# Transforming Citizenship Policy:
# Ideational and Discursive Processes in Public Policy-Making

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# Abstract

Barriers to citizenship are being raised in recent policy reforms across Europe but extant theories of citizenship are not able to explain the direction of change. While the scale, pace and nature of change makes citizenship policy a field ripe for examination by scholars of comparative public policy, it has not been integrated into the literature on public policy making. As new ideas about loyalty and belonging are shaping the transformation of citizenship policy in Europe, this paper draws on the established social sciences literature on ideas to argue that a consideration of ideational and discursive processes can enhance our understanding of the direction of recent citizenship policy outcomes. Focusing on the policy formulation stage of the policymaking process, when political actors (re)frame issues and problems, set the terms of the debate and propose solutions using discursive processes, the paper argues that the influence of ideas depends on the existence and nature of a resource base – a policy subsystem – to institutionalise them. An explanation of the causal effects of subsystems on the role of ideas in policymaking is developed by proposing a typology of subsystems (dominant, competitive, distributed) and deriving three propositions which are tested on case studies of the Netherlands, the United Kingdom and Canada using primary and secondary sources. Two conclusions can be drawn: first, the nature of a subsystem impacts how ideas are used in policy formulation and; second, the cases suggest that a focus on subsystems can also offer insights into policy change. More research is required to consider whether an ideational approach could travel easily though all stages of the policy process.

# Introduction

Against the backdrop of charged public debates about immigration, nationality and belonging, barriers to citizenship are being raised in recent policy reforms across Europe. Made, debated and remade at the intersection of international and domestic society, citizenship policy is being 're-nationalized' against all assumptions about the withering away of national models in response to changes to state sovereignty (Soysal, 1994; Sasken, 1996; Weil, 2001; Joppke, 2005, 2007a). After an era of liberalization, there is now a steady process of incremental reforms of citizenship policy characterized by restrictive measures such as compulsory fee-based civic integration programs, citizenship tests, and oaths of loyalty and allegiance (Geddes and Niessen, 2005; Jacobs and Rea, 2007; Adamo, 2008; Joppke 2008; Howard, 2009; McGhee, 2008; Van Oers, 2008; Löwenheim and Gazit, 2009; Osler, 2009). The resources that immigrants must expend to demonstrate successfully that they are British, Dutch or French can amount to barriers to naturalisation (Ryan, 2008). The scale, pace and nature of change makes citizenship policy a field ripe for examination by scholars of comparative public policy. There are opportunities to test theories of policy change, policy processes and decision-making from positivist and post-positivist perspectives. The number of contemporaneous cases set against a shared supranational context – the European Union – opens the door to large $N$ cross-national examinations or small-n comparative case studies. Despite the potential for theory-building, citizenship policy has not been integrated into the literature on public policy making. This fact is all the more surprising given that extant citizenship models cannot explain recent policy changes.

New ideas about loyalty and belonging are shaping the transformation of citizenship policy in Europe. Accordingly, this paper draws on the established social sciences literature on ideas (Hall, 1989, 1993; Goldstein and Keohane, 1993; Cox, 2001; Lieberman, 2002; Bleich, 2002, 2006; Blyth, 2002; Béland, 2009) to argue that a consideration of ideational and discursive processes can enhance our understanding of the direction of recent citizenship policy outcomes. Analyses that focus exclusively on power, interests or institutions cannot explain the nature of policy problems or the objectives and content of policy solutions. Actors build their understanding of policy problems, goals and objectives using ideas and standards of what their society should look like (Bleich, 2003; Béland, 2009; Lindvall, 2006, 2009) and discourses to communicate their ideas to other actors and the public (Schmidt, 2002; Fraser, 2003; Schmidt and Radelli, 2004). At any given time there are many ideas in circulation about how to address policy problems but most of them will never gain traction with policymakers. Ideas need the support of policy subsystems – the alliances of actors with a stake in a policy issue – in order to be able to move through the policymaking process and impact policy outcomes (Baumgartner and Jones, 1991, 1993; Jones 1994; Thurber, 1996; Howlett and Ramesh, 1998). To date, scholars have not considered the influence of subsystems on ideas to explain the direction of citizenship policy reform.

This paper seeks to fill this gap. The first part outlines the elements of restrictive citizenship reforms in Europe over the last two decades and briefly considers the strengths and weaknesses of three approaches for explaining change. The second part turns to the literature on policymaking processes in comparative public policy to develop an explanation of the causal effects of subsystems on the role of ideas in policymaking. Part three applies this explanation to case studies of the Netherlands, the United Kingdom and Canada. The conclusion considers the implications of the analysis for

broader empirical and theoretical issues in the field of citizenship study and comparative public policy.

## The Restrictive Turn in Citizenship Policies: Evidence and Explanation

Postwar Europe has witnessed a progressive liberalization of citizenship policy along three lines: the application of the *just soli* principle to citizenship (and a move away from *jus sanguinis*), the liberalization of naturalization (through the removal of cultural assimilation and reduction in residency requirements) and the increasing toleration of dual citizenship. While not all countries have progressed at the same rate (Howard, 2009), there is a strong assumption about modernization and political development in the literature (Weil, 2001), including the view that integration models based on nationhood have been eclipsed by the need to adapt to permanent large-scale immigration through the liberalization of naturalisation policies (Soysal, 1994).  More recently, changing source countries of migration and perceived social cohesion challenges are transforming naturalisation into a tool for migration control by raising barriers to citizenship.  Supposedly neutral liberal states are now stating that the goal of citizenship policy is to enforce a shared understanding of membership in the polity that reinforces western liberal-democratic values underpinned by national references to culture and history. The objective of these policies is to address the perceived integration failures by effectively restricting membership to those immigrants who can demonstrate their ability to fit into domestic society. The United Kingdom approach states the objective most clearly: "There needs to be absolute clarity about which migrants are eligible to become citizens, and the stages through which they progress to reach that status" (UK, 2008: 19).

This new model of integration is increasingly implemented using coercive instruments such as fees, tests, fines for non-compliance and, making access to social benefits and long-term residency permits contingent on participation in civic integration programs.  The outcomes in naturalisation rates have been immediate and direct. In the Netherlands, the 2007 legislative move from obligatory participation to obligatory pass for civic integration classes resulted in a 50% decline in naturalisation rates. Moreover, repeated failure is the basis for denial of permanent residency. The impact of other types of change is more indirectly felt. The success rate on the "Life in the UK" test is 73% but a breakdown of results shows that most failures are in the category of family reunification and refugees suggesting results are highly differentiated across countries of origin (Ryan, 2008). Many measures have a built-in disincentive to migrate: in the Nordic welfare states, non-compliance with the obligatory nature of integration programs can lead to a reduction in, or withdrawal of, social benefits (Jacobs and Rea, 2007). Some states have taken a different tack by using 'moral suasion' to achieve their policy objectives. The United Kingdom has introduced mechanisms to incentivize citizenship by fastracking those immigrants who demonstrate active citizenship, such as volunteering. Germany will reduce the residency requirement for immigrants who successfully complete their integration courses. Picking up on Canadian and Australian practices of citizenship tests for naturalisation, the majority of European states have either introduced them or are in the process of doing so. But even once all these steps have been completed successfully, there can be additional hurdles: France has recently added a signed contract at the end of the naturalisation process that commits new citizens to certain rights and obligations. Austria requires new citizens to take an oath to the democratic values of Europe.

Other key pillars of the liberalization of naturalisation policies have been recalibrated in response to the new policy objective of selecting the 'right' citizens. Family reunification criteria have been made more stringent within the framework of existing legal rights in response to immigrants' strategy of

selecting spouses from their country of origin (Lucassen and Laarman, 2009). France has gone the farthest down this path in response to the tripling in number of marriages between French nationals and foreigners abroad between 1995 and 2004 (Joppke, 2007a:11). Years of marriage requirements for residency permits were increased first under the 2003 *Loi Sarkozy* that reshaped immigration and nationality law in France (from 1 to 2 years) and further revised upward (to 4 years) in Sarkozy's 2006 reform. Other states have introduced similar restrictions in an effort to prevent perceived "marriages of convenience." Italy passed a security Law in 2009 that increased the time required for marriage from 6 months to 2 years (longer if resident abroad) for naturalisation. The UK intends to restrict family reunification to those immigrants who have progressed through to the status of permanent residents, a process than can take up to 6 years. Even though foreign spouses are, in the majority of cases, joining a naturalised immigrant, they are obliged to participate in the same civic integration programs as other immigrants. In a departure from previous policy assumptions, marriage to a citizen and access to his or her social networks is no longer viewed as a guarantee of integration. Overall, the newly stated goal of citizenship policy in European states has transformed nationality law into an instrument of migration control.

## Models of Citizenship

*Cultural* models of citizenship from historical sociology (Brubaker, 1998), which are premised on path dependency and policy continuity, cannot explain recent changes in citizenship policy (Hansen and Koehlher, 2005). These models have a static notion of nationhood and citizenship; attempts by scholars to use them to explain contemporary patterns of integration and socialization (Diez and Squire, 2008) don't advance our theoretical understanding of the complex interplay of new discourses, political imperatives and the evolution of policy and institutions. *Post-national* perspectives also present limitations. These models argue that changing conceptions of sovereignty (Sassen, 1996) have eclipsed the relevance of national models for explaining membership. Instead, the ascendance of a global human rights regime focused on personhood provides the basis for migrants' claims to civic, social – and in some cases political – rights (Soysal, 1994). This approach has been criticized for depoliticizing citizenship (Murphy and Harty, 2002; Tambakaki, 2009; Hansen, 2009) and as such is not ideally placed to explain the trend towards the politicisation of citizenship and the resurgence of national models. Finally, the *electoral politics* perspective argues that the combination of an active far-right movement that is mobilized on the issue of immigration and anti-immigrant sentiment among the population can explain the recent restrictive turn in citizenship policy (Schain, 2008; Howard, 2009). However, this theory is unable to explain the outliers (United Kingdom) and glosses over those cases that only partially fit (Netherlands, Spain, Belgium). Moreover, anti-immigrant sentiment has long been the norm in Europe; this argument cannot account for the timing of recent restrictive citizenship measures. At most, this approach demonstrates an instrumental motive for policy change.

# Public Policy Framework

Scholars of comparative public policy have not turned their attention to explaining the transformation of citizenship policy in European states and scholars of citizenship are not systematically reaching out to theories of public policy to explain change. In this section of the paper I develop an alternative approach that examines how policy subsystems influence the use of ideas in the policy formulation stage of the policymaking process, when political actors (re)frame issues and problems, set the terms of the debate and propose solutions using discursive processes.

## Policy Ideas and Policy Discourses

Scholars of comparative politics and international relations have focused on the role of ideas (Hall, 1989, 1993; Goldstein and Keohane, 1993; Cox, 2001; Lieberman, 2002; Bleich, 2002, 2006; Blyth, 2002; Béland, 2009) and epistemic communities (Haas, 1992; Anderson, 2008; Rich, 2004; Lindvall, 2009; Marier, 2009; Balch, 2009) for explaining institutional stability and change, paradigm shifts, and policy change. More recently, social scientists are turning their attention to the role of discursive processes for conveying ideational content in political life (Bhatia and Coleman, 2000; Schmidt, 2002, 2008; Fraser, 2003; Schmidt and Radelli, 2004).

Three features of ideational theory are relevant for the analysis that follows. First, policymakers use ideas to understand and interpret their world, define policy problem and identify policy goals and the instruments to achieve them (Hall, 1993). Ideas, and the policy paradigms that frame them, reduce uncertainty by providing actors with a model of reality that is extremely durable (Goldstein and Keohane, 1993). When policy paradigms do break down in the face of exogenous or endogenous pressures, epistemic communities – networks of knowledge-based experts with shared normative beliefs – can help state actors interpret the causal nature of policy problems through consensual knowledge, establish their position and interests and, provide a reliable way out of policy uncertainty (Haas, 1992). Second, the business of selling ideas requires a *policy discourse* that "speak[s] to the soundness and appropriateness of policy programmes [through] the interactive processes of policy formulation and communication" (Schmidt and Radelli, 2004: 193). Policymakers use discourses to frame issues for different audiences and pay careful attention to the choice of venue for delivering their message (Baumgartner and Jones, 1993: 1047-8; Schmidt and Radelli, 2004: 201). Discourse can be *coordinative* in the policy sphere to elaborate the various dimensions of a new policy or programmatic idea and *communicative* in the political sphere to present and legitimate politicians' ideas to voters, political opponents and social and economic interests. Third, there is a consensus among scholars that the explanatory power of ideas is best understood through a consideration of other factors, such as interests, institutions and power configurations (Goldstein and Keohane, 1993; Walsh, 2000; Lindvall, 2006; Béland 2009). There is an inherent problem of endogeneity in studies of the impact of ideas on policies (King, Keohane and Verba, 1994: 191-193).

I build on established concepts of ideas and institutions to explain policy change but I propose a different analysis of how they interact. For ideas, I focus on the role of *cycles* of the policymaking process (agenda-setting, policy formulation, decision-making, policy implementation and policy evaluation) because political dynamics differ across each stage, impacting the choice of analytical factors. I argue that ideas matter most in the policy formulation stage, which is bookended by agenda-setting (strategic choices) and policy evaluation (social learning) stages. In fact, state actors encourage experts to help define policy goals and objectives in the policy formulation and, to a lesser extent, agenda-setting stages. By contrast, ideas matter far less during the decision-making and implementation stages: as Thurber notes (1996: 83), "most public policymaking is not electorally conflictual but routine." By the implementation stage, a policy idea has become reality and another set of factors are at play: instrument design and settings, stakeholder relations, consultations, public awareness, etc. While social learning takes place at the policy evaluation stage, ideas will only factor in if deficiencies and gaps are identified and the political will is there to launch a new policy cycle.

State actors seek out experts to help define the goals and objectives of policies in the formulation stage. There are three reasons for this. First, it is well-known that the policy capacity of states is

challenged due to the pace and complexity of most contemporary policy problems. Bureaucracies have tried to address this issue through focused recruitment campaigns or strategies, such as foresight units in many states (Anderson, 1996; Fellegi, 1996). Turning to think tanks is another means of accessing ideas and although it is not without challenges, it can be cost effective. Second, while policymakers know that complex policy problems increasingly require horizontal solutions, authority structures often discourage this way of working (DM Task Force 1995; Bogdanor, 2005; Peters, 2006) and innovative solutions – such as building horizontal strategic capacity – are the exception, not the norm (Conference Board of Canada, 2007). Third, an idea can carry more weight among politicians if it comes from outside the bureaucracy. Even if bureaucrats support an idea, validation by a group of experts often strengthens an idea's policy prospects (Esping-Andersen et. al, 2001) because of the perception of neutrality (Weible, 2008: 615). Some scholars (Lindvall, 2009) maintain that experts have weak influence on domestic policy goals because of the challenge of providing cause-and-effect advice on nested issues (such as labour market and social policy) or because broad paradigmatic change usually involves social forces and public debates, which can eclipse experts' views (Hall, 1993). However, no scholar has demonstrated that state actors are more capable of sorting through these challenges.

Ideas are used in three ways (Weible, 2008). First, ideas can be used for *learning*, which will impact the policy process in an indirect way by building up cumulative understanding in order to gradually reshape ideas and ways of thinking. Second, ideas can be put to *political* use to rationalize previously made decisions or discredit opponents' ideas. The selective use of statistics to argue a policy point is an example. Third, ideas can be used for *instrumental* purposes in order to have a direct impact on the policy process for example, by commission research in response to an identified problem and then immediately applying the results. Governments will often strike an expert panel to examine a salient policy issue and then adopt the findings in the formulation of new policies.

## Policy Subsystems

Because I am interested in examining the role of ideas at the policy formulation stage, my institutional focus is on the policy subsystem, which "acts as the primary mechanism of policy reproduction" (Howlett and Cashore, 2009: 35). A subsystem is the alliance of different state and non-state actors who have a stake in a particular issue, the policy domain in which they operate and the mode of decision-making; it is shorthand for how to combine actors, interests and institutions (Thurber, 1996; Sabatier, 1999; Weible, 2008). Subsystem actors often play different roles in advancing a policy issue: epistemic communities of non-state actors can promote knowledge and seek to have influence over policy outcomes while smaller networks of government players can focus on decision-making processes. A focus on subsystems can help find a middle ground between incremental and paradigmatic model of institutional and policy change. As Thurber notes (1996: 82), subsystems take care of substantial policymaking that don't require electoral or legislative engagement. They exist "because of society's need to divide decision-making tasks and promote the development of knowledge to solve public problems."

## Research Design and Methodology

Building on these theories, this paper seeks to determine the causal effects of subsystems on ideas in policymaking. I develop a specific explanation of the effect of subsystems on how ideas are used in citizenship policy formulation; a more general theory will require additional testing. To capture the variation across subsystems I adapt existing typologies in the literature (Thurber, 1996; Sabatier,

1999; Howlett and Rames, 1998). *Dominant* subsystems are coherent, stable rule-making structures with few actors / departments and veto points. There is a high degree of agreement among members with regards to policy goals and the ideas underpinning them. They are prepared to bargain and compromise in order to reduce uncertainty and information costs. Finance subsystems are good examples: actors have an interest in providing a stable foundation for markets. In *competitive* subsystems authority is centralized but there is a high level of uncertainty with regards to outcomes, creating a high stakes environment in which actors are locked in a struggle over access to power. Actors are likely to represent powerful interests and be well-resourced. Regulatory subsystems that act as the gateway to product markets, such as pharmaceuticals or telecommunications, can be highly competitive depending on the degree of monopolization. Competition can also occur across subsystems when actors jockey for access to decision-makers. A *distributed* subsystem is the opposite of a competitive one. The ideational dimensions of a policy issue are shared across the different subsystems; there is an exchange of information; a willingness to explore alternative policy outcomes; and strong agreement on a meta-narrative. However, there is no obvious 'super-authority' that can force the different subsystems to collaborate and cooperate. 'Social justice' agendas are of this sort as is the current Canadian government's Arctic Agenda. Given the increasingly horizontal nature of policy issues, we would expect to see more subsystems of this type.

A number of propositions can be derived from a consideration of the influence of subsystems on the use of ideas. First, *dominant* subsystems are more likely to use *learning* because of the strong coherence of ideas and the low and controlled nature of policy conflict. Learning will most likely reinforce existing perceptions of policy problems and solutions although the dominant subsystem can also slowly adapt to new research findings, information or ideas and incorporate learning results into the policy process. The dominant subsystem can also use ideas instrumentally if they reinforce the prevailing view of the policy problem; otherwise they will be ignored. Second, *competitive* subsystems are most likely to use *political* ideas because of their potential to act as a weapon for arguing against or discrediting an opponent. Since the 'winner takes all' in this subsystem, there is no incentive to share expertise; uncertainty is exploited for gain. Third, *distributed* subsystems are most likely to use *instrumental* ideas because there is a there is a commitment to sharing and adapting to information through iterative processes and considering alternative policy outcomes. This subsystem, depending on how collaborative it is, could also use *learning* because of its commitment to consensus based solutions to policy problems.

To test these propositions, I draw on a mixture of primary and secondary evidence from reports, speeches, parliamentary evidence and existing research to identify the causal mechanisms by which ideas are taken up by subsystems. A focus on causal mechanisms is more appropriate for the initial stages of a research project such as this one; more robust results will follow fieldwork. To test for the causal effects of policy subsystems on ideas, I adopt a research design that ensures variation on the independent variable (King, Keohane and Verba, 1994) by selecting cases that correspond to different types of citizenship policy subsystems: Netherlands (dominant subsystem), the United Kingdom (competitive subsystem), and Canada (distributed subsystem). The Netherlands is chosen because it is a case of intrinsic importance. The European trend towards restrictive citizenship policies was launched there. The UK is selected because it is an outlier case: New Labour introduced restrictive citizenship policies without the presence of a far-right movement that could mobilize anti-immigration sentiment. Even Howard admits that "far right parties receive very little support and have almost no influence" there (Howard, 2009: 161). Finally, Canada is selected because the outcome is the opposite of what the far-right thesis would predict. While there is no far-right party in Canada, we would expect the logic of the far-right thesis to prevail under conditions of a Rightist

government and public demand for a review of citizenship in 2006. And yet, no restrictive policy change took place.

As with all small-*N* case studies, there is a need to introduce controls in order to reduce the risk of omitted variables. In this paper two controls are introduced. First, we might expect that a country's constitutional features, such as parliamentary processes or legislative cycles, could impact the nature of policy-making. I control for this possibility by choosing three cases with similar institutional features. They are all constitutional monarchies, parliamentary democracies and they each use constitutional features to manage diversity. The Netherlands has a pillarized system to promote consociationalism at the national level; Canada has used federalism but its national institutions have many consociational features to ensure representation of the two official language groups; and, the UK introduced devolution in Northern Ireland, Wales and Scotland. Second, from a policy perspective, we could assume that policy legacies might impact on the nature and direction of change: theorists have predicted that sunken costs and path dependencies act as barriers to far-reaching policy change. The three cases chosen here have all made a policy commitment to diversity that supports their constitutional commitment: they have a value system that is based on the accommodation of diversity. Each state's citizenship policy regime is 'liberal' and 'multicultural': liberal, in that the literature views them as having led the liberalizing trend in citizenship policy in postwar Europe; multicultural in that their citizenship integration policies have been premised on the cultural preservation of immigrant groups.

## Case Studies

### *Netherlands: Dominant and Competitive*

Over a two decade period beginning in the 1980s, the Netherlands progressed through two transformations of the country's citizenship paradigm in response to different ways of framing the immigration 'problem' in Dutch society. In the 1960s and 1970s, "the central idea was that the Netherlands was not – and should not be – an immigration country" (Bruquetas-Callejo, 2005: 4) and the country's immigration policy objective was to return migrants to their home country. The Dutch pursued this objective by using an established innovation – the pillar – (Lijphart 1968) as a means of cultural preservation of ethnic minorities: "without much reflection, the pillarization model was applied [using] pre-existing constitutional and other legal arrangements" (Entzinger, 2006b: 187). Separate cultural institutions and funding, schools, mother-tongue teaching, and ethnic representation in the mandate of public media were some of the measures used. A distributed policy subsystem supported these measures although there was no coordinated approach.

During the 1970s, the permanent nature of Dutch immigration was beginning to be debated in academic circles, the media and even within government itself using a coordinative discourse to shift ideas towards an integration policy. The Ministry of Culture, Recreation and Social Work, which handled welfare benefits for vulnerable populations such as asylum seekers, established a migration advisory board to bring together experts, frame the issue and develop solution (Bruquetas-Callejo, 2005: 12). The distributed subsystem actively used instrumental ideas in an iterative way to move forward the debate. The catalyst for change was the 1979 report on Ethnic Minorities by the

Scientific Council for Government Policy[1] – a think tank that advises the Prime Minister – recommending that the Dutch government recognize the permanent nature of immigration and develop an integration policy. By 1983 the government responded with an ethnic Minorities policy that formalized the integration subsystem and assigned a coordination role to the directorate of Home Policies in the Ministry of Home Affairs. The Ministry brought coherence to integration by building horizontal linkages among policymakers from across Dutch ministries as well as vertical ones into local government, minority organizations and non-state actors. The goals of the policy were to liberalize naturalisation and reduce inequalities between the Dutch and immigrants through anti-discrimination legislation and measures to promote labour market integration. The coordination role played by Home Affairs centralized authority, brought overall coherence to the subsystem and transformed it into a dominant one. By contrast, the immigration subsystem, which persisted with a restrictive view of admission, was in the Ministry of Justice, which controlled admission and residence and disagreed with the emphasis on integration. However, Justice officials had little control over policy development and attempts to set direction, such as a proposal to curb family reunification in the 1980s, were unsuccessful.

Beginning in the 1980s, rising unemployment among the country's minority groups prompted a re-examination of the impact of the 1983 Ethnic Minorities Policy on integration and criticism of the Dutch multicultural approach. Once again, the Scientific Council for Government Policy attempted to frame the debate with a report in 1989 that recommended a renewed effort to meet the policy's goal of socio-economic integration while de-emphasizing the government's role in cultural preservation by relegating it to the private realm. But the dominant integration subsystem rejected this expert view because it wasn't congruent with its policy objectives. In the same year, the Department of Justice's Interdepartmental Working Group on Immigration attempted to reposition integration as the weak link in the country's strategy of restricting immigration. Separate cultural institutions were a pull for migrants; restricting access to them would potentially curb immigration. These critiques of the multicultural integration model were part of a broader social discourse on Dutch society that would eventually transform the welfare state and embrace a form of 'active' citizenship that would have implications for naturalisation (Entzinger, 2006b; Ossewaarde, 2007). A highly politicized debate ensued about the 'absorptive capacity' of Dutch society and the need to curb immigration in order to better manage integration. The policy venue shifted from the closed integration subsystem to the Dutch Parliament, signalling that the consensus around integration was breaking down.

Over the 1990s, there was an opportunity for the immigration subsystem to use political ideas to shift the debate towards restricting admission in order to address citizenship and integration challenges. Machinery changes followed: a new Immigration and Naturalisation Directorate in the Ministry of Justice brought together a 900 strong immigration group and a 25 member naturalisation group, signalling a consolidation of resources and a clear emphasis on migration control (Groenendijk, 2004: 111-12). Under the 'Purple coalition' that governed from 1994-2002, there was a turn away from dual citizenship beginning in 1998; integration policies were no longer framed in terms of minority groups but rather individual residents; civic integration courses were introduced in

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[1] The Scientific Council for Government Policy (WRR) was established by an act of parliament in 1972 and is mandated to advise the government on emerging policy issues. The Dutch governments has a statutory responsibility to respond to the WRR's reports with an indication of forward action. The Council is staffed by academic experts and supported by a core group of researchers. Its reports receive significant attention in policy and media circles. See, Conference Board of Canada, 2007.

1994 and were backed up by the force of law in 1998 (Civic Integration of Newcomers Act). By the beginning of the 21ˢᵗ century, the Ministry of Justice emerged the winner in the competition against the integration subsystem by using the administrative tools it controlled to introduce restrictions to admission, residency permits and naturalisation. Decisions on admission were now taken off-shore to satellite offices in migration source countries; legal residency became the only route to accessing the welfare state and (1998 Linkages Act); long-term residency was made contingent on the successful completion of civic integration courses. Integration and immigration policies were now linked in pursuit of the broader objective of restricting access to citizenship. In 2002, the dominance of the new 'law and order' immigration subsystem was completed with the transfer of the management of integration from the Ministry of Home Affairs to the Ministry of Justice, supported by a new Minister of Aliens' Affairs and Integration and a New Style Integration Act. Further restrictive legislation followed in 2006 (Civic Integration Abroad Act) to curb family reunification making a civic integration test mandatory for obtaining a residency permit. This move has effectively made the demonstrated level of integration for residency the same as that for citizenship (van Oers et al., 2009: 29), demonstrating how naturalisation instruments can be used for migration control.

## United Kingdom: Competition and Innovation

During New Labour's second term (2001-2005) in office, Britain's immigration system was completely overhauled and citizenship has followed in the third term (2005 to present). While citizenship reforms were initially cast in terms of civic education, they increasingly took on a security perspective. The backdrop against which these changes have taken place is New Labour's broader project to redesign British society through a new social contract focused on active citizenship, social inclusion and respect. Within this paradigm, immigration was reframed as a problem from two perspectives: social cohesion, which was of interest to the Home Office, and labour market shortages in strategic sectors, which preoccupied the Treasury. Ideas had already been circulating in policy and business communities for a managed migration strategy that could capitalize on the benefits of migration through targeted labour market approaches having a social cohesion dividend. But within the Home Office there was a competition between two subsystems: a policy group that supported change and an operational one that resisted a move way from policies of exclusion (Balch, 2009).

The Cabinet Office's Strategy Unit[2] provided a potential solution. It has the authority to promote innovation in policy development by carrying out strategy reviews and develop advice for the Prime Minister in cooperation with other departments. The Strategy Unit took the lead in reframing the migration and citizenship debate through research analysis and a strategic alliance with the Institute for Public Policy Research (IPPR), which because of its close association with New Labour, would give the research more credibility and profile among politicians (Balch, 2009). However, think tanks such as IPPR "have mainly offered discourses, rather than specific policy proposals." (Bentham, 2006: 171). The Strategy Unit had to sell these new ideas back to the Home Office by winning over the sceptics in the operational group. Its goal was to have the Home Office take ownership of the research results in order to ground them in policy formulation – a clear example of the instrumental use of ideas. Balch (2009) shows how through strategic coordination and networking this goal was

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[2] The Strategy Unit was created in 2002 as a merger of two other Blair creations: the Performance and Evaluation Unit (1998) and the Forward Strategy Unit 92002). To avoid confusion I use 'Strategy Unit' to refer to all three Units.

achieved and the results were published as the 2002 White Paper on *Secure Borders, Safe Haven: Integration with Diversity in Modern Britain.*

The White Paper – a form of communicative discourse – launched the process of developing "a stronger understanding of what citizenship really means" (Home Office, 2002: 10). It framed the policy problem in terms of the failure of the idea of British citizenship – multi-ethnic, non-assimilationist – to forge a sense of civic unity and cohesion in Britain's communities. The government's response was backed up by instrumental ideas from commissioned research and formed along two lines: civic integration programs for newcomers (Kiwan, 2008; McGee, 2009) and a citizenship curriculum in schools (Osler, 2009). The Home Office established the Life in the UK Advisory Group, composed primarily of educators[3] whose report, *The New and the Old*, painted citizenship as an ongoing journey centered on integration through learning. Nevertheless, as the government's approach to migration became layered with security overtones, integrative citizenship became reframed as 'active' and 'earned'. This theme emerged in the results of the government's commissioned review of citizenship by Lord Goldsmith (*Citizenship: Our Common Bond*), which advocated a credit-based system "to measuring a person's commitment to living in the UK and engaging with UK society" (Goldsmith, 2008: 9). Commissioned as part of the governments' constitutional renewal initiative (Governance in Britain), many of the Goldsmith Report's recommendations were instead adopted as the third pillar of the immigration reform, after the points-based system and border strategies. The 2008 Green Paper, *The Path to Citizenship: Next Steps in Reforming the Immigration System* spelt out the "deal for citizenship: that we welcome newcomers, but anyone who wants to remain here long term must speak our language, obey the law and contribute to the community" (11). *The Path to Citizenship* proposed that migrants would earn their citizenship by progressing through temporary residence and probationary citizenship and demonstrating their commitment to Britain through volunteer or community work.

The reframing of citizenship as a security issue could be interpreted as an example of the Bigo's "the politics of unease" (Bigo, 2002; Diez and Squire, 2008). The use of diffuse technical practices to monitor migrants – and therefore, potential citizens – is evidence in the legislative change of 2006 (*Immigration, Asylum and Nationality Act*), which drew an express link between citizenship, immigration and borders by providing for the creation of a new UK Border Agency to which naturalisation was transferred from the Home Office's Immigration and Nationality Directorate. It possibly also signalled that the 'anti-migrant' group in the Home Office to gain ground over the policy group (Balch, 2009). Finally, the 2009 *Borders, Citizenship and Immigration Act* makes earned citizenship part of Britain's new legal framework. If this interpretation is correct, it fits with the posited relationship between the political use of an idea and a competitive subsystem.

## Canada: Distributed Subsystem

In summer 2006, a citizenship controversy emerged a result of the evacuation of approximately 15,000 Lebanese-Canadians from Lebanon in the wake of a violent conflict between Lebanese-based Hezbollah forces and Israel. There was anecdotal evidence that many of these Canadians had very loose ties to Canada (Jonas, 2006). Critics argued that these dual citizens were "Canadians of convenience" and that their passport was an insurance policy against political instability. Bureaucrats

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[3] A policy review of citizenship in education was launched in 1997/98 by David Blunkett when he was Secretary of Education and conducted by an Advisory Group lead by Sir Bernard Crick. When Blunkett became Home Secretary in 2001, he mandated Crick to lead a subsequent review of the role of citizenship education in immigrant integration.

were criticized for not knowing how many Canadians were citizens of another country.[4] There was public outrage over the news that approximately half of the Canadian evacuees from Lebanon returned there over the fall of 2006 leaving Canadian taxpayers with the reportedly $85 million bill. As political pundits, historians, lawyers and think tanks weighed in on the dual citizenship debate, views and opinions coalesced around three inter-related themes: the appropriate balance between *rights and obligations*; the definition of citizen *loyalty and*; the principle of *equity* and *reciprocity* in Canada's social citizenship regime.

Citizenship policy in Canada is framed by the idea that immigration and diversity are a source of economic and social benefits for the country whose returns are guaranteed by a strategy (*Immigration and Refugee Protection Act*, 2001) focused on attracting highly-skilled workers and a diversity policy that promotes a multicultural integration model (*Canadian Multiculturalism Act*, 1988). The linchpin is the *Citizenship Act* (1977), which facilitates naturalisation through liberal measures such as low residency requirements, multiple citizenship, *jus soli* principles for the children of foreign-born Canadians, equal rights for Canadian-born and naturalised Canadians, and citizenship as a right for qualified applicants. Citizenship is a distributed policy subsystem in Canada that includes citizenship (management of the *Citizenship Act*), immigration, multiculturalism, and security; authority – until very recently – was distributed across three departments.[5]

The Conservative government of Stephen Harper attempted to frame the problem in terms of citizens' obligations and the problem of social reciprocity presented by dual citizenship. In fall 2006, ministers used appearances before parliamentary committees to communicate a new citizenship discourse, a high-stakes venue that put legislators and stakeholders on notice that the *Citizenship Act* could be opened up. The then Minister of Foreign Affairs, Peter Mackay, in his testimony to the Senate Committee on Foreign Affairs, confirmed that the government was considering whether there "should there be different obligations when it comes to dual citizenship? Should a person who has lived outside the country for — pick a period of time — and is no longer a property holder or a taxpayer in this country be entitled, and should they have the same expectations that come with the citizenship that exists when you live in Canada?" He pointed to international models that "require[d] dual citizens to live for a specified period of time in a country, to own property, to pay perhaps a diminished level of tax or to pay perhaps a specified amount for living outside the country."[6] Mackay's departmental officials suggested that the basis for consular services could be re-examined, by making a distinction between residents and non-residents of Canada, although they noted that "within the framework of the consular service, a Canadian is a Canadian [whether a resident or a non-resident]; the rule is very clear. However... the debate has been launched and the discussion will take place. The challenge before us concerns how to frame that debate."[7] The Minister of

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[4] Estimates ranged from 2-4 million.

[5] Citizenship and immigration fall under the authority of the Minister of Citizenship and Immigration; multiculturalism to the Minister of Heritage (sometimes delegated to a Secretary of State); and security to the Minister of Public Safety. Multiculturalism was transferred to the Minister of Citizenship and Immigration in 2008.

[6] Parliament, Senate Standing Committee on Foreign Affairs, [Study of Lebanon Evacuation], November 1, 2006 (39th Parliament, 1st session), testimony by the Honourable Peter Mackay, Minister of Foreign Affairs. http://www.parl.gc.ca/39/1/parlbus/commbus/senate/Com-e/fore-e/08ev-e.htm?Language=E&Parl=39&Ses=1&comm_id=8  Accessed January 30, 2010.

[7] Parliament, Senate Standing Committee on Foreign Affairs, [Study of Lebanon Evacuation], December 6, 2006 (39th Parliament, 1st session), testimony by Robert Desjardins, Foreign Affairs. http://www.parl.gc.ca/39/1/parlbus/commbus/senate/Com-e/fore-e/08ev-e.htm?Language=E&Parl=39&Ses=1&comm_id=8 . Accessed January 30, 2010.

Citizenship and Immigration, Monte Solberg, framed the issues in similar terms in his testimony before the House of Commons Standing Committee on Citizenship and Immigration: "[...] a lot of Canadians are concerned today that if Canadians are absent from the country for many years in a row, they're not paying into social programs to ensure the social safety net is there for them should they come back to Canada. That's really the issue."[8] But when probed by opposition members on the policy problem, it was clear that Solberg was unaware of the range of international instruments – tax treaties, social security agreements – that already existed to achieve these objectives.

Alarmed by the direction the Conservative government appeared to be taking the debate, different experts attempted to change the discourse by reframing the issue and changing the policy venue. Most active was the Vancouver-based Asia-Pacific Foundation of Canada (APF) which used a coordinated discourse through op-eds, policy papers and roundtables to reframe the issue as an economic argument about the benefits of immigration for the Canadian economy. Sensitive to the situation of Hong Kong-Canadians, the APF drew on expert academic advice to advocate for a Canadian Diaspora strategy "to better prepare for the reality that Canadians have become more internationally mobile [by capitalizing on] overseas Canadians [as] a key element of international business strategies and public diplomacy" (APF, June 2006). Harnessing the economic benefits of such a strategy would require a change in "preconceived notions of the costs and benefits that the different generations of the Canadian disapora return to Canada" (DeVoretz and Woo, 2006). The conservative C.D. Howe Institute weighed in on the debate by considering the costs of the "Canadian passport package" (Chant, 2006) in the context of Canadian citizens living abroad and proposed measures that fit more closely with the government's framing of the issue: increase the passport application fee for those Canadians living abroad, raise the residency requirement, and consider placing limits on the transfer of citizenship across generations born outside Canada.

Although the instrumental use of ideas promoted by the APF could be expected to fit a distributed subsystem, in this case the APF's diaspora discourse did not resonate with the distributed citizenship policy subsystem – it was viewed as a labour market or international trade idea; the APF failed to read the geography of the policy subsystems in Ottawa. Although the C.D. Howe Institute's idea of raising the passport fee was greeted as a potential quick fix by politicians – a potential political use of ideas – it was not as straightforward as it seemed. Legislation governs the use of fees for federal services and public debate on the costs of the Lebanon evacuation coincided with an unfavourable audit by the Auditor General of General on how Foreign Affairs and International Trade calculated passport fees[9] (OAG, 2008). This was an example of experts lacking sufficient knowledge of the policy environment to make credible recommendations on the use of policy instruments. Moreover, this political idea gained no traction in a distributed subsystem where ideas are normally used to manage uncertainty by adaptation and not to seek political gains.

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[8] Parliament, House Standing Committee on Citizenship and Immigration, Examination of Supplementary Estimates 2006-2007, November 7, 2006 (39th Parliament, 1st session), testimony by the Honourable Monte Solberg, Minister of Citizenship and Immigration.
http://www2.parl.gc.ca/HousePublications/Publication.aspx?Language=E&Mode=1&Parl=39&Ses=1&DocId=2480787&File=0 Accessed January 30, 2010.
[9] The Auditor General concluded that DFAIT overstated costs of the consular services fee relative to the approved fee cost structure, which meant that Canadian passport holders were paying fees for activities that were outside the scope of the services they could expect to receive. See OAG, May 2008 Report of the Auditor General of Canada to the House of Commons, *Chapter 1: Management of Fees in Selected Departments and Agencies*.
http://www.oag-bvg.gc.ca/internet/docs/aud_ch_oag_200805_01_e.pdf Accessed on February 6, 2010.

In attempting to reframe dual citizenship as a problem of loyalty and obligations, the Harper government faced the same problem: there was no ready-made policy subsystem to work through possible solutions. Reciprocity and obligations in welfare state programs are questions of *social* citizenship. Grappling with the international dimensions of social citizenship and its interface with federal programs required bringing in a new set of actors from the Department of Human Resources and Skills Development and the Department of Finance. Policymakers from these two departments working on the internationalized system of social security arrangements and taxation for Canadians abroad were typically focused on eligibility rules (residency requirements, years of contributions) and did not engage value-laden or normative debates on Canadian citizenship. At the same time, the citizenship policy subsystem at the Department of Citizenship and Immigration viewed citizenship in purely administrative terms: its mandate was to implement the *Citizenship Act*, not define values. Monte Solberg was sharply reminded of this reality by opposition members when he questioned the principles of international social security before the parliamentary Citizenship and Immigration Committee: "So have your facts straight, and if you don't have your facts straight, please refer to your bureaucrats. And if you don't know about old age security, do not start speaking about other departments."[10] The absence of an instrumental idea to respond to the 2006 citizenship controversy that could be taken up by Canada's distributed citizenship subsystem ensured that the government's re-examination of dual citizenship went nowhere.

## Summary and Conclusion

This paper has sought to mainstream the examination of citizenship policies in the literature on comparative public policy. The analysis proposed here has drawn on established approaches in the field of comparative politics and comparative public policy to analysing change and, in particular, the role of ideas and institutions. Ideas shape policymakers' perspective of policy problems and policy solution but they will only influence policy formulation when there is a resource base – a policy subsystem – to institutionalise them. Two conclusions can be drawn. First, the nature of a subsystem impacts how ideas are used in policy formulation. The Dutch and British cases confirmed that competitive subsystems use ideas in a political way in order to take advantage of uncertainty for power gain. To overcome uncertainty in the wake of the depillarisation of Dutch society, the immigration subsystem was able to use political ideas to rationalize the use of restrictive admission measures, something it had failed to do when 'integration' was the dominant discourse and the availability of instrumental ideas sustained the distributed integration subsystem. In Britain, the political rhetoric around migration and security was used to push for an approach that viewed citizenship in security terms even though there was no evidence to support the need for it. The Dutch case showed that the distributed integration system required a coordination mechanism in order to use instrumental ideas. Similarly, in the British case, the competitive migration subsystem could use instrumental ideas when an innovation in the form of the Strategy Unit was applied. These outcomes point to the need for further research to ascertain when the relationship between subsystems and ideas proposed here can be adapted. Scholars have alluded to such mechanisms (Thurber, 1996) but not theorized them. Finally, in Canada, the lack of congruence between

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[10] Parliament, House Standing Committee on Citizenship and Immigration, Examination of Supplementary Estimates 2006-2007, November 7, 2006 (39th Parliament, 1st session), testimony by the Honourable Monte Solberg, Minister of Citizenship and Immigration. Questionning by the Honourable Jim Karygiannis (Lib) http://www2.parl.gc.ca/HousePublications/Publication.aspx?Language=E&Mode=1&Parl=39&Ses=1&DocId=2480787&File=0 Accessed January 30, 2010.
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instrumental ideas and the distributed citizenship subsystem shows how quickly ideas can fade when there are no resources to support them. Moreover, the government was searching for a political idea to support its framing of dual citizens' obligations and loyalty but the distribute subsystem was unresponsive.

Secondly, the Dutch and British cases suggest that a focus on subsystems can also offer insights into policy change. In the Netherlands, the immigration portion of the citizenship subsystem could be made dominant in response to an ideational shift in framing the twin problems of immigration and integration. The availability of administrative tools in the Ministry of Justice provided the starting point for restrictive measures that were eventually supplemented with policy levers taken from the Ministry of Home Affairs. While the Dutch meta-narrative on immigration was transformed at the beginning of this century from multiculturalism to assimilation, the 'no-immigration' perspective at Justice had not changed substantially since the 1970s: a policy idea had come full circle. In Britain under New Labour, the launch of a new approach to immigration policy was made possible by an innovative mechanism at the centre that was able to overcome a competitive environment in the Home Office. But over time a perverse outcome emerged: a new targeted migration strategy was introduced – modelled on the Canadian and Australian points system – but nationality was restricted – the opposite outcome of Canada. A broader social discourse on social cohesion with strong security undertones can explain the difference. Since Britain never had a citizenship subsystem, there was no doubt in which direction nationality policy would go: the emergence of a new border enforcement agency made it possible to link citizenship to migration control.

Too often, scholars of comparative politics put policymaking in a black box. Scholars of comparative public policy, on the other hand, often ignore how policymaking processes are inherently politicized. Bridging the gap between politics and policy requires consideration of the constraints policymakers face. A focus on subsystems allows us to trace those constraints and examine the strategies actors employ to manage them and develop some hypotheses about policy change. More research is required to consider whether an ideational approach could travel easily though all stages of the policy process. If the framework holds, it can be applied to other areas of examination in the field of comparative public policy.

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