Comparatives Issues in the Treatment, Rights, and Privileges of Migrants
Migrant Integration and Assimilation Policy
The European Union

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In Europe, considerations of migrant integration and the policies most suited to address it did not gain ground until the late 1960s, and in some case not as late as the 1990s (Doomernik, Bruquetas-Callejo 2016). This is linked to the aftermath of the post-1945 European migration boom through 'guest-worker' systems and from the former colonies. Policies to 'integrate' worker and colonial migrants were not deemed necessary, as the former were meant to leave after they were no longer economically useful and the latter were already citizens or enjoyed some sort of preferential treatment. But with the 1970s global economic restructuring and European governments' realisation that migrants were there to stay, integration policies came to be.

Three factors in particular influenced the way they took shape in Europe.[1] First, national governments' ideas of what to do about their immigrant populations emerged on the basis of the specific national contexts – and the need for 'harmonious social order' within fragmented modern societies (Hampshire 2013: 132ff succinctly develops this last point, but also Kaczmarczyk, Lesinska and Okólski 2015: 37ff for an overview). They were shaped by national traditions of citizenship, local legacies of religious and race relations, economic factors, as well as the specific characteristics of the migrants themselves and the migration patterns which brought them to the host societies. In Western Europe originally (somewhat synonymous with the European Union but clearly different), but later elsewhere, the formulation of integration policies was compounded by two additional factors. The first is the political tradition of liberalism which places normative constraints on how much the liberal state can demand of individuals of presumably equal freedom and moral worth (compare Jupp 2015). The other factor is the process of regional integration which added a new dimension of intra-European worker mobility to European migrations and, from 1993, began to have some say in how national governments managed their migrations and concomitant integration policies (we speak of EU-level integration policies specifically from 1999, as we will see below).

These three factors – historical legacies and the need for national unity, the constraints of the liberal state and its inherent moral and religious diversity (Rawls 2001: 34), and the advancing process of regional integration pushing for convergence, all seemed to have pulled migrant integration policies in Europe into different directions as 'partly deliberate, partly accidental [..] incorporation frameworks' (Freeman 2004: 946), to the extent that it is difficult (if not impossible) to speak of clear-cut policy models and patterns. Indeed, despite influential research into the typology and classification of European integration policies (Brubakers 1992, Castles and Miller 2009: 247-8, Favell 2001: 26, Soysal 1994: 36-41, Koopmans et al 2005: 16, etc), the very effort to stipulate 'national models' has been disparaged as futile: an oversimplification of 'an extremely messy reality' (Freeman 2004: 946, also Hampshire 2013: 136-40). Even at the EU-level, we speak of 'soft' Europeanisation of integration policies without specific legal competence in this domain and on the basis of the disparate national policies (Wolleghem 2019, among others).

In order to make sense of this messiness, the current chapter will provide an overview of the main ways in which integration policies in Europe have been studied and the main ways in which they have developed at national and supranational level, but it will do so disaggregating three main layers of complexity. These are the framing of integration within the wider migration policy context (which is often lost from policy analyses to the detriment of our understanding), the subject matter of the policies themselves (integration processes are complex, so many moving parts need to be taken into account), as well as the often significant interference in integration policies from other non-migration related policy areas (which can have just as much if not greater impact on integration outcomes but sit outside the scope of integration policy). These three layers of complexity will also serve to structure the discussion here in the following manner. The first section will explore the framing of integration policies within broader patterns of migration policy and how this has impacted national and supranational policy responses. The second layer of complexity will discuss national-level integration policies in a range of national contexts on the basis of the specific integration processes which have taken place there. Finally, the third layer of complexity concerns the regional integration process and will discuss integration policies at the level of the European Union itself.

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[1] Here Europe is used to refer to the member states of the European Union.

1. Integration Policy as Part of Migration Policy

Integration policy has traditionally been thought of and delivered separately from immigration policy but this has recently begun to change. There is a growing recognition both in the literature and in the practice that migrant integration policies are inherently interconnected with immigration policies, often driving and even taking precedence over them (see Duszczyk, Pachocka, & Pszczółkowska 2020 for a detailed overview of the argument). Indeed, if we follow perceived 'failures' of integration policy, we can observe that often it is these that determine subsequent immigration policies, often in terms of tightening entry requirements or putting in place restrictions of entry and stay. Thus, integration policy should not be treated as 'a non-fundamental and secondary subsection of immigration policy' (ibid, p. 4) but should be understood as an integral element within the broader domain of migration policy.

While this starting point makes sense for our exploration of integration policy in the European Union (as we will see in Section 3, the EU has explicitly formulated its migrant integration policy framework within the domain of asylum and migration policy), it also allows us to circumvent the difficult question of classifying national integration policies (see Section 2) and put European states in groups according to their immigration experience. In this way, we are able to identify in a more or less straightforward manner three groups of states: 'mature', 'new' and 'future' immigration countries. This grouping (presented neatly by Kaczmarczyk, Lesinska and Okólski, 2015: 27) allows us to recognise that responses to immigration will inevitably be contextual, given how significantly migration processes differ across countries.

'Mature' immigration countries are the Western and most Northwestern European states. In the post-war period, countries such as France, Germany, the UK, the Netherlands, became the main receiving countries for migrants both from the European continent and from elsewhere. The former colonial powers such as France, the UK and the Netherlands received large number of immigrants from their colonies, while guest worker policies were implemented, inter alia, in Germany, Austria, France, Denmark and Sweden (Hansen 2003: 25). After decades of Western European emigration to the New World, these countries were the first in Europe to experience mass inflows of immigrants and become net immigration countries in the 1950s (see Okolski 2012). In the immediate post-1973 period when colonial and worker migrations stopped, these countries experienced the consolidation and 'normalisation' of immigrant populations (Castles and Miller 2014: 112), mostly through the settlement of otherwise mobile workers and through ensuing family reunions. It was in Western Europe that policies of migrant integration were first devised because of the need to address the presence by the 1980s of clearly visible social groups formed by colonial migrants and their descendents. Of the Northwestern European countries, which also became net immigration regimes in the 1970s (Okolski 2012), only Sweden and Finland are EU members, but Iceland and Norway are part of the Schengen area, so they are also affected by the freedom of movement in the EU and the integration of European migration systems (Castles and Miller 2014: 113), but also by the specificities of intra-Nordic migration.

Finland, Iceland and Ireland are actually seen as ‘latecomers’ to the migration transition and are part of the ‘new’ immigration group, together with the countries in Southern Europe, such as Italy, Spain, Greece and Portugal. They became net immigration regimes by the end of the 1970s (Okolski 2012), using labour mainly from North Africa and Latin America (Castles and Miller 2014: 113). These countries came to share many of the concerns about migrant visibility and integration of the Western European countries, but their policy responses were undermined by weaker governmental capacity to regulate migration (Reyneri 2001) and the preponderance of irregular migration.

The Central and Eastern European countries (but also Cyprus and Malta) can be seen as ‘future’ immigration countries. Similar processes of migration transition started for them during the 21st century, after having been separated from the migratory processes taking place across the rest of Europe until 1989. During their post-communist transitions, the Central and Eastern European countries joined the process of European integration and by the first decade of the new millennium had become part of the European Union. Nevertheless, their experience of immigration is much more limited and began much later than the rest of the European Union member states, and their policy responses have been shaped by this. Limited economic growth and worsening labour market conditions have generated popular discontent, so that any policy move to improve reception conditions for forced immigrants, for example, has been met with resentment.

Starting the discussion on integration policies from their embeddedness into wider migration policies allows us to understand the logic behind the policy approaches which emerged to managing the settlement and incorporation of immigrants. These are often referred to under the presumably generic term ‘integration policies’ but as we will see, integration is but one way in which immigrant settlement and incorporation can be managed. Indeed, often the management of ethnic diversity within modern European societies is at the heart of these policies, thus bringing into the realm of ‘integration’ a range of other related policies: ethnic minorities, social cohesion, indigenous populations, identity and belonging, etc. – which have been more or less inclusive and tolerant of difference. Speaking narrowly of managing the incorporation of immigrants, the literature identifies a spectrum of approaches in Europe from assimilation, through differential exclusion, to integration and multiculturalism (this is based on Castles and Miller’s seminal textbook 2014: 264-270). Albeit criticised as lacking theoretical specification (Freeman 2004: 947), thinking of spectrum is useful here in identifying key features of the approaches adopted by key ‘mature’, ‘new’ and ‘future’ immigration states, without necessarily forcing them into a typology.

Assimilation is an approach to managing immigrants which ash traditionally been embraced both formally as a policy and popularly as a position. Assimilation allows for incorporation only when immigrants’ differences have been relinquished. It is expected that immigrants will seek citizenship and become fully fledged participants in political life (Penninx 2007). While this approach has dominated much of the 20th century (especially the inter-war period in Europe) and remains relevant (Brubaker 2001, Morawska 1994, but also the model adopted and adapted by settler societies, e.g. the USA), in Europe it has not had formal political legitimacy post-1945 because of the embrace of liberalism and the legacies of colonialism. Moreover, assimilation policies are designed for relatively small groups of immigrants originating from culturally similar areas, so they are unlikely to be successful with diversified and large waves of immigrants arriving from other continents (Doomernik 1998). In their resurgence in Europe during the new millennium, assimilation policies have been typical of states with little or no experience of immigration, such as the future immigration states in Central and Eastern European, and the mature immigration states in Northwestern Europe disenchanted by the experience of multiculturalism.

Differential exclusion is the second type of incorporation identified by Castles and Miller (2014). Differential exclusion allows for incorporation of migrants in one societal domain (e.g. labour market) but excludes them from all others (politics, society, culture, etc). Given the popularity of guest worker schemes, this can be considered the first response to accommodating immigrants and characterises Western Europe pre-1973 (and may be relevant to other national contexts, see the chapter on China in this section). This model is suitable for countries that do not see themselves as immigration countries (so it becomes redundant after migration transition to net immigration regimes), and was applied in Europe almost to the end of the 20th century by Germany, Austria, Denmark, Italy and Greece (Rudiger and Spencer 2003). Interestingly, elements of this policy can be observed nowadays in Poland (Gońda et al 2020). Because this approach effectively denies immigrants access to society as full and accepted members, restricting them instead to specific domains (mainly determined by labour market needs in the low-paid range), it does not sit well within either the need for national unity,or the traditions of liberalism and is difficult to maintain (Castles 1995).

Integration as a specific policy approach emerged on this basis as a soft form of assimilation (see Hampshire 2013: 137) – a ‘slower and gentler form’ of it (Castles and Miller 2014: 268-270). Governments recognise that immigrant incorporation requires some degree of mutual accommodation (e.g. cultural and community maintenance may be necessary) but the final goal is still absorption into the dominant society and culture (ibid). Initially, integration policies were formulated in a reactive way (Gońda et al 2020: 27) to respond to specific problems as they arose, rather than through the formulation of comprehensive and far-sighted strategies (Collison 1993: 90). This is one reason why attempts to constrict them into neat ‘models’ seem forced and detached from the empirical reality. Many different policies can fit into the integration range of the spectrum, from more assimilationist (such as France’s, Gońda et al 2020: 30) to more liberal (the approaches being adopted by most mature immigration countries in the aftermath of multiculturalism during the 1990s claim to sit into that latter group, despite being restrictionist in essence). When stripped of the political rhetoric of diversity and inclusion which usually accompanies it and boiled down to its assimilationist foundation, it is clear to see that, as a policy type, integration creates problems not only for immigrants who carry their differences by default, but also for diversity within host societies, which is inherently characteristic of the liberal state (Jupp 2015). Nevertheless, it is precisely this approach which has endured the various politics of immigration and diversity in Europe and has been ‘mainstreamed’ as the established policy of immigrant incorporation (Scholten and Breugel 2018, also Scholten and Penninx 2016). This may also be understood in the context of the growing political recognition of ‘failure’ and ‘crisis’ of all the other approaches to settling immigrants (especially multiculturalism). In a silent recognition of the problems of diversity and liberalism raised by integration policy, in the European Union it only applies to third-country nationals: not to mobile European citizens settling in other member states.

Finally, multiculturalism lies on the spectrum of approaches to managing diversity, in particular that caused by immigrant settlement and incorporation. Multiculturalism recognizes the long-term persistence – and value – of group difference and, as public policy, pursues the inclusion of immigrants as equals in all spheres of society without the expectation that they give up their own cultural, linguistic, religious or group difference. It implies both willingness on behalf of the majority to accept difference and state action to secure equal rights for immigrants (and their descendents, as well as non-immigrant minorities). Multiculturalism originated in Canada (Castles and Miller 2014: 270) but in Europe was first embraced by the ‘mature’ immigration countries the UK, the Netherlands, and Sweden. During the 1990s and into the new millennium, multiculturalism came under sustained political attack for having ‘failed’ to alleviate the concerns with immigrant visibility which it came to address, and has been gradually replaced by renewed assimilation drives under the policy guise of more muscular ‘integration’ (Brubaker 2001, also Mouritsen, Kriegbaum and Larin 2019).

The policies on the spectrum of approaches to immigrant incorporation identified here aim to illustrate the embeddedness of integration policy within the broad migration policy context and the reactive contextuality, within which such policies have been formulated. They highlight the interdependence between integration and immigration policies, as well as between those and the politics of immigration and diversity management, which underlie them. It is clear from the overview above that, despite the apparent fit between some approaches and some national contexts in Europe, it is difficult to attach types to countries: national approaches have been formulated in a reactive manner, and have evolved over time on the spectrum from one approach to another (see Martiniello and Rath 2014 for an overview of how 'immigrant incorporation studies' have reflected these developments, also Ireland 2014). Thus, a disaggregated approach looking at the various layers of complexity – such as we have adopted here – seems better suited to unpacking integration policies in Europe.

We can see why this is, if we look at the emergence of migrant integration policies at the EU level. Subsumed and formulated within the domain of migration policy from the start, they carry its main characteristics. One of them is a concern with legally residing third-country nationals only: EU migrant integration policies are blind to mobile citizens from EU member states (who are not called migrants at all in EU legal jargon) and cautious towards irregular migrants (who are partially captured by dedicated asylum and refugee policies, and partially deliberately excluded from the efforts of migrant integration). Another key characteristic of EU migrant integration policies is their alignment with EU's normative liberalism: exclusionist models of integration have ceased to be sustainable in the EU context (Wolleghem, 2019, p.6). The EU has mainstreamed the established 'two-way' approach to understanding integration as involving both migrants and host societies (EC 2005) , and it has even pioneered a 'three-way' approach (EC 2011, p.10) which insists on also involving sending countries. This is related to the emphasis on legal migration and asylum policies. And for the approximately two decades of the existence of EU level migrant integration policies (since the European Council in Tampere in 1999) they have always been focused on equality, non-discrimination, and inclusion. A third key characteristic of EU migrant integration policies is their multi-level and multi-sited nature, which is linked to EU's peculiar model of governance: they are intertwined with member states' integration policies and receive interference from urban, local, regional and transnational levels and other policy areas and domains.

The reason why EU migrant integration policies form part of migration policy is also because the EU itself has no legal competence to deliver migrant integration: that pertains to the dominion of the states. The first reference to migrant integration in EU primary law – in the Treaty of Lisbon – in effect precluded the development of a EU competence by establishing EU's role as supporting national initiatives (Art. 79(4) TFEU). Nevertheless, an EU migrant integration policy unfolded as 'a patchwork of soft instruments forming a fragmented yet consistent policy' (Wolleghem 2019, p.5) through an informal 'quasi-Open Method of Coordination' (Carrera 2008), in a way quite reminiscent of the 'messy' emergence of national integration policies we reviewed above.

2. Complexity of the Process of Integration and Interference from Other Policy Areas

It is now recognized that immigrant incorporation happens through distinct processes that occur across various domains (legal-political, socio-economic, cultural-religious) and at various levels (individual, collective, institutional). It involves multiple reference populations, including immigrants themselves, home and host societies, but also transnational networks and subnational communities, and cannot be left as responsibility solely of the migrants: all sides have a stake in the process (see Penninx & Garcés-Mascareñas, 2016: 11-29 for an overview of the concept). It is also acknowledged that these processes should be analysed across time and generations. Finally, it has been recognised that the differentiated nature of the societies to which migrants come is so complex that it makes little sense to speak of 'integrating into' a distinct society, but we should rather recognise the significance of individual differences, locations, time, and immigration statuses (see Hampshire 2013: 135, also Spencer 2003). So the complexity of the process of integration itself precludes the formulation of policies which can address issues of incorporation across contexts.

While a range of integration policies have been tried in Europe since the 1970s, from assimilation to multiculturalism and anything in between, as we saw in Section 1, they have all been proclaimed, at one time or another, to have ‘utterly failed’ (see Thilo Sarrazin’s polemic with the German chancellor Angela Merkel in 2010, David Cameron’s speech at the 2011 Munich Security Conference, Nicola Sarkozy cited by Bertosi and Duyvendak 2012). Highly politically contested, limited in their toolbox, and problematic in application, integration policies in Europe have been seen as ineffective (see Brubaker 2001) in addressing the problems of integration they were aimed at. But this ineffectiveness is explained not necessarily by the policies but by an uneven and limited understanding of the complexities of the process of integration, as well as by the interference in it of non-migration related policies which can have as much if not greater impact on integration outcomes.

Integration policies are policies which aim to manage the settlement and incorporation of migrants so they become full and accepted members of society. This process, however, is multidimensional: it happens across legal-political, socio-economic, and cultural-religious domains (see Penninx and Garces-Mascarenas 2016: 11-29 for a detailed discussion of the concept of integration). These domains contain a number of key facets of the process which have been used as measures or indicators of integration in the various policies (see their usage in policy research carried out by Ager and Strang 2008; Howard 2009; Koopmans 2013; Vink and Bauböck 2013; Goodman 2015; Helbling et al. 2017; Kalter et al. 2018; Solano and Huddleston 2020; see Scholten and van Breugel 2018): participation in the labour market and education outcomes; residential patterns, friendships with members of the host society, intermarriage rates; participation in public life; language acquisition and convergence with the majority’s values and beliefs (as per Hampshire 2013: 134). However, none of these on their own can account for integration outcomes. It has been established that there can be trade-offs between the various domains, where social integration, for example, can be at the expense of both economic and political integration (e.g. Maxwell 2012 who studies different immigrant groups in Britain and France). And measures taken with other concerns in mind, such as the regulation of state, market, welfare and culture – can influence integration outcomes without necessarily having the incorporation of immigrants in mind (Freeman 2004: 954).

Economic integration is shaped by the market and welfare systems, as well as the migrants’ own characteristics (entrepreneurship, language skills, qualifications). The likelihood of immigrants finding employment and keeping it, their participation in the informal economy, the ease of starting and doing business are shaped by institutions, regulations and discourses which are not explicit integration policies. Similarly, social integration is affected by social benefits available to immigrants and anti-discrimination legislation, but also patterns of residential planning, urban geographies and community infrastructure, which sit outside the scope of integration policies. In the cultural domain, immigrants’ incorporation is shaped by the fit between different values (which can be taught and even professed but never really inculcated), as well as by the national narratives of identity and belonging (which are often shaped by immigration but are much broader than it).

Thus, any attempt to influence integration outcomes must take into account the multi-dimensionality of integration processes and their dependence on institutions, regulations and discourses beyond the realm of immigration (this point is developed by Hampshire 2014: 140-154). In the leading concern with the economic integration of immigrants, for example, governments have good reason to worry about overall higher levels of unemployment among immigrants in main EU receiving countries (see OECD 2021). Hansen (2012: 6-7) identifies here three policy areas which must be levered to increase immigrant participation: education policy to increase schooling opportunities for immigrants, welfare policy to incentivise work over benefits, and economic growth to improve employment opportunities for everyone. Neither of these sits clearly within the domain of immigration policy and neither of these is easy to shift. Skills-based selection, which is often an immigration policy governments in Europe reach to in order to alleviate some of the imbalances existing in these domains, anti-immigration legislation and language learning provision can have positive effects as immigration tools (Hampshire 2014: 146). While some national governments in Europe have had their own anti-discrimination laws (the UK, for example, on the basis of its 1960s experience of race relations, see Bleich 2003), the EU's 2000 Race Directive required of its member states to pass anti-discrimination legislation and create monitoring bodies.

In the domain of cultural integration, the *politics* of immigration and diversity and European anxieties about settling newcomers which are at their centre (see Van Reekum, Duyvendak and Bertossi 2012 for a succinct presentation of this point) have been overlaid by security concerns about terrorism in the post-9/11 period as well as a growing recognition of Europeans' unease with Islam (Jupp 2015: 72). In this domain, the general policy shift has been away from broadly multicultural policies (sometimes referred to as '(ethnic) minorities' policy or 'equality and freedom of choice' policy, see Castles and Miller 2014: 270 but also the volume by Luedtke 2010). Since the 1990s, these have generally been replaced across the continent by an approach combining anti-discrimination legislation with more demanding civic integration policies (Joppke 2004, 2007a, 2007b, also Joppke and Morawska 2003). The latter are focused on language requirements as a condition of entry, residency and naturalisation, requirements for immigrants to demonstrate country knowledge, as well as requirements of adoption of the national values and norms often as repackaged liberal norms. Most visibly, this shift happened in the Netherlands, but Germany, France, the UK, and Austria have followed (Perchinig 2019, Strik et al 2010, Scholten et al 2012, Farrugia 2008, Bonjour and Kraler 2015, etc).

It has been argued that such demanding approach to civic integration can have little success with harmonious immigrant incorporation, especially when coupled with tough rhetoric against multiculturalism: indeed, it could retard this process (Hampshire 2014: 152). Here we can see a clear interference in the policy domain of integration from the politics of identity and belonging (Gray 2006), revealing again a disproportionate concern with the 'deficit' carried by migrants (Schinkel 2017), even when this is formally denounced (see for example the Preface to Alba and Foner's seminal discussion of integration in the Western world, 2015). Migrant integration pledges to involve newcomers and host societies in a presumably two-way process where both parties have a stake in adapting and this has become the legitimate and established policy response to managing migrant incorporation, often bolstered by governmental funding (as, we will see, is the case of the EU policy on migrant integration). However, its roots into exclusionary ethno-nationally bounded visions of society in which the newcomers are essentialised and constructed as inherently deficient, have remained visible (see Schinkel 2017, 2018). EU's application of integration only to third-country nationals reminds us of this: citizens of EU member states are not expected to integrate, even as they migrate. This is, of course, justified through the non-discrimination requirements of the common market and, since 1993, the normative and legal construct of EU citizenship. But it also speaks clearly to the fact that integration policy is 'geared towards identifying and managing the European Others' (Schinkel 2019), which is what makes it inherently problematic within a new critical idiom problematising 'the linear triad of 'immigration', 'integration' and 'citizenship'' (Favell 2001, 2015, 2022). This is significant because it forms the foundation upon which the European Union's policy of migrant integration unfolds, as we will see in the third section of this chapter.

3. Regional integration and its significance for migrant integration policy in the EU

Migrant integration policy came up on the EU agenda after the EU acquired competences in the area of justice and home affairs (added to the economic agenda with the Treaty of Maastricht in 1992 and augmented with the Treaty of Amsterdam in 1999). Meeting in the Finnish town of Tampere in October 1999, the European Council (the summit of the leaders of the EU then 15 member states) called on the EU to develop a common asylum and migration policy as a top priority objective. Within this objective, and with a view to the fair treatment of third-country nationals [legally residing on the territory of member states], the

European Council aimed for a 'more vigorous integration policy' (European Council 1999). Thus, the emergence of EU-level integration policy is clearly driven by the logic of the asylum and migration policy, as our discussion above pointed out.

It is on this basis that a EU policy on migrant integration began to take shape. The first and only legal reference to it in EU primary law appeared with the Treaty of Lisbon in 2007. It established a role for the EU in supporting national initiatives – and thus precluding the development of a proper supranational competence (Wolleghem 2019a). The policy therefore remains vested with the member states and intergovernmental in character. Nevertheless, a 'fragmented, yet consistent' EU policy has developed over the course of the past two decades, framing an ever more nuanced understanding of migrant integration.

In the first five years of the Tampere Programme, a relatively narrow view of migrant integration dominated the agenda. It concerned itself with the legal dimension only, presuming that if the legal position of immigrants was equal to that of citizens (in as much as this was possible), and legislation tackling discrimination was put in place, then 'integration processes could be left to societal forces' (Garcés-Mascareñas & Penninx 2016, p.2). Legal integration in this context was to be achieved through the 2003 directives on family reunification and free movement (after a five-year period of residence) and comprehensive anti-discrimination directives (the 2000 Race Equality Directive and the Equal Treatment Directive). Given the historical economic focus of EU migration policy, this is unsurprising. The legislation here is well-developed, binding, involving both EU and national level, and well implemented, despite the challenges of daily practice (Pietsch & Clark 2015). But it involves only very limited aspects of the migrant integration process itself.

In overseeing progress, the European Commission observed in 2003 that on all policy objectives of the Tampere Programme but one (namely the integration of third-country nationals) the necessary policy papers and actions had been put in place. To fill in this gap, the European Commission issued a communication (EC 2003) which took stock of the accomplishments, charted the future actions, and formulated a holistic approach to migrant integration targeting its main dimensions (economic, social, political rights; cultural and religious diversity; citizenship and participation). It is in this document that we find the first policy reference to the mainstream notion of integration as a two-way process engaging immigrants and host-societies and involving a series of rights and obligations for both (though the focus on employment and social cohesion is obvious). It is this notion of integration which will dominate the policy discourse until the introduction in 2011 of the aforementioned three-way approach also engaging countries of origins.

The mainstreaming of the two-way notion of integration of migrants speaks to more inclusive policy models of integration (as we mentioned above applied at the time in some member states) but it is important to note that the concern with managing otherness – one of the main issues with integration policies per se – is visible throughout. After all, the formulation of EU's integration within the justice and home affairs policies concurs with rising concerns with terrorism both globally and in Europe, as we see in the policy documents, and the main challenges are identified as follows: low employment rates (especially among migrant women), rising unemployment and high levels of 'over-qualification', risks of social exclusion, gaps in educational achievement, and public concern about the lack of integration of migrants (see Pietsch and Clark 2015, p. 40).

The first major policy instrument, for example, the Common Basic Principles (CBPs) introduced the following year (Council of the EU, 2004) next to counter-terrorism discussions in view of the murder in the Netherlands of filmmaker Theo van Gogh. The CBPs are seen as a major step towards developing a policy framework in providing concrete points of reference for the implementation of existing and planned policy measures. They start with the two-way definition of integration and present many of its dimensions (employment, education, equal and non-discriminatory access to public and private goods and services, cultural and religious diversity, participation in democratic processes and a basic knowledge of the host society's language, history and institutions). The CBPs also call for monitoring integration policies using appropriate indicators. Employment (i.e. economic integration) is seen as the cornerstone of the process (see Gońda, Lesińska and Pachocka 2020, p.38).

Another major policy instrument is considered to be the establishment of the first European Integration Fund (EIF) with the purpose of financing national programmes and community actions. Its budget between 2007 and 2013 was EUR 825 million and its impact is considerable. It is the EIF, above all else, that is responsible for the development and implementation, at national level, of the EU policy on migrant integration, in the absence of and sometimes against respective national policies on migrant integration (Geddes and Scholten 2015).

Other policy instruments developed within the framework of the CBPs are the European Migration Forum (formerly the European Integration Forum), the Website on Integration, and the network of National Contact Points on Integration (Rafaelli 2017). These are seen as the main steps towards a 'soft-Europeanisation' approach to the development of a EU policy on migrant integration in the absence of a EU competence in this area (Wolleghem 2019, Carrera & Faure Atger 2011) in consistent policy measures: the 2005 Framework for the integration of third-country nationals, the 2011 Agenda for the integration of third-country nationals, the 2016 Action Plan on the integration of third-country nationals and the 2021 Action Plan on Integration and Inclusion of the European Commission. These policy measures are seen as building up on the holistic view of integration developed since 2011 to include sending countries, also in response to criticisms that EU's policy on migrant integration did not cover, significantly, recipients of international protection (see report for the UNHCR by Huddleston 2010, also Kaczmarczyk, Lesińska & Okólski 2015).

The emergence of a EU-level policy of immigrant integration in Europe has not been insignificant in terms of impact on national level policies. To begin with, it has been pointed to to explain the emerging evidence of policy convergence and harmonisation at national level around shared objectives, common legal instruments and decision-making process (Pietsch 2015: 38). Harmonisation is especially visible in the broader domain of migration policies which, as we discussed, drive integration policy responses. In the narrower domain of integration policy per se, the EU's push for harmonisation has been in three main areas (Pietsch 2015): participation in the labour market, education and training; desegregating disadvantaged urban areas by improving multilevel cooperation between different levels of governance; and the involvement of the countries of origin in view of recognising temporary and return migration as essential elements in the migratory process (EC 2011).

Conclusion

TBC

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