

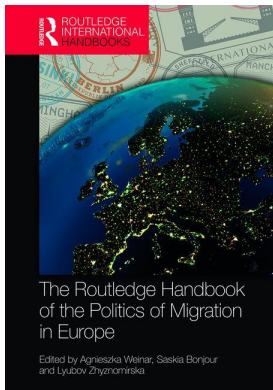
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Access details: *subscription number*

Publisher: *Routledge*

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## The Routledge Handbook of the Politics of Migration in Europe

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### Beyond national models

Publication details

<https://test.routledgehandbooks.com/doi/10.4324/9781315512853-16>

Christophe Bertossi, Jan Willem Duyvendak

**Published online on: 09 Jul 2018**

**How to cite :-** Christophe Bertossi, Jan Willem Duyvendak. 09 Jul 2018, *Beyond national models from: The Routledge Handbook of the Politics of Migration in Europe* Routledge

Accessed on: 22 Sep 2023

<https://test.routledgehandbooks.com/doi/10.4324/9781315512853-16>

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## BEYOND NATIONAL MODELS

## Comparing migrant integration regimes

*Christophe Bertossi and Jan Willem Duyvendak***Introduction**

The notion of national models of integration has been a very popular one in the comparative literature on Europe and has offered some advantages for research on the incorporation of immigrants and their offspring. Since the 1990s, it has helped scholars identify differences among countries and their respective policies and public conceptions of citizenship – such as republican assimilation in France, pluralist or multiculturalist models in Britain and the Netherlands, and the so-called ethno-nationalist model of Germany. Since then, models have been the ground of numerous international comparative studies to assess processes of convergence or divergence between various European countries.

Conceptually, models have been defined in various ways borrowing from different social and political scientist paradigms. Within the perspective of historical sociology, for example, the notion of ‘cultural idiom’ as proposed by Theda Skocpol (1985) was used by Rogers Brubaker (1992) in his seminal study of citizenship and nationhood in France and Germany in the late nineteenth and early twentieth century. New institutional approaches were based on the notion of ‘policy paradigm’, developed by Peter Hall (1993) and used by Adrian Favell (1998) in his comparison between France and Britain in the post-war era. The sociology of social movements also contributed to the discussion about models and their evolution in Europe, using the concept of ‘opportunity structure’, as did Koopmans and his colleagues in their comparison of citizenship in Britain, France, the Netherlands and Switzerland (2005).

However, despite (or probably because) of its success as a way to conceive of the structural and sociohistorical articulation between political national traditions, public perceptions, institutions and the policymaking of migration and integration, models have tended to become more often than not a non-reflexive tool, the career of which has been deeply rooted in the evolution of the politics that have agitated Western European public debates about immigration, multiculturalism, and Islam over the last two to three decades. In the social science literature, this has led to instances where a model is blamed for the success or failure of a specific policy approach. For instance, various authors have blamed the Dutch multicultural model for the alleged failure of immigrant integration in the Netherlands. As a result, a new discussion about models started in the late 2000s, and emphasized the limits of the notion and the need to critically reassess its adequacy as a tool for comparative research (Joppke, 2007; Scholten, 2009; Bertossi, 2011; Van

Reekum, Duyvendak and Bertossi, 2012). We propose to come back to these discussions. We highlight some of the key problems of models that have affected comparative research on migration, integration and multiculturalism, and we conclude with some comments about how comparative research interested in national cultural configurations of citizenship and immigration issues could be more effective.

### **The invention of models of citizenship and immigrant integration**

The notion of national models of citizenship and immigrant integration emerged in a specific social and political context. With the durable settlement of (post) colonial migrants as well as the former 'guest workers' and their family, the integration of immigrants became an important public issue in the 1980s in Western Europe, in countries like France, the Netherlands and Germany. The question was whether this newly settled foreign population and their children could access their host countries' citizenship and institutions, what could account for cross-national institutional variations regarding their incorporation, and the impact these differences had on their socioeconomic and cultural integration. Partly trying to make sense of this shift, and partly responding to a strong political and public demand, scholars have forged the notion of national models in order to describe different national approaches to integration. They proposed different typologies, suggesting a strong correlation between the institutional and ideological logics of these countries' political traditions (in terms of a 'national idiom' or a 'nation's cultural self-understanding'), and the policies of migrants' integration (nationality law, immigration regime, different social policies, etc.) one could find in these countries. As a result, notions of multiculturalism, republicanism and ethnic exclusion were extensively discussed and, associated with individual countries, they became the key categories for comparative research on citizenship and immigrants' integration.

If this framework happened to be questioned in the mid-1990s by a new 'postnational' or 'transnational' horizon for apprehending citizenship and integration in Europe (Bauböck, 1994; Soysal, 1994), 'neo-nationalistic' trends (Feldblum, 1999) in the politics of immigration and integration at the end of the 1990s and the beginning of the 2000s brought national models back at the centre of discussions among scholars interested in citizenship and integration. Of more particular concern was the question whether 'failures' or 'successes' in immigrant integration could be explained by past policies that could be situated in the oppositions between French civic republicanism, Dutch and British multiculturalism, and German so-called ethno-national conception of citizenship. As a result, behind the discussions about the heuristic potential of national models that could overcome their static and deterministic dimension (Finotelli and Michalowski, 2012), scholars became involved in debates about the political models behind these analytical categories, most of the battle being focused on the so-called 'retreat' of multiculturalism in countries like the Netherlands and Britain (Vertovec and Wessendorf, 2009), and the evaluation of the discrepancies between the categories used in public and political debates, the actual institutional and policy arrangements, and the outcomes of these policies in terms of immigrant's (more or less successful) integration (see Vink and Hebling, 2013).

### **The limits of models**

The question of models is a question about comparative research. Comparison is strategic for overcoming a national bias in the categories used by scholars in their research on immigration, immigrant incorporation, and citizenship. From this perspective, models have played a positive role, stimulating reflexivity among scholars regarding their national framings. However, comparison

also demands specific precautions, particularly concerning the risk of ‘culturalism’, insofar as research that compares cultural configurations can lead to essentialize preconceived cultural differences between homogeneous national conceptions.

This risk is not so big in a strategy that can be labelled as ‘pluralist’ and insists on the internal cultural and normative heterogeneity of models as cultural constructs that develop and change over time (see for an example Lamont and Thévenot, 2000). By contrast, a ‘monist’ strategy frames national cultures as uniform and unequivocal sets of norms, values, institutions, ways of thinking and acting. Within this second strategy, citizenship and migration policies are seen as moulded by one national principle described as coherent, stable and sufficient to account for differences between countries – for example *laïcité* in France, race in Britain or pillarization in the Netherlands. Within this second perspective, France is conceived as an assimilationist country because of its civic republican tradition (as opposed to multiculturalist countries such as Britain or the Netherlands, and to an ethno-cultural national identity, as is the case in Germany). In turn, because France is a republican country, its notion of the Republic is seen as all-encompassing – the Republic organizes the separation between public and private realms (through a strict colourblind approach to ethnicity and race), between the state and the church (the philosophy of French secularism – *laïcité*), and it underpins the specifically French ‘political’, ‘open’ definition of citizenship and immigrant incorporation. By contrast, in Britain and the Netherlands, multicultural norms are viewed as enabling people to mobilize on the basis of ethnic or racial identities, while integration policies aim at promoting group-based identities instead of a common citizenship (Koopmans *et al.*, 2005; Koopmans and Statham, 2005; Sniderman and Hagendoorn, 2007). Such a sharp polarization between models leads some authors to claim that multiculturalism remains something undoubtedly ‘un-French’ (see Jennings, 2000).

What seems important here is that both strategies have very opposite results when it comes to accounting for change. While a ‘pluralist’ approach is sensitive to the historicity of models as political and cultural constructs, the ‘monist’ perspective only offers a quasi-historical view because it supposes a priori continuity in the ‘self-understanding’ of a nation. Hence the difficulty of connecting this monist approach to the work by historians who have studied the ruptures and tensions in the emergence of national political traditions and forms of solidarity based on citizenship in the late nineteenth century (see Rosanvallon, 1984; Noiriel, 1988).

This also leads to a miscomprehension of social and institutional realities, insofar as empirical reality can depart from what could be expected from a model perspective – for example, the French military is the only Western military institution that organizes the pilgrimage of its Muslim soldiers to Mecca every year, ‘despite’ the French ‘separation’ of State and Church and assimilationist model widely used by comparative social and political scientists (see Bertossi, 2016). **In the Dutch case the multicultural model was empirically stretched into the days of ‘pillarization’, rewriting history (on the pillarization myth, see for example Vink, 2007).** Koopmans (2007) roots the Dutch multicultural approach to immigrant integration clearly in the history of pillarization when ethno-cultural cleavages were stressed. He claims that the application of this model on new immigrant groups has had strong adverse effects, as multiculturalism ‘offers new ethnic and religious groups a formal and symbolic form of equality, which in practice reinforces ethnic cleavages and reproduces segregation on a distinctly unequal basis’ (2007: 5). Although he admits that formal policy discourse and public discourse have changed, Koopmans argues that in their actual way of dealing with ethno-cultural diversity the Dutch have remained accommodative:

The Netherlands is still an extreme representative of a ‘multicultural’ vision of integration. (...) Outside the limited world of op-eds in high-brow newspapers, the relation

between Dutch society and its immigrants is still firmly rooted in its tradition of pillarization (...) (O)rganizations and activities based on ethnic grounds are still generously supported – directly and indirectly – by the government.

(Koopmans, 2007: 4)

The risk of modelling is that the models are not only taken as tools for international comparison or for understanding a certain historical period. When a model begins to shape our understanding and beliefs about policies, the model becomes more than just an analytical model: the model is instead taken as an accurate historical reconstruction of policy rather than as a model of it. Models then take the place of historical analysis (Duyvendak and Scholten, 2011, 2012), mis-portraying what is actually happening, suggesting much more continuity than actually exists (few scholars would seriously claim that the Netherlands was still in 2006 an ‘extreme representative of a multicultural vision of integration’).

Another limit of the notion of models has to do with the extent to which its definition by scholars is very close to the discourse of a variety of stakeholders in political and media spheres. Analytical ideal types of French republicanism or British and Dutch multiculturalism are akin to political stereotypes, commonly held in public and political debates in each country. When sociologists, political scientists, historians or philosophers discuss republican or multicultural models, they are not writing about anything different than what politicians and journalists talk and write about, even if scholars (sometimes) discuss the models in a different manner. The notion of models used by scholars is heteronomous: academic discussions on models are pervaded by normative, political and moral interests, which stem from ideological debates in the public arena in which scholars also take part (Essed and Nimako, 2006; Bowen, 2007; Scholten, 2009). The problem here is that scholarly notions of integration models reflect and are influenced by public debates, which in turn are structured by dominant and elite-shaped frames, among whom influential scholars (see Uitermark, 2012).

This normative dimension is strikingly obvious in the literature that has addressed the issue of a possible ‘crisis’ of models of integration in Europe since the beginning of the 2000s (Vertovec and Wessendorf, 2009). Research on the integration of immigrants in Europe has turned into discussions about the success or failure of traditional integration policies, assuming that specific claims made by ethnic minorities, particularly when these claims are made by Muslims (Koopmans and Statham, 2005; Joppke, 2007, 2009; see also Klausen, 2005), show the failure of integration caused by the multicultural model, measured in terms of Muslims’ loyalty and incorporation (‘are they with us or against us?’)

### **The entanglement of policies and scholarship**

From the 1980–1990s onwards, the notion of national models has gained purchase in both academic and policy debates. This tendency in the literature need not have been intentional and fully understood at the time. It is more realistic to see the conceptualization of national models as a somewhat unintended consequence of the dynamic between particular developments in the academic field and the concerns of policy makers.

From a policy domain perspective, the tendency to use nation-states as the level of analysis seems rather obvious. The whole point of integration policies is the idea that newcomers need to be brought into a national fold. The idea that policies should, somehow, add up to a coherent and stable construct of national citizenship is almost inevitably inherent in the very idea of developing such policies. The prevalence of national models in policy debates is clearly part of the political nationalism inherent to such forms of governance. However, the tendency among

researchers to also aggregate policies within the container of nation-states is more ambiguous and needs clarification. Here, it is far less obvious why the aggregation of policies into national models would turn out to provide the most relevant insights (Duyvendak *et al.*, 2013). How to understand the popularity of national modelling among social scientists?

In part, researchers have all too often taken over the politically motivated questions of policy makers and politicians. In service of specific political concerns, researchers have tended to research immigration and diversity while taking for granted the existence and preservation of nation-states, national identities and a national people. As long as the often-implicit research question tends to be the extent to which and the ways in which nation-states are able to preserve themselves and their populations under conditions of intensified immigration and transnationalism, the identification of national models makes methodological sense. The problem with this approach is, however, that it assumes what it seeks to explain. Why study the policy responses to immigration and diversity when one has already assumed that nation-states can be identified with philosophically coherent and historically stable models of integration? Isn't the point of studying these politics and policies the fact that the nation-states and national identities remain contentious entities? What policy makers must assume almost by default – the overriding integrity of nation-states –, researchers should question by default as well: how do people in fact succeed or fail in constructing the nation-state day by day?

The tendency to uncritically adopt political assumptions about the integrity of nation-states was greatly spurred by the salience of France and Germany in the empirical analysis of citizenship regimes. Rogers Brubaker's groundbreaking historical reconstruction of French and German citizenship, published in 1992, exerted a huge influence on the field. France and Germany did indeed seem to provide clear cases of different, coherent and stable notions of national citizenship: one republican, one ethno-national. While Brubaker's study presents the contentiousness of national citizenship in great detail – and Brubaker has gone on to add more and more ethnographic detail in his later work – the notion of different, coherent and stable regimes of citizenship turned out to be highly applicable in the academic shift taking place at the time: from conceptual, philosophical discussions over citizenship and diversity towards more empirically oriented research practices, in the vicinity of policy makers and politicians increasingly concerned with the integration of newcomers. With the methodological construction of national models, political philosophies and their philosophers had found – or so it seemed – their empirical instantiations.

As Britain and the Netherlands began to stand for 'multiculturalism', the perceived success or failure of those states to manage immigration and diversity could at the same time become a verdict on normative systems of philosophical thought. An example of this shift towards empirical validation of philosophical systems is *Contested Citizenship* (Koopmans *et al.*, 2005), in which national models, based on aggregated indicators, are positioned in a stable space of 'philosophical possibilities'. This brand of analysis overlooks, however, that nation-states 'move in regime space', precisely because actors in and outside those states constantly problematize what the possibilities of citizenship in fact are. A substantial part of the contention impacting policy is about the meanings and implications of republicanism, *laïcité*, pillarization, multiculturalism, diversity, tolerance, equity, anti-racism and human rights. One can of course follow a nominalist strategy and label specific sets of indicators 'republicanist', while labelling others 'multiculturalist'. The crucial connection to political contention, in which such terms are highly polysemic, must then be relinquished.

The complicating factor in studying the politics of immigration and diversity is that there is not only contention *between* philosophies, but also and sometimes most poignantly contention *over* philosophies. In that sense, the daily discussions over integration policies in bars, parliaments



and newspapers proceed quite differently from academic debates in which people make a focused, yet never entirely successful effort to define their terms.

It seems, then, that the concept of national model does the conceptual work of an all-too-consensual notion of political culture. The concept assumes that nation-states can be characterized by coherent politico-cultural ideas about citizenship and that these ideas path-dependently determine policies. The problem, however, is that political culture is hardly as consensual as the concept of national model assumes and projects onto policy regimes. Political culture might more appropriately be understood as the dissensus that emerges around a number of core issues on the political agenda, as Dewey has shown. What people operating within the horizon of a political culture share is not a set of deep assumptions about, for instance, citizenship that can be explicated in the form of a model, but a set of highly ambivalent problems that they have a hard time resolving and don't seem to go away (cf. Somers, 1995). A political culture need not imply consensus, nor does path-dependency imply inertia. So while the language of national models is present in both the European cases and the settler societies such as the US 'melting pot', Canadian and Australian versions of 'multiculturalism', a more close-up analysis of what notions of national models refer to reveals constant change in policy approaches and endemic dissensus about what those models amount to (for a discussion on the models in settler societies, see Foner, 2012; Reitz, 2012; Van Krieken, 2012).

What does seem relevant in comparing the European cases to the settler societies is the expectations that actors have of policies and the state. The politics of immigration and diversity in Europe has become ever more pessimistic. Discussions over models have thereby centred on the question whether the policy models really deliver results, namely integrate newcomers into the national fold. As already mentioned, these expectations have left their mark on the European research practice. In this pessimistic light, national models of integration come to be evaluated according to their performance of the task of national preservation, of defending national identities. Anxieties have arisen in numerous European polities over their supposed failure to integrate newcomers. Consequently, their models of integration are said to be in 'crisis'. The settler societies, particularly Canada and the US, present us with a different tableau. While immigration and diversity are quite clearly *hot issues*, the problem is not primarily understood to be a failure of integration into a native majority (Alba and Foner, 2015). In these contexts, there seems to be somewhat more optimism about immigration and diversity, at least in most political and public discourse. As settler societies, immigration and diversity is part of what it means to be American, Canadian or Australian. However, the election of Trump and the resulting changes in policies do show that pessimism about immigration is not limited to continental Europe anymore.

### The implicit politics of modelling

What notions of politics are implied in 'national modelling'? First of all, that policies are exclusively bound to the nation, overlooking subnational policies (or assuming, erroneously, that all subnational policies are steered from the national level). Thus, the development of these national paradigms must be considered a consequence of nation-state centredness of policy and academic discourses, rather than as accurate representations of the character of immigrant integration policies, in which local authorities, and institutions in the fields of education, care, and housing play a big role (Bowen *et al.*, 2014, see also below). In fact, this often leads to what Favell (2005: 48) describes as 'self-justificatory discourse'. Researchers have shared in this 'methodological nationalism' instead of questioning the 'national' of 'national models'.

Second, this perspective of models of integration assumes that agency and collective interests are marginal dimensions of institutional arrangements (in the field of education or health, for

example) and of public debates (Brubaker, 1992: 13–16; Bleich, 2003). Instead, normative and idealistic ‘frames’, ‘structures’, ‘idioms’ or ‘paradigms’ are seen as the primary and main driving force of policies and practices related to identity, citizenship, immigration, religious diversity and so on. Social actors, from politicians to veiled Muslim women, are portrayed as simply inheriting these ideas, using and adapting to them. In turn, a public speech on immigrants or a woman’s decision to wear the *hijab* are also brought down to a single cause, namely the power of French republicanism or British and Dutch multiculturalism to drive individual behaviours, social movements, institutional arrangements and policies. When it comes to explaining precisely how this causal relation works and where these models come from, however, the literature is unclear, without offering a detailed account of where these ideas take their power from, and the processes and mechanisms through which they shape social reality and are accepted and used by social actors in different contexts.

Finally, models tend to oversimplify policies and overstress the alleged coherency and consistency of these policies. Policy practices tend to be far more resilient and diverse than most policy models would suggest. For instance, in Dutch as well as in French literature there have been many references to differences between how policies are formulated on the national level and how they are put into practice often on the local level; some even speak of the decoupling of national and local policies in this respect (Favell, 1998; De Zwart, 2007; Poppelaars and Scholten, 2008). In fact, even when policy makers claim to operate according to a specific policy model, their reasons for doing so may be pragmatic and flexible. For instance, the reason why some Dutch politicians in the 1980s framed immigrant integration in terms of the multicultural model may have much more to do with their fear of anti-immigrant parties playing the race card than with their so-called multicultural policy beliefs (Penninx, 1988; Scholten, 2009).

### Models as discursive and institutional practices in contexts

What can national integration models teach us then about the practices of those who speak about the French Republic, Dutch and British multiculturalism, or German ethno-nationalism? It is not enough to show, as we have done, the problems with concepts such as national models of integration. The fact that these models are not institutionally consistent, normatively coherent, culturally unequivocal or historically stable does not mean that they are simply figments of the imagination of researchers who are engaged in ideological debates on the integration of immigrants.

Models are not an illusion created by public or political debates. When trying to address issues such as the integration of migrants and citizenship in a context of diversity, we are confronted with a wide range of social actors (including scholars) who believe in the existence of these models and who use them to justify strategic choices and their own practices. For this reason, it is not enough to conclude that national models ‘do not exist’ because the reality that scholars observe is in fact saturated with modelled thoughts and modelled practices. The subjects of our research (social actors) believe in the existence of a French model built on principles inherited from the French Revolution or in the (past) existence of a Dutch and a British multiculturalism. Models are discussed everywhere: in working-class pubs, hospital hallways, at the desks of family allowance organizations, in police stations, in school staff rooms, in union or non-governmental organization (NGO) meetings, in the reader commentary sections of newspaper websites, in European ministers of interior summits, to name just a few. It is therefore wrong to say that national models of integration should not be taken seriously because there are many people who take these models very seriously. The model concepts are used, imagined,



negotiated, affirmed, contested and challenged by different types of people. It is critical to be aware of the diverse uses of models and the negotiations, discussions – and misunderstandings – in which they figure.

This indicates a perspective that overcomes the limits of the notion of models in the way we discussed them. Instead of taking models as self-sufficient explanatory frameworks, they can be looked at from a more sociological perspective as a set of practices that need to be studied in context. Research has shown, for example, that variations between accommodative versus assimilationist approaches to religious diversity in public institutions had to do more with practical issues faced by members of these institutions in their daily work than with grand narratives of citizenship philosophies that dominate the public and political debates in a country (Bowen *et al.*, 2014; Bertossi, 2016).

A ‘monist’ understanding of national model fails to account for such variations. To unveil the complexity involved in the public narratives about immigrant integration and national identity, it is more fruitful to opt for a pluralist, more empirical, and critical use of models, looking at how social actors, institutions and constraints deal with notions of secularism, tolerance, integration, or ‘home’. In that perspective, it seems highly relevant to combine cross-national comparisons between national cultural configurations with cross-institutional comparisons of how different organizations of the state or the market frame the issue of diversity. This emphasizes the pragmatic dimension of belonging in contemporary immigration societies as well as the complex logics at play in boundary-making processes and exclusion/inclusion axes that cannot be reduced to one national doctrine or identity (Lamont, 2002; Wimmer, 2007; Duyvendak, 2011; Bertossi, 2016).

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