

UNIVERSITY OF GRAZ

European Master's Programme in Human Rights and Democratisation
A.Y. 2021/2022

The role of local governments in implementing a human rights-based approach to the linguistic integration of immigrants in Europe

A case-study analysis of Human Rights Cities

Author: Océane Crabbé
Supervisor: Gerd Oberleitner

Abstract: The diversification of societies as a result of migration flows has reached unprecedented proportions and generated its own share of challenges. In response to these challenges, European governments rely increasingly on civic integration policies, tying the obtention of rights and statuses to the completion of strict requirements that typify national citizenship, including linguistic competences. As an alternative to mandatory, time-intensive, and often inefficient language requirements, local levels of government can play a role in promoting the linguistic integration of immigrants while recognising diversity and fostering social cohesion. Drawing on the experience of three Human Rights Cities in Europe, this thesis suggests a set of best practices that can guide the work of local governments and strengthen their role as key human rights actors.

TABLE OF CONTENTS

Introduction	1
1. Linguistic integration	8
1.1 The concept of integration	8
1.2 Language as a tool for integration	13
2. Civic integration in the European Union	16
2.1 Civic integration policy context at EU level.....	16
2.2 Civic integration policies at national level: a theoretical framework	19
2.3 A human rights perspective on civic integration policies	24
3. Local governments and Human Rights Cities	31
3.1 Local governments as drivers of integration policies	32
3.2 Human Rights Cities and migrant inclusion	35
3.3 Case Study Analysis	39
3.3.1 <i>Graz, Austria</i>	41
3.3.2 <i>Lund, Sweden</i>	48
3.3.3 <i>Utrecht, the Netherlands</i>	54
Conclusion	59
Bibliography	65
Annexes	73
Annex 1 – Civic integration policies analytical tools	73
Annex 2 – Interview guide.....	74
Annex 3 – Ganty’s integration models flowchart	75

INTRODUCTION

“Le migrant est un individu mobile qui se déplace d’un endroit à l’autre, porteur d’un projet”¹

The movement of people across borders, while not a new phenomenon, has reached unprecedented proportions in the last decades. According to the International Organization for Migration (IOM), in 2020 there was an estimated 281 million international migrants – people living in a country other than their country of birth –, which is double the number of international migrants in 1990, and over three times the estimated number in 1970². In its latest World Migration Report of 2022, the IOM notes that Europe remains the most popular destination globally, hosting approximately 87 million international migrants³. International migration flows continued to increase despite COVID-19-related travel restrictions due to growing demographics, technological advances, higher living standards and geopolitical transformations. Furthermore, recent refugee flows caused by the war in Ukraine and impending environmental disasters induced by climate change indicate that this trend is not likely to be reversed any time soon.

These movements inevitably lead to changes in the size and composition of populations within countries. For host societies, immigration comes with increased diversity among the population. The diversification of European societies, while having the potential to be a great driving force and “a source of dynamism”⁴ for their development, is also a phenomenon that has brought about its own share of challenges. Like most migration-related issues, the question “how will we live together?”⁵ has generated a highly polarized debate. Failure to answer this question is likely to trigger adverse reactions to immigration and a rejection of otherness. Faced with this growing phenomenon, governments have formulated integration policies aimed to mitigate the effects of diversity within societies by reducing differences between immigrants (newcomers) and host societies. Integration is one of many terms found both in academic

¹ Translation: “A migrant is a mobile individual carrying a project from one place to another”. Claude Springer, ‘Migrants connectés, intégration sociale et apprentissage/certification en langues : prendre en compte la nouvelle donne numérique’ in Jean-Claude Beacco et al (eds), *The Linguistic Integration of Adult Migrants* (De Gruyter 2017) 34.

² Marie McAuliffe and Anna Triandafyllidou (eds), *World Migration Report 2022* (International Organization for Migration (IOM) 2021), xii.

³ Ibid, 24.

⁴ Ibid, 301.

⁵ “*How will we live together?*” was the title of the 17th edition of the International Architecture Exhibition of the Venice Biennale in the fall of 2021, which inspired the topic of this thesis.

literature and public discourse used to describe this process of reducing differences: absorption, adaptation, acculturation, assimilation, inclusion, incorporation...⁶ The meaning and use of these terms have evolved over time and space, but ‘integration’ is by far the most commonly found today, especially in the migration discourse.

In its Ljubljana Guidelines on Integration of Diverse Societies, the Organization for Security and Cooperation in Europe (OSCE) warns against the consequences of a lack of integration efforts by governments: “If diverse societies do not have good integration policies, there is the danger that different communities (...) may become increasingly separate, with few or no common interests and no shared sense of belonging. Such separation into parallel and unconnected societies poses a considerable risk to the viability and stability of any multi-ethnic State”⁷. Though expressed in the framework of the protection of national minorities within States⁸, the creation of parallel societies through immigration constitutes a real threat to social cohesion. In fact, the increasing focus on integration policies by European governments came about “as a response to the obvious failure of Europe’s most pronounced policies of multiculturalism”⁹, which were essentially a *laissez-faire* approach predominant in the late 20th century that came under heavy criticism after it became associated with “the rise of socioeconomic marginalisation and segregation of ethnic groups suffering from higher levels of unemployment, poverty and educational segregation”¹⁰. In addition to wider gaps of socioeconomic performance, in recent years failure of integration has also been linked to the rise of extremism, sometimes resulting in acts of terrorism, marginalising certain immigrant communities and further polarizing the discourse on migration.

As a response to these challenges, European governments have increasingly begun to rely on civic integration policies. According to Goodman, this evolution constitutes a “new strategy of

⁶ Wolfgang Bosswick and Friedrich Heckmann, ‘Integration of migrants: Contribution of local and regional authorities’ (2007) European Foundation for the Improvement of Living and Working Conditions <<https://www.eurofound.europa.eu/publications/report/2006/social-policies/integration-of-migrants-contribution-of-local-and-regional-authorities>> accessed 10 July 2022, 2.

⁷ OSCE High Commissioner on National Minorities, *The Ljubljana Guidelines on Integration of Diverse Societies & Explanatory Note* (OSCE High Commissioner on National Minorities 2012), 3.

⁸ The question of whether immigrant populations constitute national minorities is still widely debated and has not yet found a clear answer. Generally, it is recognized that the legal framework protecting minority rights only applies to so-called historical minorities”, with well-established ties to the country.

⁹ Christian Joppke, ‘Transformation of Immigrant Integration: Civic Integration and Antidiscrimination in the Netherlands, France, and Germany’ (2007) 59(2) *World Politics*, 249.

¹⁰ Paola Mattei and Miriam Broeks, ‘From multiculturalism to civic integration: Citizenship education and integration policies in the Netherlands and England since the 2000s’ (2016) 0(0) *Ethnicities*, 5.

integration (...) shifting away from historical integration models of assimilation, multiculturalism and (paradoxically) exclusionism”¹¹. Civic integration policies are based on the idea that successful integration into a host society rests on immigrants’ individual commitments to “characteristics typifying national citizenship”¹². These characteristics are generally three-fold: adherence to liberal and democratic values, country knowledge, and proficiency in the national language(s). Governments have introduced these elements as requirements – in the form of courses, tests or formal declarations – to the obtention of certain rights or statuses, such as access to residency permits, family reunification, or citizenship.

This thesis will focus exclusively on the linguistic component of civic integration, and hence introduce the term ‘linguistic integration’ to refer to the process of integrating through language acquisition. Besides personal interest and a concern for academic conciseness, the focus on language is motivated by two main reasons. First, language barriers constitute very tangible differences between communities. Differences in language repertoires – i.e., the range of languages that one speaks or has access to – can be easily instrumentalized to create an ‘us vs them’ feeling that is immediately recognizable and that one can easily identify with. Immigration brings linguistic diversity, but as summarized by the Council of Europe, “people find it hard to accept the development of a new form of diversity that replaces the traditional linguistic diversity of their home territory (regional and minority languages)”¹³. If the goal of integration is to preserve social cohesion, then breaking down linguistic barriers is an indispensable part of the process. Second, in the context of migration, language is the key to access the host society’s institutions, labor market, education system, but also its culture and traditions. In essence, language can be conceived as a fundamental tool that takes precedence over every other aspect of integration, including the two other components of civic integration, namely country knowledge and values. In turn, according to Joppke, the disproportionate focus by governments on language acquisition can be explained by the fact that language has a “functional necessity”, as “States must operate in a specific (by definition ‘majority’) language”¹⁴.

¹¹ Sara Goodman, ‘Integration Requirements for Integration’s Sake? Identifying, Categorising and Comparing Civic Integration Policies’ (2010) 36(5) *Journal of Ethnic and Migration Studies*, 754.

¹² *Ibid.*

¹³ Council of Europe, ‘Forms of linguistic integration’ (Council of Europe Language Policy Unit – Project LIAM) <<https://www.coe.int/en/web/lang-migrants/forms-of-linguistic-integration>> accessed 10 July 2022.

¹⁴ Christian Joppke, ‘The Role of the State in Cultural Integration: Trends, Challenges, and Ways Ahead’ (2012) Migration Policy Institute < <https://www.migrationpolicy.org/sites/default/files/publications/CivicIntegration-Joppke.pdf>> accessed 10 July 2022, 4.

In the field of linguistics, much has been written about language acquisition for migrants. Scholars have worked on adapting language education to fit the needs of migrants and on creating relevant language curricula for adult migrants¹⁵. The study of linguistic integration from a human rights point of view is less evident, because there is no ‘right to integration’ *per se*. As far as linguistic rights go, they refer to the rights of minorities to use their *own* language, and as previously stated the application of minority rights to immigrant populations has not yet produced consensus. And yet, the imposition of linguistic requirements as part of migrants’ integration process has raised concerns. In a recent report on the human rights aspects of immigrant and refugee integration policies, the Council of Europe warns against the risk that mandatory civic requirements be used as migration management mechanism rather than out of a genuine concern for integration. In academia, scholars have shed light on the incoherence and inconsistencies of civic integration policies in many European Union (EU) member states, pointing to discrimination in the implementation of such policies, with different legal regimes applied to EU nationals versus third-country nationals, or between highly qualified and non-qualified immigrants¹⁶. Overall, the relevance of studying the linguistic integration of migrants from a human rights lens stems from the premise that whereas integration is generally conceived as a ‘two-way process’ involving obligations from both the State and the immigrant, linguistic integration is an asymmetric process that places all the burden on the immigrant. This is almost intrinsic to the very nature of language acquisition, which is not something that can be imposed on someone but rather is the result of one’s own efforts. The arrival of migrants does not in turn create any obligations on the host society to learn new languages or to change their linguistic repertoires.

If linguistic requirements are problematic from a human rights perspective, the absence thereof implies that language acquisition is left entirely up to the choice and willingness of the newcomer. However, Europe’s experience with multiculturalist approaches to integration, combined with the fundamental role that language plays in identity formation and social cohesion, all point to the general consensus that learning the language of the host society *is* a key dimension of integration. How then can European governments reconcile the two? This dilemma is well summarised by Joppke: “the challenge for liberal states is to strike the right

¹⁵ See for instance Piet Van Havermaet and Sara Gysen, ‘Language learning, teaching and assessment and the integration of adult immigrants. The importance of needs analysis’ in Kris Van den Branden (eds), *Task-Based Language Education* (Cambridge University Press 2006).

¹⁶ Sarah Ganty, ‘Integration duties in the European Union: Four models’ (2022) 28(6) *Maastricht Journal of European and Comparative Law* 784.

balance between policies that are aggressive enough to further social cohesion (their purported goal), yet restrained enough to respect the moral autonomy of immigrants. This is especially difficult when it comes to regulating sensitive identity issues”¹⁷. The purpose of this thesis is to provide a potential answer to this dilemma by exploring the role of local levels of government in the linguistic integration of immigrant populations in Europe.

Local levels of government¹⁸ are becoming increasingly recognized as key actors in the implementation of human rights obligations. In its 2021 annual report, the International Centre for the Promotion of Human Rights at the Local and Regional Levels under the auspices of UNESCO explain the importance of acknowledging the role of local levels: “it is city and municipal administrations that are the closest to citizens and well-equipped to render human rights a lived experience in their procedures and interactions with citizens”. This is especially true in the context of immigrant integration, which is a process that naturally unfolds at the level closest to the individual: integration happens first within a neighbourhood, a community, then eventually a city, region, and a country. Cities are the primary recipient of migratory flows, and consequently are also where the effects of diversity are experienced first-hand, where different communities coexist and where linguistic barriers can be felt in everyday interactions. Though integration policies are predominantly the competence of the national level of government, this thesis aims to explore the opportunity for local levels of government to play a role in ‘filling the gap’ between linguistic expectations for immigrants on the one hand, and the respect for diversity and international human rights standards on the other hand. A reconciliation between the two leads to what we call a human rights-based approach (HRBA) to linguistic integration, resulting in the following research question:

“What is the role of local levels of government in implementing a human-rights based approach to the linguistic integration of immigrant populations in Europe?”

¹⁷ Joppke (2012) (n 14) 1.

¹⁸ The term “local levels of government” refers to any form of local government, including cities, towns, municipalities and metropolitan areas.

In order to answer this question, this thesis will examine three so-called ‘Human Rights Cities’: the city of Graz in Austria, the city of Lund in Sweden, and the city of Utrecht in the Netherlands. The concept of Human Rights City constitutes an interesting case-study because they are local levels of government that have self-imposed human rights commitments and who mainstream a HRBA in their policies. As summarized by Deklerck, “instead of the traditional account of human rights, which focuses on the international level, Human Rights Cities are employing a (not necessarily legal) bottom-up approach by formulating a commitment to human rights and by deciding locally on how to implement these rights”¹⁹. With regards to immigrant integration, this HRBA approach translates into a difference in terminology: Human Rights Cities advocate for the creation of ‘inclusive cities’ instead of the traditional integration *of migrants* approach. The Human Rights Cities of Graz, Lund and Utrecht were selected as case-studies because they share important similarities in terms of demographics (not capital cities, important student population), while also operating in considerably different national contexts in terms of integration strategies and linguistic requirements. With the proposed research question and case-study methodology, the objective of this thesis is to identify the policies and tools at the disposal of local levels in implementing integration policies aimed to promote language acquisition among the immigrant population. By focusing on Human Rights Cities, this thesis highlights best practices which could inform other cities in their integration policies and initiatives, and in so doing contributes to the existing literature on the role of local levels of government as duty-bearers in the field of international human rights law.

Before introducing the structure of this thesis, a few conceptual considerations. The terms ‘migrant’ and ‘immigrant’ are used throughout the thesis interchangeably to refer to any person living in a country – in the case at hand, a European country – other than their country of birth. No distinction will be made between different categories of migrants or legal statuses, such as economic migrant, asylum-seeker, or refugee. While acknowledging that the term ‘migrant’ is extremely broad and may pose questions with regards to the scope of the research question, the use of this term is entirely intentional: in the face of language learning, statuses do not – or should not – make a difference. While it is clear that level of education and access to resources *do* make a difference in how quickly one can pick up on a language, this thesis posits that linguistic integration, just like integration in general, is a challenge for everyone, regardless of

¹⁹ Jasmien Deklerck, ‘From Commitment to Responsibility for Human Rights in Cities and Regions’ in Gerd Oberleitner and Klaus Starl (eds), *Human Rights Go Local Publication Series*, volume 3, (HRGL Publishing 2022), 1.

the reason behind migrating in the first place. In addition, whereas some integration policies differentiate between migrants' statuses (applying different legal regimes to different categories of migrants), others do not; hence, from an academic point of view, it is easier to consider them as one, similar only in that their mother tongue(s) is/are not the same as that/those of the host society.

This thesis will begin with an overview of the concept of integration, its evolution in use and meaning, before zooming in on the role of language acquisition in the integration process. This analysis, based on an interdisciplinary literature review, will clarify the terminology used throughout the rest of the paper. With an understanding of the concepts at hand, it will then be possible, in the second chapter, to present the integration policy framework within the EU, both at supranational and national levels. Though it has adopted a progressive human rights discourse, in practice the EU has little competence in the field of immigrant integration, which is therefore largely left up to Member States, who vary greatly in their approach. Because it is not always possible to isolate *linguistic* integration policies, the analysis will present European and national *civic* integration policies, which all include a language component, in order to understand how linguistic requirements are instrumentalised in integration policies and what implications these have from a human rights perspective. The third chapter will then dive into the core of the research question with an analysis of the role of local levels of government, and in particular Human Rights Cities, in the linguistic integration of immigrants. The policies and activities implemented in the cities of Graz, Lund and Utrecht will be presented successively, which will then allow to conclude with a set of best practices and insights on the possibility to reconcile linguistic requirements and the human rights legal framework.

1. LINGUISTIC INTEGRATION

“Integration ist immer ein Abbild der Gesellschaft”²⁰

(Kurt Hohensinner – Graz City Council)

The term ‘integration’ is widely present in literature, often preceded by a range of different adjectives: economic, political, social, civic, cultural... While at first glance these qualifiers appear to describe different types of integration, it might be more relevant to understand them as various components or *dimensions* of a process by which a person – in the case that interests us, a person with a migration background – becomes integrated. Intuitively, it is easy to understand how language acquisition – the process by which the newcomer learns the dominant language of the host society – is also an important component of integration, as it is the key to communication with a neighbor, shopkeeper, or State institution. Linguistic integration can then be defined as the process by which one becomes integrated through language acquisition. In order to understand this concept, this chapter will aim to answer two questions: what does it mean to be ‘integrated’, and what role does language play in this process?

1.1 THE CONCEPT OF INTEGRATION

In their study of the dimensions of migrant integration in Western Europe, Heath and Schneider begin with the disclaimer that there is no single settled definition of integration²¹. Indeed, integration is a subject on which there is a vast literature emanating from very different disciplines. In sociology, Lockwood defined integration as “the inclusion of individuals in a system, the creation of relationships among individuals and their attitudes towards the society”²². While helpful, this definition introduces a new concept – ‘inclusion’ – which then also requires defining, and one can easily get lost in an infinity loop of conceptual considerations.

²⁰ Translation: “Integration is always a reflection of society”. Markus Wurzer (ed), ‘Integration. Gemeinsam. Gestalten. 15 Jahre Integrationsreferat der Stadt Graz’ (Stadt Graz, 2021) 8.

²¹ Anthony F Heath and Silke L Schneider, ‘Dimensions of Migrant Integration in Western Europe’ (2021) *Frontiers in Sociology* <<https://www.frontiersin.org/articles/10.3389/fsoc.2021.510987/full>> accessed 10 July 2022.

²² Bosswick and Heckmann (n 6) 2.

Instead of a definition, the concept might be better approached from the perspective of the different theoretical frameworks that have been suggested to characterize the processes through which immigrants become part of their host society. These have evolved over time as scholars and policy-makers tried to make sense of migration trends, their ever-increasing influence on societies and the ensuing diversification of populations that compose them. At the beginning of the 20th century, migration flows to the United States saw the emergence of the term ‘assimilation’ to describe the process by which newcomers were expected to be “incorporated”²³ into society. Heath and Schneider suggest that this period was initially characterized by what they call a “classic ‘straight line’ theory of assimilation”²⁴, an approach put forward by Warner and Srole in 1945 to describe the process by which each generation of immigrants is – or is expected to be – more assimilated than their predecessors as they progressively lose “many of the values, identities and modes of behavior of their countries of origin”²⁵. As more and more countries became ‘countries of origin’ and European and American societies diversified further, scholars Portes and Zhou suggested a second set of theories, coined theories of segmented and selective assimilation, in which they observed that “different groups may follow different paths on different dimensions, depending on the extent of discrimination and exclusion they are subject to, the economic opportunities open to them, and the strength of the ethnic community and its social and economic capital”²⁶. Interestingly, by comparing the literature on both sides of the Atlantic, Heath and Schneider observe that while the term ‘assimilation’ was preferred in the United States, in Europe the term ‘integration’ was used to describe the same process, by which “individuals and groups become fully part of a wider whole”²⁷.

The evolution from theories of assimilation to theories of integration is therefore not as linear as it may intuitively appear, as the terms themselves have evolved in meaning over time and across different migration contexts. Generally, however, it is accepted that the term *assimilation* “linguistically implies a referent to which immigrants and/or their offspring can become *similar*”^{28,29}. In Europe especially, with the rise of nationalism in the pre-war period,

²³ Heath and Schneider (n 21).

²⁴ *Ibid.*

²⁵ *Ibid.*

²⁶ *Ibid.*

²⁷ *Ibid.*

²⁸ Emphasis in original text.

²⁹ Jens Schneider and Maurice Crul, ‘New insights into assimilation and integration theory: Introduction to the special issue’ (2010) 33(7) *Ethnic and Racial Studies* 1144.

assimilation and assimilationist policies became associated with an attempt to create “culturally homogenous nations”³⁰, leading the concept to become taboo for the remainder of the century. Instead, the term *integration* became more popular as it did not have the same negative connotation. However, authors Schneider and Crul warn that European ‘integration’ may not necessarily be more permissive of diversity than American ‘assimilation’. They argue that, in fact, whereas the American model is based on economic and social success within a society that adapts to changing political and demographic realities, successful European integration “predominantly carries the implicit ideal of (a minimum degree of) cultural homogeneity – especially referring to language – as a prerequisite for social cohesion”³¹. In Europe, centuries of nationalism and identity-building, combined with the creation of strong welfare systems, resulted in more structural barriers to incorporation into society. This observation leads Schneider and Crul to conclude that “especially with regard to cultural aspects the term *integration*³² actually means something pretty similar to ‘assimilation’”³³.

Having made these considerations, the term ‘integration’ will be preferred for the rest of this thesis, both in light of the European context being studied and its recurrence in academic literature and political discourse. As we have seen, it is often preceded by adjectives to emphasize different domains of integration in society, such as culture, economy, or politics. Scholars such as Heckmann and Schnapper³⁴ have also suggested different dimensions of the term to describe the different ways in which one becomes integrated. First, *structural integration*, or what psychology scholars prefer to call *acculturation*, refers to “the process by which an individual acquires the knowledge, cultural standards and competencies needed to interact successfully in a society”³⁵. This ‘successful interaction’ is a precondition for *cultural integration*, which essentially refers to the position – or *placement* – of an individual in society, whether in the education system, working life, or as a citizen. While both structural and cultural integration take place at the level of society as a whole, two other dimensions of integration happen at the level of the individual concerned: first, *interactive integration*, which relates to the creation of relationships and networks, and second, *identificational integration*, which refers to the process by which an individual sees him or herself as part of society. Combining

³⁰ Bosswick and Heckmann (n 6) 4.

³¹ Schneider and Crul (n 29) 1144.

³² Emphasis in original text.

³³ Schneider and Crul (n 29) 1145.

³⁴ Friedrich Heckmann and Dominique Schnapper (eds), *The integration of immigrants in European societies*, Forum Migration series volume 7 (De Gruyter 2003)

³⁵ Bosswick and Heckmann (n 6) 3.

all four dimensions together, Bosswick and Heckmann suggest the following definition of integration:

“For the immigrants, integration means the process of learning a new culture, acquiring rights and obligations, gaining access to positions and social status, building personal relationships with members of the host society and forming a feeling of belonging to, and identification with, that society. For the host society, integration means opening up institutions and granting equal opportunities to immigrants”³⁶.

It is interesting to note that whereas assimilation is generally described in terms of result (how similar or different the immigrant is from the host society), integration is rather conceived as both a multidimensional process and a two-way process, in which both host society and the immigrant concerned play a role. This view is echoed in the definition provided by the OSCE in its Ljubljana Guidelines on Integration of Diverse Societies, where integration is formulated in terms of individual *participation* in society: “a dynamic, multi-actor process of mutual engagement that facilitates effective participation by all members of a diverse society in the economic, political, social and cultural life, and fosters a shared and inclusive sense of belonging at national and local levels”³⁷. Though formulated to address the issue of integration of national minorities within a State, this definition shows a shift in the responsibility of integration from individuals themselves to the society as a whole.

At the same time, since the turn of the 21st century, elements such as minority formation among immigrants, ethnic stratification and violence, including terrorist acts, have all contributed to “an acute sense that European states and societies have failed to integrate their immigrant and ethnic minority populations”³⁸. Bosswick and Heckmann observe that these recent developments in Europe have slowly lifted the taboo on assimilationist policies, based on “a growing awareness that incorporation, on equal terms, demands that migrants acquire the cultural and social competences and attitudes to participate in the society’s institutions”³⁹. In other words, whether the emphasis is on *becoming* similar or in *participating* in society, both assimilation and integration require a certain level of adaptation from immigrants, and, in essence, both terms refer to a process of reducing differences between groups in order to

³⁶ Bosswick and Heckmann (n 6) 11.

³⁷ OSCE High Commissioner on National Minorities (n 7) 3.

³⁸ Joppke (2007) (n 9) 243.

³⁹ Bosswick and Heckmann (n 6) 5.

facilitate social cohesion. To account for the fact that the concept of integration can have different meanings and can put the emphasis on either the individual (through immigrants' own efforts and participation) or society (through adaptation of structures and fostering a sense of inclusion), we will use the following definition of integration, provided by the Migration Policy Institute: "the process by which immigrants become accepted into society, both as individuals and as groups"⁴⁰. This definition accounts for a wide range of approaches to integration, as 'becoming accepted' can imply different scenarios, from the welcoming of migrants with no strings attached, to the imposition of strict conditions that need to be met in order to be a part of society. In addition, "the openness of this definition also reflects the fact that the responsibility for integration rests not with one particular group, but rather with many actors – immigrants themselves, the host government, institutions, and communities, to name a few"⁴¹. In all cases however, it is the host society that determines what 'acceptance' implies and what the migrant needs to do in order to be accepted.

The term 'integration' dominates the public discourse and governmental policies, but the weight that the word carries depends greatly on the reception conditions that host governments and societies establish. This allows Joppke to conclude that it has become obsolete to classify European countries using national models of 'assimilation', 'multiculturalism' or 'segregation'. Instead, he observes a common trend of transformation of immigrant integration in Western Europe, characterized by "a peculiar coexistence of civic integration and antidiscrimination policies"⁴². Putting aside antidiscrimination policies – which are not an integration strategy *per se* but rather a response to failed integration – the recent focus on civic integration constitutes an important shift as it goes beyond economic integration (employment) and political integration (civic engagement), emphasizing instead the immigrant's efforts to acquire certain characteristics typifying citizenship, specifically country knowledge, language proficiency and liberal and social values. Before diving into civic integration as a policy framework in Europe – which will be the object of the next chapter –, it is useful to turn to the issue of language proficiency specifically to understand the role of language in integration.

⁴⁰ Rinus Penninx, 'Integration: the Role of Communities, Institutions, and the State' (2003) Feature, The Online Journal of the Migration Policy Institute <<https://www.migrationpolicy.org/article/integration-role-communities-institutions-and-state>> accessed 10 July 2022.

⁴¹ Ibid.

⁴² Joppke (2007) (n 9) 247.

1.2 LANGUAGE AS A TOOL FOR INTEGRATION

In the field of linguistics, there exists a vast literature on the process of language acquisition for migrants. As European governments approach integration increasingly from the lens of civic components such as values and language, the narrative becomes that learning the language(s) of the host society is an essential part of being integrated. Interestingly, some linguists have questioned the rationale behind this narrative, claiming that the very idea of a ‘national language’ is itself a contested concept in linguistics literature. Authors Otheguy, García, and Reid explain: “a named language *cannot*⁴³ be defined linguistically, cannot be defined, that is, in grammatical (lexical or structural) terms. And because a named language cannot be defined linguistically it is not, strictly speaking, a linguistic object; it is not something that a person speaks”⁴⁴. Scholars belonging to the category of critical poststructuralist sociolinguists hold the view that “language belongs to the speaker rather than to the nation state”, and that consequently the “fluid language practices”⁴⁵ of migrants should not be stigmatized because they, too, make up the linguistic features of society. If we accept this view, then linguistic integration – i.e., integration through language acquisition – cannot be a goal in itself. Instead, language must be conceived as a *tool* for integration, a means to unlock the other components of integration.

Linguists also warn that language learning is not an insignificant process, as language is intrinsically connected to our sense of identity. According to Beacco, “languages are potential vehicles of some aspects of identification and are a main factor in both internal and external types of allegiance”⁴⁶. Identification through language is the process through which one’s sense of belonging to a community rests on the language that he or she speaks. As summarized by Wodak and Boukala, “language and language use manifest ‘who we are’; and ‘we’ define reality partly through ‘our’ language and linguistic behavior”⁴⁷. Citing Lüdy’s typology, Beacco explains that the language of identification results from subjective factors such as the

⁴³ Emphasis in original text.

⁴⁴ Ofelia García, ‘Problematizing linguistic integration of migrants: the role of translanguaging and language teachers’ in Jean-Claude Beacco et al (eds), *The Linguistic Integration of Adult Migrants* (De Gruyter 2017), 12.

⁴⁵ *Ibid*, 13.

⁴⁶ Jean-Claude Beacco, ‘Languages and language repertoires: plurilingualism as a way of life in Europe’ (2005) Council of Europe Language Policy Division <<https://rm.coe.int/languages-and-language-repertoires-plurilingualism-as-a-way-of-life-in/16802fc1ba>> accessed 10 July 2022, 9.

⁴⁷ Ruth Wodak and Salomi Boukala, ‘(Supra)National Identity and Language: Rethinking National and European Migration Policies and the Linguistic Integration of Migrants’ (2015) 35 *Annual Review of Applied Linguistics* 256.

first, second, etc. language acquired, the (ir)regular use of a language, the predominance of a language, or, in the case of immigrants, the language of their country of origin or that of their host country. Though the process of identification through language normally happens on a very individual level (“I identify with the French people because I speak French”), Beacco argues that this process is now also at work in the framework of “naturalization” imposed by States – i.e. the “administrative and legal rules for conferring nationality on foreign residents”⁴⁸. In his view, the introduction of linguistic requirements for the acquisition of citizenship is motivated by various considerations: the first is a concern for social or occupational efficiency (newcomers should “fit into working life”⁴⁹); the second is a matter of preserving the national community’s *cultural identity* (newcomers must be “culturally compatible with the host society”⁵⁰). In other words, “command of the national language is convenient direct and tangible proof of fitting in”⁵¹. Beacco argues that building our identity on just one identifying language leads to the rejection of linguistic diversity. He calls for a different type of cultural identification, identification through language repertoire, in which identity is created through the recognition of the existence of plurilingual repertoires (i.e., “the capacity of individuals to use more than one language”⁵²). In other words, he argues that social cohesion can be produced not only through sameness of behavior, values, and a common language, but also through “encounter, mixity, acceptance of influences and adaptation of them to achieve transitional but stable equilibrium”⁵³.

Following Beacco’s line of thought, the *need* for newcomers to acquire the host country’s national language(s) is not as obvious as it may initially appear to be. A similar view has been expressed by the Council of Europe’s Language Policy Unit, warning that language acquisition might not have the same importance for all migrants. Consequently, linguistic integration should be regarded as a *different* kind of integration all together because languages are used to build both individual and group cultural identities. “Thus, learning and using a new language – the language of the host society – (...) is not just a practical matter but may also trigger processes that lead to the questioning of identities”⁵⁴. Migrants may view language acquisition “as a form of enrichment of their identities”, or, on the other hand, as a process that will “lead

⁴⁸ Beacco (n 46) 15.

⁴⁹ Ibid, 16.

⁵⁰ Ibid.

⁵¹ Ibid.

⁵² Ibid, 19.

⁵³ Ibid, 20.

⁵⁴ Council of Europe (n 13).

to the loss of a ‘sense of belonging’”, as the new language drives out their previous languages and, with them, their identity”⁵⁵. Going back to the different dimensions of integration described in the previous section, it becomes clear that the process of language learning is intrinsically linked to identificational integration, through which proficiency in the host national language(s) will contribute to the creation of a sense of belonging.

This analysis of sociolinguistic research has highlighted a strong identity component of integration, and more specifically linguistic integration, as language is a fundamental part of both individual and collective identity constructions. The same holds true in the European context, leading scholars Wodak and Boukala to link European integration policies to the creation of a “(supra)national identity”⁵⁶. In other words, the formulation of integration policies at a supranational level implies the definition of a European identity. With its 24 official languages, multilingualism is an important feature of this European identity, and was even listed as a value in the Copenhagen Declaration of 1973, where Member States highlighted the desire to “preserve the rich variety of their national cultures”⁵⁷. Wodak and Boukala describe the process of European identity construction as being inherently exclusionary, and explain: “the EU constructs its identity via its distinction from the ‘other’ and accomplishes the discursive construction of supranational identity inter alia through policies of citizenship and language policies”⁵⁸. It is this very concept of citizenship (and what it means to ‘be an EU citizen’) that has led most Member States to rely increasingly on civic integration policies, requiring migrants to demonstrate language proficiency in the host national language in order to secure rights or statuses. By doing so, they choose to capitalize on the dimension of acculturation, and accept the assumption that language learning will lead (or at least contribute) to successful interaction in society. Wodak and Boukala warn against “re/nationalizing tendencies”⁵⁹, in which “language competence seems to take on the role of ‘gatekeeper’ to legal immigration”⁶⁰. The next chapter will dive into the topic of integration from the perspective of policy-makers, and will look into the different strategies adopted in the EU to address integration challenges.

⁵⁵ Ibid.

⁵⁶ Wodak and Boukala (n 47).

⁵⁷ The Declaration on European Identity [1973] Bulletin of the European Communities 12/118.

⁵⁸ Wodak and Boukala (n 47) 257.

⁵⁹ Ibid, 257.

⁶⁰ Ibid, 254.

2. CIVIC INTEGRATION IN THE EUROPEAN UNION

“We will make sure that people who have the right to stay are integrated and made to feel welcome. They have a future to build – and skills, energy and talent”⁶¹

(Ursula von der Leyen, State of the Union Address, 2020)

The integration of immigrants into the host society has a strong individual dimension, and is therefore a process that naturally unfolds at the local level. However, the role of local levels is itself strongly influenced by national governments, though their relative influence varies greatly between countries depending on their degree of centralisation, regime type, and overall autonomy of decentralised entities. In the European context, the supranational level adds another layer of governance, as Member States have come together to find solutions to common issues, especially in the face of migration. This chapter will examine each level of government subsequently: starting with the role of the EU, moving down to the national level, arguably the most prominent in the field of integration policies. With regard to civic policies, the role of national levels is particularly important, as these policies link civic requirements – value and language learning – with the acquisition of rights or statuses. Finally, it then becomes possible to introduce a human rights perspective on these strategies, which, as formulated by Ganty, reveal a lot “about Member States and EU visions of who should be considered members of society – or ‘good citizens’ – and who should not”⁶².

2.1 CIVIC INTEGRATION POLICY CONTEXT AT EU LEVEL

In his analysis of the transformation of immigrant integration in Europe, Joppke identifies two fundamental parameters that shaped immigrant integration since the mid-1990s⁶³. The first is a consensus in favour of new legal immigration, based on “a growing awareness that immigration, far from being a finite historical episode, is a permanent, even desirable feature of European societies”⁶⁴, both for demographic and economic reasons. This consensus brought the challenge of immigrant integration to a top level of priority for policy-makers, prompting

⁶¹ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Action plan on Integration and Inclusion 2021-2027, COM(2020) 758 final.

⁶² Ganty (n 16) 5.

⁶³ It is important to note that Joppke’s analysis was published in 2007, well before the so-called ‘migration crisis’ in Europe following the war in Syria and the consequential flow of refugees to European States.

⁶⁴ Joppke (2007) (n 9) 245.

European states to formulate concrete integration strategies. In the same vein, the second parameter identified by Joppke is what he calls the “Europeanization of the immigrant function”⁶⁵, a process through which EU policy seized migration issues, gradually replacing the competencies left up to the Member states.

Whereas the first European agenda for a common migration policy appeared already in the Treaty of Amsterdam in 1997, it took another seven years before Member states agreed on basic principles for a common integration policy⁶⁶. Today, the EU commitments in the field of integration can be found in the Action Plan on Integration and Inclusion (2021-2027). Of note is the choice of words “integration *and* inclusion”, whereas the previous Action Plan only used the term “integration” (2016 Action Plan on the Integration of Third Country Nationals). The current Action Plan is designed as a political tool to provide guidance for Member States “to promote integration” and “to bring inclusion for all”⁶⁷. Throughout the document, emphasis on the two-way dynamic is very clear. In order for integration to be successful, “migrants and EU citizens with migrant background are offered help to integrate and they in turn make an active effort to become integrated”⁶⁸. With regards to inclusion, the focus seems to be on upholding the principle of non-discrimination throughout EU policies, and “adapting and transforming mainstream policies to the needs of a diverse society, taking into account the specific challenges and needs of different groups”⁶⁹. The first point of action highlighted in the document concerns “inclusive education and training”, with a strong focus on language learning. Here, the action plan specifies that language learning should not be limited to language classes upon arrival – pointing to the inefficiency of civic integration policies implemented by Member States – and instead advocates for increased support to schools, non-formal learning, and overall “combining language training with the development of other skills or work experience and with accompanying measures”⁷⁰.

⁶⁵ Ibid, 246.

⁶⁶ Declaration of the Council of Europe in The Hague, 2004. It is worth nothing that, in a broader sense, the EU has been active in formulation anti-discrimination policies since the early 1990s.

⁶⁷ ‘The EU reveals its new EU Action Plan on Integration and Inclusion (2021-2027)’ (*European Commission – European Website on Integration*, 24 November 2020) <https://ec.europa.eu/migrant-integration/news/ec-reveals-its-new-eu-action-plan-integration-and-inclusion-2021-2027_en> accessed 10 July 2022. Though both terms are used throughout the document, it is unclear what is meant by either.

⁶⁸ EU Action plan on Integration and Inclusion 2021-2027 (n 61), 2.

⁶⁹ Ibid, 5.

⁷⁰ Ibid, 9.

Though an important step forward in the discourse on integration, these guidelines and action plans remain purely political. From a legal perspective, the EU still does not have any competence in the formulation or regulation of integration policies. In her analysis of integration duties in the EU, Ganty explains that integration was developed as “secondary law” in the field of asylum and immigration, which falls within the competence of the EU⁷¹. This secondary immigration and refugee law “authorizes Member States to require integration ‘conditions’, ‘measures’ or ‘criteria’ as prerequisites for the granting of family reunification or long-term residence permit”⁷², and leaves them a margin of appreciation in defining them. In theory, this conditionality can only be applied to so-called ‘third-country nationals’, since the freedom of movement principle prohibits the imposition of integration conditions on EU citizens. In practice however, Ganty highlights that recent case law of the European Court of Justice (CJEU) points to a weakening of the principle of equal treatment in certain areas (social benefits, study grants), requiring instead the condition of a “real link” with the host country⁷³. She observes that *both* categories of people (EU citizens and third-country nationals) are affected by the growing importance of integration conditions (though not in the same way), and therefore advocates for a more coherent framework on integration⁷⁴ which does not treat third-country nationals and EU citizens under different legal regimes. The imposition of language requirements is a case in point in arguing for a coherent approach, as “the difficulties of learning the language of the host State are similar for all”⁷⁵.

The role of the EU in the field of integration is therefore limited to the proclamation of political commitments to create a European environment inclusive of diversity. Though the CJEU is competent to review Member States integration practices, Ganty observes that it fails to harmonize law and regulation in this field precisely because the very concept of integration is not defined anywhere in EU directives. As a consequence, “the empty concept of integration as developed by EU Member States is thus validated by the Court and serves as an umbrella for a national vision of integration”⁷⁶. It results that integration can be better approached from the perspective of the Member States themselves, which will be the focus of the next section.

⁷¹ Consolidated Version of the Treaty on the Functioning of the European Union [2012] OJ C326/50, articles 78 and 79(1) and (2).

⁷² Ganty (n 16) 3.

⁷³ *Ibid*, 4.

⁷⁴ In her words: “it is time for the Court to adopt a vision of integration *at European Union level* which would be a lesser evil”. *Ibid*, 5.

⁷⁵ *Ibid*, 6.

⁷⁶ *Ibid*.

2.2 CIVIC INTEGRATION POLICIES AT NATIONAL LEVEL: A THEORETICAL FRAMEWORK

In recent years, whether in response to increased immigration flows and nationalistic pressure, or out of genuine concern for a more successful integration, Member States have gradually introduced civic requirements in their migration and integration strategies. Though there is a common trend of multiplication of such policies, differences can be observed in the ways in which Member States have decided to implement them. This section will present two analytical tools developed by scholars in their study of national civic integration policies. The first, created by Goodman, is the “civic integration index”, which measures civic barriers to integration across the EU-15 and their evolution between 1997 and 2009. From this index emerge four “citizenship strategies”, which describe the logic behind the (non-)existence of civic requirements. The second, created by Ganty in 2021, is a typology of four “models” that describe the legal systems at play behind Member States’ integration strategies. The examination of two different tools created by two different scholars, using different methodologies and over a span of almost 25 years, provides a theoretical framework to describe European national integration strategies.

In line with the conceptual considerations of the first chapter, adding the word “civic” before “integration” presupposes an additional layer of definition. And not unlike the blurry concept of integration, the term “civic integration” is difficult to place in a theoretical context. Goodman’s and Ganty’s individual analyses of civic integration in the EU treat this concept as “one of many strategies meant to promote immigrant integration”⁷⁷. From a legal perspective, the “civic” component can be understood as being related to “citizenship”⁷⁸, which itself refers to a combination of *rights* and *status*. In the context of migration, civic integration policies establish *requirements* that limit or condition access to such rights and statuses. Though often treated together in literature, Ganty argues that it is important to distinguish between, on the one hand, integration “conditions”, defined positively “in that they condition a right or status”, and integration “obligations” on the other hand, which are defined negatively “in that they imply the preservation of a right, a status or a sum of money, which the bearer will lose if she

⁷⁷ Goodman (n 11), 755.

⁷⁸ For a complete overview of the concept of citizenship and the way civic requirements are located within citizenship policy, see Goodman (n 11) 756-758.

does not fulfil the obligation”⁷⁹. In the interest of limited space and expertise to properly make this distinction, this thesis will take the term “requirements” to mean both integration *conditions* and *obligations*.

The first tool we will examine is the civic integration index (abbreviated CIVIX), which was constructed by Goodman to examine variations in civic integration requirements, understood as a combination of country knowledge, language and values, across the EU-15. The CIVIX is built on a scale of 0 to 6, a high score indicating strong barriers to citizenship (“thick citizenship content”⁸⁰). The coding of requirements takes into account the category of third-country nationals accountable; whether civic conditions are required for entry, settlement or citizenship; the number of requirements; and the severity of requirements. All of these dimensions are reflected in the point valuation for each member state. Goodman measured the CIVIX in 1997 and in 2009 to also allow for a diachronic analysis of integration policies. From her analysis emerge four categories of “citizenship strategy”, understood as the policy interaction between civic requirements (measured by CIVIX) and existing citizenship practices (i.e., “the degree to which a state boasts liberal or restrictive rules for acquiring citizenship”⁸¹). These four strategies are as follow:

- (a) **Prohibitive strategy:** citizenship is exclusive in terms of access, and barriers to integration are high. Member States with this strategy tend to have what Goodman calls “‘differentialist’ traditions of nationhood (birth-inherited, ascriptive and exclusive identities)”⁸². At the time of Goodman’s research (1997 and 2009), these Member States were Austria, Denmark and Germany.
- (b) **Conditional strategy:** citizenship is a reward, not a mechanism, for integration. Member States with this strategy (France, Netherlands, United Kingdom) share a history as former colonial powers and have sought “to limit and control the inflow and settlement of migrants”⁸³.
- (c) **Insular strategy:** internal regulations for status and citizenship have not been prioritised. Goodman’s attributes this strategy (or one could argue, lack thereof) to a

⁷⁹ Ganty (n 16) 7.

⁸⁰ Goodman (n 11), 759.

⁸¹ *Idem*, 764.

⁸² *Ibid*, 765.

⁸³ *Ibid*, 767.

late democratisation process (Greece, Italy, Spain)⁸⁴ and having been only recently become “receiving” countries.

- (d) **Enabling strategy:** citizenship serves as a mechanism for establishing equal status and rights, *enabling* rather than *rewarding* integration. Member States with this strategy (Belgium⁸⁵, Finland, Ireland, Portugal and Sweden) are placed on the opposite end of the spectrum to those falling within the first category (prohibitive).

The first two strategies both aim to limit or mitigate the impact of migration by introducing mandatory integration requirements, but the logic behind them is slightly different. In the case of a prohibitive strategy, the requirements exist for “historical, symbolic and strategic reasons (...) given the eventual acceptance of newcomers as a ‘fact of life’”⁸⁶. On the other hand, conditional citizenship strategy is based on a “context, history and impression of openness”⁸⁷, but it arguably reveals the most controversial reasoning behind the implementation of mandatory civic integration requirements. In contrast, the insular and enabling strategies do not implement strong integration requirements “because they respectively do not recognise immigration as playing a consequential role in contemporary policy-making, and view mandatory integration requirements for status as counterproductive to the actual goal of obtaining status – integration”⁸⁸.

The second tool, which offers the advantage of being based on much more recent research (2021), was created by Ganty to identify the legal mechanisms at work in terms of integration in order to assess their compliance with EU law, especially in light of the proportionality principle (whether the measures implemented are proportionate to the objective pursued – in this case integration). On the basis of this analysis, she suggests the following typology composed of four “integration models”:

- (a) **The symbolic model:** obligations or conditions to integration are so “light” that they are merely symbolic. The integration requirements are almost impossible to fail, implying very little burden for the person wishing to integrate (for example, signing a

⁸⁴ Luxembourg also falls within this category but for different reasons (high percentage of foreign residents, very little border control, and low naturalisation rates).

⁸⁵ As we will see with Ganty’s recent analysis (2021) of Belgium’s integration policies, this has since greatly changed.

⁸⁶ Goodman (n 11), 769.

⁸⁷ *Ibid.*

⁸⁸ *Ibid.*

“declaration of intent” to integrate). Under this model, “the main objective is to send a message about the host country’s culture and values and about how it functions”⁸⁹.

- (b) The meritocratic model:** integration is conditioned on the requirement to bring added value through work, skills or wealth; in other words, it must be “deserved”. Having observed that this model is predominant across the EU, Ganty argues for the emergence of a new *de facto* citizenship, which she calls “merizenship”⁹⁰. The status of “merizen” supersedes one’s legal situation, “and sweeps away the need for the social, civic and cultural ties woven with a state”⁹¹, though she later also suggests that “the vision of merit is likely to extend to social and cultural features going beyond mere economic added-value”⁹².
- (c) The activation model:** this model refers to the concept of “active social state”, where the State provides support to immigrants to comply with the integration requirements. In so doing, States shift the responsibility of integration to individuals, “activating them” to “fit in” and to “avoid being dependent on the state and a becoming burden on the community”⁹³. Ganty identifies an inherent contradiction to this model, where integration policies are either coercive or empowering, depending on the level of difficulty and the consequence of “failing”. Such policies often take the form of entire integration programmes, with detailed steps, resources, and tests along the way. Unlike the meritocratic model, immigrants must not necessarily bring added value to the society, but rather “show that they are making the right steps”⁹⁴.
- (d) The selective model:** on the complete opposite end of the spectrum to the activation model, this model refers to a (substantial) lack of resources provided to immigrants to help them integrate. As a consequence, “integration conditions or obligations are so onerous that they can be viewed as a way of ‘selecting’ migrants”⁹⁵.

Goodman’s typology describes *barriers* to civic integration, allowing her to place Member States’ integration policies on a spectrum (from low to high CIVIX scores) and to then categorise them into “integration strategies” based on citizenship access. In contrast, Ganty’s

⁸⁹ Ganty (n 16) 8.

⁹⁰ Ganty dedicated an entire book to this concept. See Sarah Ganty, *L’intégration des citoyens européens et des ressortissants de pays tiers en droit de l’Union européenne. Critique d’une intégration choisie* (Bruylant 2021).

⁹¹ Ganty (n 16) 12.

⁹² *Ibid.*, 13.

⁹³ *Ibid.*

⁹⁴ *Ibid.*, 14.

⁹⁵ *Ibid.*, 15.

proposed categories are not mutually exclusive; in fact, she warns that it is common for Member States to combine different models. It results from her analysis that the mere introduction of civic integration requirements is not enough to make a State fall within one or the other model, which are rather about how *strong* or *binding* these requirements are. The different models can be illustrated with the imposition of linguistic requirements: a signed declaration where one commits to learn the national language is clearly a more symbolic requirement (symbolic model) than a mandatory 600-hour language course upon entry. Linguistic requirements can also adopt a logic of merit (meritocratic model) if they are imposed on some categories of immigrants and not others: “by exempting non-nationals who are ‘wanted’ – highly-skilled workers and their families – and by imposing particularly difficult conditions and obligations on low-skilled migrants”⁹⁶. If the State waives the fee for mandatory language tests and sponsors migrants throughout the course programme, this policy could fall within the activation model. On the other hand, if the requirements are very high (e.g., obtention of B2 level) and the support provided is limited (e.g., no financial support), it results that only highly educated and wealthy migrants will be able to complete these language requirements and have a chance to ‘be integrated’, placing such policies on the side of the selective model.

It becomes clear from this analysis that civic integration policies are not inherently ‘good’ or ‘bad’, but rather depend on Member States’ *intent* behind the introduction of these policies (to promote social cohesion or to manage migration?), and their *scope of application* (do they apply to everyone equally or only to certain categories of immigrants?). As summarised by Goodman, “a requirement promoting integration is positive reinforcement, but a requirement that makes contingent one’s legal status is a potentially negative sanction”⁹⁷. Putting aside the question of their effectiveness – which falls beyond the scope of this thesis – civic integration policies are best examined in their specific national migration, integration and citizenship contexts. The next section will shed light on civic integration policies from a human rights perspective, which raises questions about the mandatory nature of such policies.

⁹⁶ Ibid, 13.

⁹⁷ Goodman, (n 11) 756.

2.3 A HUMAN RIGHTS PERSPECTIVE ON CIVIC INTEGRATION POLICIES

In addition to providing an interesting analytical framework for understanding civic integration policies across EU Member States, both Goodman and Ganty point to the link between national *integration* policies and a broader national *migration* strategy – in other words, the ways in which civic requirements can be used to influence immigration flows (more often than not, the intent being to limit or select them). Beyond academia, a similar view has been expressed by the Council of Europe, who warns against the use of civic integration policies as a *migration management mechanism*: “depending on their exact framing, they may function as a tool for the state to limit or restrict family reunification and permanent settlement in the receiving country. By doing so, they may pose human rights challenges”⁹⁸. This section will attempt to sketch out a human rights perspective on civic integration policies, which can otherwise be understood as a ‘human rights-based approach’ (HRBA) to integration.

In 2019, the Council of Europe published an issue paper on the human rights aspects of immigrant and refugee integration policies. Based on a comparative assessment of some of its Member States, its primary conclusion is that the biggest challenges in light of human rights standards are mandatory civic integration policies. The point of criticism regards mainly the practical *implementation* of these policies, and the entailed risk of discrimination in integration. For instance, the fact that language requirements “are often not well designed for the specific needs of certain applicants and vulnerable groups”⁹⁹, or that access to the courses and tests might be hindered by conditions such as income, waiting lists, or housing requirements. The report also points to discrimination in the consequences of failing to meet civic requirements, as “certain groups of applicants may be more adversely affected by sanctions”¹⁰⁰. The same conclusions were reached by Ganty, who points out the severe socioeconomic bias of civic integration policies. In addition to obvious obstacles like the cost of the tests and courses, the difficulty of combining them with familial or occupational duties, and the fact that civic requirements are tied to the enjoyment of social benefits, Ganty highlights another variable, which is that these requirements do not apply to individuals who make “a substantial economic or intellectual contribution to the host society”¹⁰¹. These can be, for instance, doctoral students

⁹⁸ Sergio Carrera and Zvezda Vankova, *Human rights aspects of immigrant and refugee integration policies. A comparative assessment in selected Council of Europe member states*, Issue Paper (Council of Europe 2019), 8.

⁹⁹ *Ibid.*, 5.

¹⁰⁰ *Ibid.*

¹⁰¹ Ganty (n 16) 18.

on exchange programs, highly-qualified workers on intra-corporate transfers, and of course any European citizen exercising his or her freedom of movement. This conclusion was again confirmed in recent developments at the EU level. For instance, in April 2022, the European Commission proposed a set of measures aimed to “attract skills and talent”¹⁰², which include a simplification of admission conditions for those immigrants who can prove their added value to the European economy.

Even if governments would take measures to improve the overall implementation of civic integration policies, critics still argue against the very existence of these policies. The main point of contention is their *mandatory* character. Some argue that this feature is contrary to liberalism itself as it places too much emphasis on ‘duties’ and not enough on ‘rights’, leading authors like Joppke to claim that civic integration is an example of “illiberal social policy in a liberal state”¹⁰³. Interestingly, Joppke further explains that despite being illiberal, civic integration policies “are not born of sources extrinsic to liberalism, such as nationalism or racism, but are inherent in liberalism itself”¹⁰⁴, as it is the contractual relationship inherent to liberalism that leads policy-makers to insist on individuals’ successful integration into society. Following this reasoning, mandatory civic integration policies are based on the idea that non-integrated individuals are incompatible with liberal democracies, where the enjoyment of rights is conditioned to the fulfilment of certain duties. Sharing a similar view, Goodman concludes that “the most prominent – and controversial – reason behind the implementation of obligatory civic integration in otherwise ‘liberal’ citizenship regimes with relatively open immigration pasts, is to limit and control the inflow and settlement of migrants”¹⁰⁵. As a consequence, civic integration policies achieve the exact opposite of integration, since they are designed to exclude applicants. And for those that do manage to meet the requirements, the consequence is that they enter into a contractual relationship with the host State, in which their rights are conditioned to linguistic competences, country-knowledge obligations, or adherence to values. As summarized by Goodman: “civic integration requirements are new guidelines for what a ‘successfully integrated’ member of the nation-state looks like, and that can be a particularly alienating notion in countries with half a century of immigrant-related ethnic heterogeneity behind them. It raises the possibility that diversity in liberal nation-states and the content of

¹⁰² ‘Legal migration: Attracting skills and talent to the EU’, Press release (*European Commission*, 27 April 2022) <https://ec.europa.eu/commission/presscorner/detail/en/ip_22_2654> accessed 10 July 2022.

¹⁰³ Joppke (2007) (n 9) 248.

¹⁰⁴ *Idem*, 249.

¹⁰⁵ Goodman (n 11) 767.

national identity, despite modernizing forces like globalization and transnationalism, are not as complementary as we assumed, or as compatible as we had hoped”¹⁰⁶.

When it comes to language and linguistic integration specifically, the same arguments can be heard from scholars who claim that language testing as a means of integration are nothing more than “an obvious formal legislative obstacle to migration”¹⁰⁷. Mandatory language requirements are criticized on three levels. First, in their *implementation*, demanding language competence from certain categories of immigrants (such as third-country nationals) and not others (such as EU citizens) is not only a source of risk for discrimination but is also nonsensical as language and communication are *equally* important for everyone. Linguistically, EU citizens do not have more in common than with non-EU citizens. Simply put, it is just as useful for an Estonian citizen living in Spain to be able to have a conversation in Spanish than it is for a Syrian national living in Slovenia to be able to speak Slovenian. Secondly, in their *effectiveness*, following a mandatory language course does not automatically lead to integration into society. Studies have shown that “language and integration tests have led to a decrease in the number of applicants for family reunification, permanent residence permits and naturalization”¹⁰⁸. Furthermore, in most cases these tests do not even lead to successful language acquisition, as most only require level A1 or A2 to succeed¹⁰⁹. Paradoxically, raising the requirements to a higher level, which could potentially improve migrants’ capacity to integrate, would simultaneously create additional barriers and increase the risk for discrimination. In fact, the Council of Europe’s Parliamentary Assembly issued a resolution inviting Member States to ensure that the language level required must not exceed level A2 of the CEFR for speaking and listening ability, and level A1 for reading and writing. Finally, the third level of criticism regards the very process of language acquisition in the context of migration, expressed mainly from the field of linguistics and echoed in the opinions of the Council of Europe’s Linguistic Integration for Adult Migrants project. The argument here is that whereas integration is conceived in theory as a two-way process, requiring efforts from both the host society and the immigrants, linguistic integration is very much a one-way

¹⁰⁶ Ibid, 769.

¹⁰⁷ Wodak and Boukala (n 47) 254.

¹⁰⁸ Committee on Migration, Refugees and Displaced Persons, *Integration tests: helping or hindering integration?* (PACE, Doc. 12604, Reference 3784 of 20 June 2011).

¹⁰⁹ On the scale of the Common European Framework of Reference for Languages (CEFR), the completion of level “A” (A1 and A2) means that the person can be considered a “basic user”. ‘The CEFR Levels’ (*Council of Europe*) <<https://www.coe.int/en/web/common-european-framework-reference-languages/level-descriptions>> accessed 10 July 2022.

process. The objective of linguistic integration is for migrants to “go unnoticed linguistically”, to make sure that they “do not stand out from other speakers or do so only minimally (through a slight accent, for instance)”¹¹⁰. In this view, language proficiency is an indicator of how dedicated the person is to his or her destination country, in direct correlation to their degree of allegiance to local values and culture. The Council of Europe describes these as “assimilationist” expectations and suggests that these should be replaced with more positive attitudes towards linguistic diversity: “the position of the Council of Europe is that the external definition of linguistic integration mentioned above is not consistent with either the real needs of the host society or the expectations of migrants themselves and the rights they should be granted”¹¹¹. Instead, they argue for the promotion of an “internal perspective”, according to which linguistic integration should be conceived as “a rearrangement of their [i.e., migrants] individual repertoires and the integration of the languages that make up these repertoires”¹¹². In conclusion, whether on the basis of process, implementation or effectiveness of linguistic integration policies, assimilating (pun intended) language competence with effective integration cannot be justified.

It is on this basis that scholars argue for the promotion of a *human rights-based approach (HRBA) to integration*. The concept of “human rights-based approach” or simply “rights-based approach” was originally developed by the United Nations (UN) as a tool to respect, promote and protect international human rights standards in policy-making. Underpinned by five principles (Participation, Accountability, Non-discrimination, Empowerment and Legality), this approach places human rights obligations “at the heart of policy”¹¹³ to promote empowerment of rights-holders and accountability of duty-bearers. Applied to integration, a HRBA stems from the notion that “the normative goal of integration is the realization of migrants’ human rights and their inclusion as equal members of society”¹¹⁴. The emphasis is therefore on the responsibilities of States, as duty-bearers, to ensure that their integration policies are aligned with this goal.

¹¹⁰ Council of Europe (n 13).

¹¹¹ Ibid.

¹¹² Ibid.

¹¹³ ‘Human Rights-Based Approach’ (*European Network of National Human Rights Institutions*) <<https://ennhri.org/about-nhris/human-rights-based-approach/>> accessed 10 July 2022.

¹¹⁴ Clíodhna Murphy, Mary Gilmartin and Leanne Caulfield, ‘Building and Applying a Human Rights-Based Model for Migrant Integration Policy’ (2019) 11 *Journal of Human Rights Practice*, 446.

Scholars Murphy, Gilmartin and Caulfield summarize the key features of a HRBA to integration¹¹⁵:

- (a) A commitment to the positive duty to eliminate discrimination;
- (b) The active promotion of tolerance and respect for cultural and linguistic diversity;
- (c) A rejection of the ideas of cultural assimilation and integration ‘testing’ of individuals;
- (d) The implementation and monitoring of practical integration measures to ensure equality of opportunity in respect of civil, political, social and economic rights.

Based on their definition, it becomes immediately evident that mandatory civic integration policies do not fit with this approach, at least if we accept the arguments presented earlier pointing out that these policies present a high risk of discrimination, promote only one named national language, and introduce strict criteria for testing individuals.

One possible way of refocusing integration under the lens of international human rights law is to formulate integration *in terms of* human rights; in other words, highlighting the human rights at stake in an integration process, and from there identify integration policies and practices that are not consistent with the protection of these rights. This work was done by multiple scholars and was summarized in the Council of Europe’s issue paper on human rights aspects of immigrant and refugee policies¹¹⁶, already quoted above. This paper anchors social integration in the protection of individual’s human dignity, non-discrimination and participation in the host societies, under three mechanisms. First, under the European Convention on Human Rights, integration is linked to the right to respect for private and family life (Article 8) and the prohibition of discrimination (Article 14 and Protocol No. 12). Second, under the European Social Charter, the report highlights the right of migrant workers to protection and assistance (Article 19) which specifies the obligation of States to facilitate family reunification. Third, for EU Member States specifically, the report mentions multiple articles of the EU Charter that echo these provisions (Article 7 on the respect for private and family life, Article 20 on equality before the law, Article 21 on the prohibition of discrimination), as well as two EU directives (2003/86 Family Reunification and 2003/109 Long-term Residence), which contain specific clauses on the introduction of mandatory civic integration policies. The report also cites

¹¹⁵ Ibid.

¹¹⁶ Carrera and Vankova (n 98).

examples of case law from the European Court of Human Rights where restrictive integration policies led to violations of the rights of migrants, though some scholars have pointed out the limited and even problematic conception of integration by the Court¹¹⁷.

In their model for a HRBA to integration, Murphy, Gilmartin and Caulfield constructed human rights and equality indicators of good practice in integration policies. This approach is innovative, as indicators to measure integration are usually limited to statistics on labour market integration or access to education. Instead, their assessment of integration policies is based on the policies' structural issues, processes and outcomes, resulting in the following indicators¹¹⁸:

<p>Structural</p> <p>The policy expressly identified measures aimed at eliminating discrimination</p> <p>The policy expressly addresses human rights</p> <p>The policy identified practical measures that promote equal access to these human rights</p> <p>The policy expressly refers to respect for cultural, linguistic or other forms of diversity</p>
<p>Process</p> <p>The policy is being implemented, with specific budget/staff allocation</p> <p>The policy provides for sufficient coverage of target populations</p> <p>The policy is being mainstreamed</p>
<p>Outcomes</p> <p>It is clear how, and by whom, the effectiveness of the policy is being measures</p> <p>The success of the policy is addressed in the annual report</p> <p>The annual report provides for follow-up</p>

Applying these indicators to measure the effectiveness of integration policies falls beyond the scope of this thesis. However, they provide an interesting framework to understand what policies fall under a HRBA to integration. Therefore, though they will not be applied rigorously, reference will be made to them when analysing our case studies in the following chapter, especially when it comes to extracting good practices for the integration of migrants.

¹¹⁷ See for instance Murphy, Gilmartin and Caulfield (n 114).

¹¹⁸ Table adapted from original table in Murphy, Gilmartin and Caulfield (n 114) 457.

Finally, one alternative way of looking at integration from a human rights perspective is to emphasize the role of local governments in implementing national integration policies. While studies such as the one by Murphy, Gilmartin and Caulfield highlight the need to better assess national integration strategies in order to formulate policies that are in line with countries' international human rights commitments, not much has been written about the possibility for local governments to bridge the gap between existing policies and successful integration of migrants. This will be the focus of the next chapter.

3. LOCAL GOVERNMENTS AND HUMAN RIGHTS CITIES

“Att ta emot nyanlända är inget som är ett ansvar för en enskilda förvaltning eller myndighet. Det är något vi gör tillsammans”¹¹⁹

Traditionally, human rights commitments and obligations are studied from the perspective of national governments. This is because States are the subjects of international law, and legally speaking, are ultimately responsible for implementing these commitments. In practice however, State institutions are not limited to the national government, and even in the most centralised government systems, imply some contribution from regional or local levels. In a recent *Human Rights Go Local* publication, Deklerck describes “a current trend towards acknowledgement of and encouragement for increasing the potential of cities in implementing human rights responsibilities”¹²⁰. Cities are also the primary recipient of migratory flows (as opposed to rural areas), and in the EU over 70% of people live in urban settings¹²¹. The first section of this chapter will present the role of local governments in formulating and implementing integration policies, both as key policy-makers but also as duty-bearers of international human rights commitments. One recent manifestation of the trend towards more responsibilities for local levels is the Human Rights Cities practice, which will be presented in the second section. Finally, this will allow to introduce three case-studies, the Human Rights Cities of Graz (Austria), Lund (Sweden) and Utrecht (the Netherlands), which will be used to illustrate how these human rights commitments can be translated into concrete policies and actions to promote migrant integration.

¹¹⁹ Translation: “Welcoming newcomers is not the responsibility of an individual administration or authority. It’s something we do all together”. ‘Invandring, integration och nyanlända’ (*Lund Municipality*) <<https://lund.se/kommun-och-politik/fakta-om-lund/invandring-integration-och-nyanlanda>> accessed 10 July 2022.

¹²⁰ Deklerck (n 19), 1.

¹²¹ European Union Agency for Fundamental Rights, *Human Rights Cities in the EU – A Framework for Reinforcing Rights Locally* (Publications Office of the European Union 2021), 5.

3.1 LOCAL GOVERNMENTS AS DRIVERS OF INTEGRATION POLICIES

In its issue paper on the human rights aspects of immigrant and refugee integration policies, one of the Council of Europe's recommendations concerns the local dimensions of integration, which "prove to be determinant for successful integration"¹²². The role of local governments as key actors of successful integration policies can be analysed from different perspectives.

First, from a societal perspective, local governments and cities are closer to the people and have a better understanding of the challenges pertaining to their local contexts. It is also where the effects of diversity are felt first-hand. As a process that has a strong impact on identity formation, both as individuals and as a community, integration is intimately linked to relations with neighbours, local businesses, and activities and events experienced as a community. One *feels* integrated first within his or her neighbourhood, then his or her city, and eventually with his or her host country as a whole. This incremental process of trust and relation-building is the reason why immigrants tend to choose to reside in neighbourhoods where there is a sense of community among foreigners of the same nationality, and create connections with people with whom they *already* share a common identity, whether through language, religion, nationality or cultural background. Everyone who has ever lived or even travelled outside of their home country can relate to this simple concept: we tend to stick with what we know. Meeting a fellow countryman or woman abroad will usually spark an immediate feeling of connection, one that is usually much stronger than would be experienced had we met them in our home country. Having this proximity to its citizens means that cities can potentially play a very influential role in their daily lives, including on issues related to the realization of their human rights. In fact, "much of the day-to-day human rights work takes place at local level – for example, in delivering public services or managing public space, social care or education, or in relation to participation in public affairs and cultural, social and economic life, as well as through citizen dialogues"¹²³.

Secondly, from a policy perspective, there is a trend towards increasing responsibility being taken by cities and local governments on a number of issues, as indicated by the emergence of city networks and forums that aim to share best practices and create common strategies. At the

¹²² Carrera and Vankova (n 98) 45.

¹²³ European Union Agency for Fundamental Rights (n 121) 11.

international level, the United Cities and Local Governments (UCLG), an umbrella organization for cities, local and regional governments, is one of the oldest and largest of such networks. Together with the UN, they launched the International Coalition of Inclusive and Sustainable Cities (ICCAR), with the specific objective to combat racism, xenophobia, discrimination and exclusion in over 500 cities across the globe. At the European level, the Congress of Local and Regional Authorities is a political assembly representing local and regional authorities from all Member States of the Council of Europe, making it a key institution. With regards to integration more specifically, the Council of Europe launched the Intercultural cities program, which gathers a network of so-called “intercultural cities” to promote equality, diversity and interaction between communities within a city. Through this program, the Council of Europe supports local and regional authorities in “reviewing their policies through an intercultural and intersectional lens, (...) and help them manage diversity positively and realise the diversity advantage”¹²⁴. Another such network is Eurocities, which gathers over 200 cities with the overall aim to “ensure a good quality of life for all”¹²⁵. This goal is divided into several “focus areas”, from employment and innovation to health and environment. One of the proclaimed goals of the network is to create “Inclusive cities”, which include a focus on migration and integration. As advertised by the Eurocities website:

“Integration happens at local level and cities have a key role in building inclusive and welcoming communities, where no one is left behind. Cities also have a role to play in challenging the public perception of asylum seekers and promoting better understanding of our collective responsibility to respect their basic human rights and right to protection. Successful migration policies therefore work in two ways: ensuring that migrants are welcomed into the host society while also ensuring the host society’s services and policies are adapted to a diverse population”.

Members of the Eurocities network have even agreed on a common Charter¹²⁶ containing their commitments – as policy-makers, service providers, employers, and buyers of goods and services – to integrate migrants in European cities. The multiplication of these networks and the increasing interest that it sparks in cities to join them, is testament to the growing importance of local levels as policy-makers.

¹²⁴ ‘About Intercultural Cities’ (*Council of Europe*) <<https://www.coe.int/en/web/interculturalcities/about>> accessed 10 July 2022.

¹²⁵ ‘About Us’ (*Eurocities*) <<https://eurocities.eu/about-us/>> accessed 10 July 2022.

¹²⁶ Eurocities, ‘EUROCITIES Charter on Integrating Cities’, *Integrating Cities* <<https://integratingcities.eu/wp-content/uploads/2021/10/CharterforWebFINAL.pdf>> accessed 10 July 2022.

Thirdly, from a legal perspective, the role of local governments as duty-bearers has been increasingly highlighted by academia and policy-makers. Following a traditional state-centric approach by which States are both party to and addressee of human rights treaties, there are two ways by which local governments are also bound by obligations to respect, protect and fulfil human rights, as described by Deklerck: “(1) drafting a Human Rights Instrument that is also directed towards, for example, administrative authorities, public welfare institutions, etc., or (2) translating international human rights obligations of States into human rights obligations of local authorities by either explicitly addressing local authorities as constituent elements of the government or by transferring relevant State competences to them”¹²⁷. With regards to integration, the common approach adopted by national governments is to remain responsible for the formulation of integration policies, but to delegate responsibility of implementation to the local levels. Some States with a strong federalization system have already started to delegate responsibility of integration policies solely to local and regional levels. In Belgium for instance, the national level is responsible for laws and policies regulating access to territory, residence, settlement, and removal of foreigners. Everything pertaining to questions of integration falls under the responsibilities of regional levels (who formulate the policies) and local levels (who implement and ensure access to integration programs)¹²⁸. As a consequence, choosing to migrate to Flanders, Wallonia, or Brussels (the three regions in Belgium) will have different consequences on integration requirements. For instance, while the Flanders regional government imposes a strict “civic integration program” – largely inspired by the Dutch model – until very recently¹²⁹ the Brussels region has a much more “multiculturalist” approach, with little to no requirements due to the nature of the city as being an international hub that celebrates diversity.

Implementing a HRBA to integration is therefore not only the prerogative of national governments. As we will see in the next section with the case of Human Rights Cities, some local governments have gone one step further and have challenged the traditional state-centric approach by viewing themselves as having their *own* human rights responsibilities, rather than being limited to the implementation of policies dictated by the national level.

¹²⁷ Deklerck (n 19) 5-6.

¹²⁸ Reinhilde Pulinx, ‘Living together in diversity – Linguistic integration in Flanders’ (Council of Europe Language Policy Division) <<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016802fc1d7>> accessed 10 July 2022.

¹²⁹ In June 2022, Brussels also introduced a mandatory civic integration program for newcomers.

3.2 HUMAN RIGHTS CITIES AND MIGRANT INCLUSION

In the late 1990s, the People’s Movement for Human Rights Learning, a New York-based NGO, developed a methodology for the implementation of international human rights norms at the local level. It was based on citizens’ empowerment through human rights education. They are the ones who first introduced the concept of Human Rights City, which they defined as:

“a city or a community where people of good will, in government, in organizations and in institutions, try and let a human rights framework guide the development of the life of the community. Equality and non-discrimination are basic values. Efforts are made to promote an (sic) holistic vision of human rights to overcome fear and impoverishment, a society that provides human security, access to food, clean water, housing, education, healthcare, and work at liveable wages, sharing these resources with all citizens – not as a gift, but as a realization of human rights.”¹³⁰

Since then, the concept has flourished. Though there is no official list of Human Rights Cities across the world, their number is above 50¹³¹, including at least 7¹³² in Europe. This practice was further consolidated in the establishment of various initiatives and networks, such as the Human Rights Cities Network, the Gwangju World Human Rights Cities Forum, the Right to the City Platform, the US National Human Rights Cities Alliance, the Human Rights City Project of the Raoul Wallenberg Institute, the Habitat International Coalition, and many more.

With the multiplication of Human Rights Cities came a multiplication of definitions of what the concept means exactly. As explained by Gomes and Möstl, some of them “do not follow a specific framework, but implement a variety of approaches in practice”¹³³, which gives rise to a wide variety of different “models” of Human Rights Cities. This differentiated approach resonates with the principle that there is no “one-size-fits-all” solution when it comes to human

¹³⁰ Deklerck (n 19) 8.

¹³¹ The exact number is difficult to pin down, precisely because of its lack of clear definition and because of the political and self-declaratory nature of Human Rights Cities.

¹³² According to the Human Rights Cities Network, these are: Graz and Vienna (Austria), Lund (Sweden), Middelburg and Utrecht (the Netherlands), Nuremberg (Germany), and York (United Kingdom). A 2021 report by the Fundamental Rights Agency adds to this list Salzburg (Austria), Barcelona and Valencia (Spain), and Turin (Italy), bringing the total number to 11.

¹³³ Karina Gomes and Markus Möstl, ‘Implementing Human Rights and the 2030 Agenda for Sustainable Development at the Local Level: Key Issues and Examples’ in Gerd Oberleitner and Klaus Starl (eds), *Human Rights Go Local Publication Series*, volume 1 (HRLG Publishing 2020), 30.

rights issues. Consequently, “each city develops its own identity based on local human rights needs”¹³⁴. Because of this multiplication of approaches, the concept of Human Rights City is rather difficult to define in clear terms. Even the Human Rights Cities Network, an umbrella organisation that gathers all Human Rights Cities around the world, does not provide a fixed definition. Its overall goal – which is presumably also the goal of Human Rights Cities – is “to help make human rights a reality for every citizen and in every city”¹³⁵.

Rather than a fixed definition, Deklerck suggests that the term is better understood in terms of five constitutional elements that are common to all Human Rights Cities¹³⁶:

- (a) An *organisational setting* that facilitates human rights implementation, through stand-alone decision-making and self-declaration as a Human Rights City, direct cooperation with other levels of governance (including the international level), and direct participation in intergovernmental initiatives and networks.
- (b) Strong *driving forces* behind the idea of becoming a Human Rights City, which can be either civil-society-driven or academia-driven (bottom-up approach), or government-driven (top-down approach).
- (c) A *rights-based approach* and/or an *advocacy-based approach* to human rights issues.
- (d) An appropriated *human rights discourse* (based on morality, good governance, or the law) which fits the local situation, culture and context.
- (e) *Institutional implementation* of human rights policies, for example through the establishment of Human Rights Departments within the city administration, the expression of human rights commitments through a formal Declaration, and human rights budgeting.

Other authors like Gomes and Möstl prefer to conceptualise Human Rights Cities as being constituted by three pillars:

¹³⁴ Ibid, 31.

¹³⁵ ‘Who we are’ (*Human Rights Cities Network*) <<https://humanrightscities.net/who-we-are/>> accessed 10 July 2022.

¹³⁶ Deklerck (n 19) 9-10.

- (a) *Societal development*, which refers to “the interaction between the individual and other members of the society in a spirit of solidarity for the achievement of the common good”¹³⁷.
- (b) A *culture of human rights* in which citizens know their rights and the rights of others, and participate in decision-making to exercise these rights.
- (c) *Urban justice*, which consists of “the establishment of alliances between urban actors and stakeholders at all levels for the realisation of international norms at the city level”¹³⁸.

The conceptualisation of Human Rights Cities is further complicated by the fact that there is no internationally agreed upon process for cities to acquire this status. In 2021, the EU Agency for Fundamental Rights (FRA) published a report titled *Human Rights Cities in the EU – A Framework for Reinforcing Rights Locally*. This report proposes a framework that compiles the necessary elements to become a Human Rights City in the EU. According to this framework, the process of becoming a Human Rights City can be summarised as follows¹³⁹:

- (a) On a *foundational* level, there needs to be a commitment to rights and principles enshrined in international human rights instruments such as the EU Charter of Fundamental Rights and the UN Sustainable Development Goals (SDGs).
- (b) On a *structural* level, the city needs to build mechanisms and procedures to integrate human rights into practice. These mechanisms include a formal commitment to become a Human Rights City, the creation of a separate body (office or unit) responsible for human rights, the establishment of complaint mechanisms, and annual reporting.
- (c) On an *operational* level, the structures must then be given the necessary *tools*, in other words, methods and resources such as guidelines for a HRBA, mainstreaming human rights, planning, monitoring and evaluation, awareness raising and communicating rights.

The framework also proposes three incremental stages of recognition¹⁴⁰ of a Human Rights City, from “basic level”, which would be a simple self-declaration of human rights

¹³⁷ Gomes and Möstl (n 133) 32.

¹³⁸ *Ibid.*

¹³⁹ Summary based on the report by the European Union Agency for Fundamental Rights (n 121) 14-30.

¹⁴⁰ *Ibid.*, 34.

commitments by the city, to “expert level”, which would be based on peer-review and external assessment of concrete outcomes in people’s lives by a cross-national group of cities and other actors (academia, EU, etc.). This differentiated “development level” shows that the concept of Human Rights City is extremely broad and cannot be reduced to a definition.

That being said, regardless of the exact conceptualisation adopted, it can be said that the overall logic of Human Rights Cities is a *commitment* to go beyond the minimum standards of international human rights obligations, and to “fill the gaps between the aspiring language of international, regional, national, and local commitments”¹⁴¹. It can also be said that because of their human rights commitments, and as highlighted by the framework proposed by the FRA, Human Rights Cities adopt a HRBA to planning, implementation, and evaluation of policies. As stated in the FRA report, “cities are an ideal starting point to strengthen respect for human rights by developing a human rights-based policy framework to guide the development of the community”¹⁴².

When it comes to diversity management in Human Rights Cities, one can immediately notice a change in terminology. In line with a HRBA, the term “integration” is largely replaced by the term “inclusion”: “a Human Rights City is an *inclusive* city that ensures equal rights for all”¹⁴³. This term is a reference to SDG 11 of the global Agenda 2030, which aims to “make cities and human settlements *inclusive*, safe, resilient and sustainable”¹⁴⁴. Though migrants, refugees and asylum-seekers are clearly identified as a vulnerable group, it is not clear whether the term “inclusion” also applies to them. For instance, the FRA report writes that one of the many challenges that local governments face is “the inclusion of vulnerable people or the integration of refugees”¹⁴⁵. The use of dual terminology here is interesting, and echoes the EU’s *Action Plan on Integration and Inclusion* mentioned in the previous chapter. The report also mentions that one of the key resources for Human Rights Cities to carry out their actions is the OSCE’s *Local Authorities’ Migrant Integration Guide*¹⁴⁶, published in 2019 by the Office for Democratic Institutions and Human Rights (ODIHR). The focus on ‘inclusion’ by Human

¹⁴¹ Gomes and Möstl (n 133) 31.

¹⁴² European Union Agency for Fundamental Rights (n 121) 5.

¹⁴³ *Ibid.*, 12.

¹⁴⁴ ‘Goal 11’ (*United Nations Department of Economic and Social Affairs*) <<https://sdgs.un.org/goals/goal11>> accessed 10 July 2022.

¹⁴⁵ European Union Agency for Fundamental Rights (n 121) 11.

¹⁴⁶ Joanna Fomina, *Local Authorities’ Migrant Integration Guide* (Office for Democratic Institutions and Human Rights 2018).

Rights Cities therefore appears to relate more to anti-discrimination policies than to integration policies. In a recently-held ICCAR Congress titled “What makes a Welcoming City for Migrants”, speakers stressed that the main barriers to migrant inclusion were fear, ignorance and stereotypes towards newcomers, as well as non-participation in the civic space, local decision-making and in social life¹⁴⁷. While cities can certainly do a lot to remove these barriers, it doesn’t say much about what is expected from migrants in terms of *efforts to integrate*. The question of language, at any rate, is entirely absent from the discussion.

The next and final section of this thesis will attempt to fill this gap. If we accept that linguistic integration is necessary to promote social cohesion, and that civic integration requirements imposed by the national level pose a significant risk of discrimination and constitute a hidden migration management tool, and if we accept that local governments are in a better position to facilitate integration through tailor-made policies, then the question remains: what can cities do concretely to promote the linguistic integration of migrants? Using three Human Rights Cities as case studies, the following section will attempt to answer that question by looking at the policies and initiatives being implemented in those cities.

3.3 CASE STUDY ANALYSIS

The three Human Rights Cities that were selected to illustrate the role of local governments in promoting a HRBA to integration are the city of Graz (Austria), the city of Lund (Sweden) and the city of Utrecht (the Netherlands). In addition to being very active in the Human Rights City network and embracing their human rights commitment and identity, these three cities share some similarities in their demographic: without being capital cities, they are all host to major universities with an important student population. The presence of academia also means that a lot of research has been done locally on the city itself and its role as Human Rights City, which is a considerable added-value for this thesis. At the same time, these cities all operate within significantly different national contexts in terms of integration strategies and linguistic requirements.

¹⁴⁷ ‘Transforming cities into welcoming spaces for migrants’ (UNESCO 21 December 2021) <<https://en.unesco.org/news/transforming-cities-welcoming-spaces-migrants>> accessed 10 July 2022.

Before we start, two important caveats about the methodology. The first is that what follows is not a comparative analysis between the three selected cities. While some observations may be reached from their similarities and differences, the objective is to analyse each city successively and to present the initiatives and policies that they implement in their respective local context. Because the local context is inevitably determined and influenced by the wider national context, each analysis will start with a brief overview of the national integration strategies, with a focus on civic integration and linguistic requirements. Where possible, reference will be made to the tools presented in section 2.2, and a table in Annex 1 will provide an overview of how these tools (and others) apply to the three selected cities. Then, for each case study, we will attempt to answer the following questions: what is the city doing in terms of integration? What sort of narrative (integration or inclusion) is reflected in local policies? What initiatives are being implemented in the field of language acquisition? What is the (perceived) importance of language acquisition in the integration process? To answer these questions, interviews were conducted with members of the city administration in Graz and Lund¹⁴⁸, as well as with a board member of the Human Rights City network. The interview template used as basis to guide the discussion is provided in Annex 2. The information collected is complemented by online resources from each city administration, such as activity reports, action plans, and more.

The second caveat is that the following analysis will not measure the effectiveness of cities' linguistic integration policies. This would require looking at the issue of language acquisition from the perspective of immigrants – language learners – themselves, and answering the question: how are different linguistic integration policies translated in the effective language acquisition of newcomers?¹⁴⁹ While interesting, this falls beyond the scope of this thesis. Instead, by describing existing policies and their objectives, the following analysis will attempt to identify best practices in the field of linguistic integration. What constitutes “best practice” will depend on the extent to which policies are in line with a HRBA as defined by Murphy, Gilmartin and Caulfield (see section 2.3), rather than the extent to which they reach their objective (effectiveness).

¹⁴⁸ Unfortunately, I was unable to secure an interview with a representative of the city of Utrecht. However, I found that this did not hinder the research process as the website of the city is very comprehensive and the university in Utrecht is very active in research projects and reports on the role of the city, especially in the field of migrant integration. See for instance the research project “Cities of Refuge” led by Barbara Oomen.

¹⁴⁹ see Gomes and Möstl (n 133) 35 for thorough guidelines to measure impact and monitoring progress of policies at the local level.

3.3.1 GRAZ, AUSTRIA

Austria's linguistic integration policies are regulated under the Integration Agreement (*Integrationsvereinbarung*), first launched in 2003, reformulated in 2012 and again in 2017¹⁵⁰. This Agreement introduces a mandatory German Integration Course (*Deutsch Integrations-Kurs*) for third-country nationals, which must be completed within a period of two years following the issuance of a residence permit¹⁵¹. According to the Federal Government's official website on migration to Austria, "the Integration Agreement serves to integrate third-country nationals who are legally settled in Austria¹⁵² and aims at the acquisition of advanced German language skills and knowledge of the democratic system and the fundamental principles derivable from it"¹⁵³. In practice, the Integration Agreement requires 300 hours of attendance of a German course, or a document proving a proficiency in German equivalent to A2 level of the CEFR ("Module 1"¹⁵⁴). To obtain a long-term residence permit or citizenship, applicants must go on to complete Module 2 of the Integration Agreement, which is equivalent to B1 level of the CEFR. The implementation of the Integration Agreement falls under the responsibility of the Austrian Integration Fund or ÖIF (*Österreichischer Integrations Fonds*). With offices all over the country, the ÖIF organises the standardised German tests and issues the certificates of completion that determine the formal fulfilment of the Integration Agreement.

However, in some cases, language requirements start *before* entering Austria, as some residence permits require a basic command of German (equivalent to A1 level of the CEFR) upon application. As stated on the interagency platform of the Austrian government: "Since first applications for residence permits must normally be submitted before entering Austria,

¹⁵⁰ While this thesis limits itself to presenting the current linguistic requirements in place, a comprehensive overview of the historical evolution of the debate on naturalisation policy and citizenship testing in Austria is provided by Bernhard Perchinig, 'All You Need to Know to Become an Austrian: Naturalisation Policy and Citizenship Testing in Austria' in Eva Ersboll, Dora Kostakopoulou, Ricky van Oers (eds), *A re-definition of belonging? Language and integration tests in Europe* (Martinus Nijhoff 2010). See also Mi-Cha Flubacher, 'The 'politics of speed' and language integration policies: on recent developments in Austria' (2021) *International Journal of Bilingual Education and Bilingualism* 1 for an evolution of the political climate and coalitions that led to the increasing focus on linguistic requirements in integration policies.

¹⁵¹ Underage minors (14 years old or less), persons in "bad health condition", and persons who do not intend to remain in Austria more than one year are exempt from having to complete the course. 'Integration Agreement' (*Austrian Federal Government official website on migration in Austria*) <<https://www.migration.gv.at/en/living-and-working-in-austria/integration-and-citizenship/integration-agreement/>> accessed 10 July 2022.

¹⁵² The Integration Agreement does not apply to asylum-seekers or individuals entitled to subsidiary protection.

¹⁵³ Integration Agreement (n 151).

¹⁵⁴ Module 1 is required for the following residence permits: Red-White-Red Card, Red-White-Red Card plus, Settlement Permit, Settlement Permit except Gainful Employment, Settlement Permit – Special Cases of Dependent Gainful Occupation, Settlement Permit – Artists, Settlement Permit – Dependent, Family Member.

knowledge of German must in principle also be proven *before immigration*¹⁵⁵. For two years (2017 to 2019), this could be done by obtaining a language diploma from a recognised institution abroad (for instance a Goethe Institute), but following another legal amendment of the Integration Act in 2019, the ÖIF now has a monopoly on the issuance of language tests and certification of language testing institutions. According to Flubacher, “while other European nation states had formulated similar aims for the ‘integration’ of their migrant population, Austria was the first to ask for the CEFR A1-level of German in a legally binding manner”¹⁵⁶.

In their analysis of the linguistic integration of migrants in Austria, Wodak and Boukala place the Integration Agreement against the backdrop of the political context at the time, and the important campaigning by the right-wing populist Freedom Party (FPÖ) explicitly against immigration, “emphasizing time and again, over many years, that Austria is not a ‘country of immigration’”¹⁵⁷. Targeting predominantly the Turkish and Muslim minorities living in Austria, this campaign highlighted proficiency in the German language as *the* necessary condition for immigration and integration, as shown by political slogans and posters with the words “*Deutsch statt ‘nix versteh’n*”¹⁵⁸. As summarised by Flubacher, from the perspective of sociolinguists, the acceleration of language integration policies and heightened demands of migrants in terms of language learning “shows how *assimilationist monolingualism* is enforced”¹⁵⁹. In turn, Wodak and Boukala conclude their analysis with the following paragraph, worth reproducing in full:

“Both residence and citizenship legislation have become much more restrictive in recent years, albeit reframed in a more positive achievement-oriented, neo-liberal way: language proficiency is now defined as a goal which every individual is able to achieve if they only try hard enough; the positive Austrian national identity is emphasized – integration thus implies being ‘proud of being Austrian’. Here, the Austrian identity is imagined as homogeneous, stable, and positive, defined primarily culturally and economically, something which a migrant could easily adopt and wear, like a coat: Austrian identity is thus essentialized; language proficiency has been clearly attributed the status of a powerful gatekeeper, along with other factors such as education, money, profession and age.”¹⁶⁰

¹⁵⁵ ‘Proof of knowledge of German (‘German before immigration’)’ (*Austrian Federal Ministry of the Interior* 10 February 2022) <https://www.oesterreich.gv.at/en/themen/leben_in_oesterreich/aufenthalt/3/Seite.120260.html> accessed 10 July 2022.

¹⁵⁶ Flubacher (n 150).

¹⁵⁷ Wodak and Boukala (n 47) 263.

¹⁵⁸ Translation: “German instead of ‘no understanding’”. Ibid.

¹⁵⁹ Flubacher (n 150).

¹⁶⁰ Wodak and Boukala (n 47) 266.

Referring back to the two tools developed separately by Goodman and Ganty to measure national integration strategies in the EU, Austria ranks among the countries where linguistic barriers to integration are relatively high, and it is also one of the countries where civic requirements have become stronger in recent years. Goodman gives Austria a CIVIX score of 4 (out of 6), calculated with the following point attribution system¹⁶¹:

Gate 1: Entry

- Language requirement before entry? **NO (+0 points)**

Gate 2: Settlement

- Language course? **YES (+1 point)**
 - o Language level required > A1? **YES (+0.5 points)**
 - o Test fee? **YES (+0.5 points)**
- Additional integration requirement? **YES (complementary language test: +0.5 points)**
- Requirements extended to family (for family reunification)? **YES (+0.5 points)**

Gate 3: Citizenship

- Additional language test? **YES (+1 point)**
- Ceremony or oral oath? **NO (+0 points)**

Total points (CIVIX score): 4

She also notes that Austria's CIVIX score was only of 0.5 in 1997, indicating a very significant move toward increasing mandatory civic requirements. Finally, she categorizes Austria as having a *prohibitive citizenship strategy*, indicating that the high barriers to integration are based on a tradition of nationhood and exclusive identity.

Ganty's analysis is only illustrated by the Belgian and Dutch systems, so it does not categorize all EU Member States under each model. However, she includes a flow chart (see Annex 3) with questions that can guide the application of the four models to other Member States. Applied to the case of Austria, the logic is as follows¹⁶²:

¹⁶¹ Based on data from 2009. For instance, Goodman indicates a test fee of 350€, but the ÖIF website mentions that since 2011 the test fee is 130€ per attempt. It is not clear whether Goodman's analysis includes other costs.

¹⁶² Adaptation of the flowchart developed by Ganty (n 16) 20, reproduced in its original version in Annex 1 of this thesis. This analysis is limited to the *linguistic* requirements for integration, and does not look into the wider integration policies. It is possible that when analyzed in its entirety, the integration policies of a Member State would fall into a different category.

(1) *Is the integration condition or obligation mainly symbolic and practically easy to comply with?*

→ Considering the mandatory German test to be completed within two years, the level required (A2) and the associated fee (130 € per attempt), the answer is **No**.

(2) *Does the integration condition or obligation consider the added value (mainly economic) that the non-national brought or will bring to the host society?*

→ Certain categories of migrants are exempted from completing the Integration Agreement: university researchers (holders of a “Settlement Permit – Researcher”), individuals who can prove a school-leaving certificate with general eligibility for admission to university, and artists who wish to pursue a career in certain artistic categories (specified in §2 of the *Kunstförderungsgesetz*). In addition, obtaining a work permit in the form of a “Red-White-Red” card (*Rott-Weiss-Rott*, referring to the colors of the Austrian flag), is considered equivalent to having completed Module 1 of the Integration Agreement. The Red-White-Red card can be issued to highly qualified migrants, skilled migrants in scarce occupations, and foreign graduates. Wodak & Boukala’s analysis also highlights the existence of a categorization of migrants in Austria, differentiating between those who are welcome (highly qualified achievers) and those who are not welcome (neither educated nor qualified). Based on these elements, the answer to the second question is **Yes**.

The flowchart stops here with the categorization of Austria in the *meritocratic model*.

Finally, one last integration measuring tools that is useful to help situate Austria’s strategy on linguistic requirements for immigrants is the Migrant Policy Integration Index (MIPEX). Though it does not measure civic or linguistic requirements individually, it provides a comprehensive overview of the integration policies put in place by governments¹⁶³, and can therefore serve as an indication of how strong barriers to integration are in each country. In 2019¹⁶⁴, Austria received a score of 46 out of 100 (100 being the highest score, indicating a favourable attitude to immigrant integration). This score indicates that Austria is “halfway favourable” to immigrant integration, and that integration is “temporary”. The exact definition of this category is as follows: “these countries go only halfway towards granting immigrants with basic rights and equal opportunities. Furthermore, they do not provide immigrants with a secure future in the country. Policies in these countries encourage the public to see immigrants as foreigners and not fully as equals and neighbours”¹⁶⁵.

¹⁶³ The MIPEX measures policies in the field of labor market mobility, education, family reunion, access to nationality, political participation, health, permanent residence, and anti-discrimination.

¹⁶⁴ Latest available data.

¹⁶⁵ Giacomo Solano and Thomas Huddleston, *Migrant Integration Policy Index 2020* <<https://www.mipex.eu/key-findings>> accessed 10 July 2022.

It is in this national context that the city of Graz evolves. As the first Human Rights City in Europe (obtaining this status in 2001)¹⁶⁶, Graz has a long-standing tradition of human rights-based policies and initiatives. This tradition is institutionalized in the form of a Human Rights Advisory Board (*Menschenrechtsbeirat*), which monitors the human rights situation in the city, outlines existing problems and good practice, advises the City Council on potential solutions, and assesses the implementation of past recommendations¹⁶⁷. Every year, their findings are compiled in a Human Rights report, produced in cooperation with the University's European Training and Research Centre on Human Rights and Democracy (UNI-ETC). With a rapidly growing population, the city of Graz is home to around 160 different nationalities, with nearly one-fourth of residents having a nationality other than Austrian¹⁶⁸. Since 2005, the City Council has an assigned Integration Office (*Abteilung für Bildung und Integration*), whose annual budget has been steadily increasing¹⁶⁹. The Integration Office is responsible for the implementation of the city's Integration Strategy (2015), which aims to “promote the cultural and social diversity of the city”. The city of Graz “recognizes integration as a cross-sectional task”, and the Integration Office therefore “serves as the interdepartmental coordination unit for the topics of integration and inclusion”¹⁷⁰. The term ‘integration’ is clearly dominant in the city discourse, who defines it as “the development of a living and working society involving people who for various reasons were excluded from it and put together in special groups”¹⁷¹. With this definition, the city places a strong emphasis on the role of society rather than on the responsibility of individuals to “fit in”.

With regards to linguistic integration specifically, the Integration Office has different initiatives that promote German among the immigrant population. The most comprehensive is **STARTPUNKT DEUTSCH**, a platform and contact point launched by the city of Graz in cooperation with the ÖIF and the state of Styria. Conceived as a ‘one-stop shop’ for German language courses, this service offers individual counselling and placement interviews to

¹⁶⁶ Two other Austrian cities, Salzburg and Vienna, have since joined the network (in 2008 and 2014 respectively).

¹⁶⁷ European Union Agency for Fundamental Rights (n 121) 22.

¹⁶⁸ Wurzer (n 20) 59.

¹⁶⁹ Ibid.

¹⁷⁰ City of Graz, ‘New in Graz: A User Manual for Newcomers’ <https://www.graz.at/cms/dokumente/10312509_7745490/e133383d/EN_Neu_in_Graz_07-2019.pdf> accessed 10 July 2022, 74.

¹⁷¹ Anna Eichinger and Thomas Grosz-Rauchenberger, ‘Integration mit | wir | kung – Integrationsstrategie der Stadt Graz 2015-2020’ (City of Graz) <https://www.graz.at/cms/dokumente/10261233/178772fb/Integrationsstrategie_web.pdf> accessed 10 July 2022, 4.

support migrants in finding a German course that fits their language level, learning needs, budget, and schedule¹⁷². With this service, the Integration Office fills the gap between immigrants’ initial language level and starting point, on the one hand, and the national language requirement and the obligation to pass an ÖIF language test, on the other hand. The Integration Agreement imposes a test but not a course – though the ÖIF also offers courses – so individuals can acquire the required German level in different ways. STARTPUNKT DEUTSCH gives migrants an overview of the different courses available to them and offered by various associations and NGOs in Graz, to help them meet the language requirements as efficiently as possible. Aside from this platform, which is only targeted at adults, the Integration Office also has projects aimed to promote German among migrant children. The **Word.PLAY.Space project** (*Wort.SPIEL.Raum*) offers language courses for elementary school children in the form of play, in order to “give children natural access to language”¹⁷³. In addition, **summer courses** are also offered that combine language with sport and other outdoor activities. These courses are intended mainly for children transitioning from kindergarten to primary school, to make them “linguistically fit”¹⁷⁴ before the start of the school year. Finally, the city also makes language learning material available on their website¹⁷⁵ as well as in the **New in Graz welcome pack** (*Neu in Graz*), which is distributed to every new Graz resident. It might be worth noting that aside from the New in Graz brochure that is available in English as well as many other languages (the languages mainly spoken among the immigrant population in Graz¹⁷⁶), the website of the City of Graz, including the pages of the Integration Office, exists only in German. When clicking on the “EN” language icon in the top right corner of the page, the following message appears: “Use Google to translate the site. We assume no responsibility for the accuracy of the translation”.

One key task of the Integration Office is to act as “interface between the city administration and the committed organizations, NGOs, interest groups, initiatives as well as all interested

¹⁷² The consultations cover the following questions: “how and where can I learn German? How will my language level be assessed? Who offers German courses? What are the costs? How can my costs be funded?”

¹⁷³ ‘Sprachförderungen und Deutsch lernen’ (*Stadt Graz*) <https://www.graz.at/cms/beitrag/10239183/7745490/Sprachfoerderungen_und_Deutsch_lernen.html> accessed 10 July 2022.

¹⁷⁴ Ibid.

¹⁷⁵ ‘Neu in Graz – Deutsch-Lernmaterial mit Graz-Bezug’ (*Stadt Graz*) <https://www.graz.at/cms/beitrag/10349173/7745490/Neu_in_Graz_Deutsch_Lernmaterial_mit.html> accessed 10 July 2022.

¹⁷⁶ The brochure is available in Arabic, BKS (Bosnian/Croatian/Serbian), Farsi, French, Romanian, Russian, Turkish and Hungarian.

Graz citizens”¹⁷⁷. The Office is very active in supporting and funding NGOs that promote language learning in different settings and for different categories of migrants. As reported by Maria Martinovic from the Integration Office, this action is necessary to support groups of people that fall outside state legislation with regards to language¹⁷⁸, such as children (such as through the initiatives outlined above), or refugees and asylum-seekers. Some NGOs also target specifically categories of people that would otherwise not have access to regular ÖIF German courses, because of financial or time constraints. For instance, one of the projects supported by the city of Graz is **Deutsch Um Drei**, organized by the NGO Deutsch&Mehr. This project is a free language café for women that includes a day-care for children, while the women hold conversations in German on everyday topics in a relaxed atmosphere. The city also supports projects that combine language learning with other integration components. For instance, the NGO OMEGA’s **Portobella project**, funded by the city of Graz and the state of Styria, offers various services for migrant women, including German language learning, psychosocial support, IT training, and job search advice. Another such project is **LeO – Learning and orientation for parents in school** (*Lernen und Orientierung für Eltern in der Schule*), which aims to help parents and legal guardians with a first language other than German navigate the school system. It aims to promote language skills of parents and children, strengthen interaction with the school, and increase parents’ knowledge of the Austrian education system. Overall, the city of Graz comprises many NGOs and language institutes that provide a wide range of different services. For instance, ISOP offers language courses and translation services specifically for asylum-seekers in order to facilitate their integration processes, or Caritas Academy which offers courses from levels A1 to C1 so that foreigners may continue their language acquisition well beyond the officially required levels.

By acting as link between migrants and these organizations, the city of Graz is both fulfilling its duty in terms of helping migrants successfully pass the language test imposed by the Integration Agreement, and going one step further by encouraging social integration and active participation beyond the obtention of a residence permit. Indeed, aside from language learning projects, the Integration Office supports a variety of projects that promote anti-discrimination, intercultural dialogue, psychosocial support and social cohesion at the local level. One key institution in this regard is the Migrants’ Council (*MigrantInnenbeirat*), set up by the city to

¹⁷⁷ City of Graz (n 170) 74.

¹⁷⁸ Interview with Maria Martinovic, Integration Office of the City of Graz (Graz, Austria, 24 May 2022).

serve as a platform for political participation of immigrants in Graz. This Council “concentrates on general issues that affect the whole migrant community”¹⁷⁹ and advises local politicians and municipal administration on how to improve the overall situation of migrants within the city. Finally, when it comes to language specifically, it is worth noting that the city is not just focused on linguistic integration and the promotion of the German language among the migrant population of Graz, but it also makes a point to promote linguistic diversity. For instance, in celebration of the 20 years anniversary of Graz as a Human Rights City, the Integration Office organised the Graz Language Festival (*Grazer Sprachenfest*) where different languages were on display. As stated by Martinovic, “We want to support the German language but we do not forget the heritage or mother tongues. We appreciate all languages very much”¹⁸⁰.

3.3.2 LUND, SWEDEN

Sweden, like most of its Scandinavian neighbours, is often praised for its openness, quality of life and level of development. The same goes for its integration policy: as explained by Borevi in her chapter *Understanding Swedish Multiculturalism*, “Sweden is often portrayed as one of the most prominent representatives of an officially declared multicultural policy”¹⁸¹. At the same time, multicultural policies have also raised a number of criticisms because while they have focused on granting equal rights to immigrants and minorities, they have failed to prevent the creation of “parallel societies”¹⁸². Solano, Doctor in Sociology from Lund University, concludes: “The one-way ‘dialogue’ of multiculturalism policies, in defining and addressing the needs of immigrants and refugees from the top down, has generally excluded the role of Swedish society at large”¹⁸³.

Nevertheless, this has not stopped the Council of Europe from calling Swedish integration policy a “promising practice”, seeing as it does not introduce any mandatory civic requirements for third-country nationals, even for long-term residence. There is an “establishment programme”, organised by the Swedish Public Employment Service (*Arbetsförmedlingen*),

¹⁷⁹ ‘Neu in Graz’ brochure (n 175) 76.

¹⁸⁰ Maria Martinovic (n 178).

¹⁸¹ Karin Borevi, ‘Understanding Swedish Multiculturalism’ in Peter Kivisto and Östen Wahlбек (eds), *Debating Multiculturalism in the Nordic Welfare States*, Palgrave Politics of Identity and Citizenship Series (Palgrave Macmillan 2013).

¹⁸² For a full overview of Swedish multiculturalist policy, see Borevi (ibid).

¹⁸³ Priscilla Solano, ‘Integration in Sweden’ (2020) IM Swedish Development Partner <<https://www.imsweden.org/app/uploads/2020/09/integration-in-sweden.pdf>> accessed 10 July 2022.

which offers free activities and support for newly arrived migrants, to make them “self-sufficient as quickly as possible”¹⁸⁴. This programme is mainly focused on facilitating access and integration to the labour market, and contains skill-building courses, work experience placements, guidance for entrepreneurs, and accreditation of previous knowledge and experience. Migrants can take part in this programme on a voluntary basis, though they are strongly encouraged to follow through with their “personal integration plan”. The integration programme becomes mandatory only in order to have access to economic support and benefits from the State. The Council of Europe concludes its analysis of Swedish integration policy with the following: “it aims at creating equal rights, obligations and opportunities for all, by empowering migrants through different incentives to make the right choices, taking into account the needs and abilities of migrants, and providing adequate state support”¹⁸⁵.

The same holds true with regards to language training, which is considered a key component of integration into Swedish society, though here too the focus is mainly on labour market integration. Swedish language acquisition is organised under the course “Swedish for immigrants” or SFI (*Svenska för invandrare*)¹⁸⁶, a nation-wide free language course available to all newcomers to Sweden¹⁸⁷. The course is organised at four different levels, and can be adapted to fit different schedules. The official information website for Sweden explains: “Once you have been granted a residence permit it is important that you learn Swedish as quickly as possible (...) for you to be able to become established quickly in the community”¹⁸⁸. The course is funded by the national government but its implementation is entrusted to municipalities, who all have the obligation to offer SFI lessons at their level. In 2018, the city of Malmö also developed a free digital course called *Hejsvenska* (“Hi Swedish”) that is now used nationwide. Many tools and resources are also available for download on the official information website for Sweden (informationsverige.se). In their analysis of the role of language in Sweden’s

¹⁸⁴ ‘The establishment programme’ (*Arbetsförmedlingen – Swedish Public Employment Service*) <<https://arbetsformedlingen.se/other-languages/english-engelska/extra-stod/stod-a-o/etableringsprogrammet#:~:text=The%20establishment%20programme%20is%20a,sufficient%20as%20quickly%20as%20possible>> accessed 10 July 2022.

¹⁸⁵ Carrera and Vankova (n 98) 41.

¹⁸⁶ For a comprehensive overview of the evolution of SFI, its content, target group, and place in Swedish integration policy, see Erica Righard, Henrik Emilsson and Klara Öberg, ‘Language Education for Asylum Seekers and Refugees in Sweden: Provision and Governance’ (2020) Governance and the Local Integration of Migrants and Europe’s Refugees (GLIMER Project), Malmö University, <https://www.glimer.eu/wp-content/uploads/2020/02/WP4-Report-Sweden_final.pdf> accessed 10 July 2022, 5-10.

¹⁸⁷ Except those who speak Norwegian or Danish as mother tongue.

¹⁸⁸ ‘Learning Swedish’ (*Informationsverige*, 3 August 2018) <<https://www.informationsverige.se/en/jag-har-fatt-uppehallstillstand/lar-dig-svenska/>> accessed 10 July 2022.

immigrant integration policy, Butenko and Chekmazov also point to the support given to children in school not only to learn Swedish but also to preserve their own language: “one of the principles when learning Swedish as a second language is multilingual help in the classroom (*Studiehandledning*), meaning not only in the development of a new language, but also the development of the mother tongue”¹⁸⁹.

Given all these elements, if we go back to Goodman and Ganty’s tools to categorize the case of Sweden, the analysis quite straightforward. Goodman gives Sweden a CIVIX score of 0.0 out of 6, based on the following criteria:

Gate 1: Entry

- Language requirement before entry? **NO (+0 points)**

Gate 2: Settlement

- Language course? **NO (+0 points)**

Gate 3: Citizenship

- Additional language test? **NO (+0 points)**
- Ceremony or oral oath? **NO (+0 points)**

Total points (CIVIX score): 0.0

She categorizes Sweden as having an *enabling* citizenship strategy, meaning that it “does not implement arduous integration requirements because [it] views mandatory integration requirements for status as counterproductive to the actual goal of obtaining status – integration”¹⁹⁰. As for Ganty, the application of her flowchart to the case of Sweden would look something like this:

(1) *Is the integration condition or obligation mainly symbolic and practically easy to comply with?*

→ As there are no obligations with regard to integration, the answer is **Yes**.

The flowchart stops here with the categorization of Sweden in the *symbolic model*. However, we could also consider the *activation model* for Sweden in light of the fact that the government “activates” migrants through financial incentives (in the form of social assistance benefits) if they complete the course and show progress in their integration.

¹⁸⁹ Vladyslav Butenko and Aleksei Chekmazov, ‘Sweden’s immigrant integration policy: the role of language’ (2020) 2020(4) *Przegląd Europejski* 136.

¹⁹⁰ Goodman (n 11) 769.

Finally, Sweden's MIPEX score of 86/100 ranks among the top three out of all 56 countries studied. This score signifies that the country "adopts a comprehensive approach to integration, which fully guarantees equal rights, opportunities and security for immigrants and citizens. Policies in these countries generally encourage the public to see immigrants as their equals, neighbours and potential citizens"¹⁹¹. Righard, Emilsson and Öberg nuance this picture by explaining that though Sweden scores high on MIPEX, at the same time it scores comparatively low when it comes to labour market integration. Unsurprisingly, Swedish is seldom spoken by immigrants before entry – unlike other languages like English, French or Spanish which have substantially more speakers outside the EU –, meaning that their learning process begins from zero. They also argue that although Sweden is a "multilingual-friendly country" on paper, in practice it is "significantly monolingual", making language acquisition a high-stake challenge¹⁹². As a result, language education has been central to integration policy since the late 1960s, even "before integration was established as a policy area itself"¹⁹³. Today, as attested by the nation-wide and comprehensive SFI program, learning Swedish remains viewed as a prerequisite for integration and participation in Swedish society. The fact that it is not mandatory *per se* does not mean that it is not important.

Municipalities play a substantial role in the implementation of SFI courses: they are responsible for organizing the courses but also for reaching out to eligible participants and motivate them to register for the course. Righard, Emilsson and Öberg report that "municipalities can offer courses "through its municipal adult education or through a subcontractor" and that "many choose to procure the service from non-municipal actors"¹⁹⁴. Regardless of how they choose to go about providing this service, in the end the content and quality of the course should be the same across the country. In addition to the responsibility of language teaching, there is a financial incentive for municipalities in the form of a flat-rate compensation for every person eligible to participate in the establishment program. While some scholars point to certain issues with SFI – for instance, important dropout rates, pressure on teachers, insufficient financing¹⁹⁵ – there seems to be a general consensus that it constitutes a promising practice, particularly because it is highly individualized and tailor-made to the needs of each individual.

¹⁹¹ Solano and Huddleston (n 165).

¹⁹² Righard, Emilsson and Öberg (n 186) 3.

¹⁹³ Ibid, 4.

¹⁹⁴ Ibid, 17.

¹⁹⁵ For an overview of the main challenges and concerns, see Milena Öbrink Hobzová, 'Development and current challenges of language courses for immigrants in Sweden' (2020) 27(1) Journal of Adult and Continuing Education 84.

With regards to language training for immigrants, the city of Lund therefore operates in a highly comprehensive and well-oiled machine. Lund municipality organizes SFI courses in two schools: Komvux Lund, which is a learning center for adults, and Hvilan SFI, which is part of the Hvilan folk high school (*folkhögskolan*). The municipality, through *Lundavälkommen*, is the first point of contact for newcomers who wish to register for the SFI course, and together they assess the background, qualifications and language level of the applicant, and establish an individualized study path. The question that remains then is, in what ways is Lund different from other Swedish municipalities who all have the same obligations with regard to SFI? Lund became a Human Rights City in 2018, making its experience in this field much shorter than the one of Graz, for instance. Based on the interview conducted with Ulrika Dagård from the office of Lund City Council, the municipality's flagship initiative has been the **Program for Social Sustainability**, launched in 2020. This program is managed by the Lund Sustainability Committee and merges two domains: human rights and public health. It is under this program that the city aims to “create equal living conditions and realize human rights for all who live and work in Lund – a Lund for all”¹⁹⁶. It covers six goal areas, linked to the 2030 Sustainable Development Goals: democracy, education, healthy habits, work and employment, housing and local environment, and equality. For each area, the city develops sub-targets and action plans that outline the activities that the city will implement.

At this stage, the program does not contain any activities that specifically target immigrant integration. However, Dagård reports that the principles of diversity and inclusion are streamlined across all municipality activities, and that a migrant-specific project could see the light in the near future. Due to the new nature of the program, as well as the wide range of areas it covers, the city does not work on all of them simultaneously but instead establishes a working plan based on priorities. Aside from SFI obligations, which are the same for all Swedish municipalities, linguistic integration has not been a priority area for the municipality because language is not a significant dividing factor within the population, or necessarily a societal issue. As confirmed in another interview with Professor Morten Kjaerum, this can be explained by the type of migration that the city of Lund receives. As a major university town in Sweden and Europe at large, as well as a host of multinational companies such as IKEA, the city attracts

¹⁹⁶ Lund Municipality, ‘Lunds kommuns program för social hållbarhet 2020-2030’ <<https://moten.lund.se/welcome-sv/namnder-styrelser/kommunstyrelsen/kommunstyrelsens-sammantrade-2020-08-12/agenda/lunds-kommuns-program-for-social-hallbarhet-2020-2030-dat-2020-06-15-slutversionpdf-41960?downloadMode=open#:~:text=Program%C3%B6r%C3%A5social%20h%C3%A5llbarhet%20g%C3%A4ller,och%20m%C3%A4nskliga%20r%C3%A4ttigheter%20med%20handlingsplan>> accessed 10 July 2020, 1.

large numbers of international students and highly qualified workers. These categories of immigrants either do not “need” to learn Swedish because they are only in the country temporarily and for a specific purpose, they study or work in an English-speaking international environment, or they have access to other language learning resources through their employer or university.

However, Dagård also mentioned that since becoming a Human Rights City, Lund has greatly increased its collaboration with civil society and other local organizations. The city plays an important role in identifying the actors with whom they share common objectives and societal challenges that they seek to address, and then connecting them with different administrations. With regards to linguistic integration, the city is a partner and supporter of **Eos Cares**, the social sustainability program of the basketball club IK Eos in Lund. Eos Cares is a centre for “integration, language training and social establishment”¹⁹⁷, “offering services, communities and meeting places for inclusion and social connection across societal groups in Lund”¹⁹⁸. In addition to sports events and social development projects, the association runs English-language activities for the international community in Lund, such as language cafés, tandem programs, etc. An interesting disclaimer can be read at the bottom of their About page on their website: “Eoscares.se is mainly in English, as this is the most inclusive language within the Lund region”¹⁹⁹. This view echoes the one expressed by Ms Dagård, that the city seems to place more emphasis on *inclusivity* – in the case of language, using English as the most widely-spoken and accessible – rather than learning the national language, Swedish. Putting this in context, the lack of local initiatives in this respect could be explained by the absence of mandatory language requirements at the national level, or by the fact that Swedish-language programs are already so well institutionalized by the national level with clear objectives, guidelines and resources for implementation at the local level.

¹⁹⁷ ‘EOS Cares’ (*EOS Lund*) <<https://www.eoslund.se/eos-cares-2/eos-cares-1>> accessed 10 July 2022.

¹⁹⁸ Ibid.

¹⁹⁹ Ibid.

3.3.3 UTRECHT, THE NETHERLANDS

The Netherlands is a staple case-study when discussing issues surrounding civic integration policies. As the country where the concept originated in the late 1990s, it is the most commonly studied and frequently cited case in integration literature. In the words of Ganty, the Dutch legal system “constitutes the paradigmatic and most advanced example of how integration conditions and obligations are being developed today at European level”²⁰⁰. According to Joppke, civic integration policies in the Netherlands were initially designed “as a remedy for disproportionate immigrant unemployment, school dropout rates, and residential segregation, which plagued especially Turkish and Moroccan immigrant populations”²⁰¹. In the beginning, the concern was to facilitate labour market integration rather than to preserve national identity. Today, the Dutch model emphasizes *participation in society* as the main justification for the integration program. As outlined on the governmental information website: “The Dutch government wants everyone who lives in the Netherlands to be able to participate in Dutch society. This means knowing about Dutch culture, speaking the Dutch language and being able to work or study independently”²⁰².

Civic integration (*inburgering*, literally “becoming a citizen”) is enshrined in the Dutch Newcomer Integration Law of 1998 (*Wet Inburgering Nieuwkomers*). Under this law, third-country nationals migrating to the Netherlands must pass a civics and language examination (level A2 of CEFR) within three years after arrival in the country. To do so, they follow a course, via an accredited school or independently (under certain conditions, completing 600 hours of the course can serve as basis for exemption from passing the test). The obligation to complete the course and pass the exam does not apply to all categories of immigrants²⁰³, whom the Dutch migration law firm Everaert Advocaten summarizes as: “highly skilled migrants,

²⁰⁰ Ganty (n 16) 7.

²⁰¹ Joppke (2012) (n 14) 2.

²⁰² ‘Civic integration (inburgering) in the Netherlands’ (*Government of the Netherlands*) <<https://www.government.nl/topics/integration-in-the-netherlands/civic-integration-in-the-netherlands>> accessed 10 July 2022.

²⁰³ The civic integration requirement does not apply to nationals of EU countries, Liechtenstein, Norway, Iceland, Switzerland, Turkey, children under 18, people who have lived in the Netherlands for at least 8 years and were of compulsory school age during that time, people who have followed certain types of education at Dutch institutions, people who have reached retirement age, and people coming to the Netherlands temporarily for a specific purpose. Ibid.

entrepreneurs and immigrants with a residence permit based on employment”²⁰⁴. However, the civic integration exam is mandatory in all cases for the obtention of a permanent residence permit, even for the aforementioned categories. The exam assesses knowledge of the Dutch-language (writing, speaking, listening and reading comprehension), and knowledge of “Dutch society”. Until recently, the test comprised an assessment on knowledge of the Dutch labour market, but it was removed in the most recent amendment of the law in 2021.

The New Civic Integration Act, which came into force on 1 January 2022²⁰⁵, introduced a few changes to facilitate the integration process. First, the test became cheaper, costing 250€ instead of 440€²⁰⁶. Second, newcomers can now choose between three “learning routes” to provide them with more flexibility in combining integration with work or study²⁰⁷. Routes one (“language and work”) and two (“*onderwijs*”) are aimed for newcomers who work (including volunteer work) or who study at a tertiary education institution: they can do so *while* completing the course, and must achieve a B1 level (CEFR framework) in Dutch within three years. The third route (“self-reliance”) is designed for newcomers “for whom routes 1 and 2 are too difficult”²⁰⁸. They are only required to reach A1 level of proficiency. Finally, the New Act introduces a much bigger role for local levels, who are responsible for assisting newcomers in completing the integration program, including financial assistance in the form of a loan to cover the examination fee.

According to Joppke, successive revisions of the Dutch civic integration legal framework have followed “an increasingly punitive and restrictive approach”²⁰⁹, with increasingly strict and conditional civic integration requirements, such as the famous “integration from abroad” policy where the course and test must be done *before* entry in the case of family reunification. Joppke also notes that, with the non-existence of Dutch education programs abroad, “integration from abroad boils down to no integration whatsoever, making the integration test a perfect tool for

²⁰⁴ Susanne Mooij, ‘Dutch civic integration exam: what expats need to know’ (*I Am Expat*, 9 June 2015) <<https://www.iamexpat.nl/expat-info/dutch-expat-news/dutch-civic-integration-exam-what-expats-need-know>> accessed 10 July 2022.

²⁰⁵ The changes only apply for immigrants who “started integrating” after 1 January 2022. All other immigrants, who already started the process before, still fall under the previous regime.

²⁰⁶ Tariffs for non-asylum-seekers. ‘Paying for integration’ (*Dutch Ministry of Education, Culture and Sciences*) <<https://www.inburgeren.nl/en/paying-for-integration/index.jsp>> accessed 10 July 2022.

²⁰⁷ The irony of having to *combine* integration with already working or studying in the country is not lost on us.

²⁰⁸ ‘Civic integration (inburgering) in the Netherlands’ (n 202).

²⁰⁹ Joppke (2012) (n 14) 2.

preventing unwanted immigration”²¹⁰. A similar view was expressed by Human Rights Watch, who, in 2008, condemned the Netherlands “for using civic integration tests as an unjustified device of discrimination”²¹¹. The case of the Dutch civic integration policies even reached the Court of Justice of the EU, who issued a ruling on the compatibility of the Dutch civic integration exam with the Family Reunification Directive (Directive 2003/86/EC). While accepting the principle of this exam, the Court insisted that it cannot, under any circumstances, have the effect of “filtering”²¹² migrants.

It is not surprising then that the Netherlands scores poorly on Goodman’s civic integration index, with a score of 4.5 (in 2009):

Gate 1: Entry

- Language requirement before entry? **YES (+1 point)**

Gate 2: Settlement

- Language course? **YES (+1 point)**
 - o Language level required > A1? **NO (level = A1) (+0 points)**
 - o Test fee? **YES (+0.5 points)**
- Additional integration requirement? **YES (complementary language test: +0.5 points)**
- Requirements extended to family (for family reunification)? **YES (+0.5 points)**

Gate 3: Citizenship

- Complementary language test? **YES (+0.5 points)**
- Ceremony or oral oath? **YES (+0.5 points)**

Total points (CIVIX score): 4.5

Compared to her data from 1997, the Netherlands is one of the countries where civic integration requirements have increased the most between 1997 and 2009. She categorizes the Netherlands in the *conditional* integration strategy, where citizenship is rewarded by the fulfilment of “arduous”²¹³ civic requirements.

As for Ganty, it is not necessary to use her questionnaire since her description of each model is already illustrated by the case of the Netherlands. Following her analysis, the Dutch civic

²¹⁰ Christian Joppke, ‘Immigrants and Civic Integration in Western Europe’ in Keith Banting, Thomas J Courchene and F Leslie Seidle (eds), *Belonging? Diversity, Recognition and Shared Citizenship in Canada*, The Art of the State volume 3 (McGill-Queen’s University Press 2007) 15.

²¹¹ Goodman (n 11) 767.

²¹² Case C-153/14 *Minister van Buitenlandse Zaken v K and A* [2015] CJEU.

²¹³ Goodman (n 11) 766.

integration policy as described above is a clear example of the *selective model*: “the requirements are so high and the support provided by the Dutch state so limited that only a certain category of migrants (wealthy, educated, etc.) will be able to comply with the obligations or conditions required without facing undue hardship”. Ganty also refers to the high cost of these tests, the language level required, and the fact that it does not apply to OECD nationals, to illustrate the selective nature of Dutch law in this regard. Finally, the Netherlands scores 57 out of 100 on the MIPEX scale, slightly higher than Austria. This means that the country “provides immigrants with basic rights and equal opportunities, but not a secure future in the country. Policies in these countries encourage the public to see immigrants as their equals and neighbours, but also as foreigners rather than as potential citizens”²¹⁴.

With the New Civic Integration Act however, the Netherlands seems to be taking a step in the right direction. Eurocities’ *Integrating Cities Report* commends the expanded responsibility granted to Dutch municipalities in their immigrant population’s civic integration, “as opposed to the current²¹⁵ situation where the responsibility to meet integration requirements lies with migrants themselves”²¹⁶. Cities’ responsibility now includes providing guidance, offering loans and financial assistance, providing language and civic integration courses, and creating individualized integration plans. A Human Rights City since 2018, the city of Utrecht has a number of initiatives that draw on the principles of a HRBA. At the basis of its activities is a comprehensive action program “Making city together in the Utrecht way”, which encourages active participation and engagement of its residents, local businesses, and civil society²¹⁷. The same approach is applied to immigrant integration, as the city promotes “active pluralism”, in other words, “turning the negative sides of diversity into positive elements”²¹⁸.

With regards to immigrant integration, one of the city’s flagship operations was launched in 2016 under the name **Plan Einstein**. It has been identified by the European Commission “as a best practice for an innovative approach to integrating refugees”²¹⁹. Its mission is to bridge the gap between asylum-seekers in Utrecht and the rest of the population, by organizing courses,

²¹⁴ Solano and Huddleston (n 165).

²¹⁵ The report was published in 2021.

²¹⁶ Lee Gillette and Sinéad Mullins (eds), ‘Cities and migrants #4 – Implementing the Integrating Cities Charter’ (2020) Eurocities <https://integratingcities.eu/wp-content/uploads/2022/01/4th-Integrating-Cities-Report_Nov2020_FINAL-min.pdf> accessed 10 July 2022, 13.

²¹⁷ European Union Agency for Fundamental Rights (n 121) 29.

²¹⁸ ‘Utrecht Human Rights City’ (*Human Rights Cities Network*) <<https://humanrightscities.net/humanrightscity/utrecht/>> accessed 10 July 2022.

²¹⁹ Lee Gillette and Sinéad Mullins (n 216) 32.

training, activities, and space for meeting and development. These activities include language cafés and conversation tables, but they are organized with the intent to create social bonding rather than to cater to the linguistic needs of immigrants (and the project targets asylum-seekers only and not all candidates to the Dutch civic integration exam). Overall, Plan Einstein taps into identification with the city, to “see migrants as local citizens who contribute to the city’s identity and diversity”, acknowledging “that social bonding and inclusion are essential to being a welcoming city in which migrants see themselves as ‘Utrechters’”²²⁰. The city of Utrecht has also set up a one-stop-shop, the **International Welcome Centre Utrecht Region** to guide migrants navigate the Dutch system and overcome obstacles like cultural and linguistic miscommunications. In preparation of the new civic integration responsibilities granted to Dutch municipalities starting 2022, the city launched in the beginning of 2021 three pilot projects: **Het Welkom Huis**, which organizes activities and training on the different components of the civic integration exam (Dutch language, labour market, and society), among others²²¹; **Kansrijke Start**, a 10 to 12-week program for asylum-seekers who are waiting on a decision on their status and can already start preparing the *inburgering* process; and **Team Inburgering**, who act as contact points for migrants and follow them through their civic integration progress. Finally, the city of Utrecht is also host to an impressive number of human rights organizations (over 100 according to the Human Rights Utrecht website²²²), all acting under the slogan “Working together for an inclusive city”. Among those that are supported by the municipality, we can name **DigiTaalhuis** (a combination of the words “digital”, “language” and “house”), which offers computer literacy and language courses in the city library, and **De Voorkamer**, a space for cultural exchange, language cafés, food events, art exhibitions and more.

To conclude our analysis, it might be worth noting that out of the three Human Rights Cities studied, Utrecht is the only one that offers an English version of their website. However, this version is limited to some pages of the website, with information on administrative procedures for foreigners. Ironically, most of the explanation on the city’s activities and initiatives described above, including those that relate to language learning and partner organizations, is only available in Dutch.

²²⁰ Ibid, 14.

²²¹ Gemeente Utrecht, ‘Utrechtse aanpak inburgering’ (YouTube, 18 October 2021) <<https://www.youtube.com/watch?v=u483IbjPcsU>> accessed 10 July 2022.

²²² ‘Human rights organisaties Utrecht’ (Human Rights Utrecht) <<https://humanrightsutrecht.nl/aangesloten-organisaties/>> accessed 10 July 2022.

CONCLUSION

“Ik hoef u niet uit te leggen wat er allemaal niet deugt aan het huidige systeem”²²³

(Wouter Koolmees, Former Deputy Prime Minister of the Netherlands,
commenting on the new Civic Integration Act)

Integration is a long-term, multi-dimensional and two-way process, which, if successful, results in the acceptance of immigrants into their host society. Linguistic integration is no exception: language acquisition, a time-consuming and energy-intensive process (especially for adult migrants), clearly requires substantial efforts on the part of immigrants; but in return, they also need to be given the resources, the space and the support to reach the expected level of fluency. National governments play an important role in this process by formulating integration policies. The importance of language within integration policies varies greatly from country to country – for instance, whereas Sweden views language learning as an incremental, long-term process that ideally should be combined with work or education, the Austrian Integration Agreement quite literally equates integration with German language acquisition at the basic level. In any case, the debate on linguistic integration is not about whether or not migrants benefit from learning the language of the host society. Language is clearly a key component of integration and is a necessary condition to social cohesion and living together. The debate is rather about the ways in which States choose to promote language acquisition, its mandatory character, the imposition of language tests, the financial implications and time constraints of this process, the consequences of failure to meet linguistic requirements and ultimately the linkage between language competence and access to rights, services, or statuses.

First, a point of observation regarding the mandatory character of linguistic integration policies. The three Human Rights Cities studied evolve in significantly different national contexts, with governments that have attributed different priorities to linguistic integration and have adopted different strategies to promote language and achieve social cohesion. Of the three countries, only Sweden has not made language learning mandatory, and interestingly, the city of Lund stood out as the one with the least language-related initiatives at the local level. And yet, it also

²²³ Translation: “I don’t need to tell you what is wrong with the current system”. Tamar de Waal, ‘De Migrant en het Nationale Zelf’ *De Groene Amsterdammer* (Amsterdam, 11 August 2021) <<https://www.groene.nl/artikel/de-migrant-en-het-nationale-zelf>> accessed 10 July 2022.

appeared that, of the three, Sweden has the most developed and comprehensive language learning system, with a national standardised Swedish-language course and readily available resources. In light of the PACE resolution which caps the required language level at A2 (speaking and listening) and A1 (reading and writing), mandatory language requirements are actually very limited in their efficiency and how far they can go in actually promoting language learning. In contrast, the Swedish government is able to develop a course that allows migrants to reach fluency – contingent on the fact that they wish and are able to complete all levels. If linguistic integration serves any purpose at all, it is essential that language learning does not stop after the ‘necessary requirements’ have been met. It is a process that happens over years, if not a lifetime, and that happens mainly outside of the classroom. In other words, voluntary does not mean inefficient, quite the contrary. In stark opposition to Lund, the cities of Graz and Utrecht are in a position of having to actively promote language and offer tailor-made, individualised language courses to make sure that national requirements are met.

Secondly, it is the responsibility of national governments to ensure that these policies are not discriminatory, which includes applying the same legal framework to everyone, especially for language where migration status is unrelated to the degree of importance or difficulty to learn a language, as well as providing financial support where necessary to ensure similar access to language learning resources and to prevent linguistic requirements from becoming a barrier to integration. Local levels of government play an increasing role in the implementation phase of these policies, as shown in the case of Sweden who relies entirely on its municipalities to organise the SFI course, or in the case of the Netherlands with its recent amendment of the Civic Integration Act providing for greater responsibility for local governments. The analysis of the three Human Rights Cities revealed that there is quite a wide range of initiatives that local levels of government can take to promote language learning, regardless of the integration policies and strategies of the national level. These initiatives can be summarised in six best practices:

- 1) The institutionalisation of human rights policies and the mainstreaming of a human rights-based approach to integration.** The three Human Rights Cities studied all have an appointed office or department with the sole responsibility of facilitating the integration of immigrants in respect of international human rights standards. This includes the creation of ‘one-stop shops’ centralising all language and integration-related information and resources, greatly facilitating the process for immigrants. The

STARTPUNKT DEUTSCH platform, the Lundavälkommen service and the International Welcome Centre Utrecht Region are all examples of institutionalised linguistic integration services that cater to the needs of migrants.

- 2) Transparency, open communication, and popularization of integration expectations.** Directly linked to the first point, cities can play a role in play a role in *translating* integration requirements: literally, with the provision of translation services and translated content, and also in the sense of simplifying the language of integration policies, making them accessible to the general – non-native speakers – public. This starts with making the official websites of the city and municipality administrations available in English (at a minimum) and other languages (ideally). An example of good practice here is the “New in Graz” brochure, available not only in English but in other languages commonly spoken among the immigrant population in Graz. Government websites are not known for their ease of navigation: having one ‘international’ page dedicated to condensing information relevant for foreigners, like the one proposed on the website of the city of Utrecht, also constitutes good practice (the only downside being that this webpage does not include information on Dutch-language courses, which arguably is not ideal). Finally, the need for transparency also includes the publication of regular reports and statistics on immigrant integration and language-related activities – here, the example of the annual human rights report published by the city of Graz is a good illustration of this practice.
- 3) Coordination with local actors and civil society.** By far the most prominent commonality between all three Human Rights Cities, coordination with local actors is key to ensure that language learning activities and resources reach the widest possible audience. Civil society actors are embedded in local populations and have their own networks among immigrant populations. Cities can tap into those networks by supporting NGOs and institutes who organise language courses and other activities like language cafés, roundtables and support groups. This practice also encourages innovation and non-traditional language learning methods, which increases the chances of motivating the target population to learn the language at a higher level than the one required (if any), while at the same time contributing to the creation of social links and a sense of community.

- 4) Combining language acquisition with skill-building and community-enhancing activities.** Language curricula, constantly improved to fit the needs of migrants thanks to the work of linguists and education specialists, should not be abandoned altogether, but they also cannot be the only means to promote language. Local governments can play an important role in offering innovative activities that allow migrants to learn new skills *whilst* learning the language, and creating a space where people want to meet and engage. This combination, recommended in the new EU Action Plan on Integration and Inclusion, is likely to yield better results than the traditional language classroom setting, especially with an adult public, and is also much more motivating as language learning is not an objective in itself, but only a tool to reach other objectives. This approach is already favoured by many NGOs, as shown with the Portobella project in Graz, EOS Cares in Lund, or Plan Einstein and DigiTaalhuis in Utrecht. Partnering with, learning from, and supporting this type of NGOs constitutes a key good practice to promote *effective* language learning among the immigrant public.
- 5) Acknowledging linguistic diversity.** In line with the framework described by Murphy, Gilmartin and Caulfield, a HRBA to integration includes an active promotion of and respect for linguistic diversity. The importance of acknowledging diversity is confirmed by some linguists who argue against the identification of named national languages, as the existence of languages is defined by their speakers and not by countries or governments. State institutions, including cities, should aim to achieve a balance between the promotion of the official language(s) and other dominant language(s) spoken in the host society, and the recognition of linguistic diversity. These two elements are not mutually exclusive; as Joppke puts it: “on the contrary, adopting a second language is capacity-enhancing; it does not deprive individuals of anything, least of all their ‘identity’”²²⁴. The promotion of linguistic diversity came up in the analysis of both Graz, with its annual Language Festival, and Lund, with its emphasis on protecting immigrant children’s native languages in schools.
- 6) Including migrants in the integration process.** Last but certainly not least, local governments benefit from the immense opportunity of being close to their populations. This gives them the ideal setting to involve migrants in defining integration-related

²²⁴ Joppke (2012) (n 14) 4.

activities and initiatives, in order to identify those that best suit their needs. Examples of this practice can be found in the MigrantInnenbeirat in Graz or in the approach streamlined through Plan Einstein in Utrecht, which both emphasize migrant participation and offer a forum in which their voices can be heard. Instead of the semantical debate on the concepts to be used – from assimilation to integration to inclusion – effective *participation* is a powerful way of actually promoting immigrant inclusion.

These practices constitute a foundational framework derived from the practice of three European Human Rights Cities operating in three different national contexts with their own language, history, and identities. Local levels of government can draw from these practices and adapt them to their own realities in order to implement a HRBA to the linguistic integration of immigrants. Regardless of their national contexts, the role of local governments is to go further than the legal requirements and to actively engage their population, especially those that have a migrant background and are at higher risk of social exclusion and discrimination.

That being said, it is important to acknowledge the limits of the above analysis and its conclusions. First, the information on the practices of each case-study was gathered on the basis of semi-structured interviews, which means that not every activity or organisation could be accounted for. The interviews were complemented by personal online research based on the websites of the cities and municipalities as well as existing reports. Here, and quite ironically, I was limited by *my own* linguistic competences, as much of the information was not readily available in languages that I could access. Consequently, it is likely that other illustrations of best practices could be found. Secondly, the linguistic integration policies and activities described are predominantly targeted at adult publics. This is because language acquisition in children is largely done through the schooling system, and is also a process that happens much faster and with far fewer efforts. For a more comprehensive analysis, primary and secondary school language curricula could be included in order to determine how children are motivated to learn the language of the host society. Thirdly, the analysis did not distinguish between legal regimes applicable to asylum-seekers or persons seeking temporary protection, and other migrants. Though not all countries apply separate integration policies to different categories of migrants, this distinction could be relevant as asylum-seekers are often subject to fewer requirements when it comes to language acquisition, and are also more likely to benefit from financial support from the government. Finally, though the purpose of this thesis was not to

analyse the effectiveness of linguistic integration policies, my research strongly suggests that this would be a key area of further study. From a human rights and policy perspective, language is often left out of the conversation on integration policies, and is rarely measured by integration indicators. Further study of this research topic could analyse the issue from the perspective of language *learners* – i.e., immigrants themselves – in order to derive best practices in terms of *effectiveness* of linguistic integration policies as well as level of engagement of immigrants. This could in turn inform policy frameworks to foster immigrant participation in societies, and ultimately inclusion.

Finally, to go back to the semantical considerations debated in the first chapter of this thesis, no clear conclusion can be drawn regarding the ideal choice of concepts used (integration or inclusion). While Human Rights Cities tend to adopt the ‘inclusion’ discourse, in practice their structures, reports, and communication continue to use the word ‘integration’. As shown with the new EU Action Plan on Integration and Inclusion, the language of ‘inclusion’ is likely to gain popularity in future discussions on diversity management. Though this constitutes an undeniable step forward, the focus should be less on the word used and more on the meaning attached to it, and more importantly its implications for migrants and for the host society.

BIBLIOGRAPHY

- ‘About Intercultural Cities’ (*Council of Europe*) <<https://www.coe.int/en/web/interculturalcities/about>> accessed 10 July 2022
- ‘About Us’ (*Eurocities*) <<https://eurocities.eu/about-us/>> accessed 10 July 2022
- ‘Civic integration (inburgering) in the Netherlands’ (*Government of the Netherlands*) <<https://www.government.nl/topics/integration-in-the-netherlands/civic-integration-in-the-netherlands>> accessed 10 July 2022
- ‘EOS Cares’ (*EOS Lund*) <<https://www.eoslund.se/eos-cares-2/eos-cares-1>> accessed 10 July 2022
- ‘Goal 11’ (*United Nations Department of Economic and Social Affairs*) <<https://sdgs.un.org/goals/goal11>> accessed 10 July 2022
- ‘Human Rights-Based Approach’ (*European Network of National Human Rights Institutions*) <<https://ennhri.org/about-nhris/human-rights-based-approach/>> accessed 10 July 2022
- ‘Human rights organisaties Utrecht’ (*Human Rights Utrecht*) <<https://humanrightsutrecht.nl/aangesloten-organisaties/>> accessed 10 July 2022
- ‘Integration Agreement’ (*Austrian Federal Government official website on migration in Austria*) <<https://www.migration.gv.at/en/living-and-working-in-austria/integration-and-citizenship/integration-agreement/>> accessed 10 July 2022
- ‘Invandring, integration och nyanlända’ (*Lunds Kommun*) <<https://lund.se/kommun-och-politik/fakta-om-lund/invandring-integration-och-nyanlanda>> accessed 10 July 2022.

- ‘Learning Swedish’ (*Informationsverige*, 3 August 2018) <<https://www.informationsverige.se/en/jag-har-fatt-uppehallstillstand/lar-dig-svenska/>> accessed 10 July 2022
- ‘Legal migration: Attracting skills and talent to the EU’, Press release (*European Commission*, 27 April 2022) <https://ec.europa.eu/commission/presscorner/detail/en/ip_22_2654> accessed 10 July 2022
- ‘Neu in Graz – Deutsch-Lernmaterial mit Graz-Bezug’ (*Stadt Graz*) <https://www.graz.at/cms/beitrag/10349173/7745490/Neu_in_Graz_Deutsch_Lernmaterial_mit.html> accessed 10 July 2022
- ‘Paying for integration’ (*Dutch Ministry of Education, Culture and Sciences*) <<https://www.inburgeren.nl/en/paying-for-integration/index.jsp>> accessed 10 July 2022
- ‘Proof of knowledge of German (‘German before immigration’)’ (*Austrian Federal Ministry of the Interior* 10 February 2022), <https://www.oesterreich.gv.at/en/themen/leben_in_oesterreich/aufenthalt/3/Seite.120260.html> accessed 10 July 2022
- ‘Sprachförderungen und Deutsch lernen’ (*Stadt Graz*) <https://www.graz.at/cms/beitrag/10239183/7745490/Sprachfoerderungen_und_Deutsch_lernen.html> accessed 10 July 2022
- ‘The CEFR Levels’ (*Council of Europe*) <<https://www.coe.int/en/web/common-european-framework-reference-languages/level-descriptions>> accessed 10 July 2022
- ‘The establishment programme’ (*Arbetsförmedlingen – Swedish Public Employment Service*) <<https://arbetsformedlingen.se/other-languages/english-engelska/extra-stod/stod-a-etableringsprogrammet#:~:text=The%20establishment%20programme%20is%20a,sufficient%20as%20quickly%20as%20possible>> accessed 10 July 2022

—‘The EU reveals its new EU Action Plan on Integration and Inclusion (2021-2027)’ (*European Commission – European Website on Integration*, 24 November 2020) <https://ec.europa.eu/migrant-integration/news/ec-reveals-its-new-eu-action-plan-integration-and-inclusion-2021-2027_en> accessed 10 July 2022

—‘Transforming cities into welcoming spaces for migrants’ (*UNESCO* 21 December 2021) <<https://en.unesco.org/news/transforming-cities-welcoming-spaces-migrants>> accessed 10 July 2022

—‘Utrecht Human Rights City’ (*Human Rights Cities Network*) <<https://humanrightscities.net/humanrightscity/utrecht/>> accessed 10 July 2022

—‘Who we are’ (*Human Rights Cities Network*) <<https://humanrightscities.net/who-we-are/>> accessed 10 July 2022

Beacco J-C, ‘Languages and language repertoires: plurilingualism as a way of life in Europe’ (2005) Council of Europe Language Policy Division <<https://rm.coe.int/languages-and-language-repertoires-plurilingualism-as-a-way-of-life-in/16802fc1ba>> accessed 10 July 2022

Borevi K, ‘Understanding Swedish Multiculturalism’ in Peter Kivisto and Östen Wahlбек (eds), *Debating Multiculturalism in the Nordic Welfare States*, Palgrave Politics of Identity and Citizenship Series (Palgrave Macmillan 2013)

Bosswick W and F Heckmann, ‘Integration of migrants: Contribution of local and regional authorities’ (2007) European Foundation for the Improvement of Living and Working Conditions <<https://www.eurofound.europa.eu/publications/report/2006/social-policies/integration-of-migrants-contribution-of-local-and-regional-authorities>> accessed 10 July 2022

Butenko V and A Chekmazov, ‘Sweden’s immigrant integration policy: the role of language’ (2020) 2020(4) *Przegląd Europejski* 134

Carrera S and Z Vankova, *Human rights aspects of immigrant and refugee integration policies. A comparative assessment in selected Council of Europe member states*, Issue Paper (Council of Europe 2019)

City of Graz, 'New in Graz: A User Manual for Newcomers' <https://www.graz.at/cms/dokumente/10312509_7745490/e133383d/EN_Neu_in_Graz_07-2019.pdf> accessed 10 July 2022

Council of Europe, 'Forms of linguistic integration' (Council of Europe Language Policy Unit – Project LIAM) <<https://www.coe.int/en/web/lang-migrants/forms-of-linguistic-integration>> accessed 10 July 2022

de Waal T, 'De Migrant en het Nationale Zelf' *De Groene Amsterdammer* (Amsterdam, 11 August 2021) <<https://www.groene.nl/artikel/de-migrant-en-het-nationale-zelf>> accessed 10 July 2022.

Deklerck J, 'From Commitment to Responsibility for Human Rights in Cities and Regions' in Gerd Oberleitner and Klaus Starl (eds), *Human Rights Go Local Publication Series*, volume 3 (HRGL Publishing 2022)

Eichinger A and T Grosz-Rauchenberger, 'Integration mit | wir | kung – Integrationsstrategie der Stadt Graz 2015-2020' (City of Graz) <https://www.graz.at/cms/dokumente/10261233/178772fb/Integrationsstrategie_web.pdf> accessed 10 July 2022

Eurocities, 'EUROCITIES Charter on Integrating Cities', Integrating Cities <<https://integratingcities.eu/wp-content/uploads/2021/10/CharterforWebFINAL.pdf>> accessed 10 July 2022

European Union Agency for Fundamental Rights, *Human Rights Cities in the EU – A Framework for Reinforcing Rights Locally* (Publications Office of the European Union 2021)

Flubacher M-C, 'The 'politics of speed' and language integration policies: on recent developments in Austria' (2021) *International Journal of Bilingual Education and Bilingualism* 1

Fomina J, *Local Authorities' Migrant Integration Guide* (Office for Democratic Institutions and Human Rights 2018)

Ganty S, *L'intégration des citoyens européens et des ressortissants de pays tiers en droit de l'Union européenne. Critique d'une intégration choisie* (Bruylant 2021)

Ganty S, 'Integration duties in the European Union: Four models' (2022) 28(6) *Maastricht Journal of European and Comparative Law* 784

García O, 'Problematizing linguistic integration of migrants: the role of translanguaging and language teachers' in Jean-Claude Beacco et al (eds), *The Linguistic Integration of Adult Migrants* (De Gruyter 2017)

Gemeente Utrecht, 'Utrechtse aanpak inburgering' (*YouTube*, 18 October 2021) <<https://www.youtube.com/watch?v=u483IbjPcsU>> accessed 10 July 2022

Gillette L and S Mullins (eds), 'Cities and migrants #4 – Implementing the Integrating Cities Charter' (2020) Eurocities <https://integratingcities.eu/wp-content/uploads/2022/01/4th-Integrating-Cities-Report_Nov2020_FINAL-min.pdf> accessed 10 July 2022

Gomes K and M Möstl, 'Implementing Human Rights and the 2030 Agenda for Sustainable Development at the Local Level: Key Issues and Examples' in Gerd Oberleitner and Klaus Starl (eds), *Human Rights Go Local Publication Series*, volume 1 (HRLG Publishing 2020)

Goodman S, 'Integration Requirements for Integration's Sake? Identifying, Categorising and Comparing Civic Integration Policies' (2010) 36(5) *Journal of Ethnic and Migration Studies* 753

Heath A F and S L Schneider, 'Dimensions of Migrant Integration in Western Europe' (2021) *Frontiers in Sociology*

<<https://www.frontiersin.org/articles/10.3389/fsoc.2021.510987/full>> accessed 10 July 2022

Heckmann F and D Schnapper (eds), *The integration of immigrants in European societies*, Forum Migration series volume 7 (De Gruyter 2003)

Hobzová M O, 'Development and current challenges of language courses for immigrants in Sweden' (2020) 27(1) *Journal of Adult and Continuing Education* 84

Interview with Maria Martinovic, Integration Office of the City of Graz (Graz, Austria, 24 May 2022)

Interview with Morten Kjaerum, Director, Raoul Wallenberg Institute of Human Rights and Humanitarian Law (virtual interview, 17 June 2022)

Interview with Ulrika Dagård, Project Manager and Strategist, Lund Municipality (virtual interview, 2 June 2022)

Joppke C, 'Immigrants and Civic Integration in Western Europe' in Keith Banting, Thomas J Courchene and F Leslie Seidle (eds), *Belonging? Diversity, Recognition and Shared Citizenship in Canada*, The Art of the State volume 3 (McGill-Queen's University Press 2007)

Joppke C, 'Transformation of Immigrant Integration: Civic Integration and Antidiscrimination in the Netherlands, France, and Germany' (2007) 59(2) *World Politics* 243

Joppke C, 'The Role of the State in Cultural Integration: Trends, Challenges, and Ways Ahead' (2012) *Migration Policy Institute*
<<https://www.migrationpolicy.org/sites/default/files/publications/CivicIntegration-Joppke.pdf>> accessed 10 July 2022

Lund Municipality, 'Lunds kommuns program för social hållbarhet 2020-2030'
<<https://moten.lund.se/welcome-sv/namnder-styrelser/kommunstyrelsen/kommunstyrelsens-sammantrade-2020-08-12/agenda/lunds->

[kommuns-program-for-social-hallbarhet-2020-2030-dat-2020-06-15-slutversionpdf-41960?downloadMode=open#:~:text=Program%20f%C3%B6r%20social%20h%C3%A5llbarhet%20g%C3%A4ller,och%20m%C3%A4nskliga%20r%C3%A4ttigheter%20med%20handlingsplan](https://www.kommuns.se/program-for-social-hallbarhet-2020-2030-dat-2020-06-15-slutversionpdf-41960?downloadMode=open#:~:text=Program%20f%C3%B6r%20social%20h%C3%A5llbarhet%20g%C3%A4ller,och%20m%C3%A4nskliga%20r%C3%A4ttigheter%20med%20handlingsplan)> accessed 10 July 2020

Mattei P and M Broeks, 'From multiculturalism to civic integration: Citizenship education and integration policies in the Netherlands and England since the 2000s' (2016) 0(0) *Ethnicities* 1

McAuliffe, M and A Triandafyllidou (eds), *World Migration Report 2022* (International Organization for Migration (IOM) 2021)

Mooij S, 'Dutch civic integration exam: what expats need to know' (*I Am Expat*, 9 June 2015) <<https://www.iamexpat.nl/expat-info/dutch-expat-news/dutch-civic-integration-exam-what-expats-need-know>> accessed 10 July 2022

Murphy C, Gilmartin M and L Caulfield, 'Building and Applying a Human Rights-Based Model for Migrant Integration Policy' (2019) 11 *Journal of Human Rights Practice* 445

Penninx R, 'Integration: the Role of Communities, Institutions, and the State' (2003) Feature, *The Online Journal of the Migration Policy Institute* <<https://www.migrationpolicy.org/article/integration-role-communities-institutions-and-state>> accessed 10 July 2022

Perchinig B, 'All You Need to Know to Become an Austrian: Naturalisation Policy and Citizenship Testing in Austria' in Eva Ersboll, Dora Kostakopoulou, Ricky van Oers (eds), *A re-definition of belonging? Language and integration tests in Europe* (Martinus Nijhoff 2010)

Righard E, Emilsson H and K Öberg, 'Language Education for Asylum Seekers and Refugees in Sweden: Provision and Governance' (2020) *Governance and the Local Integration of Migrants and Europe's Refugees* (GLIMER Project), Malmö University, <https://www.glimer.eu/wp-content/uploads/2020/02/WP4-Report-Sweden_final.pdf> accessed 10 July 2022

- Schneider J and M Crul, 'New insights into assimilation and integration theory: Introduction to the special issue' (2010) 33(7) *Ethnic and Racial Studies* 1143
- Solano G and T Huddleston, *Migrant Integration Policy Index 2020* <<https://www.mipex.eu/key-findings>> accessed 10 July 2022
- Solano P, 'Integration in Sweden' (2020) IM Swedish Development Partner <<https://www.imsweden.org/app/uploads/2020/09/integration-in-sweden.pdf>> accessed 10 July 2022
- Springer C, 'Migrants connectés, integration sociale et apprentissage/certification en langues : prendre en compte la nouvelle donne numérique' in Jean-Claude Beacco et al (eds), *The Linguistic Integration of Adult Migrants* (De Gruyter 2017)
- OSCE High Commissioner on National Minorities, *The Ljubljana Guidelines on Integration of Diverse Societies & Explanatory Note* (OSCE High Commissioner on National Minorities 2012)
- Pulinx R, 'Living together in diversity – Linguistic integration in Flanders' (Council of Europe Language Policy Division) <<https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016802fc1d7>> accessed 10 July 2022
- Van Havermaet P and S Gysen, 'Language learning, teaching and assessment and the integration of adult immigrants. The importance of needs analysis' in Kris Van den Branden (eds), *Task-Based Language Education* (Cambridge University Press 2006)
- Wodak R and S Boukala, '(Supra)National Identity and Language: Rethinking National and European Migration Policies and the Linguistic Integration of Migrants' (2015) 35 *Annual Review of Applied Linguistics* 253
- Wurzer M (ed), 'Integration. Gemeinsam. Gestalten. 15 Jahre Integrationsreferat der Stadt Graz' (Stadt Graz, 2021).

ANNEXES

ANNEX 1 – CIVIC INTEGRATION POLICIES ANALYTICAL TOOLS

Case-study	CIVIX index (Goodman)	Citizenship strategy (Goodman)	Integration model (Ganty)	MIPEX
Graz (Austria)	4.0	Prohibitive	Meritocratic	46/100 (Temporary Integration – Halfway unfavorable)
Lund (Sweden)	0.0	Enabling	Symbolic Activation +	86/100 (Comprehensive Integration)
Utrecht (the Netherlands)	4.5	Conditional	Selective	57/100 (Temporary Integration – Halfway favorable)

ANNEX 2 – INTERVIEW GUIDE

Interview guide

Human Rights Cities & their HR obligations

- 1) What makes **Graz/Lund/Utrecht** a Human Rights City? What makes it different from other cities in your country?
- 2) What areas (employment, education, etc.) do you focus on the most/are you most active in? What policies are implemented by the city in the field of human rights?
- 3) How do you perceive the relation between your city and the national government?

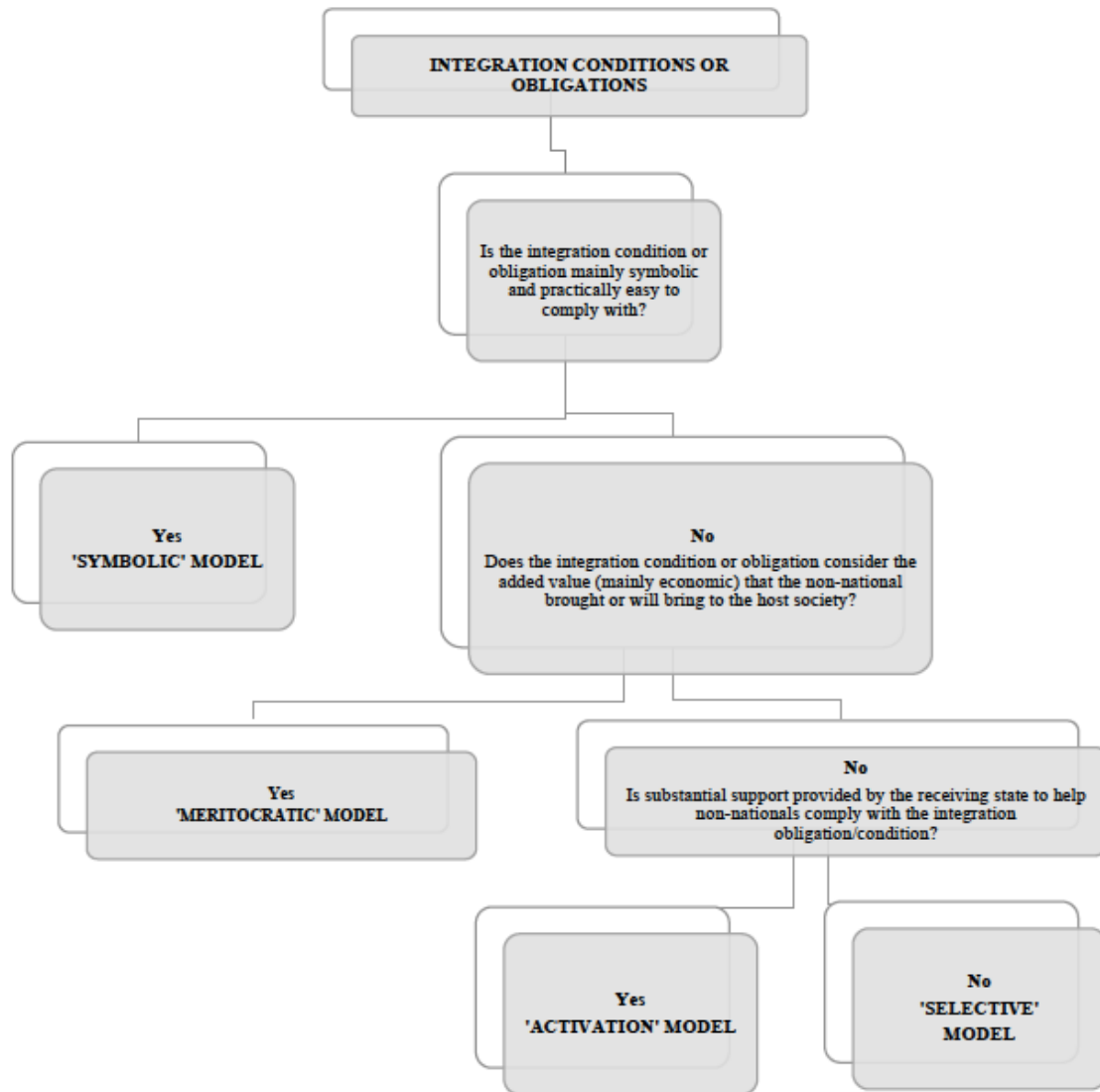
Integration policies

- 1) What kind of immigration does the city of **Graz/Lund/Utrecht** receive? How does it translate in terms of diversity?
- 2) In your opinion, what is the role of the city in the integration of migrants?
- 3) What do you consider to be “successful integration”?
- 4) Does the city have any policies/activities aimed to facilitate integration? If so, which ones?
- 5) Which dimensions of integration does the city of **Graz/Lund/Utrecht** struggle with the most? What have been the biggest challenges so far?

Linguistic integration

- 1) Do you perceive language as an important dividing factor within the population of the city?
- 2) What are the main resources available to migrants to learn the national language?
- 3) Does the city have any initiatives to promote language learning? If so, what is the motivation behind them? What are the results?
- 4) Are there any other actors involved in language learning initiatives within your city (NGOs, schools, etc.)?

ANNEX 3 – GANTY’S INTEGRATION MODELS FLOWCHART²²⁵



²²⁵ Ganty (n 16) 20.