

EUROPEAN CONFERENCE

FROM TAMPERE 20 TO TAMPERE 2.0

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Background Note: Integration

Prepared by:

Ilke Adam, Institute for European Studies, Vrije Universiteit Brussel
Daniel Thym, Research Centre Immigration and Asylum Law, University of Konstanz

Pre-Conference Version

DISCLAIMER

The draft of this note has been prepared by Ilke Adam, Associate Professor of Political Science, Institute for European Studies, Vrije Universiteit Brussel and Daniel Thym, Professor of European and International Law, Director of the Research Centre Immigration and Asylum Law, University of Konstanz. The present document is, however, the result of a process during which some changes have been made following a preparatory workshop and in liaison with the author. This means that the author might not agree with all of the suggestions proposed in this note. Final versions of all the background notes, which will take account of the input provided by the conference, will be published and widely disseminated. References to authors quoted have been reduced to a strict minimum contrary to academic rules due to a lack of space. More details will be provided in the published version of this note.



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Tampere Conclusions:

III. Fair treatment of third country nationals

18. The European Union must ensure fair treatment of third country nationals who reside legally on the territory of its Member States. A more vigorous integration policy should aim at granting them rights and obligations comparable to those of EU citizens. It should also enhance non-discrimination in economic, social and cultural life and develop measures against racism and xenophobia.

19. Building on the Commission Communication on an Action Plan against Racism, the European Council calls for the fight against racism and xenophobia to be stepped up. The Member States will draw on best practices and experiences. Co-operation with the European Monitoring Centre on Racism and Xenophobia and the Council of Europe will be further strengthened. Moreover, the Commission is invited to come forward as soon as possible with proposals implementing Article 13 of the EC Treaty on the fight against racism and xenophobia. To fight against discrimination more generally the Member States are encouraged to draw up national programmes.

21. The legal status of third country nationals should be approximated to that of Member States' nationals. A person, who has resided legally in a Member State for a period of time to be determined and who holds a long-term residence permit, should be granted in that Member State a set of uniform rights which are as near as possible to those enjoyed by EU citizens; e.g. the right to reside, receive education, and work as an employee or self-employed person, as well as the principle of non-discrimination vis-à-vis the citizens of the State of residence. The European Council endorses the objective that long-term legally resident third country nationals be offered the opportunity to obtain the nationality of the Member State in which they are resident.

I. ASSESSMENT OF THE CURRENT SITUATION:

Member States have long rejected extensive European intervention in immigrant integration policies. Instead, the Treaty of Lisbon (2009) established a power 'to encourage and support actions by the Member States', thereby excluding any direct harmonisation of national legislation (Art. 79.4 TFEU). Yet, this does not exclude the adoption of measures on different legal bases, such as social policy or directives on immigration and asylum. As a result, there are segments of a supranational legislative framework for integration complemented by soft policy instruments, which all build on the initial ambition set out at the 1999 European Council in Tampere for a 'more vigorous integration policy.' The EU approach essentially embraces four domains.

A. Rules in Immigration Directives:

The Family Reunification Directive 2003/86/EC and the Long-Term Residents Directive 2003/109 were controversially discussed during the legislative process, especially regarding the underlying integration concept. While the Commission had initially seen a strengthening of the rights of migrants as an instrument

to advance integration, Member States (MS) defended an approach wherein rights are seen as a reward for integration.

Both directives comprise what you may call ‘implicit’ and ‘express’ integration requirements for the attribution of a visa or residence permit. While the former do not use the term ‘integration’, they nevertheless rely on proxies for integration, such economic self-sufficiency, length of stay or the absence of extensive criminal convictions. Moreover, all directives guarantee equal treatment in diverse domains for those holding the status. These ‘implicit’ provisions on integration are less controversial. By contrast, ‘explicit’ rules that employ the term ‘integration’ were highly contentious during the legislative process and continue dominating many domestic and supranational debates about integration. Corresponding ‘may clauses’ were used in particular for language requirements, thereby triggering a process of policy diffusion with more and more MSs introducing express integration conditions over the past 15 years.

This policy shift has been criticised by many academics from different disciplines. The criticism mainly points to the fact that introducing integration requirements, when too strict, might foster exclusion rather than inclusion (Böcker and Strick, 2011). The Court of Justice however confirmed language requirements to be compatible with the Family Reunion Directive and the Long-Term Residents Directive in 2015, since they ‘greatly facilitate communication ... and ... encourage interaction and the development of social relations’ among nationals and third country nationals (ECJ, *K & A*, C-153/14, EU:C:2015:453, para 58; and *P & S*, C-579/13, EU:C:2015:369, paras 46-47). States are required, however, to lay down hardship clauses for those with special needs or whenever pre-departure language tests are disproportionate.

B. Funding:

Besides legislation, the EU adopted specialised funding instruments on the basis of articles 77-80 TFEU, which cover projects on immigrant integration. The original ‘European Fund for the Integration of Third Country Nationals’ (EIF) was replaced by the ‘Asylum, Migration and Integration Fund’ (AMIF) for the 2014-20 period. To our knowledge, we still lack an evaluation of AMIF-funded activities to national integration policies. An evaluation study of the EIF (Carrera & Atger, 2011) showed that Member States disproportionately emphasise linguistic training and civic orientation courses and that EU funding contributed to spreading civic integration courses.

It should be noted that AMIF decreased the budget for integration measures, although additional money is available for integration projects under other funds on different legal bases like the European Social Fund (ESF). Ongoing debates about the next multiannual financial framework (MFF) plan to deal with integration-related projects under the future ‘ESF+’ and the enhanced asylum and migration fund (COM(2018) 321).

C. Soft Policy Instruments:

To compensate for the limitation of the EU’s competence, the Commission had recourse to soft policy instruments that are meant to stimulate MSs to evaluate and rethink their integration policies. The three initiatives mentioned below are complemented by a [website](#) on European integration, statistics, handbooks, agendas and the recent Commission Action Plan (COM(2016) 377).

In a joint effort of the Council and MSs representatives, the EU established the 'Common Basic Principles for Integration' (Council doc. 14615/04 of 19.11.2004), which may be considered the 'eleven commandments' of the integration policy'. The underlying idea of integration as 'a dynamic two-way process of mutual accommodation by all immigrants and residents of Member States' has been taken up widely across Europe. It is complemented by an inspection of different policy areas including employment, education, naturalisation, political participation. It should be noted, thus, that it is not limited to language courses and civic integration.

National Contact Points on Integration (NCPI) were established from 2003 onwards with the aim of facilitating regular meetings of national representatives to identify and exchange best practices and foster mutual learning. Whilst evaluating the impact of such a policy learning tool is difficult, research suggests that there is little evidence of norm diffusion through NCPI (Mulcahy, 2011), which often concern lower ranked civil servants. However, that does not unmake the diffusion processes through other platform and activities mentioned above.

The EU contributed to the professionalisation and fine-tuning of indicators of immigrant integration (Westerveen and Adam, 2019). Eurostat's migrant integration report was complemented by the joint EU/OECD 'Settling in 2018', thereby allowing for increasingly professional measurements of ethnic and racial inequalities in Europe. Research shows that there is no straightforward link between state's investment in integration policies and integration on the ground. This is so because integration is fostered by a wide range of variables beyond explicit integration policies.

More recently, the European Commission focuses more on the need for mainstreaming of integration across all policy sectors and levels. In 2015, the Commission created an Inter-Service Group on 'Integration of Third Country Nationals', which unites relevant directorates. The need for policy coordination was also strongly highlighted in the 2016 EU Action Plan on Integration.

D. Measures beyond the Area of Freedom, Security and Justice:

Other policy measures contribute to immigrant integration beyond the legal scope of the original Tampere Conclusions and the area of freedom, security and justice.

As the EU defines integration 'as a two-way process of mutual accommodation by all immigrants and residents', anti-discrimination policies are key to integration. The Race Equality Directive 2000/43/EC set up or extended anti-discrimination laws across Europe. Research shows that the legislation is poorly implemented in many countries and that support for national equality bodies varies significantly. The Court of Justice adopted a narrow approach to the definition of race when it excluded unequal treatment on grounds of the place of birth from the scope of the Directive (*Jyske Finans*, C-668/15, EU:C:2017:278), thereby indirectly vindicating narrow domestic practices.

More relevant than the Race Equality Directive in the legal practice of the MS and the Court of Justice is the Equal Treatment Directive 2000/78/EC, which concerns different grounds of discrimination and is limited to employment and occupation. On its basis, important judgments on religion were delivered, which will be considered below.

In line with the Common Basic Principles many other policies should be considered contributing to immigrant integration. Among the areas of (limited) EU competence, activities in the field of social policy

should be mentioned as well as measures supporting economic growth, thereby facilitating labour market integration. By contrast, the EU lacks competence in many other domains, such as education or political participation, which are crucial for the success of integration and the overall assessment of state policies.

II. IDEAS AND SUGGESTIONS FOR THE FUTURE:

A holistic approach is warranted that accepts the complementary nature of the different instruments mentioned above. EU institutions could make a renewed effort to emphasise the linkage between diverse policy areas instead of speaking about explicit integration policies only. The Commission should support and supervise the application of existing rules by the Member States in line with ECJ case law and it consider how to reinvigorate debates about naturalisation. It is important to keep in mind that integration combines diverse generic policies, such as education, housing or employment, with a broader debate about the underlying vision of what constitutes an ‘integrated’ society. This input paper accepts that there are different views and presents two of them: one concentrating on factual equality by fighting institutional racism; the other highlighting multiple meanings of integration, including the search for a new sense of togetherness which connects operational policies and structural reforms.

A. Thematic Scope of Integration Policies:

In line with the Common Basic Principles (CBP), integration be understood as a two-way process of mutual accommodation with the aim of the full participation of immigrants in economic, social, cultural and political life. On that basis, any evaluation of the EU’s approach essentially depends on the thematic scope of the measures analysed. If we concentrate exclusively on express integration conditions in secondary legislation, we will find a one-sided focus on language courses and civic knowledge, which emphasises obligations of immigrants. If, by contrast, we include other policy areas mentioned in the CBP, the conclusion will be more nuanced, since the stance of both the EU and the Member States on schooling, social policy and employment often embraces equality-based elements, which accentuate obligations of and support by the host society.

Against this background, the limited EU competence under Art. 79.4 TFEU can appear in a different light, since it may reflect an approach which considers immigrant integration as an integral part of wider policies on diverse issues such as employment, social policy, education or political participation. Specific measures for immigrants are often appropriate at the early stages after entry (for instance, language courses to support the integration of refugees). In the medium and long run, it is neither desirable nor possible to disentangle the integration of immigrants from the general policy approach. Immigrant integration should, in other words, be discussed as part of other policies instead, thereby mainstreaming integration. In doing so, Member States and the EU should ask whether the immigrant experience requires a reconfiguration of existing policies to take account of the specific requirements of immigrants, for instance in schooling (SVR 2019). There are different views, however, about the direction of that institutional change (see below II.D) Many policy areas mentioned above, such as education, employment or social policy, will remain prerogatives of Member States in the foreseeable future – and may, at best, be coordinated through soft policy instruments at EU level. As a result, the current patchwork of different instruments is here to stay and the EU institutions are invited to better emphasise the linkage between policy areas in the future, thereby countering the widespread stereotype that EU integration policies are limited to the express integration conditions in secondary legislation with their focus on language requirements and civic knowledge. Unfortunately, the EU institutions have occasionally left that impression over the past years.

Initial suggestions and ideas include:

- 1. Accentuate integration as a two-way process in line with the Common Basic Principles.**
- 2. Talk less about language requirements and civic knowledge by highlighting that other policy areas such as social policy are based on active support by host states.**
- 3. Reassess mainstream policies whether they should be reconfigured to take account of new challenges and difficulties in increasingly diverse societies.**

B. Developing Existing Rules and Policies:

Research has shown that the optional clauses in the Family Reunion Directive and the Long-Term Residents Directive that allow Member States to introduce integration requirements have legitimised national policy change in that direction. The use of integration requirements has led to heated debates in political and academic circles ever since their inception. Different actors have called for either their fortification or their abolition over the past years, but the Commission has not proposed a revision of the directives. It may be a pragmatic choice that prevents heated political debates about immigrant integration, which might end up with a deadlock of the legislative process mirroring difficulties with the recent asylum package. Not to propose an amendment of the directives also prevents Member States from lowering existing standards. The Commission should, however, support and supervise the correct application of existing rules by the Member States in line with their interpretation by the ECJ. The fitness-check on legal migration and the recent implementation reports contribute to this objective (COM(2019)162 and COM(2019)161), although they remain rather abstract in their restatement of the law.

Debates about the multiannual financial framework 2020-27 show that migration will generally receive more funds (see above I.B), even though border controls and asylum policies will see a comparatively larger increase than integration. For that reason, policy actors should preserve a substantial amount of EU funding for integration within the multiannual financial framework 2020-27. In doing so, it is convincing to limit the integration component of the future migration and asylum fund to the early stages after entry for immigration-specific measures, for instance to support beneficiaries of international protection to find a job. Mid- and long-term integration will be financed as an integral part of the ESF+ in the future, in line with the objective to mainstream immigrant integration policies (see above II.A.). Within that overall context, EU institutions should ensure that Member States effectively use ESF+ funds for immigration-related project instead of channelling money into initiatives which predominantly benefit nationals.

Initial suggestions and ideas include:

- 4. The Commission should continue supporting and supervising the Member States in the correct application of existing rules as interpreted by the ECJ.***
- 5. Ensure that ESF+ money is earmarked for projects which effectively benefit immigrants within the broader context of mainstreaming integration policies.***

C. Reintegrating Nationality Law into the Policy Concept:

In a recent case, the ECJ found that naturalisation means ‘to become more deeply integrated in the society of that State’ (ECJ, *Lounes*, C-165/16, EU:C:2017:862, para 58). This statement reminds us of the significance of the acquisition of nationality for the legal dimension of integration, of which the CBPs recognised that it ‘can be an important incentive for integration’ (Principle No. 6). Against this background it is conceptually incoherent that the EU deals with immigration status, but cannot regulate nationality

laws. While it seems unrealistic to call for an EU competence for harmonisation in the foreseeable future, since that would require Treaty change (see Art. 20 TFEU), this should not prevent the EU institutions from recognising the conceptual argument that naturalisation should be considered an integral part (or rather the end-point) of immigration laws. It should be noted that doing so would be a return to the roots of EU immigration policy, reinvigorating the original impetus of the conclusions of Tampere that 'third country nationals be offered the opportunity to obtain the nationality' (para 21).

A new beginning in the EU's involvement in naturalisation could be achieved by simply re-integrating the prospect of naturalisation into policy papers, from which it seems to have mostly disappeared regarding long-term residents in recent years. It might even be appropriate to move beyond informal policy papers and to reconsider the formation of an informal coordination framework for nationality laws, possibly on an intergovernmental basis to take into account the absence of a corresponding EU competence.

Nationality law is not only about the acquisition of nationality by those who have lived legally in a country for several years. In the past years, the EU institutions have dealt with tendencies in some Member States to set up 'citizenship for sale' or 'gold passport' programmes. These measures are problematic from a normative perspective, if membership rights are monetarised, and can have political repercussions across Europe, if they grant cross-border mobility within the EU without previous residence in the Member State selling residence permits. It is significant, therefore, that the Commission in particular tries to activate indirect means to oversee these programmes (see COM(2019) 12).

Initial suggestions and ideas include:

6. Reintegrate the option of naturalisation into immigration policy and consider attempts to move towards an informal policy exchange between the Member States.

7. Continue an indirect supervision of 'citizenship for sale' programmes.

D. Integration between Non-Discrimination and Social Cohesion:

It is a regular feature of the academic literature and the political debate that different conceptions about the theoretical foundations and the practical realisation of basic policy concepts co-exist. The notion of integration is no exception. There are different strands to the academic and political debate, which become particularly relevant when we move beyond more operational policy areas, such as employment or education, towards general debates about individual and collective identities and the normative underpinnings of societal togetherness any holistic approach to integration requires.

There are two different strands to the debate: the first one focuses on integration as equality, which emphasises the structural disadvantages migrants are confronted with; the second one highlights the need for a shared feeling of togetherness in addition to equal treatment. It should be noted that they are not mutually exclusive, since they can overlap in practice. In any case, we should recognise the legitimacy of different positions with the options of manifold intermediate positions and room for compromise.

Strand 1: Fostering Equality and Fighting Racism:

The position concentrating on equality takes as a starting point the CBPs that integration is about equal participation in central societal fields (employment, housing ...). In that respect, the increasingly complex sets of indicators at the EU level mentioned above show that integration policies do not necessarily lead

to more equality on the ground, in relation to which manifold deficits persist in core areas like labour market integration or language knowledge. Against this background, the second wave of anti-racist organisations and activists goes beyond equal rights on paper and focuses on effective outcomes. Instead of 'more' of the same policies, they want to do it 'differently'. The activists of the second wave have lost hope in anti-discrimination legislation and its individualistic approach.

Instead, they want to refocus the debate to tackle 'institutional' or 'systemic' racism, which they conceive to be part of the European political culture and embedded in mainstream institutions. Similar like for gender, it is not just the explicit sexist/racist rules and practices which maintain inequalities, but the pervasion of major institutions by often subtle racial stereotypes, ideas, images, emotions and practices. Two options can be considered to tackle institutional racism. One option is a revision or further reinforcement of the EU anti-discrimination policies to support Member States in adopting strong and comprehensive policies to combat institutional racism, including a sophisticated definition of racism beyond the ECJ case law mentioned above. It should be recognised that changing legislation would require unanimity under Art. 19.1 TFEU. Another option is to invest into the implementation of current anti-discrimination legislation through the support of National Action Plans against Racism (NAPARs). As recommended by ENAR (2019: 9), these NAPARs could include sophisticated definitions of racism and discrimination beyond racist crime, recognizing structural discrimination and intersectionality; they could recognize specific forms of racism and targeted measures to address these; they could go in pair with comprehensive and quality-ensured equality data-collection; and include specific policy objectives in each societal field, accompanied by positive action plans and clear and measurable indicators of progress. The quality of these NAPARs is not only guaranteed by their content, but also by the process through which they are developed, with communities affected by racism, and that, from day one.

Moreover, several academics and certain policymakers argue that the term 'integration' should be replaced by 'equality', since the concept of integration refers to an unscathed whole and the need of keeping the whole together, while integration becomes individualised and is being turned into a property of individual people in daily practice. This would entail that less emphasis is put on individual responsibility of migrants, while the obligations of society as a whole are not usually addressed. It is also criticised that integration policies as they currently stand structurally dispense the integration of 'white citizens', thereby promoting 'white privilege'. Unlike migrants their integration is not monitored, thus fostering social hierarchies rather than equality.

Changes along these lines would not mean we have to throw out the baby with the bathwater. Even if language courses sometimes seem inefficient that does not mean they are not a good starting point. Many programs for new migrants, if not too conditioned, are also considered helpful by immigrants themselves. However, without tackling institutional racism, these policies will not lead us to equal participation for all.

Initial suggestions and ideas include:

8. Focus on effective outcomes, not only equal treatment on paper.

9. Recognise that full equality on the ground cannot be reached without addressing institutional discrimination and racism in the Member States and at Union level.

10. Take the claims of ethnic minority citizens within the European Union seriously and do not just make policies 'for' those concerned.

11. Replace 'integration' by 'equality' to undo the impression that integration is primarily about obligations of migrants and to counter underlying hierarchies of 'white privilege.'

12. Start fostering equality and non-discrimination in the European institutions' own backyard, and ensure a diverse and representative workforce. The diversity of the EU staff should not only be evaluated

and promoted regarding gender and nationality, but also regarding ethnic and racial diversity (see 'Brussels so White' campaign).

Strand 2: Multiple Meanings of 'Integration':

Another strand in the academic literature highlights the theoretical and practical open-endedness of the integration concept. Practically, it combines express and implicit rules on integration in supranational legislation as well as different policy areas beyond the area of freedom, security and justice, such as employment, education or housing. Theoretically, 'integration' would be presented as an incomplete agreement when different actors agree on the need for 'more/better' integration without sharing underlying ideas and concepts what it means and how it should be put into effect (Thym 2016).

Against this background, the second strand would complement attention to equality with an additional focus on society 'as a whole', in line with the CBPs. There is a rich academic debate about how to construe social togetherness in response to immigration, which can be popularised in line with the classic American distinction between the 'melting pot', in which different traditions and background feed into a new whole, and the 'salad bowl', which emphasises the continued diversity of migrant communities as sociocultural minorities. Corresponding academic debates revolve around notions of liberalism vs. communitarianism or different versions of multiculturalism and moderate form of republicanism in the theoretical sense. While some focus on individual freedom, equal treatment and state obligations, others concentrate on a sense of commitment towards states and societies as communal venture, which are more than the sum of the individualistic parts.

It is evident that authors subscribing to the second view would be less concerned that integration policies generally embrace elements of commitment – provided that these measures are proportionate and are complemented by other policy instruments with a more promotional character, such as education, employment or social policy. As a result, they would be less critical of EU policies, even though they might invite the EU institutions to adopt a more holistic outlook (see above II.A).

It should be noted that such an outlook should not be confused with older visions of the nation-state as a closed and culturally homogeneous club. Instead, it would underscore that European societies change in response to migration and that such change involves host societies – both in terms of adapting their self-image and by changing existing laws and institutions to take account of increasing diversity. Such reconfiguration would be directed towards a new sense of togetherness, which states can promote without guaranteeing the success of the venture. How we frame the policy debate about integration would be relevant in this context. Those concerned with a new feeling of togetherness would combine individual liberty and a rhetoric emphasis on diversity and equal treatment with the search for a new narrative for the society as a whole. These abstract debates would complement structural changes to integrate the specific experience of migrants into existing institutions.

Initial suggestions and ideas include:

13. Recognise that 'integration' can have multiple meanings and that it can be legitimate to focus on structural and discursive elements promoting a feeling of togetherness.

14. Emphasise that integration policies should be holistic instead of highlighting specific elements such as expectations towards migrants, which can be a legitimate component if they are complemented by other, promotional instruments.

15. Acknowledge that a new sense of togetherness cannot be prescribed by legislation, since it should develop from within societies with the support of state policies.

Example: Religious Symbols at the Workplace:

A classic example in which the different strands of the theoretical and political debate identified above can lead to different outcomes are religious symbols at the workplace. In two controversial recent judgments, the ECJ decided that the prohibition of indirect discrimination on grounds of religion in the Equal Treatment Directive 2000/78/EC can possibly justify a commercial policy that bans religious symbols at the workplace, especially when workers interact with customers (see ECJ, *Achbita*, C-157/15, EU:C:2017:203; and *Bougnaoui & ADDH*, C-188/15. EU:C:2017:204).

Judges did not vindicate such commercial practices unconditionally, but insisted on their neutral implementation covering all religious symbols on paper and in practice, mirroring the compromise formula enshrined in the equally controversial judgments on pre-departure language requirements as a precondition for family reunification (see above I.A). National courts were asked to check these conditions in practice. This caveat does not, however, unmake the principled consent of the Court to ban religious symbols at the workplace, which judges construed as a balancing exercise between the human right to equal treatment and the freedom to conduct a business (Art. 17 and 20 CFREU).

It is evident that the first strand of the academic literature and the political debate mentioned above would criticise these judicial findings as a continuation of structurally embedded inequality, which disproportionately affects Muslim women and can therefore be described as an expression of institutional racism and white supremacy. By contrast, some authors of the second strand discussed above would highlight that societies should develop distinct patterns of the role of religion in public life, also reflecting the diversity of corresponding models within the European Union (Art. 17 TFEU).

Moreover, the example reminds us of general features of integration policies: they are not confined to measures adopted within the area of freedom, security and justice, but include areas such as non-discrimination, employment, education, housing, social policies (see above I.D.). It is important to enhance cross-sectoral coherence among diverse domains through a holistic outlook, which is not limited to express integration conditions in immigration legislation (see above II.A.). Given that many of these policy fields are beyond the scope of the EU competences, there will continue to be differences between the Member States, which can be coordinated informally at the supranational level (see above I.C).

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