation state itself. Indeed, some authors argue that the degree of national control exercised has been compromised to such an extent by international norms (such as civil and social rights available to all regardless of their nationality) that a 'post-national' citizenship has effectively developed (Soysal, 1994; Jacobsen, 1997).

These views are part of broader globalisation literature which contemplates the end of the nation state. However, this view has been challenged by North American and European comparativists, who argue that it ignores the fact that nation states' control of borders does have an impact, and that welfare and that the acceptance of norms regarding the right to asylum is highly voluntary (Joppke, 1999). In addition, national citizenship in the developed world remains crucially important in terms of providing absolute security of entry and residence, the right to vote and full access to welfare benefits and public sector employment (cf Hansen and Weil, 2001). As noted above, the unique structure of the civil service in Germany makes this aspect particularly important there.

In response to these challenges, the UK and German governments have developed a very similar agenda, with both countries now shifting towards the management rather than the prevention of labour migration. As outlined above, integration has also become a central political goal. However, both countries question the need for unskilled migrants, in spite of the existence of elements of the 'dual labour market theory' (ie jobs that natives will not usually accept), and despite the fact that demographic trends in Germany mean that unskilled workers will be needed. The blocking of 'front door' routes for unskilled economic migrants in both Germany and the UK and the effects of globalisation (such as ease of transport) means that 'side door' routes are likely to remain high (family reunification and migrant networks), as are asylum applications by economic migrants together with 'undocumented immigration'.

Thus a number of challenges for the governance of migration remain. On the one hand, the UK government has recognised that by introducing a separate entry path for labour migrants, pressure on the asylum system will potentially be eased (Home Office, 2002). On the other hand, there are increasing moves towards the internationalisation of migration

governance, especially in the form of the EU (cf Wöhlcke, 2001). Such developments take place within the context of broader multi-level governance solutions that look at migration both from the perspective of the migrant and in the context of international population flows in general. Policy must be developed which can operate both on different governmental levels and across the different themes related to immigration outlined above. Thus governments and research must also include considerations of *why* people migrate within a broader, integrated concept. There is also the question of implementation: Hagedorn's work on Germany and France (2001) reveals the extent to which regional differences abound, even in a highly centralised country such as France.

In terms of the internationalisation of immigration management, a number of international conventions, such as the 1990 United Nations Convention on the Rights of Migrant Workers and Members of their Families, as well as a number of conventions within the Council of Europe, are already in place. However, it is within the EU that the most significant developments are taking place. Already, asylum and immigration policy has passed into the Community sphere of influence (the so-called 'First Pillar') with the ratification of the Amsterdam Treaty. This envisages a common asylum and immigration policy by 2004, and the Commission has already put forward proposals for the joint regulation of family reunification. The Dublin Convention, which came into force in 1997, regulates (albeit ineffectively) the question of under whose jurisdiction asylum seekers fall, as well as nominally preventing multiple applications. In 2001, a European Refugee Fund was established. Lastly, 12 member states are now full participants in the Schengen system of external border controls, with a common visa list.

However, many of the proposals are extremely controversial: thus Germany rejects the proposition that the maximum age for children to join their parents be set at 18: in Germany, the discussion is currently about lowering it to 14 or even 10. With decision-making based on unanimity in this area, finding a consensus will be extremely difficult. At the same time, Europeanisation also creates new issues of governance. By increasing the status of other EU nationals in EU member-states, to the extent where their position is practically equal, the difference to third-country nationals is emphasised.

In addition, the issue of migration is increasingly taking on a multi-lateral dimension. The laws of the country of origin can have a major impact on the ability and willingness of immigrants to integrate in their receiving country. Thus for many years, inheritance in Turkey was limited to Turkish nationals, and release from its military service required the payment of large sums of money. Although such matters have now been at least formally resolved with amendments in the relevant Turkish legislation, few such agreements exist between other countries and Germany or Britain. Yet the increase in migration and the internationalisation of the EU's population will make such bi- or multi-lateral agreements *de rigueur*.

6.2 Potential research areas

The potential research areas in this field are numerous. In particular, the international relations of migration have so far received only sporadic attention. How are bilateral agreements reached, and what interests dominate them? How can foreign policy generally better take account of the requirements of immigrants, in terms of dual

nationality, inheritance and entry rights. How can the format and reach of readmission treaties for failed asylum seekers, which the EU has already signed with several neighbouring countries, be improved, and what kind of sanctions can be imposed?

In the field of public administration, too, there is scope for research. For instance, how is legislation implemented in the UK? Are there regional differences in naturalisation policies, as revealed for Germany and France? How are standards in asylum policy implemented, and can models of best practice be identified? Should asylum case officers be independent (as in Germany) or part of the Home Office structures (as in the UK)? How is residence policy implemented? Can the relatively low number of permanent residence permits in Germany be explained by a failure of German officials to provide the legally-required full advice on the options available? How does devolution in the UK affect asylum and immigration policy outcomes?

Finally, what other mechanisms are useful for managing migration? Does the US Green Card lottery provide a model for European countries? How can asylum policy best be coordinated with labour migration policy, so that economic migrants do not fill up the asylum system, as has been the case for the past 20 years?

7 Summary and conclusions

This paper has provided an overview of the issues around immigration, asylum and integration currently facing the UK and Germany, and of the current state of research addressing these issues. Where possible, the research has been situated in a broader context. It has also sought to identify key areas and specific questions which have emerged as a result of existing research, some of which has already been supported by the Foundation.

Inevitably, the above analysis cannot claim to be comprehensive. Because migration is both global and cross-disciplinary, a whole range of micro-studies in the area of sociology, education and economics is likely to exist, mainly in a North American context, which could not be included here. However, by concentrating on issues of importance for the UK and Germany, a number of key questions have been identified for future research.

Moreover, these are questions which the Foundation can realistically support. Despite the absence of a satisfactory overarching theory of migration, there are now plenty of macro-studies which need to be substantiated with meso- and micro-level research. The report's recommendations reflect this emphasis, by prioritising issues of applied policy research. It is here that the Foundation can have a significant impact, both in academic terms and in terms of public policy-making.

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