

Immigrants in Western Welfare States: A Systematic Comparison of Immigrants' Social Rights¹

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Abstract. *A sensitive issue in the politics of immigration is immigrants' access to social benefits and services. Some academics have warned that exclusion from welfare arrangements places migrants in a vulnerable and marginalized socio-economic position. Others have argued that granting immediate access can threaten the future persistence of welfare state arrangements, not only because of the financial costs such access would incur, but also because the resentment it might trigger among the native-born population about the welfare state in general and the benefits that immigrants can make use of in particular. While immigrants' place in welfare state systems is thus of large relevance to academics and policymakers alike, there have been few attempts to compare immigrants' social rights in different countries at different moments in time systematically. This paper presents the results from a comparative policy analysis that maps immigrants' access to seven different social programs, in sixteen different Western democracies, at four different points in time. The main findings are twofold. First, some countries have curtailed immigrants' access to benefits considerably over the last two decades, while other countries have moved in a more inclusionary direction. Second, and more generally, there are large differences in the extent to which different welfare states differentiate in benefit extension between immigrants and native-born citizens. These findings raise important questions about the future of social protection in an era of cross-border mobility, and enable the future investigation of the causes and consequences of different approaches to immigrants' integration in welfare state systems.*

Key terms: immigration, social policy, differentiation, welfare state

Introduction

Immigration has become one of the most polarizing issues in the politics of Western democracies. The electorate and political elite are sharply divided on the extent to which their country should open its borders to newcomers, and on the kinds of rights it should

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grant to immigrants who live on their territory. One of the most salient areas of controversy in this context regards immigrants' place in systems of redistribution. The picture of the burdensome and lazy immigrant who takes advantage of social programs has become a commonplace in anti-immigrant rhetoric, and several political parties have made restricting newcomers' welfare rights one of the spearheads of their electoral campaign.

These developments have not gone unnoticed by political scientists. There is now a large literature that investigates this issue from almost every angle. However, so far there has not been an attempt to compare the way different countries have differentiated between immigrants and native-born citizens in the extension of benefits at different moments in time. Such an investigation seems long overdue. For one, considering that immigration has been projected to increase in virtually every Western democracy (United Nations, 2016), a comprehensive overview of the level of social protection that this growing population enjoys would tell us much about the future of equality in an era of migration. Second, comparative cross-national and diachronic data would enable us to investigate the consequences of adopting one approach over another. Political disagreement on immigrants' social rights often revolve around speculations on the way inclusion or exclusion could affect immigrant integration, government expenditure, or nativist backlash. Part of the reason why such disagreement persists even in scholarly circles is that so far we have not had the data that would allow for a systematic investigation of the untested hypotheses that dominate discussion.

This paper presents the findings from an attempt to provide such data. The Immigrants' Social Rights Index maps differentiation in benefit extension across sixteen Western welfare states, at four moments in time, based on 23 indicators that span seven different social programs.² Two conclusions are particularly apparent. First, some countries have curtailed the social rights of immigrants significantly over the last few decades, while the direction of policy change has been decidedly inclusionary in others. Second, and more generally, there are large differences between welfare states, time periods, and social programs in the level of inclusion of immigrants.

This paper is structured as follows. The following section reviews existing literature on the social rights of immigrants. I then describe the methodology underpinning the Immigrants' Social Rights Index, after which the fourth section presents preliminary findings. The final section summarizes the conclusions of this paper and discusses the scope of future research that the index makes possible.

Existing literature on the social rights of immigrants

It is difficult to exaggerate the attention to welfare and redistribution in discussions about immigration. Stories that migrants burden or even abuse the welfare system are common across Western media, many immigration critics insist that the state should reduce its

² Data collection is currently in progress to expand this database to include more countries and more policy indicators. See the section 'Constructing the Immigrants' Social Rights Index' below.

spending on newcomers, and political parties frequently bring up concerns about welfare dependence in debates on immigrant integration. Unsurprisingly, therefore, the connection between immigration and welfare has received much attention in the scholarly literature. For example, several philosophers and economists have engaged in abstract discussions about the future of social rights in an era of cross-border mobility (Carens, 1988; Engelen, 2003; Hammar, 1990; Miller, 2007; Soysal, 1994). Other social scientists have probed the views on the public. A particularly common line of inquiry has been to investigate whether immigration reduces public support for redistribution (Alesina & Glaeser, 2004; Burgoon, 2011; Eger, 2010; Finseraas, 2012; Freeman, 2009; Mau & Burkhardt, 2009; Soroka, Johnston, & Banting, 2004). Related studies have paid more attention to the sentiment of 'welfare chauvinism', which holds that the benefits of the welfare system should be reserved exclusively for those who truly 'belong' to the nation (Gorodzeisky & Semyonov, 2009; Mewes & Mau, 2013; Reeskens & Van Oorschot, 2012; Van der Waal, Achterberg, Houtman, De Koster, & Manevska, 2010). And yet other scholars have analyzed the way political parties invoke and exploit this type of sentiment and discuss the connection between immigration and welfare more generally (De Koster, Achterberg, & Van der Waal, 2012; Koning, 2017; Rydgren, 2006).

This literature makes it clear that many voters, politicians, public commentators, and academics disagree about the extent to which a welfare system should be accessible to immigrants. And while the disagreement likely has its roots in contrasting normative principles, much controversy revolves around the possible consequences of different policy regimes. Some argue, for example, that a generous and inclusionary approach would stifle integration because it would encourage immigrants to become dependent on the state rather than to integrate successfully into the labour market (Koopmans, 2010; Scheffer, 2004). Others defend the polar opposite position, reasoning that inclusive approaches are likely to encourage immigrants to develop a sense of belonging and to reduce intergroup tensions with native-born citizens (Sabates-Wheeler & Feldman, 2011; Wilkinson & Craig, 2012). Equally stark is the disagreement on the likely effects of inclusionary approaches on the welfare state budget. Some argue that granting equal access to immigrants will make the welfare state financially unsustainable (Borjas, 1999; Freeman, 1986; Grubel & Grady, 2011; Sinn & Ochel, 2003). Others, however, insist they are in fact most conducive to salvaging the system because they avoid the much larger economic costs associated with excluding large groups of residents and leaving them in the margins of society (Doctors Without Borders, 2005; Kahanec, Kim, & Zimmerman, 2013).

For now, we do not seem to have the kind of data to test these claims systematically and with a high degree of external validity. Accomplishing this would require comparable information on the extent to which immigrants can access social programs in different countries and at different moments in time. Much of the available literature, however, consists of case studies, focusing on immigrants' access to one specific benefit, the social rights of one specific category of immigrants, or on one specific policy reform that had important implications for immigrants' welfare. These types of studies are too numerous to summarize comprehensively in this paper. What follows are just a few

examples that illustrate the detailed and context-specific nature of most of the research in this area. A case in point is an edited volume by Michael Fix (2009), which offers an extensive analysis of how the welfare reforms in the mid-1990s in the United States have affected immigrants. Similarly, Jørgen Goul Andersen (2007) investigated reforms in Denmark that have reduced immigrants' social assistance rights. Edward Koning and Keith Banting (2013) reviewed immigrants' access to five social programs in Canada. In a similar vein, Anna Boucher (2014) assessed the social security benefits that are available to newly arrived immigrants in Australia. Alex Boso and Mihaela Vancea (2016) discussed undocumented migrants' interactions with the health care system in Spain. Paolo Cuttita (2014) studied integration services in Italy. Stephen Drinkwater and Catherine Robinson (2013) focused on social assistance for immigrants in the United Kingdom. Ana Raquel Matias (2016) and her colleagues reviewed language training for migrants in Portugal. Magdalena Mostowska (2011) zoomed in on the provisions for homeless immigrants in Oslo and Brussels. And Regina Riphon and Christoph Wunder (2012) probed the consequences for immigrants of the mid-2000s welfare reform in Germany.

Certainly, there is research that casts a wider net and compares immigrants' access to benefits in different countries. In her classic study of the increasing rights protection of non-citizens in six countries, Yasemin Soysal (1994) included a number of social policy arrangements in her analysis. More specifically focused on social rights is an edited volume from 1998, which compares the way immigrants interact with social benefits in the United States and Germany (Kurthen, Fijalkowski, & Wagner, 1998). Diane Sainsbury has conducted foundational comparative work on Germany, Sweden, and the United States (Sainsbury, 2006), and she included France, Denmark, and the United Kingdom as well in her later investigations (Sainsbury, 2012). Similarly, Koning compared the social rights of immigrants in Canada, Sweden, and the Netherlands (Koning, 2019), and in a collaborative study compared these countries to the United Kingdom as well (Banting & Koning, 2017).

Finally, there is comparative research on immigrants' social rights with a much larger sample size, focusing on a specific type of policy arrangement or class of immigrants. Rachel Sabates-Wheeler and her colleagues (2011), for example, compare virtually all countries in the world in terms of their portability arrangements that allow migrants to bring built up social security entitlements with them when they leave a country. The European Migration Network, funded by the European Commission, issued a series of comparable case studies for each member state of the European Union on the social security and health care rights of third country nationals (EMN, 2014). Timothy Hatton (2004) has collected data on the benefit entitlements of asylum seekers in 15 West European countries. The Migrant Integration Policy Index, which describes 38 countries from 2004 to 2014, includes information on immigrants' access to active labor market policies and health care (Huddleston, Bilgili, Joki, & Vankova, 2015). And a similarly impressive dataset, the Asylum Information Database, describes the access to health care and housing benefits of which asylum seekers can avail themselves in 23 European countries (Mouzourakis, Pollet, & Ott, 2019).

All in all, the social rights of immigrants have not been ignored, and there is a large literature that provides much insight on the politics and policies that shape them. Nevertheless, the literature currently lacks information that allows for systematic comparisons across place and time with a broad scope both in terms of the programs it reviews and the countries it includes. Such information would allow us to develop more generalizable insight not only on the overall state of immigrants' social rights in Western welfare states, but also on the origins and consequences of different approaches to this pressing issue. The Immigrants' Social Rights Index aims to offer this type of information.

Constructing the Immigrants' Social Rights Index

The main goal of the Immigrants' Social Rights Index (hereafter: the index) is to provide a comparable summary indicator of the extent to which a welfare system differentiates between immigrants and native-born citizens in the extension of social rights. Following a framework developed elsewhere (Koning, 2019), it pays attention to both the criteria by which differentiation occurs (the *grounds* for differentiation) and the degree to which the differentiation benefits or disadvantages migrants compared to native-born citizens (the *level* of differentiation).

In regards to the grounds of differentiation, migrants' access to social programs and services can be different because of four reasons. First, residence status matters. In most welfare states, undocumented migrants are least protected, temporary migrants enjoy more social rights, and the benefit access of permanent migrants and naturalized citizens differ little from those of native-born citizens. Second, differentiation occurs based on the duration of residence. For example, all welfare states require migrants – regardless of their status – to have lived a minimum number of years in the country before being eligible for tax-funded pension programs, and many have placed similar requirements on other benefits as well. Third, the location of residence is of importance. Some welfare states pay out benefits to people who do not reside within their borders because of the entitlements those people built up in the past. The possibilities for this type of benefit export, however, differ considerably between different programs, different welfare states, and even different countries of residence. Fourth and finally, migrants' success in meeting integration requirements can affect their benefit access. In some countries, immigrants face cuts in their unemployment, housing, and/or social assistance benefits if they do not complete language courses or attend integration classes.

As far as the level of differentiation is concerned, the index considers three possible scenarios. In some cases, benefits that are available to native-born citizens are altogether inaccessible to (some categories of) migrants. For example, temporary migrants are often ineligible for social assistance benefits. In other cases, especially in the context of pension programs, the benefit that migrants receive is less generous than what is available for native-born citizens. Finally, some social programs are exclusively available for migrants. Many welfare states offer immigrant-targeted education services (in particular language training), and some also provide additional health care benefits to vulnerable groups of immigrants.

Table 1. *Components of the Immigrants' Social Rights Index.*

| Policy | Indicator | Range |
|---|--|---|
| <i>Tax-paid pensions</i> | Residence requirement for universal pension | Less than 5 years (0) to more than 40 years for complete benefit (4) |
| | Availability of means-tested program for those with incomplete benefit | Available without residence requirement (0) to non-existent (4) |
| | Status requirement for tax-paid pension | All legal residents (0) to citizens only (4) |
| | Export possibilities | Without restrictions (0) to not possible (4) |
| <i>Health care</i> | Residence requirement for public health care | No waiting period (0) to 5 years or more (4) |
| | Status requirement for public health care | Full access for all residents (0) to citizens and permanent residents only (4) |
| | Health care accessibility services | State-funded translation services and cultural sensitivity (0) to no services (4) |
| | Additional health care benefits | Expanded coverage for refugees and claimants (0) to no additional benefits (4) |
| <i>Contributory unemployment</i> | Status requirements | All legal residents (0) to citizens and permanent residents only (4) |
| | Integration requirements | No integration requirements (0) to civic integration and language requirements (4) |
| | Export possibilities | Without restrictions (0) to not possible (4) |
| <i>Contributory pension</i> | Status requirement | All legal residents (0) to citizens and some permanent residents only (4) |
| | Export possibilities | Export or cash-out without restrictions (0) to not possible (4) |
| <i>Housing benefits</i> | Residence requirements | No wait period (0) to more than 4 years (4) |
| | Status requirements | Any resident (0) to citizens and some permanent residents only (4) |
| | Integration requirements | No requirements (0) to integration and/or language requirements (4) |
| | Preferential treatment in housing | Earmarked housing for various groups of migrants (0) to no privileged access (4) |
| <i>Social assistance</i> | Residence requirements | No wait period (0) to more than 5 years (4) |
| | Status requirements | All residents (0) to citizens and some permanent residents only (4) |
| | Consequence of uptake | No consequences (0) to revocation of residence permit (4) |
| | Integration requirements | No requirements (0) to compulsory integration for recipients (4) |
| <i>Integration services</i> | Public language programs | Fully funded language programs available to anyone (0) to no funded programs (4) |
| | Public integration programs | Fully funded integration programs available to anyone (0) to no funded programs (4) |

The index measures differentiation in regards to seven social programs: tax-paid pension benefits, public health care or health care subsidies, contributory unemployment benefits, contributory pension benefits, housing benefits, social assistance, and integration policies. More specifically, it consists of 23 indicators that capture the way in which these programs can differentiate between native-born citizens and immigrants based on the framework described above.

A large research team³ has collected information on each of these indicators for 16 Western welfare states (Australia, Belgium, Canada, France, Germany, Ireland, Italy, Luxembourg, Malta, Netherlands, New Zealand, Portugal, Spain, Sweden, United Kingdom and the United States) at four points in time (1990, 2000, 2010, and 2015). Data collection relied on review of existing scholarly literature, analysis of government and policy documents, and follow-up cross-validation with civil servants. In some of the countries under study, some of the programs are operated at the subnational level, in which case the index reports the policy regime in the most populated subunit.⁴

After the data collection, I coded the data using a range from 0 to 4 for each indicator, with higher scores indicating a more exclusionary approach. In order to capture as much variation as possible, I determined the coding scheme inductively. In other words, for each indicator I compared the approach in each country and at each point in time and assigned a value of 0 to the most inclusionary approach, a score of 4 to the most exclusionary approach, and used the intermediate scores of 1, 2 and 3 for approaches that fell somewhere in between the extremes. Table 1 below lists all 23 indicators that are included in the index, as well as the range of variation that it captures.

Before presenting preliminary findings, three caveats are in order. First, it is important to emphasize that the index exclusively measures *policy differentiation*, and does not reflect other aspects of a country's migration regime that it might seem to capture at first glance. For example, the index does not measure the overall generosity of the benefits of which immigrants can avail themselves. It merely captures whether there is a difference between the social rights of immigrants and native-born citizens. In other words, immigrants could enjoy more protection in a generous welfare state with a high score on this index than in a leaner welfare state with a low score on this index. Similarly, the index does not measure practice, which can diverge from the letter of the law. We know that immigrants often do not make use of benefits to which they are entitled (Barrett & Maître, 2013; Ma & Chi, 2005), and that welfare and health care professionals sometimes diverge from legal requirements (Alexander, 2010; Capps, Hagan, & Rodriguez, 2004). For that reason, whether a policy regime is inclusionary or exclusionary does not describe perfectly how benefit extension plays out on the ground. Finally, the index does not measure the intention underpinning a specific policy. For example, it does not differentiate between a country that offers no state-funded integration services because it refuses to spend tax money on immigrants and a country that does not offer such services because it has not yet developed any type of immigrant integration

³ See the acknowledgements on page 1.

⁴ This means some of the indicators describe New South Wales in Australia, Flanders in Belgium, Ontario in Canada, Lombardy in Italy, Andalusia in Spain, and California in the United States.

apparatus. While it might be tempting to interpret the index as reflective of the presence of a punitive approach to immigrants, such an interpretation is therefore potentially misleading.

A second caveat is that the construction of this index necessitated a number of arguably debatable decisions. First, one might wonder whether each of the 23 indicators in this index are equally important. Some might reasonably argue, for example, that the presence of a lengthy residence requirement on access to social assistance is a more significant form of exclusion than the absence of preferential treatment for refugees in the allocation of social housing. This line of reasoning would lead to the conclusion that some indicators should be weighted more heavily than others. In this paper, I will present summary findings that weight the indicators for each policy equally, but future presentations will show the individual scores on every single indicator and therefore allow other researchers to administer weights as appropriate for their purposes. A second area of possible contention is the comparability of indicators across countries with different immigration regimes. For example, exactly how exclusionary it is to disentitle immigrants with a temporary permit depends partially on how difficult it is to obtain a permanent permit. The presence of multiple indicators for each social program mitigates this challenge to some extent, but does not remove it entirely. Nevertheless, a country's policy apparatus regarding admission and residence status is analytically separate from the social rights associated with different statuses, and can easily be included in future studies that make use of the index.

The third and final caveat is that the process of data collection is still in progress, which means that the findings in this paper might be adjusted and will be expanded in future presentations. For one thing, information is still missing for about 10 percent of the (23 indicators \times 4 years \times 16 countries =) 1472 data points. It has proven particularly challenging to find information on some aspects of the policy regime for the earliest two data points. Moreover, data collection has started regarding three sources of policy differentiation in the provision of active labour market policies (residence requirements, status requirements, and the existence of immigrant-targeted active labour market policies) and four additional countries (Austria, Denmark, Norway, and Switzerland). I also intend to start the process of data collection for two more countries (Finland and Iceland) soon.

Preliminary findings

Figure 1 shows summary scores of the index for each country in 2015. I constructed these summary scores by taking the average of all indicators for each policy, multiplying these averages by 25 to end up with values between 0 and 100, and then taking the average of all seven programs. As such, the values in Figure 1 give a straightforward indication of the extent to which each country grants fewer social rights to immigrants than to native-born citizens.

The differences are large. Some countries, such as the Netherlands and the United States, place many restrictions on immigrants' access to social programs, while others,

such as Portugal and Sweden, are much more inclusionary. While a systematic test is beyond the scope of this paper, it is clear that the differences in Figure 1 cannot easily be explained by straightforward explanations such as the structure of the welfare state (see, for example, the large differences between similar welfare systems such as the United States and the United Kingdom), or the sheer size of the immigrant population (see, for example, the large differences between Ireland and Sweden, which both host a foreign-born population of about 17 percent). In other words, these findings underscore the importance of treating the differentiation between immigrants and native-born citizens in welfare rights as an analytically distinct subject that is worthy of more scholarly attention.

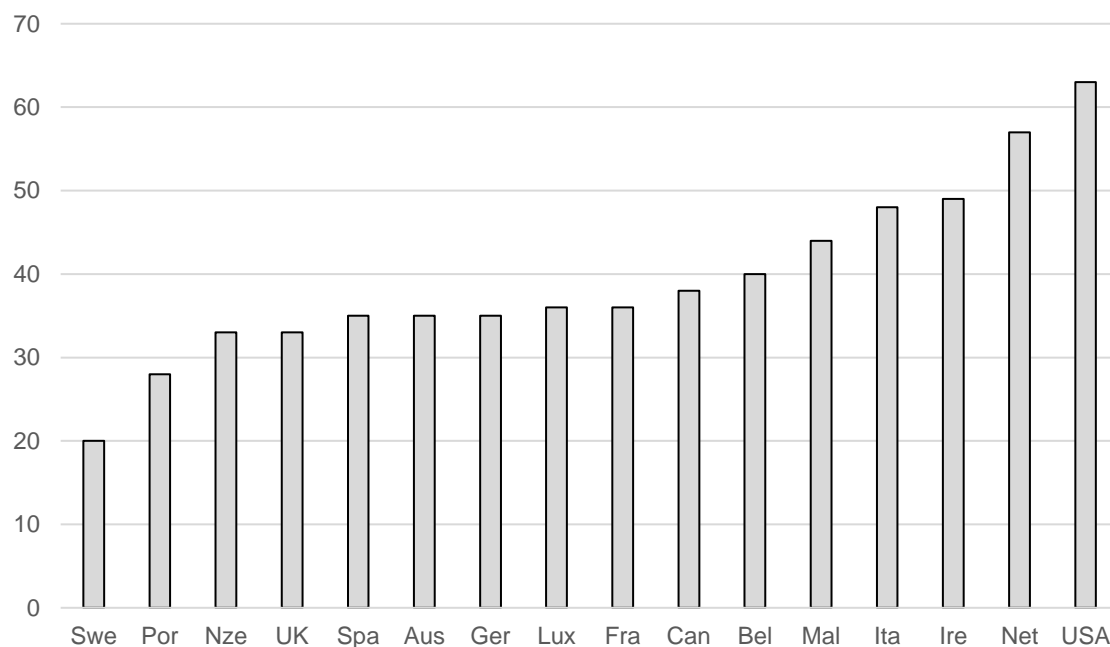


Figure 1. Summary scores on Immigrants' Social Rights Index, 16 countries, 2015. (Higher scores indicate more exclusionary differentiation.)

The difference in policy approaches captured by the index have real and important consequences for migrants in these countries, as a few comparisons between extreme cases will illustrate. For example, the only tax-paid pension in the United States (the Supplemental Security Income) is exclusively available to citizens (Zimmerman & Tumlin, 1999), whereas all legal residents in Sweden can access a universal tax-paid pension (the *folkpension*) as well as a top-up benefit in case of need (the *äldreförsörjningsstöd*) (Koning, 2019, pp. 74-75). Only citizens and permanent residents can access public health benefits in the United States and all migrants are therefore barred from these programs during their first five years in the country (Ku & Matani, 2001), but there is no residence requirement on health care for newcomers to Portugal, where even undocumented migrants have access to free emergency care (Backstrom, 2014). In the Netherlands, immigrants have to participate successfully in language and integration

classes in order to access social assistance, housing, and unemployment benefits (Koning, 2019, pp. 155-156), whereas no such requirements exist in either Sweden or Portugal. Even more strikingly, the Netherlands make immigrants pay for these classes themselves (OECD, 2008), while Sweden and Portugal offer a wide range of state-funded language and integration programs that are free of charge (Matias et al., 2016; Van Aerschot, 2014). As a final example, Portugal reserves a portion of its social housing specifically for immigrant occupants (ACM, 2014), whereas the Netherlands abolished such arrangements in the 1990s (Ponzo, 2010) and the United States never adopted them in the first place.

Table 2 offers a more fine-grained overview of each country's approach to extending social rights to immigrants. It presents the average scores for each of the seven policies in 2015 separately.

Table 2. Scores on the Immigrants' Social Rights Index by policy program, 16 countries, 2015. (Higher scores indicate more exclusionary differentiation.)

| | <i>Tax-paid pensions</i> | <i>Health care</i> | <i>Contrib. unempl.</i> | <i>Contrib. pension</i> | <i>Housing benefits</i> | <i>Social assist.</i> | <i>Integr. services</i> | <i>Mean</i> |
|--------------------|--------------------------|--------------------|-------------------------|-------------------------|-------------------------|-----------------------|-------------------------|-------------|
| <i>Australia</i> | 38 | 31 | n/a | 13 | 56 | 38 | 38 | 35 |
| <i>Belgium</i> | 67 | 50 | 67 | 25 | 31 | 69 | 0 | 40 |
| <i>Canada</i> | 60 | 44 | 58 | 0 | 31 | 31 | 38 | 38 |
| <i>France</i> | 67 | 56 | 33 | 25 | 31 | 50 | 0 | 36 |
| <i>Germany</i> | 42 | 56 | 50 | 13 | 38 | 81 | 13 | 35 |
| <i>Ireland</i> | 50 | 63 | 50 | 0 | 69 | 38 | 63 | 49 |
| <i>Italy</i> | 67 | 63 | 50 | 25 | 69 | 31 | 13 | 48 |
| <i>Luxembourg</i> | 100 | 69 | 25 | 0 | 6 | 44 | 13 | 36 |
| <i>Malta</i> | 75 | 44 | 25 | 25 | 44 | 31 | 50 | 44 |
| <i>Netherlands</i> | 47 | 38 | 75 | 25 | 56 | 75 | 100 | 57 |
| <i>New Zealand</i> | 33 | 25 | n/a | 25 | 44 | 19 | 38 | 33 |
| <i>Portugal</i> | 75 | 50 | 33 | 0 | 6 | 63 | 0 | 28 |
| <i>Spain</i> | 50 | 38 | 17 | 25 | 31 | 25 | 50 | 35 |
| <i>Sweden</i> | 28 | 44 | 8 | 0 | 38 | 25 | 0 | 20 |
| <i>UK</i> | 50 | 19 | 50 | 13 | 44 | 38 | 25 | 33 |
| <i>USA</i> | 75 | 75 | 42 | 50 | 44 | 50 | 88 | 62 |

Two observations stand out. First, and much in line with what we saw above, we see very large differences between countries in the extent to which they open these seven social programs to immigrants. Second, we also see striking variation in the degree to which different programs within one country differentiate between immigrants and native-born citizens. For example, Belgium employs a restrictive regime on unemployment benefits, but is inclusionary when it comes to integration services. Ireland throws up many barriers to accessing housing benefits, but poses essentially no hurdles at all when it comes to taking up contributory pension benefits. And Luxembourg features simultaneously as

the most exclusionary case under consideration when it comes to health care and tax-paid pensions, but the most inclusionary in granting access to contributory pensions and housing benefits.

The implications of the low correlations between the scores on different programs are twofold. First, they suggest that the separate components of this index can vary relatively independently from each other. An inclusionary approach in one area can mitigate exclusion in another: for example, the availability of free language and integration courses in Belgium make the integration requirements to accessing social assistance there less onerous. Second, they underline the importance of including multiple indicators when trying to paint an overall picture of the state of immigrants' social rights in a particular welfare system. Existing research that compares immigrants' welfare rights across a large number of countries tends to focus on a single policy or program characteristic. The findings in Table 2 demonstrate that using such research to generalize about the social rights of immigrants in general could be highly misleading.

Apart from enabling comparisons between countries and programs, a key purpose of the index is also to trace developments over time. Figure 2 reports the difference between 2015 and 1990 in the summary score for each country. Positive differences indicate that the country has become more restrictive over this time span, whereas negative differences highlight an inclusionary development.

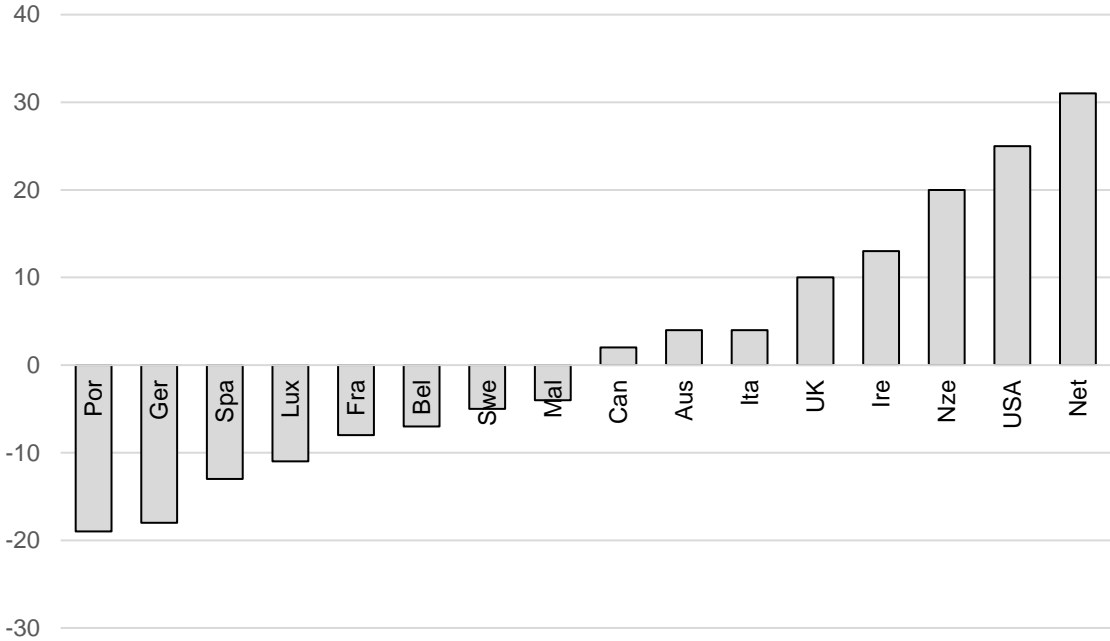


Figure 2. Change in immigrants' social rights, 1990-2015, 16 countries. (Positive scores indicate an exclusionary direction in policy change.)

The trajectory of immigrants' social rights has clearly been very different from one country to another. Some states, like Spain (-13), Germany (-18) and Portugal (-19) have

gradually opened their welfare system more and more to immigrants. Others, like New Zealand (+20), United States (+25) and the Netherlands (+31) have become decisively more restrictive. It is worth emphasizing just how dramatic these changes are. Considering that the difference between the highest and lowest summary score for any country at any point in time is 52,⁵ the magnitude of the changes at the extreme ends of Figure 2 are impressive in size indeed.

Again, some examples might help to appreciate what these numbers indicate concretely. The drop in Spain's overall score on the index mostly reflects inclusionary reforms in the health care system that granted access to more categories of migrants and introduced government-subsidized translation services (Quevedo & Rubio, 2010; Romero-Otuño, 2004). Germany's score decreased because of the introduction of a means-tested pension benefit for migrants with incomplete coverage (Conrad & Fukawa, 2003), as well as an expansion of the eligibility requirements for unemployment and housing benefits (BAMF/EMN, 2016; Müller, Mayer, & Bauer, 2014). On the other extreme, we see a dramatic increase in the summary score of the Netherlands, which over the last few decades restricted the export of pension benefits (EMN, 2014), cut translation services in the health care sector (Deville et al., 2011), introduced integration requirements for a variety of benefits, abolished the practice of reserving social housing for immigrants, introduced the principle of revoking residence permits of those who 'burden' social assistance, and cut all funding for language and integration programs (Koning, 2019). A similar but slightly less dramatic series of changes occurred in the United States, which cut funding for language programs (Fix & Zimmerman, 1994), and introduced additional requirements for accessing tax-paid pension, health care, and welfare benefits (Fix, 2009).

Table 3 displays the summary scores of each country for each of the four years under investigation. The table further underlines the conclusion that the development over time has been far from uniform across the countries under investigation. Some countries, such as Australia and Canada, have undergone little change over time. Others, like the Netherlands, New Zealand, and the United Kingdom, have gradually become more restrictive. Yet others, like Luxembourg and Portugal, have slowly moved in the opposite direction. And a final set of cases, most notably France, Italy, and Spain, has undergone considerable change but in a less uniform direction.

Again, it is beyond the scope of this paper to investigate explanations for the variation in these trajectories systematically. More important, however, is that the construction of this index allows for such investigations in future research. The initial findings presented in this section demonstrate that there are large differences between countries, within countries, and over time in the extent that welfare programs differentiate between native-born citizens and immigrants. This presents the opportunity for an exciting research agenda on a subject of increasing relevance that so far has been the subject of much speculation but little systematic investigation.

⁵ The highest summary score is 65 for the United States in 2010, and the lowest is 13 for New Zealand in 1990. See Table 3 below.

Table 3. *Summary scores on Immigrants' Social Rights Index, 1990-2015, 16 countries. (Higher scores indicate more exclusionary differentiation.)*

| | 1990 | 2000 | 2010 | 2015 | ('15-'90') |
|-----------------------|------|------|------|------|------------|
| Australia | 31 | 33 | 35 | 35 | +4 |
| Belgium | 47 | 46 | 39 | 40 | -7 |
| Canada | 36 | 38 | 38 | 38 | +2 |
| France | 44 | 28 | 24 | 36 | -8 |
| Germany | 53 | 53 | 36 | 35 | -18 |
| Ireland | 36 | 30 | 49 | 49 | +13 |
| Italy | 44 | 30 | 43 | 48 | +4 |
| Luxembourg | 47 | 40 | 40 | 36 | -11 |
| Malta | 48 | 48 | 42 | 44 | -4 |
| Netherlands | 26 | 35 | 50 | 57 | +31 |
| New Zealand | 13 | 13 | 29 | 33 | +20 |
| Portugal | 47 | 42 | 26 | 28 | -19 |
| Spain | 48 | 28 | 33 | 35 | -13 |
| Sweden | 25 | 28 | 23 | 20 | -5 |
| United Kingdom | 23 | 30 | 33 | 33 | +10 |
| United States | 37 | 65 | 65 | 62 | +25 |
| Average | 38 | 37 | 38 | 39 | +1 |

Conclusions

This paper offers the first systematic overview of immigrants' social rights that includes multiple countries, a large time span, and a broad range of social programs. The findings show remarkable variation across time and place. Some countries, like the Netherlands and the United States, make it hard for immigrants to access social programs and have implemented additional restrictions over the last two decades. Other countries, such as Sweden and Portugal, have pursued a much more inclusionary approach, and have only tried to make programs more available to immigrants. The implications of these findings are difficult to overstate. They demonstrate that different governments have decided to tackle more or less the same policy challenge – how a welfare system should respond to the arrival of new residents – in very different ways. In light of the expected increase in migration and the increasing politicization of the subject, it is essential that social scientists offer reliable evidence and evenhanded assessments on the relative advantages and disadvantages of one approach over another.

The Immigrants' Social Rights Index can provide this evidence and enable the investigation of the effects of different approaches. Of most immediate importance seems an analysis of the effect on three variables. First, it is worth investigating whether inclusionary approaches are associated with more government expenditure. While such a claim tends to feature as a key argument in justifications of restrictive approaches (Bosma, 2010; Grubel & Grady, 2011), it is not obvious that this would necessarily be the

case. Indeed, some even reason that an inclusionary approach would reduce spending, hypothesizing that it would decrease newcomers' reliance on the state in the long run and avoid spending on potentially more costly outcomes of exclusion (Doctors Without Borders, 2005). This brings me to the second investigation: it will be invaluable to study whether inclusionary or exclusionary approaches are most conducive to the socio-economic integration of immigrants. To many advocates of immigrants' rights it seems obvious that state assistance would alleviate the challenges of integrating in a new labor market (Kahanec et al., 2013), but at the same time others worry that inclusive approaches would discourage newcomers from becoming economically active (Mollenkopf, 2000). Finally, a promising line of inquiry would center on the consequences of the nature of immigrants' social rights for tensions between newcomers and native-born citizens. Again, there are reasonable arguments supporting very different predictions. On the one hand, some point out that citizens are easily outraged when they learn that immigrants are making use of tax-paid services, and therefore reason that inclusion would only fuel more nativist backlash (Engelen, 2003; Goodhart, 2004). Others expect the opposite effect, arguing that policy differentiation would further accentuate the differences between classes of residents and increase economic inequality between social groups (Koning, 2019; Wotherspoon, 2018).

Probably as relevant as investigations of the consequences of different approaches would be studies that aim to explain the divergence in immigrants' social rights across different welfare states. Such research would help us better understand this subtype of social policy, which can reasonably be expected to be driven by different factors than what we know about social policy in general. A good start would be to center on three possible explanatory variables. First, the structure of the welfare state is likely to shape migrants' benefit access (Banting, 2000; Sainsbury, 2012). In particular, we might expect migrants' social rights to be more encompassing in social democratic welfare states, not only because targeted exclusion is difficult to implement in a welfare regime based on principles of universality, but also because we know that this regime discourages the depiction of some groups of recipients as undeserving (Korpi, 1980; Larsen, 2008). Second, it seems likely that immigrants' benefit access is shaped by political context, in particular the degree to which immigration and multiculturalism are politicized. Especially the presence of vocal anti-immigrant politicians seems of relevance in this context, not only because they have the potential to convince the public of the need for restrictions (Green-Pedersen & Odmalm, 2008; Rydgren, 2003), but also because they pose an incentive for mainstream parties to compromise and change their own position out of electoral calculations (Norris, 2005; Van Spanje, 2010). Third and finally, we can expect immigrants' benefit access to be shaped by the national and supranational legal commitments a welfare state has committed itself to. Especially relevant in this regard is the role of the European Union (EU). Not only are member states obligated to open their social programs and benefits to all EU citizens who work on their territory, EU membership also comes with considerable obligations in terms of benefit export and standards of non-discrimination (Geddes, 2003; Stokke, 2007).

All in all, the Immigrants' Social Rights Index not only appears as a valuable tool to track the state of social protection of immigrants, but also to enable a large number of research projects that will help us better understand the origins and consequences of differentiation between immigrants and native-born citizens in benefit extension. In the most optimistic scenario, those projects will help to ground the often polarized and hotheaded discussions on this subject.

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