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### European cities and their migrant integration policies: case-studies from eight cities

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# KING

Knowledge for INtegration Governance

## European Cities and their Migrant Integration Policies Case-Studies from Eight Cities

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with

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KING Project – Social Science Unit  
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# KING - Knowledge for INtegration Governance

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The KING project's objective is to elaborate a report on the **state of play** of migrant integration in Europe through an interdisciplinary approach and to provide decision- and policy-makers with **evidence-based recommendations** on the design of migrant integration-related policies and on the way they should be articulated between different policy-making levels of governance.

Migrant integration is a truly multi-faceted process. The contribution of the insights offered by different disciplines is thus essential in order better to grasp the various aspects of the presence of migrants in European societies. This is why **multidisciplinarity** is at the core of the KING research project, whose Advisory Board comprises experts of seven different disciplines:

**EU Policy** – Yves Pascouau

**Political Science** - Alberto Martinelli

**Public Administration** – Walter Kindermann

**Social Science** – Rinus Penninx

**Applied Social Studies** – Jenny Phillimore

**Economics** – Martin Kahanec & Alessandra Venturini

**Demography** – Gian Carlo Blangiardo

The present paper belongs to the series of contributions produced by the researchers of the “Social Science” team directed by Rinus Penninx.

The project is coordinated by the **ISMU Foundation**.

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## European Cities and their Migrant Integration Policies

### 1. INTRODUCTION

Within the KING project, the research group on Social Studies chose to analyse in-depth local integration policies by preparing case-studies concerning eight European cities: Amsterdam, Barcelona, Milan, Prague, Stuttgart, Turin, Turku and Warsaw. The eight cities were chosen on the basis of two criteria. The first is that together they should represent the diversity of cities and policies that was found in the state-of-the-art-report: old and new, all geographical areas of Europe, representing various type of policies, etc. The second criterion was that there should be significant material available for the city to use as background for a number of selected interviews and targeted collection of recent data.

In order to collect data for the case-studies that would make a comparison possible and meaningful, it was decided that all writers of city reports should use the analytic approach to study integration processes and integration policies that was developed in the state-of-the-art report elaborated by the research team in the framework of the desk research of the KING project. Before starting the field work a list of topics to be covered was drawn up, and a tentative common table of contents for the City Reports. This resulted in a number of papers by members of the Research Group in which local integration policies of eight cities were described and analysed in a comparable way.

In this document we will report on the eight case-studies as an elaboration of the state-of-the-art report of February 2014. In the next section, we will recall briefly the analytic concept of integration processes. In section 3, we come back to the question what integration policies are and how they should be studied. In section 4, we will situate local integration policies in relation to national and EU integration policies and point to some historical developments that contextualize the present complex multi-level structure of policies. These sections build strongly on the first state-of-the-art report, but are also rewritten in the light of the comparative analysis of the City Reports.

The sections 5 and 6 are built around the two basic questions of the case studies. Section 5 focuses on the framing and content of local policies and asks the question how the three dimensions (the legal/political, the socio-economic and the cultural/religious one) are reflected in policy rhetoric and practice and how these dimensions relate to each other in the cities' policies. Section 6 is on the governance of integration policies at the local level.

### 2. THE CONCEPT OF INTEGRATION AND HOW TO STUDY INTEGRATION PROCESSES

Integration is a rather specific post-war European term. As a field of research, the study of settlement processes of immigrants in Europe has an ambivalent relation with an earlier tradition of settlement studies in the United States: on the one hand, it borrowed its essential framing as the study of how immigrants as newcomers find their place in the society in which they settle; on the other hand, the concept of assimilation that was developed by American researchers was rejected in Europe as being lop-sided in two

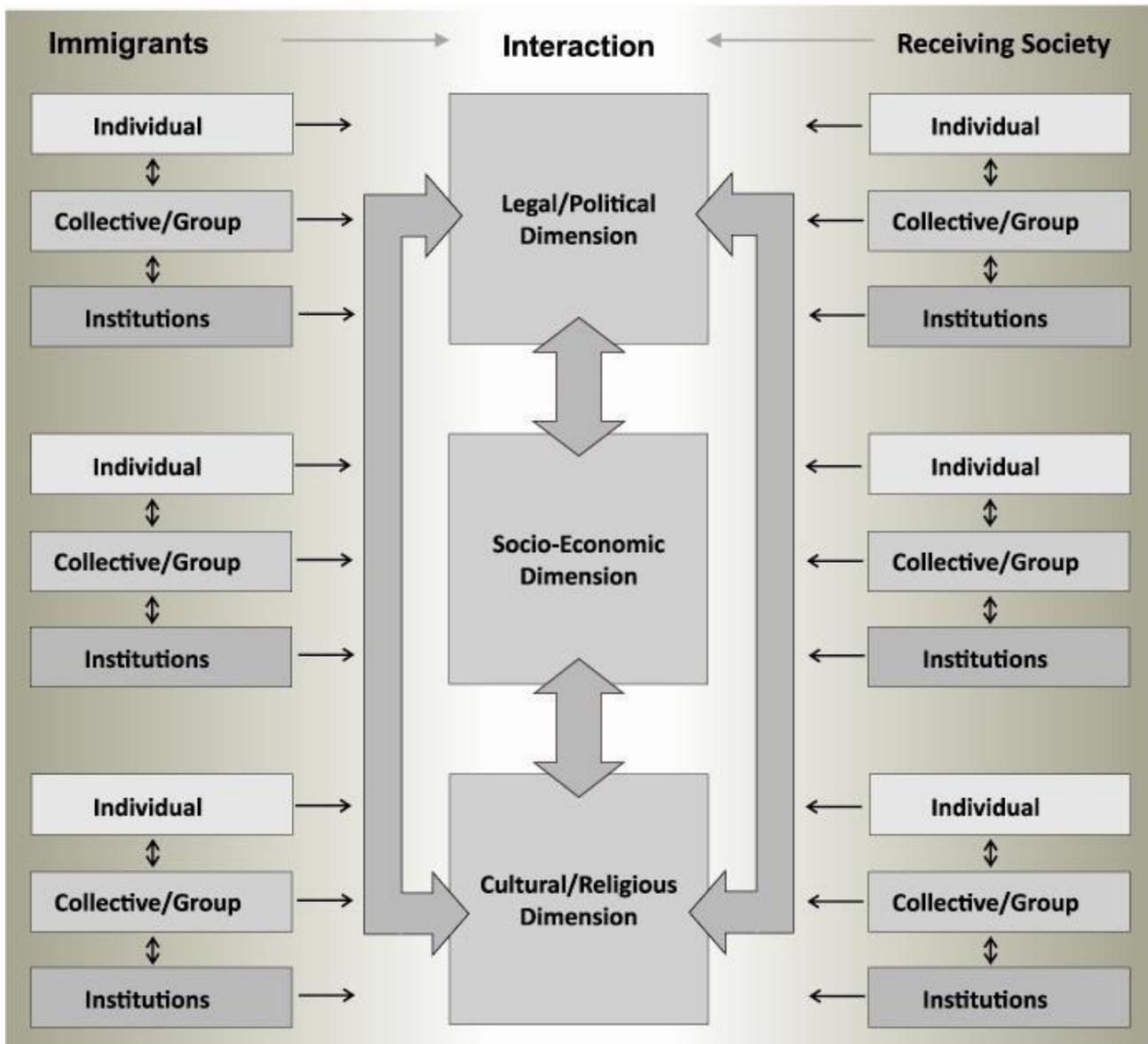
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respects: in seeing the process of settlement as primarily a process of cultural change of newcomers and seeing it as a linear process towards assimilation in mainstream society.

The integration concept as it developed in European research in the past half century still focuses on the process of settlement of newcomers but it has become more complex and rich. Firstly, it looks systematically at both the society of settlement and immigrants as two parties involved in the settlement process and it often recognizes the dominant role of the receiving society in this process. Secondly, it spells out the different dimensions of the integration process:

- The legal/political dimension: the study of this dimension of integration has been developed extensively, both the part that focuses on the legal status attributed by admission policies and its consequences for integration (including the absence of an official legal status) and the part on (non-)participation of immigrants in politics in the broadest sense, a branch of studies that often goes under the name of citizenship studies.
- The socio-economic dimension: the study of the (development of the) position of immigrants in key fields of societal stratification: work and income, education, housing and health. If the benchmark is the native/ non-immigrant, such studies often go under equality studies; if they are longitudinal within the group, they go under the label of (intergenerational) social mobility studies.
- The cultural/religious dimension: while the study of the cultural and religious adaptation of individual newcomers has been central, nowadays the perception and acceptance of newcomers by natives has become increasingly important. Immigrants' culture and religion are furthermore studied as collective phenomena, as is the political and societal organization of cultural and religious diversity and its recognition in the society of settlement (equity studies).

**Figure 1:** A heuristic model for the empirical study of integration processes



The study of integration has also gained much by distinguishing between levels at which integration processes take place and by studying the different mechanisms involved. Firstly, there is the micro-level of individual immigrants and their households and kin, and the comparable micro-level of native individuals in the society of settlement and how they perceive and react to each other. Secondly, there is the level of collectives of both immigrant groups and natives and how they relate to each other. Thirdly, there is the level of institutions, both general institutions relevant for all residents and specific ones of and for immigrants.

The concept of integration as developed above is used as an analytical tool in writing the state-of-the-art report. In particular, the three dimensions have been taken as a starting point to analyse integration policies of European cities. It has also been at the basis of the case-studies of integration policies of eight European cities. How these policies are studied is explained in the next section.

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### 3. HOW TO STUDY INTEGRATION POLICIES

The study of policies is fundamentally different from the study and understanding of the processes that such policies aim at. The essence of policies is that they intend to guide and steer processes in society, in our case, integration processes of immigrants. Explicit integration policies are part of a political process of a normative nature in which the issue of integration is formulated as a problem, the problem is given a normative framing and concrete policy measures are designed and implemented to reach a desired outcome. Other policies not specifically targeting immigrants, such as policies for education and health, housing, the labour market or the public regulation of religion, may exert a strong influence (positive or negative) on integration processes of immigrants. Therefore a systematic analysis of integration policies should go beyond integration policies in the strict sense.

When studying integration policies, the first question to be analysed is how different political and social actors perceive and frame immigrant integration. A frame is (a reconstruction of) the problem definition of a policy issue, including the underlying assumptions of its causes and the remedies for it. This means looking at how the problem is actually defined and explained and what could and should be done. In terms of problem definition, the first question is how immigration is perceived: is it seen as a problem or as opportunity? Who has the moral and/or legal right to be/become an immigrant? Who are the wanted and unwanted immigrants? For immigrants who are actually present in the host society, the basic question is whether they are seen as “foreigners”, as “temporary guests” or as permanent members of the society for whom the state accepts the same responsibilities as for native citizens, guaranteeing the same rights and providing the same facilities.

Once the problem has been defined, the next step to be considered is what should be done. In some cases, a state or a city may choose to ignore immigrants' presence and therefore avoid any special responsibility for them. This is thus a choice for a non-policy response, which as such should be understood as a policy in itself (See Hammar 1985: 277-278; Alexander 2007: 37 ff). In other cases, new policies may be formulated to cater for certain immigrants' needs but under specific conditions due to the alleged temporary nature of their stay. Under this guest worker approach immigrants otherness may be “tolerated” and even encouraged though their (residence) rights may be curtailed in the long run. Finally, if immigrants are perceived as permanent residents, inclusion may be the main response. This can be done in different ways though. As Entzinger (2000) illustrates with his model of integration policies, integration policies may differ significantly with regard to the three dimensions of immigrants' integration identified above.

In terms of legal recognition and political participation (the legal/political dimension), policies may recognise immigrants as permanent foreign residents (the so-called denizens), thus incorporating them socially but limiting their political rights, or as full citizens, thus removing all barriers for and even promoting naturalization. In the socio-economic domains, policies may devise specific measures catering for immigrants' concrete interests and needs or they may just act on the common interests of citizens in general. Finally, in terms of diversity (the cultural/religious dimension) policies may be designed under two very different premises: one is that integration demands the adaptation and learning of immigrants but also significant changes in access to and the working of institutional structures of the host society (here integration is a two-way-street leading to mutual adaptation); the other is, that societal rules and structures, including underlying norms and values, should be taken as a given and immigrants should (voluntarily or even as a mandatory task) adapt to them (a one-way-street that leads to assimilation).

Finally, the third question to be addressed is for whom integration policies are meant. Migrant integration policies that formulate specific groups of immigrants as target groups are different from policies that focus on all immigrants. And these are even more different from policies that target all individuals regardless of their origin or that target at natives. Policies may also target collectives (organisations, civil society) rather

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than individuals. They may even target general institutions of society. In practice these different approaches result in very different policies again with regard to the three dimensions of integration: political rights can be granted to immigrants as individuals, for instance by granting voting rights, or as members of a group, which often means the creation of representative bodies; policies may seek to promote equal opportunities for all citizens, meaning equal access to housing, education, health care and the labour market, or equal share in their actual access to these goods and services; finally, cultural diversity can be promoted as an individual or as a group right, the latter often implying the state support to immigrants' organisations and own institutions.

Frames cannot always be analysed directly but have to be reconstructed from policy documents and political discourses. When a policy is defined, there is generally an explicit formulation of a perceived problem and of the desired outcome of the specific efforts that are taken by policies. Such verbal, politically debated statements in and about policy documents contain the essential elements of policy frames. The most important elements to be studied and compared are: general assumptions and orientations on causes of the problem and remedies as well as basic concepts used (or explicitly rejected); general aims of policies and dimensions of integration addressed; and definition of the main target groups.

Policy documents may be closer to policy discourse than to policy practice. In this regard, it is fundamental to complement the study of policy frames with a concrete and detailed analysis of the actual policy measures. This means looking at the concrete programmes in place and again identify in which of the three dimensions of integration we find them, what their main goals are and who they target. As said before for integration policies in general, we should not limit ourselves to the analysis of explicit integration policy measures: programmes addressed to the population as a whole or to specific socio-economic groups regardless of their immigrant background as well as general institutional arrangements in areas such as education, health care, housing or the labour market may be as fundamental (or even more) in fostering (or not) the integration of immigrants. We should study how these policy measures are implemented in practice and, in particular, to what extent and how street-level bureaucrats, practitioners and professionals adapt them to their specific goals and (possibly limited) resources.

In this regard, the study of policy measures entails a triple difficulty: a) we should go beyond integration policy measures in the strict sense, which means that the field of study becomes much larger; b) many policy measures are seldom described in official documents and therefore cannot be traced in advance; and c) programmes are often constituted of a set of unwritten norms and practices which may vary across time and space. A way to overcome these difficulties is by conducting extensive fieldwork, specially interviews with the main actors involved: policymakers at the different administrative levels, practitioners and professionals in the different social areas, NGOs and immigrant organisations. This is actually what we have done in the eight case-studies of European cities. When focusing on policy measures, it is also key to examine the budgets allocated in each programme in order to get a concrete picture of what actually is being done.

Once we have identified the main policy frames and policy measures, the next question is how integration policies are organised and implemented. In terms of organisation, there are two aspects relevant here. First, we should consider whether the implementation of policies by civil servants and other actors is directly steered and controlled by politics or whether there is a relatively big gap between politics and policy. In highly politicised contexts, what politicians say and what is actually being done may differ significantly. Second, we should examine the location of the initiating and coordinating force for migrant integration within the governmental administration: is it centrally located and coordinated, at the national level within a specific ministry (i.e. Home Affairs, Social Affairs or Employment), or is it decentrally organised between all areas that are relevant for integration policies? Such questions also apply to regional and local policies.

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If we want to examine not only how policies are organised but also how they are formulated and implemented, we should shift the focus from government to governance. This means taking into account a wider range of actors, including other administrative levels such as regional and local governments; other institutions, agencies and practitioners within the state apparatus; and other relevant actors, such as politicians, NGOs and private institutions. The vertical dimension of integration policymaking, that is, the relationship between the national, regional and local levels, is of particular relevance since both municipalities and the EU level have become increasingly involved in the making of immigrant policies. This multiplicity of levels should be analysed in detail so as to understand how new tensions have come to the fore but also how new alliances and forms of cooperation (e.g. between the local and the EU level) have developed. Key questions are: who is in charge of integration policies? How are the different levels coordinated? Do they respond to different political and social imperatives? Do they complement or contradict each other?

The horizontal dimension of integration policymaking, meaning whether and how integration policies are implemented by other relevant actors such as private institutions, NGOs, immigrant organisations and professionals, should also be considered. The central question here is who is supposed to be a relevant actor in policies. If we look at immigrants, are individual immigrants seen as primary actors? Are their organisations and other collective and institutional resources regarded as relevant? If we look at the receiving society, what are the main actors (again at the individual, organisational and institutional level) involved? As several studies on Southern Europe have shown, in the absence of governmental integration policies, civil society actors (such as trade unions, NGOs, charities and civil movement associations) have become key in providing various services and offering political support for immigrants' rights claims (Campomori 2005; Zincone 1998). At the same time, as noted by Caponio (2005), their mobilisation may produce a "crowding out" effect wherein native associations mobilising on behalf of immigrants actually become the main recipients of municipal funding and partners in policymaking, thus preventing immigrants from forming their own organisations.

## **4. INTEGRATION POLICIES IN EUROPE AND THE PLACE OF LOCAL INTEGRATION POLICIES**

The development of the concept of integration in policies (i.e. the specific meaning that is given explicitly or implicitly to integration in policy formulation and practice) should be understood against the background of how immigration has been framed in Europe. While the United States and Canada define themselves as countries built by immigration and immigrants, Northwest-European countries in the post-war period did exactly the opposite in their guest worker policies: they started to attract hands for their booming economies but on a temporary basis, ideally without their families and with an explicit expectation of return. From such a perspective, there was no need of integration policies in the legal/political and cultural/religious dimensions while integration in the socio-economic dimension was pursued only as far and as long as required by their (temporary) stay.

### **4.1 National integration policies**

From the beginning of the 1970s on, and particularly after labour migration had stopped in the mid-1970s, there was a growing contradiction between the facts of immigration and the norm of not being an

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immigration country. In a few countries this tension led to comprehensive integration policies that did not only pertain to the socio-economic domains but also covered the political and cultural spheres: Sweden started such integration policies in 1975 (Hammar 2004) and the Netherlands in the early 1980s (Penninx 1981). However, most national governments in Europe maintained the illusion of immigrants' temporariness and return till the late 1990s and 2000s and therefore confined themselves to ad hoc adaptive measures, in practice leaving the integration responsibility to the local level of cities and to parties in civil society such as trade unions, churches and welfare organisations (Penninx 2005).

When the increasingly politicised climate of the late 1990s and early 2000s pushed for the implementation of integration policies at the national level, the term integration started to get a different meaning: where early policy conceptions such as those used in Sweden and the Netherlands had been rights-based, aimed at structural integration in the socio-economic domains and framed in a liberal cultural atmosphere (later called multicultural), the new approach focused increasingly on the cultural dimension of integration as an obligation for immigrants: cultural and value-based commonalities were thought to be essential for social cohesion. Acquisition of national citizenship - that was promoted in early Swedish and Dutch policies as an instrument that would facilitate structural integration - was increasingly redefined as the crown on a finalised process of cultural adaptation. This new cultural conception of integration policies went hand in hand with redefining the identity of Northwest European countries. The claims and outcomes of such discussions on the 'identity' of receiving societies (as modern, liberal, democratic, laicist, equal, enlightened, etc.) were translated into civic integration requirements for immigrants and civic integration courses of an assimilative nature. The latest development - compulsory pre-immigration courses such as developed in the Netherlands - extends this logic even further: under the label of integration, such courses actually function as instruments to make immigration more restrictive and selective (Guild et al. 2009).

The picture outlined above is one that holds for the 'first generation immigration countries' in North-western Europe. This Northwest-European model has become dominant and influential as the immigration regulation of these countries has become the formal standard for the EU and through the *acquis* the blueprint for all EU-countries that accessed later. Similarly, these same countries have tried in the 2000s to transpose their new national integration policies and civic integration courses to the European level as exemplary for other EU-countries (Goeman 2012). Notwithstanding these pressures, quite different immigration and integration policies developed in practice in the 'second generation immigration countries', particularly in Southern Europe. Most immigration in those countries is legalised *ex-post* by regularisations. Integration measures and policies are initiated since the mid-1990s, predominantly on the local and regional levels, based on rights of access to important domains irrespective of their immigrant status. Such local policies aimed primarily at insertion in the labour market and were embedded in a liberal cultural atmosphere that tends to use interculturality as a strategy.

A third model of integration policies is emerging in the Central and East-European Member States where the number of immigrants is still low and immigration and integration issues do not have high political priority. Mostly supported by European funding, civil society actors, NGOs and local authorities develop reception and integration activities while pressuring the national government to develop integration policies (See the case-studies of Prague and Warsaw by Patrycja Matusz).

## **4.2 EU integration policies**

Policies on migration at the EU level have been double edged: there is the full freedom of mobility for EU-citizens within the EU, on the one hand, and the common and restrictive immigration and asylum policies for Third-Country-Nationals, on the other. Three important consequences of this migration and mobility

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policies for integration followed from the very beginning (in the 1999-2004 Tampere programme). The first was that integration policies at the EU-level aimed exclusively at Third-Country-Nationals; immigrants from within the EU were supposed to be integrated. The second consequence was that integration for TCNs was defined rather limited in the early phase. EU-policies started from the assumption that if the legal position of immigrants would be equal (as much as possible, as the Tampere programme stipulated) to national citizens and if adequate instruments would be in place to combat discrimination, then integration processes could be left to societal forces. The third consequence was that, in contrast to immigration policies, integration policies were not defined as binding communitarian (1st pillar) but as non-binding, consensus policies since national governments wanted to keep their sovereignty in domains that were important for integration of immigrants.

In 2003 the European Commission formulated for the first time a more comprehensive and explicit view on integration policies based on a conceptualisation of integration as a two-way process involving immigrants, on the one hand, and the receiving society, on the other. From then on the (implicit) definition of immigrants' integration, the actors and stakeholders involved and the issues covered gradually expanded in the Hague Programme (2004-2009) and the Stockholm Programme (2009-2014). This happened basically along an internal line and an external line.

The internal line covers two main elements. The first element was that more and more levels of integration governance were activated, basically within destination countries. In this context, the networks of European cities that exchanged knowledge and best practices on integration policies, all funded by EC-funds, made local governmental actors visible. In countries such as Spain also regions profiled themselves as important policymakers in the field of immigrant integration. The conceptualisation of and interests around immigrants' integration tend to differ and even contrast at these different levels. The second element of expansion along the internal line was that more and more stakeholders at all levels became involved in and mobilized for policies: migrant organisations, human rights organisations, NGOs, social partners, etcetera.

The definition of immigrants' integration also expanded through an external line when actors and stakeholders in countries of origin came into the picture. This happened in two ways, stemming from quite different sources and interests. The first was that since the turn of the century new international initiatives were taken – from a renewed perspective of Migration and Development – to establish a framework for the regulation of international migration in such a way that migration would be beneficial for countries of origin and destination as well as for migrants themselves (De Haas 2010). The Global Commission on International Migration, the High-Level UN Dialogues on Migration and the Global Forum on Migration and Development created frameworks in which both countries of origin and countries of destination were represented and their interests balanced and coordinated. Both the EU and all major immigration countries in Europe were involved in these new international developments.

The second way through which countries of origin had become involved in that same period derived from the increased difficulty of European countries to control and regulate immigration without the help of countries of origin (and of countries of transit to Europe). Several European countries such as Spain made bilateral agreements with countries of origin in which cooperation on admission and particularly on return of (irregular) migrants was exchanged for development assistance or improvements to facilitate regular migration (often on a temporary basis) to Europe. The terminology of co-development has come up in this context, combining the renewed Migration and Development approach with immigration and integration policy interests of European countries. The EU also became increasingly involved in such cooperation programmes, which often included local governments and non-governmental organisations in countries of origin (Van Ewijk 2013).

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The renewed European Agenda for the Integration of Third-Country Nationals of 2011 proposed to anchor these two external lines of policy development into the integration agenda (from integration as a two-way-street to a three-way-process), thereby adding the countries of origin as a third key actor in the process of immigrants' integration. As stated in the document, "countries of origin can have a role to play (...) in three ways: to prepare the integration already before the migrants' departure; 2) to support the migrants while in the EU, e.g. through support via the Embassies; 3) to prepare the migrant's temporary or definitive return with acquired experience and knowledge" (European Commission 2011). The first element responds to the pre-migration courses and requirements that some European immigration countries have recently developed in order to anticipate integration of those still to be admitted; the second legitimises and encourages support for migrants from countries of origin during their stay elsewhere, a practice that governments in countries of origin have developed more systematically in order to bond their compatriots abroad (see Østergaard 2003). The third seems to include in its euphemistical formulation only voluntary return of legal migrants (and as such refers primarily to the (re-)migration and development theme). If we look at concrete policies and policy implementation, one may readily assume that involuntary return of irregular migrants constitutes an important part of this policy stream.

### **4.3 Local integration policies**

Local integration policies have always been in the shadow of national integration policies or developed independently in the absence of the latter. This has basically to do with the fact that migration policies (decisions on who is allowed to enter and stay) are predominantly a national competence. If immigration policy is followed by a national integration policy, as has happened in an early phase in Sweden and the Netherlands, then local integration policies are stimulated and facilitated by these preceding national frameworks. That is why Dutch and Swedish cities do have a longer history of local integration policies (Penninx forthcoming). But - as we have seen – factual immigration is not necessarily followed by an integration policy at the national level. Most North-West-European countries did have sizeable immigration but did not develop national integration policies till the turn of the century. In the absence of national policies, many cities have developed integration policies as is testified by Birmingham and Bradford in the UK, Berlin and Frankfurt in the FRG, Vienna in Austria or the cities of Zurich, Bern and Basel in Switzerland, to give just a few examples (Penninx 2009).

In the last decade, local integration policies have become much more visible: cities have organised themselves internationally in networks. These networks are strongly supported and funded by the European Commission and their activities have been studied extensively often on their own request. Systematic comparison of local policies reveals a significant variation in the framing of policies and the meaning of integration behind these local policies. Some initiatives, such as the Intercultural Cities Network, focus very strongly on the cultural dimension of integration, using diversity as a strength and diversity management as a strategy. Other cities frame integration policies primarily as a socioeconomic issue using anti-discrimination and equality as strategies and mainstreaming as governance principle. Still other cities stress the participation dimension of integration, looking at accessibility and opportunity structures, on the one hand, and 'active citizenship' of immigrants, on the other. Some cities have even developed a local citizenship concept as opposed to national citizenship.

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## 4.4 Some preliminary conclusions

This brief analytic description leads us to a few general conclusions on the meaning of integration in integration policies in Europe. The first is that integration policies – or policies that go under the flag of integration – have developed at many levels of government: the national level of states; the local level of cities and municipalities; in some cases the level of (autonomous) regions or Länder; and the supra-national level of the European Union. The latter is a relative newcomer but at the same time an increasingly important platform for all. This multi-levelness is a characteristic that will be present in the future.

The second conclusion is that – partly parallel to governmental multi-levelness – a multitude of stakeholders has become involved as policymakers and implementers. This includes not only governmental and quasi-governmental actors but also and increasingly non-governmental agents from the immigrant collectives, civil society in general, social partners, NGOs, etcetera.

Both the (vertical) multi-levelness of policies and the (horizontal) involvement of an increasing number and diversity of stakeholders do bring more diverse interests to the policy and policymaking table. Such different interests may not be in line with each other or may even clash; they may also lead to quite different views on what integration is, what integration policies should promote and who needs what assistance in the integration process. If multi-level governance is normatively defined as the process through which policymaking and implementation is coordinated vertically between levels of government and attuned horizontally among governmental and non-governmental actors, we can then conclude that we are only at the beginning and much more multilevel governance is needed in practice in the field of integration.

## 5. INSIGHTS THROUGH EIGHT CITY – CASES: DIMENSIONS OF INTEGRATION IN POLICIES

How do local authorities frame their policies for immigrants and what is the actual content of local policies: what do they actually do? We will try to answer these questions by analyzing how the three dimensions (the legal/political, the socio-economic and the cultural/religious one) are reflected in policy rhetoric and practice and how these dimensions relate to each other in the cities' policies of our eight case-studies.

In this final note we will not repeat the full analysis of the literature that was given by Tiziana Caponio (2014), Blanca Garcés-Masareñas (2014) and Patrycja Matusz Protasiewicz (2014) on the (importance of the) three dimensions for local integration policies, but – following the structure of the three papers – we will briefly report how the case-studies deepen the insights reported.

### 5.1 The legal and political dimension of local integration policy

As Tiziana Caponio (2014) has explained in her paper for KING, this dimension is essentially about legal inclusion (access to a legal status, permanent status and naturalisation) and participation in the public sphere, directly through local voting rights and indirectly through special consultative committees and through involvement of immigrant associations in the decision making and implementation of local integration policies. The competence over the legal and political dimension of integration lies

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predominantly at the national level, particularly when it comes to the legal status and formal political participation through voting. This means that in these respects conditions are set for local policies.

Local authorities have to deal with these conditions, by using their discretionary power in implementing national policies and/or by promoting specific initiatives to facilitate immigrants' access to secure a legal status (e.g., a dedicate office providing information on how to prepare the naturalisation procedure) or to favour their political participation (e.g., consultative committees).

The status of illegal immigrants is indeed a controversial issue in many cities, but the case-studies also indicate that the significance varies greatly, depending on two factors. The first is how rigid national governments are in their policies towards illegal immigrants and in how far they force local authorities to co-operate with strict admission and expulsion policies. The second is what possibilities local authorities have to influence decisions or create alternative statuses.

As to the first, it seems that national governments in North-West Europe do have more strict policies to combat illegal residence and have more means to force local authorities to comply. But still, in practice the cities of Amsterdam, Turku and Stuttgart do feel the tensions with national authorities quite differently. The city of Amsterdam has significant problems in handling the situation of irregular residents. The national Linkage Law (Koppelingswet) asks all service providers (also municipal ones) to check legal residence of clients and to exclude illegal residents from service provision. The city of Amsterdam has solved this problem by subsidising NGOs to provide elementary services to illegal residents that the city itself is not allowed to provide. In the recent policy programme 2014-2018 the city states that it will make a budget reservation to fulfil their obligation to care for asylum seekers who received a final negative decision. Introduction of a bed-bath-and-bread-programme is considered.

The city of Stuttgart does have some problems with irregularity, but seems to be able to deal with national authorities. The city of Turku does not report significant problems: the Finnish national policies of controlled immigration do not seem to be under a security regime as much as immigration policies of other European countries.

Cities in Southern Europe – at least in Italy and Spain – are in a different situation when it comes to immigration control and irregular status of immigrants. National immigration policies have been different: most immigrants have come without an admission permit and residence status, but have gained legal status afterwards (often through regularisations). Cities may have significant influence in such processes of regularisation, as Caponio (1014) explained. In the case study of Barcelona, in particular, the institution of the padron municipal, an administrative register where immigrants who live in the city can register just with their foreign passport and therefore without necessarily having a regular residence permit, is indeed an important instrument for the local administration. It does not only give irregular migrants access to some basic services, it can also be used as a means to promote regularisation by producing the so called "social rooting" (arraigo social) report, which is a fundamental requirement for seeking regularisation. The city of Barcelona uses the Padron registration as a local 'resident citizenship'.

But even if cities do not formally have any competence on matters of regularisation – as is the case in Italy – they may make a difference through their active or passive cooperation with national authorities. The case studies of Milan and Turin show how different government coalitions at the city level make different choices in such cooperation. Since the early 2000s, when national government's attitudes towards undocumented immigrants have become more and more restrictive, two different policy styles have emerged in the two cities. Whereas Milan decided to explicitly restrict access to public services to regular migrants only, imposing this restriction also on the NGOs delivering services on the basis of contracts with the local administration, the city of Turin has largely resorted to the more flexible instrument of granting

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subsidies to NGOs thereby supporting their autonomous initiatives. In this way, Turin has de facto subsidised NGOs for providing services to illegal residents that the city itself is not allowed to provide, a situation quite similar to the one in Amsterdam pointed out above.

As for differential statuses of legal immigrants, the city reports of Turku and Amsterdam explicitly make reference to the problematic target group definition of the European Union that defines Third Country Nationals only as relevant for integration policies. In both cases workers and family members of the new EU accessing countries are found in need of integration facilities. The city of Amsterdam did form a special project group to handle problems of EU-migrants in the city. It is not the legal status (of being a citizen of a Member State) itself that is problematic; on the contrary, that status should open the full range of opportunities and services on an equal footing with natives. It is the fact that the presence of these newcomers cannot always be digested immediately by (institutions, collectives and individuals) of the receiving city and newcomers have to acquire the knowledge and skills to find their position. However, cities cannot use EIF-funds, and often also not national funds, to finance basic integration support for these EU internal immigrants. The two cities do pressure their national governments on this (which in Turku resulted in a new regulation for employers to register workers from the EU and thus make them visible) and at the same time invest their own resources in integration activities for this category.

Similar to access to legal status and citizenship, also the definition of the criteria for access to political rights/ local voting is primarily a national matter. In general, cities have no autonomous powers on matters of political participation.

Among the eight city cases, in only two of them foreign immigrants have full active and passive voting rights in local elections: Turku (Finland) and Amsterdam (The Netherlands). Already in the 1990s in Amsterdam and recently also in Turku this has actually led to a significant representation of elected Councilors with an immigrant background. It is difficult, however, to establish the exact importance of such direct political participation. Local policies do not seem to especially promote this kind of political participation and respondents in Turku and Amsterdam seem to take this participation for granted. It looks as if such individual participation is not seen as “representing” the immigrant community and thus as less relevant than other forms of collective representation, such as by immigrant organisations. The Turku case, however, has recently shown that a significant representation of Councilors with immigrant background may lead to specific policy initiatives. In the Amsterdam case, this happened also in the past.

As for indirect political inclusion, and particularly involvement of immigrants in integration policies, the picture in the eight cities is much clearer and pronounced in one sense: all cities have (in the past and or present) invested in consultative committees, platforms or councils that bring together stakeholders in integration policies. But there is also a great variety in their composition and to a certain extent in their function.

First of all, there are those forms that primarily bring together immigrants (mostly coming from immigrant organisations) to represent the target group of policies. They are asked to function as a communication, mobilisation and evaluation agency between target groups and policymakers. Milan once had its *Coordinamento Migranti* (1985) and Turin had its *Municipal Consultative Committee* (1995). Stuttgart used to have its *International Council* whose members were chosen by Stuttgarters with an immigrant background, but in the present Council members are appointed on the basis of their expertise in migration and integration issues. Amsterdam still has its *Advisory Council*, although its status has declined in the course of recent years. The case studies suggest that overall such forms of representation – as a kind of alternative political representation – is rather vulnerable and does not live a long life.

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Secondly, there are those forms that primarily gather direct stakeholders in integration policies and have a primary focus on mobilisation, policy instrumentation and implementation. Immigrant organisations may be an important part of the members, but then as stakeholders and participants in policies rather than as representatives of a group. The broad 58-member Immigration Council of Barcelona is a good example, but also the present International Council in Stuttgart. Membership is rather based on expectations of contribution to policy making or implementation or the expectation that members scrutinise the administration's policies and practices.

On a related topic, it is worthwhile to refer to a tension that arises regularly between (representatives of) immigrant organisations and NGOs (of natives) that defend the interests of immigrants and provide services to them. In the very first phase of immigrants settlement, such as in the Prague and Warsaw cases, interests of immigrants are – in the absence of strong immigrant organisations - defended by such native NGO's: the ones that nowadays build up the service provisions for immigrants and pressure for national and local policies and – as in the Prague case – are strongly represented in the Regional Advisory Platform. As immigrant organisations develop in the course of time, these may (re-)claim such representing tasks and the resources that governments may make available for both representation and service provision. The outcome of such a struggle is to a great extent dependent on choices that local governments make. For example, in the city of Milan, as reported by Caponio, representation (and to a lesser extent also service provision) was moved away from immigrant organisations to Catholic NGOs.

## **5.2 Local policies as structural integration policies in the hard domains**

As Blanca Garcés-Mascareñas (2014) has explained in her KING paper, the structural incorporation of immigrants in health care, housing, education and the labour market is key in any conception of immigrant integration, but it is especially so at the local level since challenges and problems around the structural incorporation of immigrants are first felt there – by immigrants themselves and by local authorities and service providers. The paper also made it clear that equal opportunities of access and equal (quality of) service provision are the important criteria to evaluate policies in this field: the benchmark is access to and outcomes of service provisions for natives in these domains.

The case-studies of Prague and Warsaw make it clear that it takes some time before the beginnings of a local integration policy – in these cases very much pressured by NGO's and supported by EU-funds - can move from basically an early reception policy for refugees and other specific groups such as Roma towards a more systematic policy for the important structural domains and for broader target groups. Such a transition is visible in the recent (15 years') history of Turku's integration policies. In more established integration policies of cities the efforts in the socio-economic domain do in practice form the key of policies, although that may not always be clear from policy rhetoric. (In the case of Amsterdam, for example, the present policy discourse is built on "diversity and participation". In the practical organisation of policy these key concepts are mirrored in by far the smallest (in terms of personnel and budget) Citizenship and Participation Department; the Work and Income Department is by far the largest, followed by the Department of Housing, Care and Living Together.)

As for the policies as presented in formal documents and speeches, there is a strong tendency of the cities studied to present immigration as a (potential) gain for the city and the diversity it brings as an asset for the development of the local society. Amsterdam, Barcelona, Stuttgart, Turin and Turku (and even Warsaw) do this very explicitly. In the concrete expressions, it is not the diversity in itself but rather its positive function for the local economy that is important. Immigrants and the diversity they bring, become part of the national and international branding of the city. Such an approach is also present in the recent immigrant

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integration policies of the city of Milan that, since the mid-2000s, has shown a greater appreciation of immigrant diversity as part of the internationalisation strategy pursued for the 2015 World Expo event which the city will host.

The question is, however, how such a framing of policies works out in the concrete activities in the domain of labour market, entrepreneurship and education in particular. In general, we find a strong tendency of cities to present activities for immigrants in these domains as part of general policies that targets the whole population: equal opportunities and mainstreamed service provision. Such general policies may become specific in their implementation, as is the case in Amsterdam and Stuttgart.

In cities in the North-West Europe, policy activities for immigrants merge to a certain extent with general 'workfare' policies that aim to promote participation through work (and reduce dependency on welfare). But at the same time they do get special characteristics: particularly in the case of Amsterdam and Turku, but also in Stuttgart, significant efforts are made to equip immigrants with the knowledge and skills (including the local language) to fit them into the labour market (or to 'make immigrants more competitive'). The diversity aspects of these measures are often much less visible than the adaptive pressure made on the immigrants concerned. Recently, diversity is brought into this domain by making employers aware of the importance and workings of diversity policies as employment and managing strategies, as in the new Turku Integration Programme 2014-2017. Also in Stuttgart respondents felt the need of having (more) 'diversity awareness seminars' but there is presently no funding for this.

In the domains of health and housing policy is mostly framed differently: in a welfare or rights frame. The principles of the right of access and equal opportunities are universally accepted, but the practical question how make these rights exercisable for newcomers is answered differently. Although also here application of general rules and practices is nearly always the starting point, cities may conclude that extra efforts are needed for (certain groups of) immigrants. Examples of soft measures are campaigns to inform newcomers better on housing or health services or easing the procedures like through interpreting services. In a number of cases, there is a clear preferential treatment for specific groups that have been admitted for humanitarian reasons: in Turku and Amsterdam e.g. part of the social housing is made available for refugees and accepted asylum seekers outside the regular allocation system for social housing.

As one can deduce from what is said above, the legal status may have a strong influence on access to services in the socio-economic domains. This is strongest for illegal residents, particularly in cities that are forced to implement exclusion of illegal residents from any service provision (as for example the Linkage Law in the Netherlands requires). But in practice, there may also be significant differences between categories of legal residents – such as intra-EU migrants or refugees – to effectively gain access to services to which they are formally entitled.

### **5.3 Local policies as cultural integration and social cohesion policies**

In her paper for the KING project, Patrycja Matusz Protasiewicz (2014) has shown that the cultural and religious aspects may get quite different meanings in policy rhetoric and that practices used by cities as cultural integration policies are quite diverse. The city case studies confirm these general conclusion.

First of all, the cultural and religious element plays a role as an individual right. On the rhetoric level, all cities that we have studied, do recognise publicly the rights of individuals to have their language, culture and religion. Such individual rights form the base line for cities. Sometimes, limitations to exercising these rights are added, such as "as long as these are not in conflict with general laws and regulations". At the

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same time, however, one may observe that such statements are relatively passive, in the sense that local authorities and their policies do keep distance to culture and religion of immigrants. They refer culture (in the broad anthropological sense), home language and religion to the private sphere of individuals and their families and want to be neutral. As far as these elements come to play in the public sphere and on the collective level of organisations and institutions, the best cities can do is to treat these in the same way as they treat other cultures, languages and religions in the city: the equity principle. However, there is not much explicit rhetoric on such a strategy of equal treatment of similar phenomena at the city level. There may be a pragmatic handling of such issues on the local level by civil servants (such as in the case of Turku where the city has rented out certain buildings for use as a mosque).

Secondly, the cultural element may come into play at the city level, when it is defined as part of Cultural Policies (where Culture is defined as high culture such as forms of art) through which professional or amateur expressions of such Culture are supported. In the city of Amsterdam, and Turku, for example, forms of cultural traditions and folklore of dance or music may be supported. In Stuttgart, the local Cultural Office has a special budget for 'intercultural' cultural activities. The Forum of Culture (and their member organisations) frequently apply to that specific budget.

For home languages of immigrants a similar procedure is sometimes in place, for example when home language is recognised as an element in the educational curriculum of primary schools – be it facultative – as was the case in Amsterdam and still is in Turku, or when the home language of an important group receives a status of preferred foreign language in secondary education. Another case in point is the project carried out by the Turin city administration "In Piazza s'impara" ("You can learn in the square"), where basic courses of Moroccan and Chinese are offered along with informal classes of Italian language.

As for religion, cities may also engage in having 'new religions' taught in the educational curriculum in the same way as 'native religions' are part of such a curriculum. Stuttgart has made some attempt to do this. Such policies may have the important practical consequence of bringing immigrants in the educational system – as teachers. But above all, they have an important symbolic function: the message of recognition of 'culture' as heritage and home language and religion as important element of identity of immigrants. They are, however, not present yet in all cities.

Thirdly, the language, culture and religion element may come into play at the concrete level of implementation policy in the socio-economic domain, particularly when mastering of the language, or cultural and or religious habits or prescriptions may have consequences for the practice of access or service provision. Most cities stress in their official documents the (equal) rights of immigrants to services and the necessity to mainstream service provision. Some cities, however, also introduced special practices for immigrants to provide better or more targeted services, often by bringing in practitioners, interpreters, interns, volunteers or representatives of immigrant organisations in service provision.

These three ways mentioned above through which language, culture and religion come into play "as individual rights" in the practice of policies, however, do not play a prominent role in the official statements of policies. In such documents the key terms are interculturality and diversity. Both terms do not refer so much to cultural diversity as a right, but to the possible use of (certain forms of) cultural diversity for economic development and social cohesion of the local society<sup>1</sup>. In the concept of interculturality a selectively used concept of diversity (not all cultural diversity is positive) is combined with a strategy that

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<sup>1</sup> The recent Amsterdam policy discourse goes so far that it rejects the concept of integration, because that term would allude to the gap between natives and immigrants and would reinforce that gap. Obviously, integration has become a "spoiled" term in the politicised policy discourse, just like happened before with the terms guest workers (*gastarbeiders*), ethnic minorities (*etnische minderheden*) and multiculturalism in the Netherlands. Key words in the new Amsterdam policy discourse are diversity and participation.

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mobilises different stakeholders such as public institutions, business organizations, media, NGOs, civil society organization, immigrant organisation, churches and trade unions in order to manage diversity both for economic purposes and for societal cohesion<sup>2</sup>. In such a definition it is a (normative) strategy – rather than a model to describe and analyse reality. The term inter-cultural policies has replaced multicultural policies as far as that term was used before (except in the city of Turku where the latter term is still used sometimes as a principle of recognition rather than a practical strategy).

Such a definition of interculturality leads to practical policies in this third dimension that focus on crosscultural contacts and events, on forums for (cultural and religious) dialogue and exchange, and on stressing the commonness and common interests rather than the diversity. Policy involvement in such activities and events is always indirect, e.g. by encouraging organisations as the Forum of Cultures in Stuttgart and providing facilities and resources. It can only be indirect, because authorities feel that they have to be neutral when it comes to culture, language and religion. In the socio-economic domain, as we have seen above, it leads primarily to practical policies to equip immigrants for and adapt them to the labour market, and in some cases also to efforts to make employers aware that a diversity management strategy helps.

The intercultural approach is also at the basis of immigrant integration policies of the city of Turin. In this case, the approach focuses on two specific issues: conflict mediation and participation. Conflict mediation is part of intercultural practices at the neighbourhood level, especially in the immigrant areas of San Salvario and Porta Palazzo. These practices aim to promote encounters between different groups and their involvement in the management of public spaces. Participation policies have addressed primarily the second generation youngsters who are regarded as would-be-citizens.

## **6. INSIGHTS THROUGH EIGHT CITY – CASES: GOVERNANCE OF POLICIES**

In this final section, we will make some cross-city observations on the governance of local integration policies. Our key questions are: How do the eight cities organise policies internally, within the city administration? Secondly, what institutions and organisations at the city level are mobilised? How does the city relate to other levels of government?

### **6.1 Internal local governmental administration**

As we have observed above, integration policies of cities have often started as early reception policies for refugees and/ or migrant workers. In the cases of Prague, Warsaw and Turku for example, reception of refugees formed the starting point for policies. In other cases specific groups of immigrants, such as guest workers in Amsterdam and Stuttgart, became target groups of policies because their position in the local society was problematic and their access to public facilities closed or problematic. As a consequence, such early policies started as policies in the welfare sector: social benefits, housing, and health.

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<sup>2</sup> In the Barcelona case, the municipality has used the intercultural approach to promote diversity while at the same time promoting Catalan language and culture. In doing so it seems to conflate two language right frames: that of Catalonia of using Catalan as national language in the Spanish national context (and obliging it for non-Catalan speaking immigrants) and that of immigrants to have their mother tongue recognised in destination countries. For immigrants the first works out as an assimilation frame and the second as a diversity/multicultural frame.

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In the case of more recent immigration cities like Milan and Turin, integration policies started as a consequence of first reception measures for migrant workers who had managed to legalise their status in the 1986 and 1990 amnesties. These migrants moved from the South, where they had been working irregularly in the agriculture, to the North in order to find better job opportunities. This posed a series of challenges in the domain of housing and in access to services to the receiving cities, Turin and Milan in the first place. Family members joining these workers in the years that followed, raised new challenges and put even more pressure on these cities' first reception services.

As the presence of such specific groups becomes prolonged, more and more policy fields become involved and the need for more coordination of policies comes to the surface. When then at a certain point in time the welfare character of policies is replaced by a more comprehensive and future oriented approach, and when such more comprehensive policies are applied to a much broader category of (all) immigrants, then an additional need is felt to place the coordination of policies at a (hierarchical) higher level within the administration of the city. This process often goes together with higher visibility of these policies in local politics. Such a pattern is visible in the eight city case-studies, be it with variations: some of the cities e.g. do have a special alderman or vice-mayor for integration policies (as Amsterdam had and Turin still has), others have the coordination of policies placed directly under the mayor (in Turku e.g. in a staff department for city development). The city of Stuttgart has both: a special alderman directly under the mayor.

## 6.2 The city's horizontal governance

A more or less logical consequence of a process of policies becoming more cross-sectional, more comprehensive in aspects of integration covered and target groups included, is that more and more stakeholders get involved in the policies, many of them outside the local administrative structure of the city. This is clearly a trend that is visible in cities that have an integration policy for some time. Interestingly, in the new immigrant cities in Central Europe – Prague and Warsaw in our case studies – it is a part of these external stakeholders – NGOs in particular – that play an important role to press the city government for policy action. National NGOs, in particular Catholic organisations working in the field of social assistance, have been crucial also in developing first reception measures in Turin and Milan, and still nowadays they are the main partners of these municipalities in service delivery.

A particular aspect of this tendency towards a stronger horizontal pattern of governance is the choice of cities to involve of immigrant organisations in policymaking and implementation<sup>3</sup>.

Some cities have made a choice not to involve immigrant organisations in the implementation of policies, such as Milan did. Other cities do mobilise their cooperation to reach target groups and to implement policies. In such a situation immigrant organisations may bring (indirectly and often tacitly) cultural elements into the implementation of policies (thereby easing service provision), as we have seen. Such participation of immigrant organisations in policy implementation may lead to the interesting situation that – even when a city does not have an explicit policy to promote immigrant organisations as such - it actually does support immigrant organisations, be it selectively the ones that are able and willing to support city policies. The Turku case illustrate this.

The increasing relevance of partnerships between public authorities and private organisations is illustrated in a very specific way in the Italian cities Turin and Milan: in both cases private banking foundations have

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<sup>3</sup> There is a more general discussion in the literature on recent tendencies of governments (local and national) to outsource and/ or delegate tasks and activities that used to be implemented by the administration itself. That is surely the case. The more specific question here is outsourced to whom?

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become an important source of funding of immigrant integration activities and service provision for immigrants.

### **6.3 The city and national and EU – policies**

Local integration policies have always been in the shadow of national integration policies or in the shadow of the absence of the latter. This has basically to do with the fact that migration policies (decisions who is allowed to enter and stay) are national policies. If an immigration policy was followed by a national integration policy, then local integration policies could be stimulated and facilitated by such national policies. In our case studies, the cities of Amsterdam and Turku have – historically – profited from national policies and the resources made available through them. Most of the cities in our sample, however, have started to develop local policies without a stimulating role of concepts and resources from the national level. These cities' attitude towards national authorities is quite different: they pressure their national governments to develop integration policies, as happened in the cases of Stuttgart and Barcelona.

Policies at the local level differ from policies at the national and at the EU level in several aspects. Local policies are (have to be) geared to the concrete and practical aspects of immigrants' lives, and they have to involve the immigrants directly: it is about their work and income, how and where they live, about their education and that of their children, about their health and care, but also about the acceptance and practice of their home language, their world view and cultural traditions. The concreteness of these aspects in daily life in the city, combined with the fact that integration activities can only be done with and by immigrants makes that policy (implementation) is done rather pragmatically. Policy and policymaking at the national level is often regulatory in nature (setting general rules), abstract and – particularly in a politicised climate – more driven by ideology and done unilaterally (i.e. without immigrants' involvement). Such differences between national and local policies transpire from all case-studies, be it to a varying extent and with different consequences.

This is not to say that local policies do not have ideological elements: they do, but these refer much more to strategic elements (needed in pragmatic approaches): the concept of interculturality and the keywords of diversity and participation did emerge in local policy documents rather than national ones and do receive ideological aspects in local discourse.

Such differences in the nature and orientation of policymaking can be – and often are – complementary. The whole idea of the normative definition of multi-level governance is that policies at different levels should be complementary and mutually supportive. But in practice this is not always the case. During the last decade we have seen that tensions have developed between cities and national governments on issues on which national and local interests diverge. One of these tensions that turned up in Amsterdam, and to a lesser extent Stuttgart and Turin, relates to different views on how to implement (controlled and restrictive) immigration policies, particularly how to treat illegal migrants in municipal care and service provision, how to combat illegal residence in other ways than by excluding them from city services.

Tensions between cities and national governments also arise often when it comes to the financing of integration facilities. Where national policies do oblige cities to implement certain elements of integration policies, such as happens in Finland and The Netherlands, the question is who finances these efforts, and are financial allocations by national authorities sufficient. The complaints of Turku that the new national Integration Law (of 2010) broadens the target group significantly, but not (sufficiently) the financial resources is a case in point. Dutch cities complain that the national government that wants to have its

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immigration policies self-financed, devolves the financial burden to the immigrants themselves and to the city where they live.

Relations between integration policymaking and implementation at the local and the EU level are recent – the last decade only – but also remarkable. As we have reported in the February report (Caponio et al. 2014), European cities participate in quite a number of international projects in the field of integration, financed by ERF, EIF, ESF or other EU-funds. They furthermore have formed networks in which they exchange their policy experiences, also supported and financed to a great extent by EU-funds. This is reflected clearly in the eight case-studies. Stuttgart has been the city that took the initiative in 2005 to establish the Cities for Local Integration Policies network (CLIP): a project in which some 30 European cities had their policies studied and compared in order to learn from each other. Amsterdam, Prague, Turin and Turku are members of CLIP. Barcelona is a very active participant in the Intercultural Cities Network. In all of this there is clearly a direct line visible between the local level of cities and the EU-level.

The importance of the EU through funding of (projects of) NGOs is particularly great for the cities in Central and Eastern Europe. Much of what is happening there is – according to observers – actually dependent on EU funding. Similarly, because of the economic crisis and cuts to the national social policy budget in Italy, European funds have a crucial relevance also for cities like Turin and Milan for the funding of immigrant integration policy.

The specific - limiting - definition of target groups of EU integration policies (the EU defines Third Country Nationals only as target group) is not taken for granted by cities. Looking pragmatically at the situation of their immigrant residents, local policymakers may decide that intra-EU migrants are in need of integration facilities. In Amsterdam and in Turku, for example, certain groups of intra-EU migrants do come in into local policies as target groups. However, it seems that conflicts on this mismatch of target groups definitions (between the EU and the cities) are not made explicit. In many cases the definition problem is also solved by using general funds like ESF money for employment especially for immigrant target groups, as is the case in the Trangeli project in Turku.

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