

Integration Policies Implemented for Migrants in Welfare States

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Summary

There is a profound interaction between immigration and welfare state. In the process of rebuilding Europe after World War II, Western European countries received labor migration flows. This process not only became the key to economic growth, development and contributed to social welfare, but also strengthened the welfare states as well. The consolidation of the welfare state has increased the amount of aid available to immigrants. There is no common immigration or integration policy that would fit each state's needs due to the fact that every country has its unique migration history and welfare state structure. Methods of receiving and managing immigration differs from one country to another. This study aims to show the extent of integration policies concerning immigrants in welfare states through analyzing examples of countries that play a dominant role in the welfare state models and display problems immigrants face in host countries regarding integration. The scale and structure of the welfare state models existing among countries have an extremely decisive role in defining their attitudes towards immigrants. In America, known as one of the leading countries that have adopted the Liberal model and it is best known as a country of immigrants, practices in the field of integration of immigrants have been linked to language learning. Many aspects of burdens and policy development regarding immigrants have been left to market mechanisms. In the Scandinavian model which is based on universal principles, equal service is provided to everybody and various harmonization policies are implemented for immigrants. Ensuring social peace and high standards of living in society as a whole has been made possible through providing a fair service to everyone. In the conservative model, which is based on individual empowerment, premiums, and social insurance, welfare policies were mostly based on merit. Majority of aid and services provided to immigrants were in proportion to benefits of their labour. In countries like Turkey, which integrated into welfare state systems later, migration and integration policies began to take place within the framework of the EU accession process and have been shaped to a large extent by Syrian immigrants.

Keywords

Welfare State • Immigrant • Adjustment and Integration • America • Germany • Sweden • Turkey.

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Refah Devletlerinde Göçmenlere Yönelik Uyum Politikaları

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Öz

Göç ve refah devleti arasında yoğun bir ilişki bulunmaktadır. II. Dünya Savaşından sonra Avrupa'nın yeniden inşası sürecinde Batı Avrupa ülkeleri işçi göçü ithal etmiştir. Bu süreç ekonomik büyüme, kalkınma ve sosyal refahı artırmanın anahtarı olmak ile birlikte refah devletlerini de güçlendirmiştir. Refah devletinin güçlenmesi göçmenlere yönelik yardımları artırmıştır. Her ülkenin gerek kendi göç tarihi gerekse refah devlet yapısından ötürü ortak bir göç politikası ya da uyum politikası söz konusu değildir. Ülkeden ülkeye göçü kabul etme ve göçü yönetme şekli farklılıklar göstermiştir. Bu çalışma refah devlet modellerinde baskın olan ülke örnekleri üzerinden refah devletlerinde göçmenlere yönelik uyum politikaların ne düzeyde olduğu ve bu ülkelerde göçmenlerin uyumla ilgili sorunlarının neler olduğunu ortaya koymayı amaçlamaktadır. Ülkelerin içinde buldukları refah devletleri göçmenlere yönelik tutumlarında son derece etkili olmuştur. Liberal modelin öncü ülkelerinden ve göçmen ülkesi olarak bilinen Amerika'da göçmen uyumuna yönelik uygulamalar daha çok dil öğrenme ile ilişkilendirilmiştir. Göçmenlere yönelik birçok yük ve politika piyasaya devrolmuştur. Evrensel prensibe dayalı İskandinav modelde herkese eşit hizmet sağlanıp, göçmenlere birçok uyumlaştırıcı politika gerçekleştirilmiştir. Toplumsal huzur ve iyi yaşam standartlarının toplumun yekûnunun de görülmesi herkese adil hizmet sağlama ile gerçekleştirilmiştir. Bireysel yapılanma, prim ve sosyal sigortayı esas alan muhafazakâr modelde daha çok refah politikaları hak ediş üzerinden yürümüştür. Sağlanan birçok yardım ve hizmet göçmen emeğinden faydalanma nispetinde olmuştur. Türkiye gibi refah devleti sistemlerine sonradan dâhil olabilmiş ülkelerde ise göç ve uyum politikaları AB girme süreci ile oluşmaya başlamış ve Suriyeli göçü ile büyük ölçüde şekillenmiştir.

Anahtar Kelimeler

Refah Devleti • Göçmen • Uyum ve Entegrasyon • Amerika, Almanya • İsveç • Türkiye.

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Introduction

Migrations have profoundly affected the processes that shaped world history. Migration policies have been shaped by history of migrations starting from slave trade in the colonial period, migrations to the Americas, migration of citizens during the nation-state building in the early 1900s, labor migration to Europe in the 1960s, migration of women and children in the 1970s with the policy of family reunification and refugee movements stemming from the political tensions in the Middle East after 2000s.

In some cases, migration takes place as a result of perceived demand in the host country and depending on a policy pursued, while in some cases it occurs as an involuntary response to political or geographical factors. In forced migration, since most immigrants are forced to leave their homes without preparation or knowledge, they face various barriers such as language problems, low education level, and inability to have equivalent documents. Therefore, they experience many problems such as exploitation, discrimination, exclusion, inability to access basic services, human trafficking, being forced into prostitution, exposure to violence, smuggling, being exploited by crime syndicates or being forced to work for illegal organizations. The fact that people migrate to escape from torture, oppression and violence has led to the adoption of various international regulations to deal with this issue. For this reason idea of establishing a common immigration and integration policy has gained momentum. Although the impossibility of establishing a common immigration policy has led to the adoption of many different independent immigration policies, what they have in common is a legal regulation that is respectful of the rights and dignity of every human being. (Human Rights Watch, 2010).

International migration is undoubtedly one of the most important factors that has shaped the economic, political, social and cultural structure of Europe in the 21st century. Globally, 91.9 million immigrants have sought asylum in 132 countries. While 90% of the world's migrants move voluntarily for economic reasons, 10% have sought asylum to escape from persecution and violence (Heilbrunn & Iannone, 2019). The destination of most of these migrations was America and Western European countries. When we look at the process of Europe as a destination country in international migrations, migratory movements can be summarized as three major historical waves: worker migrations, migrations created by family reunifications, and forced migrations involving refugees/asylum seekers. Welfare states in developing countries have developed in proportion to arrival of migrant workers and their contribution to labour. This study aims to analyze the level of contribution of immigrant labor in welfare states and tries to find an answer to the following questions: what kind of integration and adaptation policies were adopted and how these policies differed according

to the countries. A comparison of welfare states model was conducted using experiences of leading countries in the subject matter.

1. Concept of Welfare State and Classification

The state is one of the most essential and long-established institutions in the history of humanity (Coşkun, 1997, p.15). There are many different definitions of the formation and content of the State. State is a political and social organization established by a nation to govern itself. They are institutions organized according to different services supplied to govern the relations between people. Aforementioned various organized institutions work in an integrated manner and serve as an integral part of an entire organism. As a whole, the fact that one part of the system fails in this mission hinders the functioning of other parts (Banarlı, 2007, p.9). Generally speaking, the objectives of the state structure can be summarized as follows: To ensure social order, justice, and well-being and to maintain peace among its people settled on a certain piece of land (Meray, 1965, p.154).

Throughout history, people's philanthropic ideas, depending on their beliefs, have created a sense of responsibility to help and support those in need around them. After the 19th century, this notion of responsibility for helping others has started to become a responsibility of the state (Ersöz, 2003, p.121). After this century, governmental and voluntary organizations have been included in welfare state practices. Social assistance and support provided by the family and society have been incorporated into services offered by states in their move to become a social state. This process strengthened the social aspects attributed to state apparatus and transformed the state into a welfare state. When the classical economic theory lost its functionality, and the states abandoned the liberal state view and assumed the function of an interventionist state, the concept of the state evolved as a social state or welfare state (Gümüş, 2018, p.35).

In post-World War II era, welfare state started to manifest itself especially in response to changes occurred in business relations. States have commenced to intervene in the market as they dropped the idea to solely execute police powers. Welfare states not only interferes with the labor market, but also provides individuals with minimum income, ensure their access to basic foodstuffs, basic services such as housing, health, education, and grants equal political rights for every citizen. However, in line with social security programs, it aims to redistribute income through taxes in order to ensure fair distribution of income, to make national health services accessible to everyone, to ensure absolute welfare by controlling family benefits, pensions and other social risks (Wilensky, 1975, p.1).

According to another formulation, the welfare state consists of three components. First of all, the state should provide a minimum income guarantee to all individuals. Secondly, sickness, disability, elderliness, death, and unemployment should be also covered under the umbrella of social security, albeit in a limited way. Thirdly, the state should provide a decent standard of living to all citizens, regardless of class or status (Briggs, 2006, p.16).

Welfare state is a state system that strives to ensure the well-being of everyone and, above all, the well-being and welfare of society as a whole. While the rule of law attributes importance to values such as freedom, right to life and property, the social state attaches importance to the security of living, job or income guarantee and the preservation of work force. The welfare state is intertwined with the concept of "social integration". It is essential for integration that the plurality becomes singular, the differences in the society are smoothed out, inequalities are eliminated, conflicts are minimized and unified without destroying the freedoms of the individuals. Social welfare can only be achieved by creating a classless society (Huber, 1970, p.23-39).

Wars, famines and epidemics caused the deterioration of the feudal structure prevalent in the Middle Ages. The deterioration of the feudal structure made interventions necessary. Following the rise of the industrial revolution, feudal principalities lost their power; migration of peasants from feudal villages to industrial cities began; business relations changed and administration was transferred from feudal structures to more systematic state administrations (Ersöz, 2003, p.123).

Due to effects of the Great Economic Depression of 1929, the classical economic view was destroyed and the Keynesian economics era started. The situation emerged after World War II invalidated the views of the classics and the liberal view began to lose its power. The Keynesian model, which required state intervention, made its debut and the state transitioned from an entity that solely executes police powers to an entity that functions as an interventionist state (Işıklı, 1987, p.19).

The Keynesian era has been referred to as the golden age of the welfare state. In Western countries, state apparatus strived to ensure economic growth, low inflation, full employment, trade balance, and fair income distribution via economic policies. In addition, the state aims to protect its citizens against risks such as unemployment, disability, maternity, senility and death by imposing higher taxes (Kocabaş, 2004, p.12).

In order for the welfare state to function, it is important to create social welfare and justice, to ensure fair income distribution, to eliminate poverty, and to establish a life order

befitting human dignity. To achieve this, a life order suitable for the family, morals and culture of the society, equality of opportunity, equality before the law, a minimum income for everyone, the right to collective bargaining, social security for those in need of protection, equal educational opportunities, protection of women and children in need of protection, dissemination of social participation, eradication of poverty is important. (Yazgan,1975, p.32; Göze, 1980, p.187; Seyyar, 2002, p.171).

Esping Andersen introduced a widely accepted three classification schemes for the welfare state: the liberal model, the conservative model, and the social-democratic model. In the welfare state classifications, each state or social class has made different definitions of the welfare state. The perspectives of states on the welfare state differed according to their economic indicators, social structures and arguments they use to provide welfare state. In each model, the market, the state, and the family assume different roles in providing the welfare state (Pierson & Castles, 2006, p.167).

Table 1: Esping-Andersen's Welfare State Classification

| Liberal Welfare Regime | Conservative Welfare Regime | Social Democratic Welfare Regime |
|------------------------|-----------------------------|----------------------------------|
| America | Germany | Sweden |
| Canada | France | Norway |
| Australia | Italy | Denmark |
| Switzerland | Austria | Finland |
| Japan | Belgium | Netherlands |

Kaynak: Esping-Andersen, G. (1990). *The Three Worlds of Welfare Capitalism*, UK: Polity Press.

The liberal welfare regime is listed at the bottom of the welfare state typology. America, Canada and Australia are prominent examples of this group of countries. The foundation of this model is based on liberal and free market economy While government intervention is kept limited, the private sector is seen as a welfare provider. In this model, it is essential for the state to keep wages and taxes low, to encourage the private sector, to increase employment while reducing unemployment and to keep the number of people who will benefit from social aids low in order to maintain order (Özdemir, 2007, p.140).

In countries that adopt liberal welfare regime, public sector employment is low and private sector employment is above average. The rate of women's participation in the labor force is quite high compared to countries in the other model. In these countries, where unions are weak, there are large differences in wages. Countries in this model only provide a minimum income guarantee. Because of their limited intervention, these states define them as "night-watchman state". Except for the national health services, the state only selects those in need and provides a minimum level of income guarantee to these people only if it determines that they are not working and in need (Özdemir, 2007, p.37).

The conservative welfare regime ranks in the middle in the classification scheme for the welfare state. Among the leading countries in this model are Germany, France, Italy, and Austria. Germany is generally regarded as a reference in the evaluations concerning this model. In conservative model, the influence of religion is intense and the family has great responsibilities (Pierson, 1999, p.778). Social security is extremely important in countries that adopt this model. Instead of offering new job opportunities as a solution to people who have lost their job or income for various reasons, relief measures and compensatory policies are pursued (Arin, 1996, p.63).

The Social Democratic Welfare Regime ranks at the top of the classification scheme for welfare state. This model includes countries such as Sweden, Norway, Denmark, the Netherlands and Finland. The social democratic welfare regime is also called "universal welfare regime", "modern welfare regime" or "Scandinavian Model". Sweden is the leading country in this model. For this reason, it is also known as the "Swedish Model" (Özdemir, 2007, p.141). This model has three main features: universal income guarantee, social insurance, and provision of highly advanced services. There is a high rate of social state expenditures and social rights are guaranteed at a high level. The state is seen as the main social state provider. Model ensures equality and high standards and includes everyone. Most of the state's social service expenditures are covered by taxes. Therefore, the level of taxes is high (Özdemir, 2007, p.141; Pierson & Castles, 2006, p.169). These countries are also referred to as happy countries because of their anti-poverty policies, successful investments, social policy implementations aimed at young people more than the elderly, and successful social policy investments (Andersen, 1996, p.34, 14).

Based upon Esping-Andersen's triple classification with subtle contributions, typology offered by Nick Adnett and Stephen Leibfried came to fore. While Adnett adds Latin Basin maintains Esping-Andersen's triple classification scheme and adds a fourth category of welfare state model. As Pereirinha points out, Leibfried's welfare state model uses a more comprehensive scheme.

Leibfried, based on social policy regimes, proposes a four welfare state classification model based on the European Union member states.

1. Scandinavian welfare states (Modern welfare state)
2. Bismarck countries model (Institutional welfare state)
3. Anglo Saxon model (Residual welfare state)
4. Latin Rim welfare states model - Southern European Welfare State (denoted with the term “rudimentary welfare state”) (Yılmaz, 2006, p.23).

Within the framework aforementioned classification, Southern European Welfare State - Latin Rim welfare states model (Rudimentary Welfare State) which is also referred to as the Solidarity Model, argues that social responsibilities should be solved by family members or people close to the family (Şenkal & Sariipek, 2007, p.156).

Greece, Portugal, Spain, Italy, and Turkey are included in this model. According to Rudimentary Welfare State model, family and kinship relations play a primary role in providing social policy and social welfare within the framework of the market-state-family tripartite structure. “Family” alone is the bearer of this model. In these countries, traditional aid structures and family solidarity are quite profound. On the other hand, the social conditions and institutional structure of the welfare state are insufficient (Çelik, 2006, p.62). Another unique feature of this model in terms of social policy practices is that the social protection network is inadequate and fragmented. The limited social benefits, the lack of national social protection, the disorganization and gaps in the social protection network characterises the basis of this model (Keyder, 2007, p.133).

2.Harmonization and Integration Policies

The potential effects of immigrants on host countries are substantial for many relationship networks such as interactions brought by cultural differences and similarities, cohesion, exclusion, compromise, competition, favouritism, discrimination, and conflict. For this reason, countries that take in immigrants carry out integration and integration studies in order to manage aforementioned effects (Aydemir & Şahin, 2018, p.126). Each state accepts immigrants with different dynamics and criteria and applies different integration policies. Social cohesion is related to many issues such as education, housing, health, right to work, and social security (Özgüler, 2018, p.1-3).

One of the most widely accepted definitions of harmonization has been adopted by the

United Nations High Commissioner for Refugees (UNCHR). According to this definition, harmonization; “is considered as a dynamic, multifaceted and bilateral act with three interrelated legal, economic and socio-cultural dimensions. It is a bilateral situation in which refugees/immigrants adapt to the host community without giving up their own cultural identity, and the host society, together with its institutions, accepts refugees/immigrants and meets their needs”. The concept of integration, on the other hand, is more ambiguous, and in some respects there is a parallel with the concept of assimilation. Integration is defined as a sociological concept; “It is the process of learning social norms and values that allow a person or group to be a member of a larger group”. In terms of individuals or groups, it interferes with many areas such as adaptation, school, culture, education, profession and working standards (Çağlar & Onay, 2015, p.40).

The success level of immigrants in the integration process varies and depends on many factors such as age, gender, education level, language ability, ethnicity, religion, socio-economic status, socio-psychological acceptance role in, the way the migration takes place (voluntary or compulsory), the ethnic structure of the settled region, and the potential to accept migration (Seker, 2015, p.15). Even though immigrants are willing to adapt, they have to struggle with many problems in many parts of the world such as discrimination, social exclusion, xenophobia, racism, marginalization, poverty, unfair income distribution, unregistered life and informal work. For this reason, the integration and cohesion policies implemented by the states aim to contribute to solving these problems. After the 2000s, many countries focused on the integration process. In order to achieve success in integration, especially in the context of human rights, many countries firstly have taken many positive steps to protect migrant workers with visa extension, granting regular migrant status, and implementing labour mobility programs. In many countries, migrant workers are allowed to access basic services such as health and education, regardless of their status. Various regulations regarding employment in basic services have been adopted. Furthermore, providing immigrants with social protection, the right to be protected from discrimination and xenophobia, the right to freedom of association and collective bargaining, equal pay for equal work, income security, and the right to a decent job are other factors that contribute to cohesion. Aligning immigration and employment policies while detecting and developing migrant workers' skills and adopting employment policies and programs to take into account the specific needs of vulnerable migrant workers, particularly women, youth, domestic workers and low-wage migrant workers should also be mentioned. Specific measures should be taken to prevent, report and address all kinds of exploitation and abuse and to provide effective remedies¹.

¹Uluslararası Çalışma Örgütü. Göçmen işçiler için insana yakışır iş sağlamaya yönelik çabaları artırma çağrısı. https://www.ilo.org/ankara/areas-of-work/dw/WCMS_789022/lang--tr/index.htm, 23.12.2021.

Another factor related to cohesion is the new working patterns brought by the capitalist system. Mechanization and factory-type production paved the way for the organization of work outside the home. In countries where the service sector is developed, the employment of women and youth has increased with the spread of flexible working patterns. The increase in employment of women has brought to mind the question of who will do the domestic work. Although these works are carried out by members of the household, most of the time they are also done by employees rather than family members (Erdem & Sahin, 2010). In Europe, especially with the effect of neo-liberal policies, social services have been transferred to the market (Browne & Braun, 2007). European working women with children tended to purchase services for their domestic chores. In response, migrant women have started to migrate to developed countries to work for low wages. In 2003, Ehrenreich and Hochschild's book "Global Woman: Nannies, Maids and Sex Workers in the New Economy" described their migration to first world countries for babysitting as **"a global heart transplant"** where poor children are sacrificed in order to provide care for rich children" (Deniz, 2018, p.290).

After the disintegration of the Soviet Union, the migration flows from Eastern European countries to Western Europe began. Most of the immigrants that have left their countries work in hard conditions for low wages in capitalist agricultural fields and research institutes. Many were treated as "unqualified" because of language problems and because they came from different cultures and regions. (Blaschke, 1994). Reducing informal work is among the most important goals in European Union countries. In these countries, about 5% of the population works informally in the economy. As of 2015, Austria has the lowest informal economy with 8.2%, while Bulgaria has the highest informal economy with approximately 30.6%. While the informal economy in Eastern and Southern European countries (except the Czech and Slovak Republics) is above the European Union average, it is below the average in Western Europe and Scandinavian countries. Informal employment is more common especially among immigrants and even more among female immigrants (Oğuz & Şahin, 2020).

In Europe, the ratio of women immigrants and foreign women in unregistered employment is increasing on a daily basis. While 25% of female immigrants work in domestic services such as housekeeping, child and elderly care, 11% work in personal care services (e.g hairdressers, cosmeticians). Registering informal workers not only provides security but also improves their working conditions. This also contributes to equal opportunity (Williams, Nadin, & Windebank, 2012).

Policies adopted in the field of employment of women immigrants mostly aim to save them from informal employment, to improve their working conditions, to solve their

problems regarding integration and social inclusion practices for immigrants, to make them gain qualifications through vocational training practices, to increase their workability, and to include them in the social safety net. Solving employment and social security problems is among the priorities of the European Union and OECD countries (Koçak & Gündüz, 2016, p.77).

3.Comparison of Integration and Integration Policies for Immigrants in Welfare States

The importance of social policy gained momentum at the end of the 19th century, due to conditions of post-World Wars era, i.e. the labour movements brought by industrialization along with the capitalist order, worker-employer relations, workers' rights and the formation of the political order. Exploitation of the working class, inequalities and poverty issues were especially influential in the first formation period of the welfare state. The second stage was marked by the heavy burden and difficult living conditions caused by the World Wars in the 1930s-1940s. The third stage of the welfare state covers the years 1950-1970. The effectiveness of Keynesian policies implemented during this period, economic growth, and the strengthening working class laid the groundwork for defining this period as the golden age of the welfare state. In this period, the most far reaching welfare state policies were implemented. The years after the 1970s were defined as the last period of the welfare state. The oil crisis of 1973 caused economic contraction, regression in rights, and reduction of welfare state practices. This period, in which neoliberal policies gained predominance, is also referred as the period marked by the decline of social policy (Şenkal, 2005, p.233; Baştürk, 2010, p.530).

Neoliberal policies, which were put into practice specifically after the end of the Keynesian period, have induced several countries to implement strict monetary policies and tight border controls. Countries have started to limit their immigration acceptance levels according to countries of origin. Except for Western European countries, states have distanced themselves from immigration outside their borders. This situation not only fuelled illegal immigration but also opened the door to discrimination. The media's depicting of immigrants as a source of "fear", "danger" and "crime" and the strict customs strategies implemented by Western European countries have very easily labelled immigrants as "different", "other", "foreigner" and "terrorist". This situation casts a shadow on cohesion and integration (Güllüpinar, 2014, p.2).

Many developed and developing countries in the world had to respond to immigration movements and asylum requests. The economic stability of the host countries, social state programs they implement, the attitudes towards human rights have increased the number of

immigrants/refugees. Countries that have been exposed to international migration build their migration policies in 4 stages which can be listed. As follows:

- Protection
- Regularity
- Cooperation
- Integration (Taş, Koçar & Çiçek, 2017, p.1376).

Considering the inevitability of migration movements and the increase in their density with each passing day, the main goals pursued by governments are managing migration successfully, minimizing negative impacts of migration, and turning migrant labour, experience and capital into positive input for economic growth and development. Due to the dynamic nature of migration, strategic migration management is extremely important in terms of evaluating the opportunities and threats emerged by migration. For this reason, inclusion of immigrants in the labor market has been a priority in the integration studies conducted with immigrants. Cohesion policies have been expanded in this context (Öztürk & Tekiner, 2017, p.153).

One of the most important factors in terms of cohesion and integration is to prevent discrimination. For this reason, the Council of Europe has enacted a convention to prevent discrimination. The Council states that with this convention, citizens are protected against this discrimination regardless of their ethnic origin, race, gender, age, disability, homeland, religion, belief, and sexual preference (Howard, 2006).

Along with preventing discrimination, it is important to provide immigrants with means so that they can continue their lives and to enact legal instruments regarding citizenship or status. The conception of the welfare state is shaped by the unique conditions of each country on the basis of citizenship rights and social contract. This understanding provides the nation-state with mechanisms to regulate the interaction between labour and capital, and balance immigrant-citizen concepts. This balancing mission contributes to regulate the market and determine citizenship rights (Atasü-Topcuoğlu, 2019, p.945).

In this study, the literature on the concept of social welfare state and its classifications is included, and the developed countries that receive immigration are grouped according to regime types. In this context, Turkey has been compared with the dominant country example in each model included in the welfare state models. While making this comparison, the welfare state classification is taken into account, and what these countries do regarding

their cohesion and integration policies in relation to the model they are in. According to the literature review, adaptation and integration studies for immigrants started with the demand of immigrant labor and the policies made in general progressed in the focus of the labor market. All regulations, such as laws and policies facilitating the inclusion of immigrants in the labor market, learning a language, getting a job, improving educational conditions, and preventing discrimination have been made to ensure full economic and social participation of immigrants. In the last part of the study, the comparison made in the selected countries was examined from this perspective.

3.1. America;

America, the most prominent example of countries that have adopted liberal welfare regimes, is referred to as the country of immigration. America, Canada, Australia and majority of Western European countries were established as a result of immigration or developed thanks to immigrant labour. Migrant workers that they accept periodically or the intense migration movements they are exposed to have underlined the need for these countries to make a series of legal and institutional arrangements for immigration and immigrants (Zincone, Caponio, & Carastro, 2006).

The United States of America (USA), the country of immigrants, has a population of 308,745,538 according to the last population census conducted in 2010. While 280,629,097 of this population is white, 38 million of them are black. Hispanics are the second most populous group with a population of 47 million, following Blacks². Due to increase in production during and after the colonial period, the need for cheap labour has turned this place into a country of immigrants. It has hosted many different immigrant communities, primarily from Europe or Canadian, from the Asian and South American continents, especially Mexican immigration. A wide range of immigrant groups gathered under the umbrella of the United States of America, which was founded in 1786. Between 1880 and 1890, waves of immigration intensified. With the intensification of immigration, the fact that the majority of immigrants were of Southern European origin became a concern for the United States, and it has started to adopt a more restrictive attitude towards accepting immigration. In 1907, a “migration commission” was established to be more selective in terms of accepting immigration (Güler, 2020, p.258). Although being seen as a nation of immigrants, the United States restricted its flexible immigration policies after the 2001 terrorist attacks on the Twin Towers and eased deportation procedures (Koven, & Götzke, 2010).

² <https://www.census.gov/data/datasets/2010/demo/popest/modified-racedata-2010.html>, 05.01.2022.

Various groups and specifically Africans that have brought as slaves during the colonial period could not benefit equally from housing and employment opportunities and were exposed to discrimination. In 1961, President Kennedy gave statements and adopted measures in order to ensure that there would be no discrimination in recruitment process on the basis of race, language, religion, and gender. Policies implemented to redress discrimination were not only applied to African Americans, but also to Hispanics, Native Americans and Asians (Joppke, 1999).

It is of utmost importance to being able to speak the common language spoken in the country during the harmonization and integration process. For this reason, learning and speaking English in America is one of the subjects that has a prominent position. While the first-born Jews speak English as well as Hebrew, the second generation can understand Hebrew, but the third generation speaks only English and does not know Hebrew at all. In this case, it needs to be underlined that assimilation, not integration, is enforced in America (Levine, 2021).

3.2. Germany;

Germany, one of the most dominant countries that have conservative welfare regimes, plays a cultish feature in the metaphor of the immigrant country as well. It drew attention and made a name for itself with its family benefits, child benefit applications, and strong insurance schemes. Germany opened its doors to immigrants in the rebuilding process and benefited greatly from immigrant labour. Country welcomed migrant workers in order to fill the shortage of workers in low-status, low-paid, unsanitary, manual labour and physically challenging jobs, especially in jobs that the German people did not want to work. While the migration process took place in the form of individual initiatives during the 1950s, it was regulated by interstate bilateral agreements after the 1960s. Bilateral labour migration agreements were signed with Italy, Spain and Greece in 1955, Turkey in 1960, Morocco in 1961 and 1964, Portugal in 1963, Tunisia in 1964, and Yugoslavia in 1968. Since 1973, migration movements have continued through "family reunification" or "family formation". Immigrant families who came within the framework of worker migrations and family reunifications constitute the current immigrant profile of Germany. The population of Germany stands at 82,793,000 people according to 2018 data. 10,915,455 of the population consists of immigrants. At the end of 2019, Germany hosts approximately 1.15 million refugees and 309,000 asylum seekers. It is the country that hosts the most refugees going to Europe. Syrians make up half of the refugees it has accepted³ (Ulutaş, 2013)⁴

³ "Population by nationality and sex (quarterly figures)". (Çevrimiçi) <https://www.destatis.de/EN/Themes/Society-Environment/Population/Current-Population/Tables/liste-current-population.html> , 02.12.2019.

⁴ UNCHR: Germany. (Çevrimiçi) <https://www.unhcr.org/germany.html?query=germany>, 23.01.2022).

Immigrants are required to pass an integration test before they are granted entry into Germany. Through this test, it is tested how well immigrants can adapt, to which degree they can act as a European and how western they can think. 600 hours of language learning lessons are given along with citizenship lessons. Thus, the door to full integration is opened. While German policy on foreigners draws the boundaries of how integration can take place, the German Federal Office for Immigration and Refugees is the main coordinator of these policies (Snyder, 2006).

It is essential for immigrant ethnic groups to abandon their past in order to fully integrate into host society. The individuals who are not connected to their past will adapt better to where they have gone. Family reunifications in countries such as Germany, which receive huge amount of immigration, reveal that assimilation practices do not really serve their intended purpose. This proves that immigrants do not actually forget their own culture (Guler, 2020). In this model, where social insurance and social security networks play an active role, individuals can benefit from the system via premiums they pay. While the family and child assistance provided to migrant workers and their families through family reunifications benefited the immigrants, it was perceived as an exploitation of their rights by the native citizens of the country. This situation disrupted the harmony between immigrants and native Germans (Diehl & Blohm, 2003).

"Immigration and Refugees Bureau" deals with applications of foreign persons in Germany. Although the German government implements policies to limit immigration, it acts generously towards qualified entrepreneurs and facilitates their entry into the country by implementing an open door policy. In particular, the entry of qualified and eligible people from India to the country is carried out with the Green Card programme. In the recent period in which technology and innovation are trending, the government aims to attract a qualified workforce to the country, especially in the sectors such as software development and information technologies (Amrute, 2016).

At the 13th Integration Summit, the German Chancellor announced the five-stage national action plan. At this summit, the social integration strategy for foreigners and immigrants living in Germany was elaborated. In the first stage, outreach and information campaigns are implemented in order to attract qualified workforce to the country, while the second stage consists of language learning, recognition of diplomas, and consultancy services related to daily life. In the third stage, the difficulties faced in participating in social life are eliminated and entry to the employment market and participation in civil society activities are supported. The fourth stage includes strategies that encourage participation in fields such as culture, health, sports and media and multi-diversity, and finally in the fifth stage includes measures

to strengthen social belongingness and cohesion.⁵

Although Germany is willing to accept immigration, it is sensitive about social cohesion. It is important not to disturb the peace of the German people while profiting from immigrant labour at a high capacity. Therefore, the German language proficiency of the immigrants, whose admission procedures are continue, is tested before they arrive in Germany, and after they are settled in Germany, immigrants are required to take both citizenship and language education. Citizenship education is among the most essential aspects of immigration process that German Government considers as essential for integration. Immigrants are given information on following issues: What do Germans like? What are their daily routines? What kind of attitudes are deemed to be offensive in society? ⁶.

3.3. Sweden;

It is remarkable that Sweden, one of the exemplary countries of the Scandinavian model, is more constructive and flexible in its approach to immigrants in comparison with other European countries. This feature indicates that it adopts a universal model. This model does not discriminate in terms of admission to the country, giving status to immigrants and providing social support. According to OECD data, the proportion of the immigrant population in the total population in Sweden has approached 16% (OECD, 2016). Wide social rights, good working conditions, high income level, abundant welfare practices have brought Sweden to the top of the welfare state rankings. It has adopted a universal approach in its welfare practices and migrant workers have also been treated like their citizens. This has led many people to seek immigration to Sweden for political or economic reasons (Messina, 2002; Borevi, 2012).

The idea of providing a labour force via immigrants for Sweden, which wanted to develop its industry after the Second World War, paved the way for the emergence of flexible immigration policies. Policies that facilitate the entry of immigrants into the country were supported. Thanks to its flexible approach; Sweden received qualified labour migration first from Scandinavian countries such as Finland, Denmark, Norway, and then from all over Europe, and thus, it reduced production costs and reached a level where it can compete with European markets. (Scott, 1999; Riniolo, 2016, p.8). By the 1970s, the wages of immigrants were reduced and more restrictive policies were implemented vis-à-vis immigrants (Rooth,

⁵ “Almanya’da uyum için beş aşamalı plan”. (Çevrimiçi) <https://www.dw.com/tr/almanyada-uyum-i%C3%A7in-be%C5%9F-a-%C5%9Famal%C4%B1-plan/a-56820687> , 20.01.2022.

⁶ <http://earsiv.medeniyet.edu.tr:8080/xmlui/bitstream/handle/123456789/390/06.03.%20TezRukiye%20%281%29.pdf?sequence=1&isAllowed=y>, 10.12.2021

1999). Native (Swedish) workers have started to be employed instead of migrant workers in enterprises. With the transition from industry to the services sector, the entry of skilled labour migrants into the country has been facilitated. Authorities focused on language learning and integration in order to benefit from skilled immigrant labour force. Equality, freedom of choice, and support for partnerships are prioritized in order to obtain effective and productive results from integration (Alonso & Fonseca, 2012, p.9).

The economic crises in the former Yugoslavia during the 1990s and the ethnic conflicts and wars in the Balkans resulted in immigration to Sweden. The Swedish government accepted these immigrants by adhering to the 1951 Geneva Convention and implemented programmes for immigrants via the Swedish Immigration Agency. The Swedish government focuses on integration in order to benefit from qualified labour force. It is assumed that immigrants will work more effectively when the language proficiency problem is solved. Sweden has transferred the integration issue to the municipalities. For this reason, implementation differs from region to region. The Ministry of Integration and Gender Equality was established to prevent discrimination in recruitment and facilitate integration to the society. The cohesion and social peace play a prominent role in the activities of this ministry. Thanks to these policies, public peace and living standards are high in Sweden. Treating everyone in an equal manner and providing services is seen as the biggest contributing factor to this success (Alexander, 2003, p.420).

Although Sweden has been able to develop a successful migrant admission system compared to many European countries, there has been an increase in discrimination and exclusion against immigrants in housing and employment after the 1990s. In addition to spread of racism, Islamophobia and discrimination which had begun to increase their impact in the world, the influx of Syrian refugees after 2015 led to a visible increase in racist approaches in the country. Immigrants began to be discriminated against in terms of employment, working conditions and wages. In this process, immigrants were the group most affected by negative effects of discrimination (Carlsson, 1970). In the system where being Swedish considered to be sufficient to obtain welfare-state benefits, blood and citizenship ties are not obligatory, but it has been underlined that the generous attitude in the acceptance of immigrants and the services provided to immigrants should be changed, especially after the 2014 general elections. The fact that Sweden is the country that receives the highest number of asylum applications among EU countries supports these claims. In recent years, Sweden has narrowed the processing of immigration applications and granted short-term residence and work permits to labor migrations, and has started to decrease the provision of social welfare services (Kupsky, 2017).

3.4. Turkey;

Immigration to Turkey started with citizen migrations which was deemed as the legacy of the Ottoman Empire. Since the first years of the Republic, it has become a country of immigration with the effect of the policies carried out in the nation-state building process (Erder, 2007, p.23). From the establishment of the Republic until the 2000s, the country accepted immigrants or citizens from many countries, especially from Greece, Balkan countries, Germany, Bosnia, Kosovo, Bulgaria and Macedonia (Yılmaz & Uludağ Güler, 2020, p.3887). After the 2000s, due to the political turmoil and economic problems in Turkey's neighbouring countries, irregular migration flows to Turkey have started from Afghanistan, Iran, Iraq, and finally Syria (Pusch & Wilkoszewski, 2010, p.29). Political events that took place in the world due to social, political and economic reasons have reached massive proportions by expanding their field after globalization. In 2011, many popular movements against governments or power in Arab countries gained momentum. One of the most well-known among them is undoubtedly the Arab Spring, which started in Tunisia in 2011 and spread to other countries (Uludağ Güler, 2019, p.104).

After the 1980s, with the disintegration of the Soviet bloc, migration movements intensified due to the deepening poverty and unemployment. Turkey has become the preferred destination especially for women immigrants. Women from Ukraine, Moldova and Romania started to do sex work as well as shuttle trade, office work, agriculture, light industry, entertainment sector and home care work (Erder & Kaska, 2011).

Inspired by the United Nations' Palermo Protocol (Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children), Turkey defined human trafficking as a crime in 2002. After 2004, status of "victim" was defined and protection mechanism was created. In 2006, its scope was extended by amending both the "human trafficking" and "forced prostitution" laws. Thus, the country aimed to prohibit the forced labour of women immigrants in the prostitution sector in the context of decent works worthy of human dignity (Coşkun, 2014). Throughout migratory movements to Turkey that have diversified over time, immigrants have turned to new business areas such as interpretation, clerical work, modelling and designing. They entered Turkey mostly with a tourist visa and worked informally, deprived of all social and economic security (Kaşka, 2007, p.231).

Domestic works are placed near the top of list in Turkey, as in other countries, where women immigrants find work. Women's entry into the labor markets has been facilitated with the spread of the service sector, the change in the gender-based division of labor, the differentiation of gender roles, the intensification of the flexible working model, and the

increase in dual-income families. The fact that women are in the labour market has made it a necessity to get support from outside for domestic work. The idea of employing migrant women to reduce costs by not paying for shelter has paved the way for them to concentrate on this area (Ramirez-Machado, 2003). In addition, the nature of the job is flexible, often there is no notion of overtime working, there is a lack of leave and break periods, many works are expected to be done within this scope, and women immigrants are often excluded, abused, subjected to violence and sexual harassment while performing this service. Because of these reasons, there has been a growing need for regulation. Within the scope of ILO Convention No. 189 on "Decent Work for Domestic Workers", provisions were drafted to cover the specified problem areas. Accordingly, the definitions of domestic work and domestic worker are primarily included in the Convention, and the concept of domestic work and domestic worker were provided with a conceptual basis in Turkey and in many countries (Yıldırım & İslamoğlu, 2014, p.112). This situation will not only improve the working conditions of immigrants, but also will reduce the economic discrimination against them.

Prohibitions on employment in domestic work for immigrants in Turkey were abolished in 2003 with the adoption of the "Law No. 4817 on Work Permits of Foreigners". In addition to the pressures of the European Union, the expression of the problems of migrant workers in many areas made it necessary to make legal arrangements in this area. Thus, Turkey has made important legal arrangements for migrant workers after 2011. According to the "United Nations Convention on the Protection of the Rights of All Migrant Workers and Members of their Families" ratified by Turkey in 1999, migrant workers are required to be treated equally with citizens (Demirdizen, 2013, p.331).

Although the law enacted for work permits of foreigners wanted to secure the rights of foreigners, most of the working foreigners could not benefit from this law due to the informal nature of domestic work, the fact that the immigrants do not possess legal papers, and their processing takes a long time due to the complex structure of the law. In addition to the problems of previous immigrants, due to Syrian migration flows that started in 2011, the "Law No. 6735 on International Labour" was put into effect on 13.08.2016, aimed at solving the problems of foreigners who are already working or wish to work in labour market (Uğur & Yanık, 2016).

Until 2011, Turkey did not have an immigration policy or an integration policy that could be applied to immigrants. As a matter of fact, Turkey has not faced many problems in terms of social cohesion and harmonization of immigrants until this year. While the migrants it received during and after the proclamation of Republic were mostly citizen migrations or a limited number of migrations, it was exposed to mass migration with the open door policy

implemented by Turkey after 2011. This situation has compelled Turkey to adopt a permanent and clearly defined regulation on immigration and integration.

In the first years, the concept of “guest” was at the forefront and the social acceptance among the people, who acted with a high sense of tolerance and empathy, towards Syrians was at a very high level (Yıldırım, İslamoğlu & İyem, 2017:112). As a result of the protracted war and the increase in the number of people arriving, tolerance gave way to dissatisfaction, especially as most of the immigrants were young men. 53.8% of those coming from Syria are men and 46.2% are women. The ratio of Syrian men between the ages of 15-64 to overall number of Syrian men coming to Turkey is 59.89%⁷.

Dissatisfaction with the existence of Syrians was sometimes expressed orally and sometimes in a physical manner. The "us" phenomenon, which is unique to community-type societies such as Turkey, has prepared the ground for the Syrians to be easily positioned as the "other" (Cetin, 2016, p.201). Considering the obstacles to integration, opponents argued that the Syrians are culturally different from the Turks, they have a different language and culture. Even if they share the same religion with the Syrians, they differ in many aspects such as sanitation, hygiene, child marriage, the way of communication, and table manners (Gözler Çamur, 2017, p.93). The people living in border provinces were among the most disturbed by the presence of Syrians. So much so that the number of Syrians in some border provinces exceeded the number of the native population of the province. This situation caused discomfort among native population (Harunoğulları & Cengiz, 2016, p.310).

Conflicts between neighbours in border provinces and polygamous marriages constitute another stumbling block for social cohesion. In general, it has been observed that there is an increase in the number of divorces due to the increase in marriages with Syrian women in border cities (Ekici & Tuncel, 2015, p.18). Most of the marriages between the citizens of both countries took place on a voluntary basis. Young Syrian women were married to elderly men or disabled people in exchange for a small fee, in the hope that their "life would be saved", or they had to marry Turkish citizens as second or third wives. Syrian women who sought asylum in Turkey were used for cheap labour, prostitution and second marriages. They were excluded from society because they disrupted the unity of family and caused the failure of some marriages (Cengiz, 2015, p.116). In the early years, the Syrians, who behaved in a calm manner and in harmony due to their gratitude and the psychology brought by the forced

⁷ Uyum Strateji Belgesi ve Ulusal Eylem Planı: 2018-2023, Republic of Turkey, Ministry of Internal Affairs, Directorate General of Migration Management. (Çevrimiçi) http://www.goc.gov.tr/icerik6/gecici-korumanin-unsurlari_409_558_1095_icerik. 05.01.2022.

migration, started to get involved in criminal activity over time. This has led to distrust and prejudice against Syrians (Tunç, 2015, p.45)

The legal and institutional framework of migration management in Turkey was drawn within the scope of the Eleventh Development programme, as the Syrians' return scenario not being realized and it appeared that their presence would be permanent. Pursuant to this plan, the "Project of Supporting a Development-Sensitive and Harmonious Migration Policy Framework in Turkey" carried out in cooperation with the General Directorate of Migration Management and the Swiss Undersecretariat of Migration during 2015-2017 aimed to develop a development-oriented migration policy in Turkey. Project aims to maximize positive ripple effect on development of integrating immigrants into society In Turkey, new regulations are being made in order to make faster, more effective and analytical regulations and applications on migration, and institutional formations have been realized in this context. The most important of these regulations is the "Foreigners and International Protection Law" numbered 6458 and the "Republic of Turkey Ministry of Internal Affairs General Directorate of Migration Management" established in the context of this law. The purpose of establishing this General Directorate; It continues its activities in order to carry out the necessary business and procedures for the entry, exit and deportation of foreigners to Turkey, to provide international protection status such as refugees, asylum seekers, temporary protection, and to combat human trafficking⁸.

Cohesion Strategy Document and National Action Plan (2018-2023) have been prepared under the coordination of the Ministry of Interior, General Directorate of Migration Management, and public institutions and organizations, municipalities, international organizations, non-governmental organizations are supposed to work in an integrated manner to implement the policies prescribed in this plan. According to this action plan, 6 themes were determined under the umbrella of harmony, namely social cohesion, information, education, health, labour market and social support (social services and aids). One of the most important factors in integration is undoubtedly language learning and education. Studies on the education of immigrants in Turkey in this regard are carried out under the coordination of the Ministry of National Education (MEB), the Council of Higher Education (YÖK) and the General Directorate of Migration Management⁹. Besides education, employment is an important issue for full integration. In this regard, legal arrangements have been made concerning the work

⁸ Özel İhtisas Komisyonu RAPORU, <https://www.sbb.gov.tr/wpcontent/uploads/2020/04/DisGocPolitikas%C4%B1OzelIhtisasKomisyonuRaporu.pdf> , 23.01.2022.

⁹ Uyum Strateji Belgesi ve Ulusal Eylem Planı: 2018-2023, Republic of Turkey, Ministry of Internal Affairs, Directorate General of Migration Management. (Çevrimiçi) <https://www.goc.gov.tr/kurumlar/goc.gov.tr/Yayinlar/UYUM-STRATEJI/Uyum-Strateji-Belgesi-ve-Ulusal-Eylem-Plani.pdf>., 23.01.2022.

permits issued for immigrants. Social support stands out as one of the most prominent aspect of welfare state practices. Social services and aids are the support provided to cover the needs of immigrants when they first come to the country and for their continuing needs, although they may change in forthcoming periods. In this framework, social services and assistance are provided to immigrants as well as citizens of the country in case of need (Uludag Güler, 2021, p.148).

Conclusion

Global migration has been one of the most prominent factors shaping contemporary societies and still maintains its relevance. The integration of immigrants and refugees, i.e., their full membership in a society, is closely related to the development of those countries. Especially after the World Wars, the contribution of immigrant labour in the process of re-emergence of growth and expansion is cannot be ignored. Reaping the benefits of immigrant labour and ensuring full integration have been associated with providing immigrants with basic rights such as housing, education, health, employment, freedom of movement, participation in public affairs and political rights. While the best way to benefit from migrant labour is to employ them, economic integration actually contributes to psychological, sociological and cultural harmony.

The scale and structure of the welfare state models existing among countries have an extremely decisive role in defining their attitudes towards immigrants. Countries in the liberal model, where freedom and individuality play a central role and social state practices are largely transferred to the market, have been restrictive in accepting immigration after the 2000s. In America, one of the most prominent countries of the liberal model, and whose the majority of population is immigrants, programs implemented to ensure social cohesion for immigrants are mostly associated with language learning. Degree of an individual's cohesion and happiness is proportional to his/her level of English proficiency, and ability to speak fluently means better job opportunities. People's quality of life and harmony are completely in their own hands. Individual effort is extremely important for social harmonization and integration. Many aspects of burdens and policy development regarding immigrants have been left to market mechanisms. Due to these features, the theme of freedom, which is at the core of the liberal model, has brought individualism to the fore in terms of providing social welfare and left the harmony to the free will of the people.

In the Scandinavian model, which is founded upon universal principles, equal service is provided to everyone regardless of class, and many harmonization policies have been implemented for immigrants. Social peace and good living standards are ensured in the

society as a whole, by providing fair service to everyone. Scandinavian countries, with their low levels of unemployment, fair income distribution, and high living and working standards, have been one of the attractive places for immigrants due to these features. They have managed to balance the income levels among society with the help of high taxation and provide social welfare services to many people without utilising income tests. They have adopted a moderate and flexible attitude towards the issue of accepting immigration.

In the conservative model, which is based on individual empowerment, premiums, and social insurance, welfare policies were mostly based on merit. Majority of aid and services provided to immigrants were in proportion to benefits of their labour. The premium term and premium amount paid for insurance determine the extent insured people will benefit from the welfare state. If immigrants want to live and work in better conditions, they need to learn German better and integrate fully into society. For this reason, they are subjected to language training and integration courses. Citizenship procedures are not carried out for those who cannot pass the courses.

In countries like Turkey, that were late to adopt a welfare state systems and considered to be in the Southern European welfare state classification, income distribution injustice, unemployment and poverty are at high levels, while the level of education, women's participation in employment, welfare state aids are at a very low level. In these countries, immigration policy that started to take shape with the process of accession to European Union. In Turkey, the institutions and processes related to migration have been shaped to a large extent by the Syrian migration. The activities of the Department of Integration and Communication under the General Directorate of Migration Management contribute to the harmonization process. The Integration Strategy Document and the National Action Plan (2018-2023) have developed strategies to empower immigrants living in Turkey, contribute to their ability to manage their life in an independent manner and their integration into society.

Integration policies in welfare state regimes differ according to the economic system, perspective on the integration of immigrants and the criteria to which they are attached, but what they have in common is a shared belief that cohesion and integration contribute to social peace and economic growth. It is essential to strengthening the international responsibility of sharing mechanisms for the effective implementation of policies in the field of social cohesion. The governments of these countries depict immigrants as a source of "danger", "fear" and "crime" with the strict border control strategy they implement. These strategies, which largely determine the ideological framework of the media on immigrants, label the existing immigrants to be integrated as "other", "different" and "foreign" and hinder social cohesion. Negative perceptions especially towards immigrants should be changed.

Institutional framework, harmonization and integration, legislative, and institutional capacity based on human rights work not only for the protection of immigrants, but also for the cohesion and integration of individuals with society, participation in social life, their participation in employment, and their use of basic services. It is extremely important to integrate the immigrants into the society and pay regard to public acceptance and satisfaction in this process. Integration is a two-sided process and mutual cohesion and consent are essential.

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