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Global Migration: Consequences and Responses

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Comparative Reception Policy Typology

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Horizon 2020 RESPOND: Multilevel Governance of Migration and Beyond (770564)



Leading Partners: University of Göttingen (Alexander K. Nagel) and Istanbul Bilgi University (Ayhan Kaya)

Focus: WP 4 focuses on reception policies, practices and humanitarian responses to the current refugee crisis. Despite efforts to achieve harmonization (especially promoted by the 2016 CEAS and by the ENP), relevant differences exist in this field in the countries that are the object of research (Austria, Denmark, Germany, Greece, Hungary, Italy, Poland, Sweden, UK, Turkey and Lebanon). WP4 will map the policies and practices of reception and humanitarian responses of 11 countries, and migrants' perceptions, actions and reactions to policies and practices. The main objectives of the WP4 to be achieved are as follows: a) to develop a mapping of policies and practices of reception in the countries being researched; b) to develop a typology of these policies, practices and responses; c) to assess the coherence of these policies and practices with respect to international and EU standard; d) to study migrants' perceptions, actions and reactions to policies and practices; and e) to provide basic information in the area of reception for the development of all subsequent WPs.

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About the project

RESPOND is a Horizon 2020 project which aims at studying the multilevel governance of migration in Europe and beyond. The consortium is formed of 14 partners from 11 source, transit and destination countries and is coordinated by Uppsala University in Sweden. The main aim of this Europe-wide project is to provide an in-depth understanding of the governance of recent mass migration at macro, meso and micro levels through cross-national comparative research and to critically analyse governance practices with the aim of enhancing the migration governance capacity and policy coherence of the EU, its member states and third countries.

RESPOND studies migration governance through a narrative which is constructed along five thematic fields: (1) Border management and security, (2) Refugee protection regimes, (3) Reception policies, (4) Integration policies, and (5) Conflicting Europeanization. Each thematic field is reflecting a juncture in the migration journey of refugees and designed to provide a holistic view of policies, their impacts and responses given by affected actors within.

In order to better focus on these themes, we divided our research question into work packages (WPs). The present report is concerned with the findings related to WP4, which focuses specifically on reception policies, practices and humanitarian responses to the current refugee crisis. Despite efforts to achieve harmonization (especially promoted by the 2016 CEAS and by the ENP), relevant differences exist in this field in the countries that are the object of research (Austria, Denmark, Germany, Greece, Hungary, Italy, Poland, Sweden, UK, Turkey and Lebanon). WP4 will map the policies and practices of reception and humanitarian responses of the afore-mentioned countries and migrants' perceptions, actions and reactions to policies and practices. The main objectives of WP4 are as follows:

- to develop a mapping of policies and practices of reception in the countries being researched;
- to develop a typology of these policies, practices and responses
- to assess the coherence of these policies and practices with respect to international and EU standard
- to study migrants' perceptions, actions and reactions to policies and practices
- to provide basic information in the area of reception for the development of all subsequent WPs.

The last point is achieved through an additional comparative report that will be based on the data from individual country reports.

Executive Summary

- In this comparative report we develop a typology of reception governance, which allows
 for a country comparative perspective on reception measures for refugees. The term "reception governance" is to comprise both reception policies (i.e. a system of principles to
 guide decisions), decision-making and actual practices.
- The main rationale for the construction of the typology is that reception governance does
 not constitute a policy field or domain on its own, but crosscuts both classical policy
 domains (such as social policy, immigration policy, economic and labour policy) and various levels of governance (such as inter- and supranational, national, federal and municipal).
- The report is based on a based on a meta-analysis of 11 national reports on reception policies and practice from countries along the so-called Eastern Mediterranean Route. It comprises established EU member states, such as Austria, Germany, Greece, Italy, Sweden and the United Kingdom (before Brexit), more recent member states, such as Hungary and Poland, and third countries, such as Turkey, Lebanon and the Iraq, which have played an important role as source and transit countries of refugees.
- The typology of reception governance is based on six criteria. Two of these criteria (Welfare State and Immigration Regime) reflect the recent turn in migration studies to account for the complexity and crosscutting nature of reception governance whereas the other four are derived from a recent model of state transformation which conceives of late modern nation states as exposed to processes of internationalization, regionalization, privatization (involvement of societal actors) and (re-)nationalization.
- Based on country-by-country pair comparisons we identified five major types of reception governance which are presented in the order of declining state intervention:
 - Wary Hospitality is characterized by comprehensive and reliable reception measures, a lack of early integration options based on an inherently transitory notion of migration, an intensive monitoring and accountability of asylum seekers, a substantial involvement of societal actors in the (re-) formulation of reception policies and growing public pressure to apply restrictive measures towards refugees. In our sample, the type applies to Austria, Germany and Sweden. Other European countries might include France (albeit a higher degree of centralization) and the Benelux-States (despite a higher degree of marketization).
 - Post-Communist Reluctance is characterized by rudimentary and volatile reception measures, an overall strategy of preventing immigration by performing humanitarian tasks in third countries and a highly ambivalent stance towards European regulation between grudging compliance and selective protest. In our sample, this type applies to Hungary and Poland, but it might be extended to include other post-communist countries in Europe, such as the Czech Republic, Slovakia and the Baltic states.
 - Ordo-liberal Delegation is characterized by rudimentary reception measures, a high degree of delegation through market mechanisms and a critical stance towards European or international regulation. The nation state is reduced to a managerial capacity seeking to active civic potentials of support. In our sample, this type only

- applies to the United Kingdom, but it might well be extended to other Anglophone countries, such as the USA or Australia.
- Overload and Externalization is characterized by rudimentary and volatile reception measures, decoupling or inertia vis-à-vis international regulation and a high degree of decentralization of reception services. In our sample, this type applies to many of the so-called front states, such as Greece, Italy and Turkey, which have turned from emigration countries into transit and destination countries for refugees since the 1990s. As a consequence, they have not embraced reception as a national responsibility, but sought to externalize it to the subnational or private sphere or to traditional destination countries within the EU.
- Residual Patronage is characterized by little state intervention (both in terms of provision and coordination of reception measures) and an important role of societal actors (both local communities and international NGOs), which leads to a highly fragmented and segmented 'system' of reception. In our sample, this type applies to Iraq and Lebanon, but it might be extended to many other weal or failed states along the established migration routes to Europe.

Introduction: Defining Reception and Reception Policy

The aim of this report is to develop a typology of reception governance, which allows for a country comparative perspective on reception measures for refugees. The term "reception governance" is to comprise both reception policies (i.e. a system of principles to guide decisions), decision-making and actual practices. The main rationale for the construction of the typology is that reception governance does not constitute a policy field or domain on its own, but crosscuts both classical policy domains (such as social policy, immigration policy, economic and labour policy) and various levels of governance (such as inter- and supranational, national, federal and municipal). In order to address the complexity of the matter, we will use this introduction to briefly outline our understanding of reception and comment on the sample and methodology of the report. In section 2, we will review the existing state of research in migration studies and beyond in order to locate reception governance at the intersection between national welfare and immigration regimes. In section 3, we will elaborate on the conceptual grid of our typology based on recent discussions on state transformation in the light of global challenges and develop some core criteria for the typology. In section 4, we will comparatively review the existing national reports on reception governance along the lines of these criteria, and present a typological discussion in the concluding section 5.

In our working understanding, *reception* refers to the liminal period between the arrival and application for asylum on the hand and the decision about the asylum application on the other. In addition, applicants who were not granted asylum, but another title of temporary protection (e.g. the suspension of deportation), applicants who appeal against the decision, or applicants who were rejected and are supposed to leave the country without it being enforced by public authorities remain subject to reception governance. Despite efforts to achieve harmonization throughout the European Union, relevant differences exist in the countries that are the object of research. Nevertheless, the definition of reception in EU legislation can serve as a common point of departure and a heuristic to grasp the various (possible) dimensions of reception governance. Direction 2013/33/EU points out a number of "material conditions" of reception including "housing, food and clothing provided in kind, or as financial allowances or in vouchers, or a combination of the three, and a daily expenses allowance" (Art. 2 (g)). The direction also touches upon matters of education (Art. 14) and basic health care, which ought to be provided during the period of reception and formulates criteria for proper accommodation (e.g. an adequate standard of living, protecting vulnerable populations, qualified staff, see Art. 18).

In this report, we will use the terms "refugee" and "asylum seekers" interchangeably since refugees in the context of reception governance usually are asylum seekers (see above). After the asylum decision, they leave the reception system and become subject to other policies fields, such as integration. Furthermore, we use of the term "immigrant" as a more general expression to cover other motives for emigration than flight, such as labour migration.

In the framework of this report, our notion of *governance* ties in with the understanding by Renate Mayntz, who used the term governance to "indicate a new mode of governing that is distinct from the hierarchical control model, a more cooperative mode where state and non-state actors participate in mixed public/private networks" (Mayntz 2003: 8). Hence, we conceive of reception governance as a collaborative endeavour to provide asylum seekers with adequate reception measures (see above) which involves public (e.g. asylum authorities) and private (e.g. NGOs) collective actors, and operates in a multi-level arena. Needless to say, the "cooperative mode" of governance does not hypostasize any sort of unanimity or a spirit of

solidarity among the actors, but it assumes a more formal mechanism of co-production of rules and practices. In addition, the semantics of 'cooperation' does not necessarily imply a level playing field. In reception governance, state actors are likely to remain in charge in the asylum decision making process and to retain at least some coordinative role in the actual provision of reception.

Regarding *methodology* this report is based on a meta-analysis of 11 national reports on reception policies and practice from countries along the so-called Eastern Mediterranean Route. It comprises established EU member states, such as Austria, Germany, Greece, Italy, Sweden and the United Kingdom (before Brexit), more recent member states, such as Hungary and Poland, and third countries, such as Turkey, Lebanon and the Iraq, which have played an important role as source and transit countries of refugees. These reports were commissioned by accomplished national experts and collect insights on reception regulations and policies (mainly based on deskwork and expert interviews) as well as practices and experiences (based on in-depth interviews with refugees and expert interviews with reception professionals and NGOs). In order to validate our comparative analysis as well as the typology, we shared a first draft of this report with the country report authors and entered an extensive discussion process.

For the *construction of the typology* we will combine deductive (important aspects from scholarly debates in migration studies and beyond) and inductive strategies (comparative themes emerging from the reports, such as populism, civic engagement and multi-actor networks) in order to determine a set of typological criteria. Technically speaking, we will re-analyse the country reports along the line of six typological criteria, based on a re-lecture of selected sections and a content analysis focusing on relevant keywords. In a second step, we will systematically analyse commonalities and differences between the country cases based on pair-comparisons. To this aim, we will compile a commonality matrix which indicates most similar clusters of countries with reference to the six criteria. It is important to mention at this point that we aim at a heuristic typology of reception governance, which may inspire future comparative research rather than a categorization, which is strictly exhaustive and disjunctive. In the following section, we will locate our perspective on reception governance in the state of research.

Reception Governance: State of Research

Much of the existing comparative research on reception has focused on particular groups, such as unaccompanied minors (Wimelius et al 2017; Derlyun and Brokaert 2008), or issues, such as (mainly psychosocial) health (Belz et al 2017; Blitz et al 2017). Many of these contributions were inherently practical and did not address the policy level very explicitly. At the same time, several studies have dealt with "refugee policy", a term that usually refers to a comprehensive set of strategies to promote the sustainable social and structural integration of refugees (Lidén and Nyhlén 2014; Landau 2006; Kagan 2011). In the terminology of the RESPOND project, this broad understanding of refugee policy includes matters of border administration, legal protection, reception and integration. While such an integrated approach might be politically desirable, in this report we are taking a narrower focus on the dimension of reception. Indeed,

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¹ For individual country reports see Barthoma et al. (2020), Chemin and Nagel (2020), Gyollai and Korkut (2020), Josipovic and Reeger (2020), Karamanidou and Folley (2020), Kaya (2020), Pachocka et al. (2020), Papatzani et al. (2020), Rahme (2020), Terlizzi (2020), and Warda et al. (2020).

some studies have looked at reception policies as a case for policy convergence within the European Union.

An early contribution by Bank (2000) investigated the legal conditions for asylum seekers in Germany, Austria, Belgium, France and the United Kingdom. Although things have changed during the last 20 years, the general approach, i.e. to conceive of reception policy in a wider context of social policy and welfare production, may still open up a promising research avenue. According to Bank, reception measures are an integral part of public welfare provision even though they are in many ways complementary to the rationale of welfare for citizens:

"[T]reatment accorded to asylum seekers follows aims *opposite* to those pursued by according welfare benefits: the latter serve to preserve or to *foster* (re)integration while the treatment of asylum seekers during the reception phase seeks to *impede* integration. By excluding asylum seekers as far as possible from taking part in normal life of the host society, states try to secure that the intended law enforcement against rejected asylum seekers is not impaired by irreversible structures of social ties" (lbid, 259, emphasis added).

In this understanding, reception measures resemble general welfare services as they allow the beneficiaries to make a living (or, as Bank puts it, "to survive"), but are built on an isolationist premise of not letting asylum applicants take roots. Following Bank, the exclusionary treatment of asylum applicants applies to the domains of social assistance, health care, education and language training and manifests itself stronger in Germany than in the other country cases. He warned against a competition of deterrence between the nations of Europe and expressed his hope in a supranational endeavour to harmonize reception conditions (ibid, 288).

Likewise, Joppke has analysed processes of convergence in civic integration policies in the Netherlands, France and Germany (Joppke, 2007). He found a lot of dynamics and variation in all three countries, which contested national trajectories and interpreted these path-breaks as an indicator of European convergence: "Most of the observed variation runs counter to what the 'national models' (or rather, accumulated stereotypes about a respective country and its policy) would predict. The 'multicultural' Netherlands adopted the most repressive variant of civic integration. 'Republican' France [...] now submits to Rawlsian 'political liberalism' [...] And 'segregationist' Germany has adopted the (hitherto) least control-minded, most 'Canadian' variant of civic integration" (ibid: 19).

From another vantage point, Kymlicka has addressed the connection between the reception of immigrants and the welfare state as an ideological challenge of the liberal left: "For almost twenty years, the left has debated what is sometimes called the new progressive's dilemma: the fear that there is a trade-off between being pro-immigrant and being pro-welfare state" (Kymlicka 2015: 1). According to him, the parallel rise of multiculturalism and neoliberalism led to a common misunderstanding that neoliberal reform, such as the retrenchment of public welfare, was the necessary price to pay for a cosmopolitan society (ibid, 6). As a matter of fact, this perspective resonates well with a theme which is pervasive in many of our national reports on reception, namely the notion of a 'competition of the deprived' which in some cases turned into a political competition of putting refugees in a worse condition than domestic welfare beneficiaries.

Building on Kymlicka's work, Scholten has also emphasized the nexus of immigration and welfare in a recent attempt to grasp the inherent complexity of immigration policy making:

"The path dependency of established welfare states can cause a failure to adapt to the complexification of migration. This is illustrated by studies of welfare tourism, where welfare regimes could become a magnet for migration, as well as welfare chauvinism where the fear of welfare tourism becomes a driver behind anti-immigration sentiments" (Scholten 2019, 114, emphasis added).

For Scholten, the entanglement of welfare and immigration policies is one out of many examples of, what he calls, the "complexification of migration", which requires an entirely new way of policy making that is able to "cut across traditional policy sectors and levels" and "involve broad actor networks (including but not limited to governments)" (ibid: 109). In our understanding, this notion of complexification of reception governance is not restricted to the well-developed welfare state of the OECD world, but may also be applied to states, such as Lebanon and Iraq, where societal actors are the main producers or public welfare.

All in all, we can account for an increasing trend in migration studies to conceive of reception as a policy arena which is cross-cutting traditional policy fields and particularly aligned with social policy and welfare production.² In order to understand reception governance, it makes sense to look at the intersection between immigration and social policy. The scope and measure of support of a state towards immigrants depends on a) its overall model (and capacity) for public welfare and b) its stance to and trajectory of immigration. In a rudimentary fashion, the interplay between these dimensions can be systematized in a fourfold table:

Welfare State (+)	Comprehensive benefits for citizens and asylum seekers alike	Comprehensive benefits for citizens, limited benefits for asylum seekers
Welfare State (-)	Rudimentary benefits for citizens and asylum seekers alike	Rudimentary benefits for citizens, limited benefits for asylum seekers

Table 1. Reception Governance

For heuristic reasons, the table is based on a dichotomist distinction between strong vs. weak welfare states and welcoming vs. reluctant immigration countries. In our notion, a welfare state is strong if it assumes a lot of responsibility for the welfare of its citizens and other populations in need, such as asylum seekers. In light of Esping-Andersen's classical distinction, this would mainly apply to the social democratic and the conservative welfare state regime (Esping-Andersen 1990). In contrast, the liberal (United Kingdom and many other Anglophone countries) and the so-called Southern European type of welfare state (e.g. Greece, Spain, Portugal) are considered "weak" in the sense that they emphasize the private (individual or family-based)

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² It should be noted here, that the growing interest of scholars from migration studies in social policy has so far not translated into an increased interest of social policy scholars in immigration.

responsibility for social welfare. A welcoming immigration country is marked by a positive framing of its previous history of immigration, clear legal schemes of immigration naturalization and a general sense of cosmopolitanism. In turn, a reluctant immigration country either has no historical experience with immigration or not framed it positively, stipulates high barriers for immigration and naturalization and puts more emphasis on national sovereignty.

Whereas strong welfare states with a welcoming approach to immigration (cell 1) are likely to provide comprehensive benefits for their citizens and for asylum seekers alike (e.g. based on a universal understanding of human rights), strong welfare states with a reluctant stance to immigration (cell 2) are more likely to offer unequal treatment. The difference may refer to the scope (e.g. basic needs vs. societal participation) or form (e.g. monetary vs. in-kind benefits) of welfare provisions. On the other hand, weak welfare states with a welcoming approach to immigration (cell 3, the ideal type discussed by Kymlicka, see above) are likely to offer rudimentary benefits to their citizens and asylum seekers alike. In a similar vein, weak welfare states with a reluctant stance to immigration (cell 4) at a first glance have less capacity of unequal treatment of citizens and refugees given that a certain subsistence minimum is required for citizens as well as for other beneficiaries. Such a constellation may, however, foster a 'competition among the deprived' which lends itself to right-wing populist mobilization while the emphasis on self-sufficiency may also result in quicker access of refugees to the (lower strata of the) labour market. While the fourfold table offers a heuristic model of the intersection between social and immigration policy, each of the two dimensions entails a set of more specific research questions vis-à-vis reception governance.

The *social policy dimension* involves research questions, such as: What does a state do for its citizens and wards? What are the social ethical foundations of welfare production? To what extent can there be an unequal treatment of beneficiaries, based on citizenship? And: How does the production of welfare services actually take place and which actors are involved? The last question relates to the wider theme *neoliberal reforms and welfare state retrenchment*: In order to cut costs in the welfare sector, several states have sought to actively engage NGOs, Faith-Based Organizations (FBOs) and civil society initiatives in the production of welfare services and other public goods. While proponents of this approach have emphasized its efficiency since NGOs and FBOs may have an advantage in mobilizing volunteers and donations (see for instance Carlson-Thies 2001), others have pointed to the risks of hollowing out the professional standards of social work and an oligarchization of civic engagement (Furness and Gilligan 2012; Lewis 2003; Nagel 2019).

The *immigration policy dimension* (in the narrow sense) involves research questions, such as: Who can immigrate for which purpose? How does the inherent complexity of immigration policy translate into cross-sector collaboration or frictions? How are refugees distributed across the national territory and which level of authority is primarily responsible for implementing reception? What is the explicit or implicit temporal perspective of reception and how does it translate into inclusionary or exclusionary measures (e.g. early integration vs. isolation)? All of these questions are closely connected to the *rise of right-wing populism* and the capacity of parties and activists from the far right to dominate the national discourse on immigration and to influence reception policy directly (e.g. through political parties and networks) or indirectly (by putting pressure on established conservative parties). In the arena of reception politics, right-wing populist mobilization is likely to promote an understanding of isolationism and deterrence. In the following section, we will draw on a model of state transformation in order to translate these research questions into typological criteria.

Conceptual Grid and Operationalization

Between 2003 and 2014, the TranState Research Centre has offered extensive and multidimensional analyses on the nature, reasons, and possible results of state transformation since the 1970s.³ Its point of departure is so-called "Democratic Constitutional and Interventionist State" which is characterized by a centralized supply of a variety of public goods, such as domestic security and welfare (Zürn et al 2004: 6). This maximal version of the nation state used to be fully responsible with regard to money and taxation as well as means of force, legislation and jurisdiction, democratic decision making, redistribution, and social welfare. During the last decades, however, this nation state model has been increasingly contested by structural megatrends and challenges, such as globalization, denationalization, the end of the industrial age, as well as individualization and the pluralization of life worlds. As a consequence, nation states have turned from "monopolists" of power into "managers" of power (Genschel and Zangl 2008). In the TranState terminology, these driving forces may trigger changes along the lines of two dimensions (Zürn et al 2004: 18-19): In the spatial or territorial dimension responsibility for public goods can be shifted to inter- or supranational actors ('internationalization') or be taken over by regional actors ('subnationalization'). In the organizational dimension, responsibility for public goods may either shift to societal actors ('privatization') or be concentrated at the core of the nation state ('nationalization').

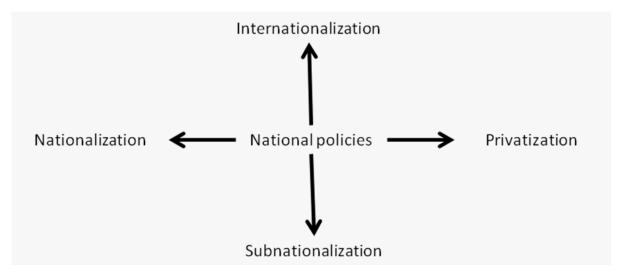


Table 2. Dimension of State transformation

The TranState model seems particularly suitable for the analysis of reception governance in the framework of RESPOND since it takes the nation state as a point of departure without denying the relevance of global challenges, such as large-scale migratory movements.⁴ Within the arena of reception governance, *internationalization* may refer to international (e.g. Geneva

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³ http://www.sfb597.uni-bremen.de/?SPRACHE=en

⁴ Although the TranState model was explicitly designed for developed nation states of the OECD world, the coordinate system of state transformation may be a useful tool to understand transformative dynamics in young or precarious nation states, too.

Convention) and supranational regulations of reception conditions (e.g. EU's Reception Conditions Directive) as well as the involvement of international NGOs in states like Lebanon, Iraq and Turkey. On the other hand, many of the national reports point to a high degree of subnationalization as responsibility for the implementation of reception is often transferred to regional or municipal bodies. In the organizational dimension, various instances of privatization can be expected, ranging from a privatization of border control through external security companies to service contracts with welfare associations and other NGOs or for-profit providers for refugee accommodation, counselling, and health services. It is important to note here, that in the TranState terminology the notion of privatization goes beyond marketization as it refers to all forms of delegation of public responsibilities to non-state actors. While some states follow a more proactive approach of privatization marked by active acquisition and monitoring of societal partners, others take a more reactive and residual stance of letting NGOs fill the gaps. Finally and in contrast, instances of *nationalization* seem to be less prevalent in the arena of reception governance although attempts to externalize reception to hotspots in third states or national reception strategies, such as the so-called "integration refugee management" in Germany may go along with increased state control.

Combining recent suggestions of migration studies to locate reception governance at the intersection of social and immigration policy and in light of the TranState model of state transformation, we will base our *typology of reception* governance on *six criteria*, which guide our synoptic analysis of the national reports. Two of these criteria (Welfare State and Immigration Regime) reflect the recent turn in migration studies to account for the complexity and crosscutting nature of reception governance whereas the other four are derived from the TranState model of state transformation which conceives of late modern nation states as exposed to processes of internationalization, subnationalization, privatization and (re-)nationalization.

Welfare State Regime: We already pointed out that the capacity and disposition of a state to provide the material conditions of reception (housing, food, clothing, health care) depends on its overall welfare regime. Hence, we expect that social democratic and conservative types of welfare states are likely to provide welfare benefits in a more comprehensive and reliable way than liberal and Southern-European types, which emphasize the private responsibility for social welfare. At the same time, we expect that conservative welfare states, such as Austria or Germany, are most prone to claims for an unequal treatment of refugees as compared to domestic beneficiaries since they exhibit a high rate of redistribution and a logic of individual accountability. In order to access this dimension, we will rely on literature on welfare state regimes.

Immigration Regime: As indicated earlier, we expect that the experience with and positive framing of immigration in a given state has an impact on reception governance. Generic notions of immigrants and immigration can take shape in guiding semantics, such as "guest workers" in Germany or the "Ansar spirit" in Turkey (see below). They may also manifest in structures, such as (the lack of) early integration measures for immigrants. For instance, long-term destination countries for refugees, such as Germany and Sweden, are more likely to provide coherent concepts and infrastructure than transit states, such as Greece, Italy or Turkey. Furthermore, we expect post-communist states to be more restrictive with regard to the permission, reception and repatriation of refugees, based on a protectionist understanding of national identity and sovereignty. In order to access this dimension, we will review the sections on immigration history and discourses within the national reports.

International Regulation: In line with the aspect of internationalization in the TranState model, we assume that international regulation is an important driving force for reception governance. We expect that the EU member states within our sample will either seek to comply with the EU Reception Directive and adjust national law respectively or protest against it through political intervention or blunt non-compliance. Furthermore, we expect that states, which are not EU members (Iraq, Lebanon and Turkey), will seek to comply with international regulations, based on pressures by external partners and donors, be it international organisations or NGOs. In order to access this dimension, we will focus on the sections on legal foundations and international regulations within the national reports.

Pattern of Regionalization: In line with the aspect of subnationalization in the TranState model, we expect that national authorities will transfer organizational responsibility to regional and local bodies who thus acquire a key role in the implementation of reception measures (see Scholten and Penninx 2016 for an application to migration studies). We expect that countries with a strong federal structure (such as Austria, Germany and Iraq) are more prone to regionalization than centralized states. Furthermore, we expect that regionalization may foster politics of dispersal, i.e. a frequent redistribution of refugees between different regions during the reception phase. Last, but not least, we expect that a high degree of regionalization of reception governance may foster an incoherence of policy and practice across the different governance layers and increase the volatility of reception experiences. In order to access this dimension, we will focus on the section on municipal actors and micro-level accounts by refugees within the national reports.

Involvement of Societal Actors: In line with the aspect of privatization in the TranState model, we assume that much of the organizational responsibility for reception is transferred to societal actors, such as NGOs, civic initiatives or for-profit organizations. We expect that faith-based organizations and welfare associations assume an important role as service providers and advocates on behalf of the interests of refugees. Furthermore, we expect that the general civic spirit of welcome and support has cooled down in the later phase of the reporting period (2016-2018). In order to access this dimension, we will focus on the sections about NGOs and welcome culture within the national reports.

Renationalization and deterrence: In line with the aspect of nationalization in the TranState model, we assume that reception governance may turn into an arena of renationalization. We expect that right-wing populist parties and movements highjack public debates on reception and claim that refugees should not be entitled to the same welfare benefits as locals. In response, we expect a restrictive shift in reception policies and practices driven by a rationale of deterrence, i.e. reception conditions are designed in a way to motivate asylum seekers to move on or back or not to emigrate in the first place. As an effect of renationalization, we expect that refugees are confronted with increasing discrimination and expectations of cultural assimilation. In order to access this dimension, we will focus on the sections on populism, policy change and individual accounts of discrimination within the national reports.

As a matter of fact, many of these criteria are closely interrelated. For instance, the overall immigration regime sets the tone for (and, vice versa can be substantially transformed by) the renationalization and deterrence in reception governance. Likewise, tendencies of renationalization are inversely related to inter- and supranational regulation. In many EU member states, right-wing parties have mobilized through campaigns against European "overregulation" or "dictation". Last, but not least, patterns of regionalization and the involvement of societal actors

are close intertwined since both reflect a more general approach to the politics of subsidiarity in a given polity. At the same time, upholding the distinction between the criteria has two advantages: first, it connects our discussion on reception governance to wider debates in migration studies and nation state transformation and second, it enables a more nuanced perspective in terms of operationalization. For example, while our understanding of national immigration regimes refers to broader historically shaped national trajectories vis-à-vis immigration, our notion of renationalization translates into a much more concrete perspective on the rise of right-wing populist movements.

Country Comparative Synopsis

In this part of the report, we will review 11 national reports on reception governance which have been compiled by local expert teams in the course of the collaborative European research project "Multilevel governance of mass Migration in Europe and Beyond" (RESPOND).⁵ All reports are based on desk research as well as expert interviews with immigrations stakeholders (e.g. administrators, NGO spokespersons, social workers) and in-depth interviews with refugees. As pointed out earlier, we pursue a meta-analysis of these reports, based on our criteria for a typology of reception governance. To this aim, we reviewed specific thematic sections of the reports and performed a content analysis through MaxQDA18 for relevant keywords.

Welfare state regime

The welfare regime determines the capacity and disposition of a state to invest in the social welfare of its citizens and other indigent groups in its territory. We tie in with the classical distinction of welfare regimes by Esping-Andersen (1990), who has differentiated between social democratic (public responsibility, comprehensive benefits), conservative (mixed responsibility, quite comprehensive benefits), and liberal (private responsibility, rudimentary benefits). Taking into account that Esping-Andersen's approach faced substantial contestation and diversification (Isakjee 2017), we also relate to Ferrera's suggestion of a Southern European model of welfare, which is marked by low state intervention, a "peculiar mix between public and non-public actors" and "the persistence of clientelism" in the distribution structures (Ferrera 1996: 29-30).

In our sample, Sweden is the only country with a **social democratic welfare regime**. The authors of the country report highlight the important role of civil society organization and emphasize that they "have been involved in the reception of asylum seekers, since the 1990s, and have contributed a number of crucial social services" (Barthoma et al. 2020: 37). They also point out how populist movements from the far-right nourished fears of an overburdening of the welfare state by refugees and managed to set the tone of mainstream reception policy accordingly: "The right-wing surge after 2015, provoked an increase in xenophobia and misconceptions about the future of the Swedish welfare state, issues that were largely fuelled by right-wing rhetoric" (ibid: 84).

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⁵ The national reports cover reception policies and practices between 2011 and 2018 in the following countries: Austria, Germany, Greece, Hungary, Iraq, Italy, Lebanon, Poland, Sweden, Turkey and the United Kingdom.

The only (yet paradigmatic) country in our sample with a **liberal welfare regime** is the United Kingdom. Indeed, the national report affirms many of the classical features of the so-called Beveridge system and their implications for refugee reception: "Welfare provision was privatised, while entitlement was increasingly associated with narratives of individual responsibility and fulfilling social obligations, excluding both citizens and non-citizens who were deemed as not contributing to the welfare state" (Karamanidou and Folley 2020: 11). The authors also bring to light, how "discourses of abuse of the welfare state by 'bogus' asylum seekers legitimated and normalised the exclusion of asylum seekers and those with no legal status from mainstream welfare provision" (ibid).

Austria and Germany are examples of **conservative welfare regimes** within our sample. In Austria, asylum seekers are included in the scheme of Basic Welfare Support and have accounted for the majority of Basic Welfare Support recipients between 2014 and 2018 (Josipovic and Reeger 2020: 13). The authors point out that Basic Welfare Support was really designed to grant the subsistence level for a limited period of time which was thwarted by a protraction of the reception period (ibid: 39). In Germany, asylum seekers were also treated under a specific welfare scheme, which was severely restricted after 2015. The country report refers to a decision of the German Constitutional Court "that an unequal treatment of asylum seekers and other recipients of social benefits aimed at securing the level of subsistence is unconstitutional except for 'short stays'" (Chemin and Nagel 2020: 20).

With regard to the **Southern European welfare regime**, our sample includes Greece and (to some extent) Italy and Turkey as relevant examples. An earlier study of the welfare state in Turkey emphasized the "remarkable similarities" of the Turkish system with the Southern European model:

"The Turkish social security system strongly protects an occupational core, the level of state penetration in the social realm is extremely low and a safety net in form of a social assistance scheme is absent. The most significant common trait of the welfare regimes in Turkey and the rest of Southern Europe is the importance of the family as a main institution of welfare. This status is also endorsed by the state through modelling (sic) its social policies after a Family and Kin Solidarity Model. For a significant part of the Turkish population the family is the main and often the only safety net and provider of social services" (Grütjen 2008: 128).

Likewise, the Greek country report points to "a long-standing absence of mainstream welfare services and allowances for both foreigners and locals" which has been further aggravated by the Global financial crisis (Papatzani et al. 2020: 55). The Italian report underlines the highly decentralized nature of reception under the National System for the Protection for Asylum Seekers and Refugees, which "consists in the implementation of basic material measures (food and lodging), together with services aimed at supporting paths of social inclusion" (Terlizzi 2020: 20).

The remaining countries, Hungary, Poland, Lebanon and Iraq, evade an easy categorization of their welfare regime. A recent paper on the Polish welfare state indicates that the **post-communist** countries of Eastern Europe could present a type of their own as they combine aspects of the liberal (rapid marketization), conservative (strong corporations) and Southern European type (low trust in formal institutions) (Golinowska 2009: 293). In a similar vein, there is an emerging literature on welfare provision in highly divided post-conflict countries, such as Lebanon and Iraq, which points to the **residual** nature of public welfare provision, the important

role of international NGOs and the high degree of clientelism in the welfare distribution structure (Cammett 2011).

All in all, we find evidence in our sample, as we expected, that social democratic and conservative welfare states provide welfare benefits in a more comprehensive and reliable way than liberal or Southern-European types, which emphasize the private responsibility for social welfare. At the same time, we only could find little evidence in the reports that conservative welfare states are most prone to claims for an unequal treatment of refugees as compared to domestic beneficiaries since similar claims could be found in many of the other countries, too.

Immigration regime

It is beyond the scope of this report to provide any sort of comprehensive classification of the country sample as to the immigration regimes and trajectories of all 11 countries. Instead, and as proxy, we will present a comparative overview of immigration numbers and then turn to a synoptic review of the national reports. The following diagram provides an overview of the estimated percentage of a country's population that is foreign born, by year. It is based on data compiled by the Pew Research Center.⁶

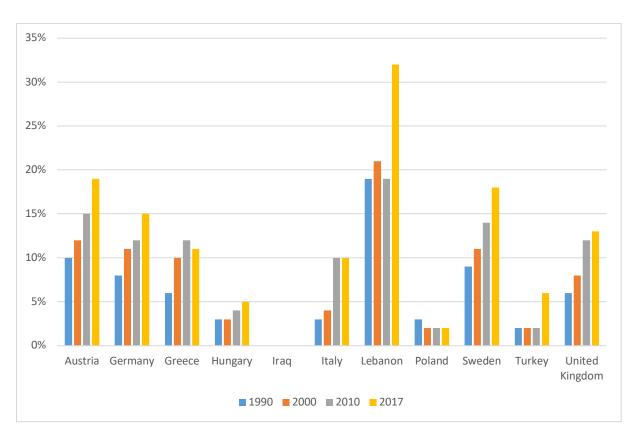


Diagram 1. Proportion of a country's population that is foreign born

(Source: PEW Research Center).

It is important to note that the diagram goes beyond the primary focus of this report as it covers all immigrants and is not restricted to refugees. That being said, there are some basic patterns,

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⁶ https://www.pewresearch.org/global/interactives/international-migrants-by-country/ accessed on 19 February 2020.

which can be highlighted: *First*, almost all countries in the sample have witnessed an increase of immigrants in proportion to their local population since 1990, which appears to be more nuanced in the classical destination countries (Austria, Germany, Sweden and the United Kingdom). *Second*, the post-communist countries (Poland and Hungary) exhibit the lowest degree of immigration, just as Turkey, which shows a considerable increase between 2010 and 2017. *Third*, it is necessary to keep in mind what the figure does *not* show, e.g. the high numbers of internally displaced persons in Iraq (Warda et al. 2020: 11-12) or those who are undocumented for whatever reason. *Fourth*, Lebanon is clearly marked as an exceptional case as it was "hosting the largest number of refugees per capita worldwide, following the eruption of the Syrian conflict in 2011 (Rahme 2020: 12). Along with Turkey and Germany, it is among the world's top 10 refugee hosting countries as far as absolute numbers are concerned.⁷

Only a few of the 11 country reports have addressed refugee reception in the context of *wider immigration history*. For instance, the Turkish report calls into mind that "Turkey has a long history of accommodating refugees since the 19th century of the Ottoman Empire (and) also has a long history of outgoing labour migration since the second half of the 20th century" (Kaya 2020: 65). Likewise, the German report states that "[d]espite its immigration history since the 19th century, Germany can be regarded as a "reluctant" immigration country" (Chemin and Nagel 2020: 64). Other reports point to recent changes in immigration policies, which we will address under the criterion of Renationalization and deterrence. All in all, there seems to be a parallel pattern in the traditional destination countries which adopted a liberal approach towards labour migration during a phase of economic flourishing whereas they have come to emphasize various restrictive measures of "immigration control" vis-à-vis refugees (Josipovic and Reeger 2020: 36; Chemin and Nagel 2020: 11; Karamanidou and Folley 2020: 9).

Narratives of reception in many countries make use of tropes, such as "hospitality" which underline the temporary and inherently asymmetric character of "refugees" finding "shelter" (e.g. Rahme 2020: 35). A particular variation of this theme was the "Ansar spirit" in Turkey: "The metaphor of Ansar originally points at a temporary situation as the Muslims later returned to Mecca after their forces recaptured the city from the pagans" (Kaya 2020: 12). In a similar vein, the German term "guest worker" illustrates that the notion of temporariness is not restricted to refugees, but has been widely applied to labour migrants as well (Chemin and Nagel 2020: 64). The Swedish case recalls that there were several competing tropes in the public debate on refugee reception: "Some municipalities see the reception of new arrivals as a 'welfare gain' due to their entitlement for economic compensation from the state. Some other municipalities point out the 'solidarity' aspect of receiving new arrivals, but some others see the reception as a 'welfare loss" (Barthoma et al. 2020: 41). With certain variations the basic distinction between a utilitarian approach to refugees (framing them as a loss or gain) in contrast to a narrative of solidarity and human rights could be found throughout the sample.

In sum, we could only find occasional evidence for our assumption that historical experiences with immigration have an impact on reception governance. However, the reports do support our expectation that post-communist states are more restrictive with regard to the permission and reception of refugees. If and to which extent this is based on a protectionist understanding of national identity and sovereignty remains an object for further research. Finally, we expected

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⁷ https://www.amnesty.org/en/what-we-do/refugees-asylum-seekers-and-migrants/global-refugee-crisis-statistics-and-facts/

that long-term destination countries, such as Germany and Sweden, are more likely to provide coherent concepts and infrastructure than transit states, such as Greece, Italy or Turkey. The reports indicate that the distinction between destination and transit countries may be difficult to uphold in terms of reception governance. At the climax of immigration in 2015 and 2016, the reception systems of almost all countries in our sample were brought to their limits, which in many cases led to significant policy changes in the process of re-normalization.

International regulation

We assumed that international regulation is an important driving force for reception governance and expected that the **EU member states** within our sample would either seek to comply with the EU Reception Directives and adjust national law respectively or protest against it through political intervention or blunt non-compliance.

Our meta-analysis of the reports shows that all EU member states within our sample had transposed the first Reception Directive (2003/9/EC) into national law and all states except from the United Kingdom had transposed the later Reception Directive into national law (2013/33/EU). The national report from the United Kingdom holds that "[t]he official explanation for not adopting Directive 2013/33/EU was its provisions regarding access to the labour market" (Karamanidou and Folley 2020: 12). In fact, the transposition of European into national law in itself does not mean compliance. First, the process of transposition may be flawed and AIDA provides meticulous lists of transposition failure. Second, and more important from a social scientific point of view, transposition into national law does not mean *implementation*. In this vein, almost all national reports from EU members states point to severe *violations* of the 2013 Reception Directive. E.g., the authors of the Austrian report held:

"Among experts there is a strong consensus that Austria's de facto ban of asylum seekers from labour market participation is legally questionable and politically problematic. Considering the Reception Conditions Directive 2013/33/EU, according to which asylum seekers must receive effective access to the labour market no later than nine months after they have filed an application." (Josipovic and Reeger 2020: 8)

In addition, the authors of the Swedish report summarized that "[t]he majority of our respondents being settled in the municipalities' accommodation list numerous complaints and inconsistencies with the regulations of Article 18 of the Directive 2013/33/EU" (Barthoma et al. 2020: 85). The Italian report critically discussed sanction measures by some Prefectures, which "might constitute a violation of Article 20 of Directive 2013/33/EU according to which the withdrawal of reception conditions should be an exceptional measure" (Terlizzi 2020: 29). The authors of the Greek report indicated that refugees faced high bureaucratic obstacles in obtaining reception services (Papatzani et al. 2020: 34) and the German report suggested that public authorities who are responsible for reception measures needed to be constantly reminded of their duties by NGOs with respect to the 2013/33 Directive.

Furthermore, we expected that states, which are **not EU members** (Iraq, Lebanon and Turkey), will seek to comply with international regulations, based on pressures by external part-

⁸ For instance, in the case of Hungary 25 instance of transposition failure have been marked only for Directive 2013/33/EU: https://www.asylumineurope.org/reports/country/hungary/annex-i-transposition-ceas-national-legislation

ners, be it international organisations or NGOs. The *Iraqi* report highlighted the role of international organisations and regulations for the reception of refugees and internally displaced persons on several occasions without exploring the connection between the international and the national level in detail. Given the substantial reliance on international organisations, such as UNHCR and IOM, it is likely that these can formulate conditions, such as the observance to international standards, vis-à-vis public authorities. However, the report does not provide concrete evidence of such a soft-governance approach.

The *Lebanese* Report took a critical stance at the mismatch between international regulations and domestic practice: "While Lebanon is party to numerous international conventions and treaties safeguarding reception standards, it however falls short in practice with the implementation of discriminatory measures breaching those very principles" (Rahme 2020: 10). The authors emphasized the prevalence of discriminatory practices in the provision of reception, "such as class-based profiling and selection" which "infringes on the notion of international asylum standards and reception practices, but is also in breach of the safeguarding provisions included in international conventions to which Lebanon is party" (ibid: 30). Similar to the Iraqi report, international actors play an important role in the implementation of reception, but it remains unclear to which extent they become active as advocators of international rules and standards.

Unlike Iraq and the Lebanon, *Turkey* has ratified both the 1951 Geneva Convention relating to the Status of Refugees and the 1967 Protocol maintaining the geographical limitation only to people originating from Europe. In addition, the report elaborates on the back and forth of political collaboration between Turkey and the European Union, e.g. in terms of visa liberalization. The author concluded: "Despite the ongoing asymmetrical character of Turkey-EU relations, Turkey has transformed its migration and asylum system in the last decade and harmonized it with the EU *acquis*" (Kaya 2020: 24, emphasis in original). While the Turkish report also emphasized the significance of international organizations for the provision of reception (ibid: 50), they seem to play a less central role as compared to Lebanon and Iraq and are particularly active in providing services in the border region to Syria.

All in all, the reports allow for a limited picture of the role of international regulation for the domestic handling of reception. On a formal level, all EU member states and those, which ratified the Geneva Refugee Convention, were *compliant* in the sense that they transposed the supra- or international provisions into national law. At the same time, the majority of national reports (all except from Poland and Turkey) accounted for substantial violations of the respective regulations in practice. Hence, the dominant pattern in dealing with international regulation is a *decoupling* between international regulation and domestic implementation. The alternative of overt *protest* was only pursued by the United Kingdom, which did not transpose the 2013/33 Reception Directive and Hungary, which opted for practical resistance through blunt non-compliance. In addition, the reports from Lebanon and Iraq underlined the reliance of their reception systems on international organizations, which could act as transmission belts for international standards (*soft governance*). In this regard, the Lebanese report took a sceptical stance and pointed to the inertia of domestic structures, which refused to comply with international anti-discrimination standards.

Pattern of regionalization

It is beyond the scope of this report to provide a comprehensive overview of the multi-level constellation of reception governance in 11 countries; therefore, we will concentrate on some characteristic patterns of regionalization.

First, we expected that national authorities would transfer organizational responsibility to regional and local bodies and countries with a strong federal structure (such as Austria, Germany and Iraq) are more prone to regionalization than centralized states. The national reports clearly indicated that in all countries (except from Hungary) responsibilities for reception were delegated from the national to the regional and/or municipal level. Although the scope and depth of delegation differed, the reports do not support our hypothesis that federal states exhibit a higher degree of regionalization in the field of reception governance than centralized states. In most cases, the organizational responsibility of regional or municipal authorities referred to the provision of accommodation and early education measures (such as language classes), the allocation of monetary and in-kind welfare benefits and basic health care. In some cases, such as Germany and Sweden, regional authorities received a lump sum for each asylum seeker to cover the expenses whereas in Austria, the expenditures are divided between the federal and the provincial level (Josipovic and Reeger 2020: 19). In other cases, national ministries delegated specific responsibilities to the local government. e.g., the Polish report mentioned that "[I]ocal government units are entitled to the educational part of the general subsidy for tasks related to the education of children from abroad." (Pachocka et al. 2020: 53).

Furthermore, we expected that a high degree of regionalization might foster an incoherence of policy and practice across the different governance layers. Indeed, most of the country reports referred to instances of policy incoherence between the national and subnational levels of reception governance. Several reports showed that while subnational authorities carried a lot of responsibility for the implementation of reception measures, they were hardly involved in the decision-making process. For instance, the Swedish report held that "the approach of the Swedish government is more one of centralised dictating to the regional and municipal level" (Barthoma et al. 2020: 8). In a similar vein, the authors of the UK report took a critical stance towards the externalization of problems to the local level: "In this context, local authorities, while having little involvement or control on either policy making or decisions about the organisation of the implementation of key reception policies, have to address the effects of centralised reception policies" (Karamanidou and Folley 2020: 57). The Austrian report pointed to several platforms for subnational decision making in the context of reception governance (reflecting the federal model of the Austrian polity), but also underlined the lack of support for subnational endeavours: "While civil society, NGOs and some local government actors helped overcome the reception crisis, their involvement has received little acknowledgement from the federal state level" (Josipovic and Reeger 2020: 48). Whereas the authors of the German report found that "the strong federalist structure of the German state fosters an incoherence of migration policies and practice within and across different levels of migration governance (national, regional, municipal) in general" (Chemin and Nagel 2020: 64), the Italian report referred to a particular instance of incoherence, namely the bypassing of the regional level. Against this backdrop, the author recommended to "[i]ncrease the role of the regional level as an interlocutor between the central government and the municipalities in order to improve coordination in multi-level governance" (Terlizzi 2020: 38).

Finally, we expected that regionalization could increase the *volatility of reception experiences* and fostered politics of dispersal. It is remarkable that in spite of the centralised approach of reception governance in Sweden, the authors of the report pointed to substantial variation between different municipalities, e.g. with regard to the provision of services and allowances (Barthoma 2020: 9). Several countries (e.g. Austria, Germany, Sweden and the United Kingdom) had schemes for the national redistribution of asylum seekers. The national reports underlined that these politics of dispersal did not only compromise the freedom of movement of refugees, but could also lead to frequent relocation, particularly during the period between 2015 and 2016, which was often perceived as "chaotic" (Josipovic and Reeger 2020: 48). The authors of the German report emphasized the negative effect of dispersal and relocation for asylum seekers, including the aggravation of health issues, the lack of opportunity of early integration and the general experience of insecurity and vulnerability (Chemin and Nagel 2020: 64).

All in all, we found a subnational delegation of organizational responsibility in most of the countries and could identify three major patterns: In *Austria* and *Germany*, the implementation of reception measures was delegated to the regional and municipal level. Subnational actors had a voice in reception policy through federalist structures of decision-making and advocacy. In addition to this *federal* pattern, many countries exhibited a *semi-centralised* pattern, which entailed a high level of delegation of practical responsibility to subnational entities (mostly municipalities) without substantial involvement in the decision-making process. In our sample, this pattern referred to *Italy*, *Lebanon*, *Sweden*, *Turkey* and the *United Kingdom*. Finally, there was a cluster of countries with no or little subnationalization. These *centralized* countries included *Hungary*, *Poland* and *Greece*.

Involvement of societal actors

We expected that organizational responsibility for reception was in certain fields *transferred to societal actors*, such as NGOs, civic initiatives or for-profit organizations. In fact, most of the country reports mentioned numerous instances of *public-private collaboration* in the domain of reception. In many cases, private providers (both NGO and for profit) entered into *service contracts* with local or national authorities. For example, the Austrian report held that these organizations acted as operative partners, cooperated with the provinces through service contracts and were tied to legal provisions regarding the scope of activities covered by public finance (Josipovic and Reeger 2020: 16). Likewise, the authors of the German report highlighted that accommodation facilities are often "subcontracted to a welfare association or a private forprofit company" (Chemin and Nagel 2020: 46). The Swedish report explored the repercussion of these arrangements for reception governance and concluded that "[t]he relationship between the state and private sector (service providers) is more at a contractual level, and thus, their involvement in the reception system is limited" (Barthoma et al. 2020: 39). Hence, both subnationalization and privatization entail a transfer of practical responsibility without granting the respective actors a political voice.

Normally, service contracts are associated with an *active approach towards privatization* in which public authorities search for and acquire appropriate societal partners, e.g. through official tenders. In this regard, some of the reports emphasized the challenges of a competitive welfare market. For instance, the authors of the Polish report elaborated on a government contract for refugee health services to a private company, which undercut the offers of its com-

petitors and led to many complaints (Pachocka et al. 2020: 47; 70). In a similar vein, the Swedish report noted that "[t]he private sector has been criticised for exploiting the situation, overcharging the state for their inadequate services, understaffing, poor quality of food, lack of translators and so forth" (Barthoma et al. 2020: 39). As the authors of the UK report found, privatization under market pressures may lead to "negative effects ranging from the social and health effects of poor accommodation for asylum seekers, homelessness at the end of COM-PASS provision [housing scheme], and social tensions in already deprived dispersal locations" (Karamanidou and Folley 2020: 57).

On the other hand, a number of reports referred to a *passive approach towards privatization*, i.e. the reliance of public authorities on societal efforts in order to 'fill the gaps'. In this vein, the authors of the Italian report pointed out that "collaboration between state and non-state actors is a bit unbalanced in the sense that non-state actors make up for a series of shortcomings of state actors [...] and therefore increasingly find themselves carrying out functions that should in reality be carried out by state actors" (Terlizzi 2020: 25). Likewise, the Lebanese report held that "[w]ith government bodies and security agencies falling short of adequately responding to the influx of Syrian asylum seekers, non-state actors have stepped in to fill in the gaps in the provisions of goods and services" (Rahme 2020: 20). Other reports as well arrived at a sceptical evaluation of privatisation as the epitome of neoliberal governance, which unduly shifts public responsibilities to private shoulders (Barthoma et al. 2020: 45; Karamanidou and Folley 2020: 12).

Furthermore, we expected that faith-based organizations and welfare associations assumed an important role as service providers and advocates on behalf of the interests of refugees during reception. In fact, many reports (all, but Austria, Hungary, Turkey and UK) referred to religious communities as important supporters of refugee reception. Both the Iraqi and Lebanese reports pointed to a systematic structuring of reception practice based on religious lines. E.g., the authors of the Iraqi report noted that "The religious and ethnic identity of the refugees in Iraq played a major role in determining the direction of residence and housing" (Warda et al. 2020: 30) and the Lebanese report mentioned instances of "religious profiling" (Rahme 2020: 31). A common pattern of faith-based support was that it was offered complementarily to state measures. In this regard, the Italian report stated that "the role of religious associations in welcoming people has been crucial, above all when there are no places available in governmental reception centres" (Terlizzi 2020: 25). Likewise, the authors of the Polish report held that "faith-based organisations provide assistance to asylum seekers with housing or housingrelated issues" (Pachocka et al. 2020: 66), which includes Catholic organisations as well as Tatar-led Muslim communities. In addition, the Swedish report emphasized the role of religious communities as places "to find a first human connection and solidarity" and underlined that "between 2015 and 2016, 8 out of every 10 churches in Sweden dedicated a large part of their activities to supporting asylum seekers. They also perform an important lobbying role" (Barthoma et al. 2020: 78). The authors of the German report found a widespread involvement of confessional welfare associations as contracted service providers and highlighted the possibility of "church asylum" as an opportunity to prevent deportation (Chemin and Nagel 2020: 39).

In addition, we expected that the general civic *spirit of welcome and support* had cooled down. Several country reports referred to an initial rise of a civic welcome culture, mainly in the traditional destination countries, such as Austria, Germany and Sweden. At the same time, they indicated that this climate of support was not sustainable. For instance, the authors of the

Austrian report accounted for "a deterioration of the so-called 'welcome culture' in politics, the media and society since the summer of 2015" (Josipovic and Reeger 2020: 45) and the Swedish report concluded that "Sweden has been known as one of the most generous countries in terms of welcoming refugees and providing an easy path to citizenship but its migration and reception policy has taken a 'restrictive turn' in recent years" (Barthoma et al. 2020: 8). The Turkish report elaborated on the "Ansar spirit", a religious blend of welcome culture, which at first "made it easier for the Syrians to be received and to be offered all the basic provisions such as housing, education, health services, accommodation and allowances in the border cities". Recently, however, this has given way to "a radical shift in the political discourse adopted by the AKP government and the state actors can be observed. Rather than emphasizing guesthood and the Ansar rhetoric, emphasis is now on the return of the Syrians" (Kaya 2020: 12).

Other authors also accounted for a severe deterioration of the overall public sentiment vis-à-vis refugees and associated it with attempts of *xenophobic mobilization* (see next subsection). The Lebanese report stated that "[g]overnment discourse has continuously framed Syrian asylum seekers as an economic burden, which has continued to foster a xenophobic sentiment among the host community" (Rahme 2020: 32). And the authors of the Hungarian report concluded that "[t]he Hungarian Government's attempts to generate an audience for its agenda have been successful given how a significant proportion of the Hungarian public has identified with the government's narratives of exclusion". In result, "[t]here is an increasing level of intolerance and public hatred against foreigners" (Gyollai and Korkut 2020: 25).

All in all, the general spirit of welcome and support appears to have cooled down considerably in most of the receiving countries which went hand in hand with the withdrawal of volunteers in refugee aid. In many countries, this change of public mood towards refugees was associated with attempts of right-wing populist movements to occupy the discourse on immigration (see below). As far as the pattern of privatization is concerned, the comparative analysis allows differentiating between countries with an *active approach* to the participation of societal actors, such as Austria, Germany, Poland, Sweden and the United Kingdom. In these countries, public authorities play a pro-active role in the acquisition and monitoring of societal actors, e.g. through public service contracts. As service providers, societal actors rarely have a voice in reception politics, although corporatist polities, such as Austria and Germany, seem to provide better feedback loops. The other cluster is marked by a passive approach to privatization in which societal actors 'fill the gaps' of the official reception system and which included Greece, Iraq, Italy, Lebanon and Turkey.

Renationalization and deterrence

We assumed that reception governance might turn into an arena of renationalization. More specifically, we expected that *right-wing populist parties and movements* could highjack public debates on reception and trigger a *restrictive shift* in reception policies and practices driven by a rationale of deterrence.

While many reports noted a rise of anti-immigration voices, only a few of them scrutinized how right-wing political mobilization actually translated into reception policies. The authors of the German report reconstructed the ascent of the far right *Alternative für Deutschland* (AfD) and concluded that as a result of its electoral success "other political parties (namely the Christian Democrats and the Liberal Democrats) have embraced a more restrictive stance towards im-

migration" (Chemin and Nagel: 21). This new political sentiment translated into several legislatives acts which "can be read as a direct response to polemic tropes such as the 'exploitation' of asylum law, the alleged preference of asylum seekers as compared to poor German citizens" (ibid: 22-23). The Swedish report seconded this strand of discourse and held that "[t]he rightwing surge after 2015, provoked an increase in xenophobia and misconceptions about the future of the Swedish welfare state, issues that were largely fuelled by right-wing rhetoric". As a consequence, "[t]he Swedish parties' political discourse took up the notion that reception standards in Sweden should not exceed minimum EU reception standards, putting into question the non-excludable accessibility of the Swedish welfare state" (Barthoma et al. 2020: 84). On a more general level, the authors of the UK report reconstructed the increasing alignment of debates about welfare benefits for asylum seekers and immigration control and concluded that "[a]ccess to welfare benefits was constructed as a 'pull' factor even though this has been repeatedly refuted by research, and limiting such benefits was seen as a policy of deterrence" (Karamanidou and Folley 2020: 12).

Furthermore, as an effect of renationalization, we expected that refugees were confronted with *increasing discrimination* and expectations of cultural assimilation. In this regard, the Greek report called into mind that "politically conservative and racist discourses have always been reproduced by political parties, official institutions and media actors alike, even before the beginning of the so-called refugee crisis" (Papatzani et al. 2020: 60). Other reports were very clear in denoting the carrier strata of such attitudes, be it right-wing populist entrepreneurs (as in Germany, see above) or established nationalist parties with governmental responsibility. As far as the latter are concerned, the authors of the Hungarian report have identified a "direct link between the government's campaign and the increasing xenophobia" (Gyollai and Korkut 2020: 24) and the Polish report stated that "[t]he new government favoured (or even intentionally provoked) the politicisation of the issue of refugees in public media and strengthened its anti-immigration, anti-refugee, and even anti-European narrative" (Pachocka et al. 2020: 28).

Domains of discrimination included public institutions, schools, the job and housing market and everyday life. Experiences of discrimination and racism could take different forms from verbal or non-verbal individual encounters to anti-refugee protests and arson attacks on accommodation centres. Some reports stated that the national media had played a crucial role in reinforcing racist stereotypes and thus fuelled a climate of resentment and violence (Papatzani et al. 2020: 60; and Kaya, 2019). Others have addressed the relation between discrimination and vulnerability. For instance, the authors of the UK report referred to "widely reported issues of facing discrimination and hostile behaviour in dispersal areas, which are often characterised by crime and deprivation as well as a lack of ethnic and racial diversity" (Karamanidou and Folley 2020: 49). Likewise, the Turkish report concluded that "discrimination, exploitation and prejudices against Syrian refugees resulted in their settlement at the lowest and most vulnerable strata in Turkey" (Kaya 2020: 52).

All in all, it is difficult to classify the countries in our sample in terms of renationalization and deterrence in a systematic way. In the reporting period, the post-communist countries Hungary and Poland were ruled by nationalist parties and put particular emphasis on national sovereignty. In other countries, various forms of nationalist and xenophobic mobilization took place, reaching from the long and painful Brexit to specific strategies of immigration control or privileging the autochthonous population vis-à-vis 'foreigners'. In almost all countries, right-wing populist parties or movements managed to appropriate the theme of immigration and were able —either directly through parliamentary work or indirectly by influencing public sentiment—

to achieve a restriction of reception measures, including the reduction of benefits, the transformation from monetary allowances to in-kind provisions, sanctions for non-compliance and exacerbating deportation. For our sample, it is possible to distinguish two main cluster of countries, namely those with established far-right parties that have taken government responsibility during the reporting period (Austria, Hungary, Italy, Poland and the UK⁹) and others in which right-wing populist parties were rising, but have taken an indirect influence on reception governance (Germany, Greece and Sweden).

Towards a Typology of Reception Governance

It was the aim of this report to come up with a typology of reception governance. We departed from the idea that reception does not constitute a policy domain on its own, but intersects with traditional political fields. Another crucial feature of reception governance is that nation states respond to overarching global developments and crises, such as the Arab Spring. This constellation reinforces the multi-level setup of reception governance and may trigger substantial state transformation. Hence, we adapted the TranState model of state transformation, which envisages changes of national states in relation to global challenges in a territorial (internationalization vs. subnationalization), and organizational dimension (privatization vs. nationalization). Against this backdrop, we distinguished six typological criteria, namely welfare state regime, immigration regime, international regulation, pattern of regionalization, involvement of societal actors, and renationalization and deterrence. The following table provides a brief overview of the 11 countries in our sample in light of the criteria.

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⁹ It would of course be misleading to equal the Conservative Party in the UK with other right-wing or farright parties, such as Fidesz or the Lega Nord. At the same time, their migration narratives as well as the deeply anti-European sentiments, which ultimately lay ground for the Brexit, do resemble the political programs of right-wing populists throughout Europe.

	Welfare state regime	Immigration re- gime	International reg- ulation	Pattern of regionalization Involvement of societal actors		Renationalization and deterrence	
Austria	Conservative	Open reluctant	Decoupling	Federal Local provision (federal); dispersal	Active corporatism	Right-wing party in government (FPÖ)	
Germany	Conservative	Open reluctant	Decoupling	Federal Active Local provision (federal); dispersal corporatism		Right-wing party on the rise (AfD)	
Greece	Southern European	Reluctant	Decoupling	Centralized	Passive	Extreme right-wing nationalist party on the rise (Golden Dawn, Χρυσή Αυγή) Conservative right-wing party in gov- ernment (New Democracy, Νέα Δημοκρατία)	
Hungary	Mixed/ post-communist	Reluctant	Protest	Centralized	Subversive?	Right-wing party in government (Fidesz) Anti-European sentiments	
Iraq	Residual	Open/ selective	Soft governance	Federal Special path of Kurdish region	Passive	Increasing societal and political pressure on return	
Italy	Southern European	Open reluctant	Decoupling	Semi-centralized Local provision, regional level by- passed	Passive	Right-wing party in government (Lega Nord)	
Lebanon	Residual	Open/ selective	Soft governance	Semi-centralized Local provision (top-down); "policy of no policy"	Passive	Increasing societal and political pressure on return	
Poland	Mixed/ post-communist	Reluctant	Compliance	Semi-centralized Selective local provision	Active marketization	Right-wing party in government (Prawo i Sprawiedliwość) Anti-European sentiments	
Sweden	Social democratic	Open	Compliance/ decoupling	Semi-centralized Local provision (top down); disper- sal	Active marketization	Right-wing party on the rise (Sverige- demokraterna)	
Turkey	Southern European	Open selective (Ansar)	Compliance/ decoupling	Semi-centralized Local provision	Active	Increasing societal and political pressure on return	
UK	Liberal	Open reluctant	Protest			Nationalist shift of established parties Anti-European sentiment and Brexit	

It is important to recall the initial disclaimer that we are not aiming at a categorization, which is strictly exhaustive and disjunctive, but on a *heuristic typology* that may inspire future comparative research on reception governance. Therefore, we will start with a purely inductive approach by looking for commonalities and differences in our data and then discuss it in the wider context outlined in the conceptual part of this report. The following table provides a commonality-matrix, i.e. an overview of countries, which are similar in terms of two out of the six criteria (Table 3).

Criterion by Criterion	Welfare state regime	Immigra- tion regime	Inter- national regulation	Pattern of regionali- zation	Involve- ment of societal actors	Renation- alization and deterrence
Welfare state regime	Х	AUS, GER, HUN, POL IRA, LEB	AUS, GER, GRE, TUR IRA, LEB	AUS, GER ITA, TUR	AUS, GER IRA, LEB ITA, GRE	HUN, POL IRA, LEB
Immigration regime		Х	AUS, GER ITA, GRE, TUR	AUS, GER ITA, TUR	AUS, GER, UK IRA, LEB	AUS, ITA, UK HUN, POL IRA, LEB
Interna- tional regu- lation			Х	AUS, GER	AUS, GER, SWE GRE, ITA	GER, GRE, SWE AUS, ITA HUN, UK IRA, LEB
Pattern of regionalization				Х	AUS, GER POL, SWE, UK ITA, LEB	ITA, POL, UK
Involvement of societal actors					Х	AUS, POL, UK GER, SWE GRE, (ITA) IRA, LEB
Renationalization and deterrence						х

Table 3. Commonality-matrix and an overview of countries

A reading example: At the intersection between Welfare state regime (line 1) and immigration regime (column 2), there is a cell with two clusters, which are marked in different colours. The first cluster comprises of Austria, Germany and Italy all of which combine a conservative welfare regime with an open yet reluctant stance to immigration. The second cluster comprises of Hungary and Poland, which combine a post-communist welfare regime with a reluctant stance to immigration. There were no other matching pairs at the intersection of these criteria. The lower diagonal of the table mirrors the upper one (e.g. welfare state regime # immigration regime is the same as immigration regime # welfare state regime), but is left blank to keep it readable. Instead of discussing the results cell by cell, we will concentrate on the most frequent clusters, which indicate the degree and depth of similarity between countries across various criteria.

The first and by far most frequent cluster consists of *Iraq and Lebanon*, which are very similar in terms of all criteria, except from their pattern of regionalization (Iraq has a federalist system whereas Lebanon organized reception in a semi-centralized way). Apart from that, both countries exhibit a residual welfare regime and a limited capacity of action of the nation state as a whole, an open yet selective immigration regime, an indirect impact of international regulation through international NGOs (soft governance), a passive approach towards societal actors and increasing political pressure for refugees to return to their countries of origin. All in all, this cluster might be exemplary for a *residual patronage* approach to reception, marked by little state intervention (both in terms of provision and coordination) and an important role of societal actors (both local communities and international NGOs), which leads to a highly fragmented and segmented 'system' of reception.

The second most prevalent cluster consists of *Austria and Germany*, which are very similar in terms of all criteria, except from renationalization (Austria already had a right-wing populist party in government whereas in Germany it has been on the rise). Apart from that, both countries have in common a conservative welfare regime, an open yet reluctant stance towards immigration and a strategy of decoupling vis-à-vis international regulation, namely the EU Reception Directive 2013, which was transposed into national law, but not thoroughly implemented (with Austria restricting early access to the labour market and German authorities in need to be pushed towards compliance by NGOs). Furthermore, both countries exhibit a similar pattern of regionalization based on federal redistribution and an active approach of involving societal actors based on contractual agreements. All in all, this cluster might be exemplary for a *Core European* approach¹¹ to reception, marked by comprehensive and reliable reception measures, a lack of early integration options based on an inherently transitory notion of migration, an intensive monitoring and accountability of asylum seekers, a substantial involvement of societal actors in the (re-) formulation of reception policies and growing public pressure to apply restrictive measures towards refugees.

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¹⁰ The cluster were identified by a simple pair comparison, i.e. for each cell all countries were compared to all others if they exhibit the same or a different pattern. Clusters include all countries with the same pattern, hence the more clusters two (or more) countries share, the more similar they are in terms of our criteria of reception governance.

¹¹ The term "Core Europe" goes back to a debate about European integration in the 1990s in Germany where (conservative) politicians suggested a closer collaboration between the "Core European" states France, Germany and the Benelux-states in response to the limited capacity of action of the European during the Yugoslav Wars.

The third biggest cluster is comprised of *Hungary and Poland*, both of which exhibit a post-communist welfare regime (see above for a more detailed discussion), little experience with or a restrictive overall stance to immigration and a strong focus on national sovereignty, which is backed by right-wing parties in the government. They differ in terms of their stance to international regulation and their patterns of regionalization and privatization: According to the country report, Poland has undergone substantial reform in order to comply with the EU reception directive whereas in Hungary both the legal transposition and the practical implementation of supranational reception regulation has been deficient. In addition, Hungary seems to have taken a more centralist and statist path to reception governance than Poland, which delegates specific tasks (such as early education) to subnational actors and has taken an active approach to involve societal actors. All in all, this cluster might be exemplary for an *Eastern European* approach to reception, marked by rudimentary and volatile reception measures, an overall strategy of preventing immigration by performing humanitarian tasks in third countries and a highly ambivalent stance towards European regulation between grudging compliance and selective protest.

Another cluster includes Greece, Italy and Turkey, which are similar regarding their welfare state regimes (Southern European), a decoupling stance towards international regulation, a semi-centralized approach to regionalization (ITA, TUR) and passive approach vis-à-vis societal actors (ITA, GRE). In Italy and Greece, right wing or far-right parties have been on the rise along with the so-called "refugee crisis". In terms of their integration regimes, all three countries used to be emigration rather than immigration countries and adapt differently to their new role as destination countries: While Turkey has adopted an open yet selective stance to Syrian immigrants as guests and brethren in faith, the overall sentiment in Italy and Greece towards immigrants appears to be more (GRE) or less (ITA) overtly reluctant. All in all, this cluster might be exemplary for a type of reception governance which tentatively can be called Overload and Externalization and is marked by rudimentary and volatile reception measures, decoupling or inertia vis-à-vis international regulation and a high degree of decentralization of reception services. It is important to note here, that externalization does not only refer to the delegation of reception measures to subnational and societal actors, but to a broader notion of immigration being mainly a problem of the classical destination countries. At the same time, the hybrid position of Italy between this and the core European cluster calls into question the distinction between transit and destination countries underlying the RESPOND project

In a similar vein, another cluster which goes against the division of transit and destination countries comprises *Poland and the United Kingdom*, both of which exhibit a semi-centralized pattern of regionalization and an active (and marketized) approach to the involvement of societal actors in conjunction with distinct tendencies of renationalization. All in all, this cluster might be exemplary for an *ordo-liberal approach* to reception governance, marked by rudimentary reception measures, a high degree of delegation through market mechanisms and a critical stance towards European regulation.

Based on these clusters and the literature review we propose five preliminary types of reception governance. Scaled by the degree of state intervention (from high to low) these include (scaled from high to low levels of state intervention) (Table 4):

Type of Reception Governance	Content
Type 1: Wary Hospitality	Wary Hospitality is characterized by comprehensive and reliable reception measures, a lack of early integration options based on an inherently transitory notion of migration, an intensive monitoring and accountability of asylum seekers, a substantial involvement of societal actors in the (re-) formulation of reception policies and growing public pressure to apply restrictive measures towards refugees. In our sample, the type applies to <i>Austria, Germany and Sweden</i> . Other European countries might include France (albeit a higher degree of centralization) and the Benelux-States (despite a higher degree of marketization).
Type 2: Post-Communist Reluctance	Post-Communist Reluctance is characterized by rudimentary and volatile reception measures, an overall strategy of preventing immigration by performing humanitarian tasks in third countries and a highly ambivalent stance towards European regulation between grudging compliance and selective protest. In our sample, this type applies to <i>Hungary and Poland</i> , but it might be extended to include other post-communist countries in Europe, such as the Czech Republic, Slovakia and the Baltic states.
Type 3: Ordo-liberal Delegation	Ordo-liberal Delegation is characterized by rudimentary reception measures, a high degree of delegation through market mechanisms and a critical stance towards European or international regulation. The nation state is reduced to a managerial capacity seeking to active civic potentials of support. In our sample, this type only applies to the <i>United Kingdom</i> , but it might well be extended to other Anglophone countries, such as the USA or Australia.
Type 4: Overload and Externalization	Overload and Externalization is characterized by rudimentary and volatile reception measures, decoupling or inertia vis-à-vis international regulation and a high degree of decentralization of reception services. In our sample, this type applies to many of the so-called front states, such as Greece, Italy and Turkey, which have turned from emigration countries into transit and destination countries for refugees since the 1990s. As a consequence, they have not embraced reception as a national responsibility, but sought to externalize it to the subnational or private sphere or to traditional destination countries within the EU.
Type 5: Residual Patronage	Residual Patronage is characterized by little state intervention (both in terms of provision and coordination of reception measures) and an important role of societal actors (both local communities and international NGOs), which leads to a highly fragmented and segmented 'system' of reception. In our sample, this type applies to <i>Iraq and Lebanon</i> , but it might be extended to many other weal or failed states along the established migration routes to Europe.

Table 4. Preliminary types of reception governance

In order to assess the analytical value of this typology, some *caveats* are in order: First of all, types are static and abstract whereas reception governance 'on the ground' has been highly dynamic even in the short period covered by this report (2011-2018). Therefore, both the typology and the classification of countries along the six criteria must be seen as snapshots and will continue to be subject to change. Nevertheless, the country clusters upon which the typology is built showed similarities in several of these criteria, so it seems appropriate to assume that there are structural commonalities, which are worth further exploration. Second, the synoptic analysis in this report relies mainly on 11 national reports and only marginally refers to other sources and secondary literature related to the 11 countries. Despite the very good quality and comprehensive shape of the country reports, there may be flaws or blind spots, which call for further elaboration and revision. Third, and more conceptually speaking, the very notion of reception (as the liminal phase between arrival and the asylum decision) underlying this report can be contested on the ground that it is stretched between the spheres of refugee protection (including the asylum system as a classic matter of national sovereignty) and practical support (including early integration measures, such as language classes) which is usually organized in a more horizontal fashion involving subnational and private actors.

In spite of these caveats, however, the typology offers a heuristic value in the sense that (in line with Max Weber's notion of ideal types) each type represents a systematic exaggeration of a bundle of attributes which points to a characteristic mode or style or reception governance. While some country clusters, such as Austria and Germany, did not come as a surprise, future research might focus on the puzzles and unexpected constellations in the commonality matrix (see above). For instance, there are striking commonalities between Poland and the United Kingdom in terms of their politics of subsidiarity, the level of marketization and the emphasis on national sovereignty, which evade any easy explanation. Moreover, the hybrid role of Italy between front state and core Europe may deserve deeper attention as it calls into question traditional distinctions between source, transit and destination countries of refugees. One overarching pattern was prevalent in almost all countries in the sample, i.e. the (more or less) silent consensus for a more restrictive approach to reception, which favours accountability and control over humanitarian concerns. This shift reflects the success of right-wing parties and movements which have managed to get hold of reception governance either directly through government participation and parliamentary action or indirectly by putting the established parties under pressure.

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