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COMPARATIVE ANALYSIS OF MIGRATION AND INTEGRATION MODELS IN WESTERN AND SOUTHERN EUROPE: THE EXPERIENCE OF GERMANY, THE NETHERLANDS, AND ITALY

Abstract

The aim of this study is to conduct an analysis of contemporary models of migration and integration, using Germany, the Netherlands and Italy as case studies. To assess their effectiveness in the context of the current European challenges, the research method is based on a comparative analysis of government strategies, as well as on an examination of the legal and social integration for newcomers. The results of the study demonstrate that Germany has a more stable integration system due to its focus on the labour market adaptation of migrants. The Netherlands places particular emphasis on cultural and value-based integration through a system of pre-integration requirements. Whilst Italy faces serious challenges due to its high migratory pressure, with the prevalence of short-term anti-crisis measures. The scientific novelty of the study lies in the comparative classification of these integration models. The findings can be utilised in the development of migration and social policies.

Keywords: migration, integration models, Germany, Netherlands, Italy.

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Introduction

The socio-economic structure of Western European countries has faced numerous challenges which have significantly been affected by recent large-scale demographic shifts. This has brought migration issues to the fore, making them key topics of academic discourse. Western European countries, which have traditionally advocated open-border policies and comprehensive multiculturalism, in recent decades have increasingly begun to review their migration policies. For Europe, 2015 was marked by a significant increase in the flow of migrants from African and Middle Eastern countries, as stated by R.M Hasanov in his study. This migration crisis was described by the European Commission as the biggest since the Second World War. Additionally, R.M Hasanov points out that these migration flows exposed the ineffectiveness of the European Union's existing institutional structures, emphasising that this crisis has come to symbolise challenges of the 'managed

migration' policy, as both legal and illegal migration flows have merged into a single uncontrolled flow. According to R.M Hasanov's analysis, the cumulative effect of socio-economic inequality and military conflicts has led to a situation that many experts view as a challenge to European stability [1, p.11]. Thus, this crisis has highlighted institutional flaws in the existing mechanisms for the integration of newcomers in Western Europe, which has arguably led to a shift from passive to more active state intervention in the process of migrant adaptation. The relevance of this study is explained by the necessity to identify the most effective system for the integration and adaptation of migrants amidst the political and social polarisation of European societies. It is important to note that each European state selects and implements its own integration policy based on its historical context, economic needs and geographical position.

This article presents a comparative analysis of three different models of integration, using Germany, the Netherlands and Italy as case studies.

1. Modern models of migration policy in European states

1.1 The German model: pragmatism and labor integration. The German integration model is characterised by a strong, institutionalised system. This system has evolved from the concept of temporary residence for so-called guest workers (Gastarbeiter) to the modern German model. Today, the German integration model is based on pragmatism, in which immigration is seen as a solution to demographic challenges, as well as compensation for the shortage of qualified employees in key economic sectors. The legal principle of “Fördern und Fordern” in the 2016 Integration Act is considered a central concept of current German integration policy. According to this principle, the state and newcomers have a number of obligations towards one another; the state assumes responsibility for providing migrants with opportunities for social integration, such as language courses or vocational training. In turn, migrants are required to demonstrate a proactive commitment to economic prosperity and compliance with the law. Newcomers attend compulsory courses where they are introduced to the role of values of German society, as well as the basics of German history and law. From an economic perspective, the German government places emphasis on the rapid recognition of foreign candidates’ qualifications and their early profiling. This approach helps to build long-term economic stability for the German state, making it function-oriented. On the other side this system created challenges for migrants with few or no qualifications at all. Despite this, Germany still remained one of the most attractive destinations for newcomers within the European Union. According to Eurostat, in 2017 Germany registered the biggest number of newcomers applying for asylum among EU countries [2]. This fact could be viewed from two perspectives. On the one side, it demonstrated Germany’s high appeal to foreigners; on the other side, such an influx

could lead to growing problems with the distribution of this group and rising tension from the local population. V. Radchenko argues that Germany’s integration system still faces numerous structural challenges, despite its overall effectiveness, stating that the arrival of large numbers of migrants can overwhelm local government institutions and expand the difficulties of social integration [3, p.110]. In academic discourse, such problems with the German model are not viewed as its shortcomings, but rather as a consequence of its openness and attractiveness to migrants, moreover the change of German integration policy shows that their model is dynamic and focused towards developing. The Skilled Immigration Act and the introduction of the ‘Opportunities Card’ in 2024 can be regarded as significant changes to the current German model for the social integration of migrants. This demonstrates that the German government has moved to a more flexible points-based system, which is already in use in various countries. From now on, the qualifications of foreign specialists are rated based on different criteria, such as language proficiency, work experience, age and ties to Germany. This shift has enabled the German government to pursue a more proactive policy on social integration, replacing the policy of addressing the consequences of the migration crisis of the previous decade. Another recent fundamental change to the German model has been the revision of citizenship rules. The 2024 Act reduced the mandatory residence period required to obtain citizenship from 8 to 5 years, and in exceptional cases to 3 years. Non-EU nationals were also granted the option to retain dual citizenship. This law has once again demonstrated the pragmatic nature of the German model, by allowing the passport to provide an incentive for migrants’ development in accordance with the criteria mentioned above.

1.2. The Dutch model: from passive tolerance to strict civic integration. The Dutch model of integration is often characterised by its strict approach to migrant adaptation. This approach evolved from a relatively lenient form of multiculturalism [4, p.60]. This shift was driven by growing public



criticism of the Netherlands' migration policy at the turn of the 21st century. The existence of autonomous communities arguably contributed to the creation of parallel societies, a deterioration in social cohesion and general social isolation. As a result, the Dutch model of integration shifted its focus towards migrants' acceptance of the host country's cultural and legal norms – social assimilation. The practical implementation of this idea was facilitated by a law passed in 2013. This law has undergone significant changes in recent years. Under this system, normative integration is regarded as the key requirement for a migrant to obtain the right to permanent residence, whilst a compulsory integration exam was used as a tool [5, p.32]. The preparation for this was considered the migrants' own responsibility. The state provided loans for tuition, whilst migrants were required to search for language schools themselves and pass exams testing their knowledge of the Dutch language and society. However, this approach was accompanied by a number of difficulties. A certain number of individuals failed to pass the language exam for years, as they were subjected to substandard courses, which only served to raise their social and economic isolation from the rest of society. To address this issue, the Dutch government introduced a new law setting out a long-term strategy, in January 2021. The Civic Integration Act was passed. Under this Act, the state reassumed a supervisory role and integration practices underwent certain changes. From that point onwards, the primary responsibility for integration shifted from the migrants themselves to local municipalities [5, p.32]. The exam was replaced by a system of individual integration and participation plans, whilst also taking into account each migrant's basic education and abilities. In modern Dutch practice, newly arrived migrants are categorised into three pathways. The first pathway aims to achieve a high level of language proficiency, up to B1 level, whilst simultaneously seeking paid employment. The second pathway is aimed at a younger age group, predominantly those with an education, and prepares them for admission to Dutch

universities. The third pathway is designed for migrants with a low level of education or a lack of literacy skills. Here, the emphasis is on basic self-care skills and local socialisation [4, p.56]. The law also raised the language proficiency requirements. In addition, newly arrived migrants were required to sign a document entitled the 'Declaration of Civic Participation'. Under this document, each migrant affirmed their commitment to fundamental values. These values include equality, freedom of speech and non-discrimination. In academic discourse, this Dutch model is described in two ways; one of its advantages is that the 2022 reform mainly restored state support for migrants' language learning, as attending and finding language courses is no longer the sole responsibility of a newcomer. The specific circumstances of migrants were also taken into account, helping to make the system more individually focused. However, the Dutch government's requirements for migrants remain among the strictest in Europe. For example, embracing liberal values can present difficulties and pressure for individuals from more conservative societies or migrants from religious countries; furthermore, migrants face numerous challenges entering the labour market until they have passed an exam testing their knowledge of the language and culture. This can have an impact on economic integration, and means that the success of individuals' integration into society depends on how quickly they adapt to the legal norms of the Dutch model. It is important to note that the integration framework does not equally apply to all categories of migrants, as illegal migration constitutes a distinct dimension of the migration system. D.A Volkov states that illegal migrants influence the structure of society [5, p.31]. Under the law, a migrant acquires illegal status once their right to remain in the country expires, or if they fail to comply with a deportation order after the government has refused to grant them asylum or a residence permit. Such migrants are subject to administrative measures. This includes placement in special centres, with a view to subsequent deportation. Despite this, not all migrants are ultimately deported. In order to

return a migrant to their home country, it is mandatory to establish their identity, nationality and migration history. In the absence of this information, the deportation process becomes significantly more difficult or impossible. As a result, around half of those detained are not deported. Consequently, the state implements policies aimed at encouraging migrants to cooperate in the identification process. Despite that, undocumented migrants still possess basic rights enshrined in international conventions and instruments, such as access to immediate medical care or legal protection [5, p.31]. This shows that the Netherlands continues to face a structural dilemma: on the one hand, the need to maintain demand for skilled migrants, driven by economic factors, on the other, the introduction of increasingly stringent control and integration measures.

1.3 The Italian model: challenges of a first «Contact Country». The theoretical and practical foundations of the Italian government's migration policy differ significantly from the approaches adopted by other countries and the European Union in that Italy's approach to multiculturalism is influenced by the country's geographical location on the southern border of the European Union. In academic discourse, the Italian model is often described as a «first-contact» or «emergency response» model. A distinctive feature of the Italian strategy is the need for a rapid response, as Italy is not considered a country of a final destination. The main focus was on security, coastal protection and the initial reception of refugees, whereas the long-term economic and social integration strategy was usually given secondary consideration. The Italian emergency response system was reinforced in the 2010s in response to the need for a rapid reaction to the migration crisis triggered by the events of the Arab Spring [6]. To gain a more detailed understanding of how the Italian government deals with migrants, it is worth examining two academic theories. The first theory is known as the concept of securitisation. According to this concept, migration is not viewed in most other countries as a normal economic or demographic phenomenon; instead, the

migration process is subject to serious security concerns, as it is considered that it may threaten the country's national security and sovereignty. In other words, the state initially perceives any newcomer as a potential threat and resolves the issue as quickly as possible. Consequently, the state adopted a centralised approach specifically in matters of primary security. The principles of this model are usually characterised by relative decentralisation in the area of social integration, where the main influence lies with local municipalities, non-commercial organisations and religious associations. The second theoretical approach explaining the specific characteristics of the Italian system is the 'Southern European model'. This theory suggests that the Italian state - a point often emphasised - possesses distinctive features that prevent the application of analytical frameworks designed for other European countries. However, the differing degrees of centralisation between border control and internal integration have led to institutional instability. As described in the study by Lyubin and Alonzi, a dual tendency emerged. In 2018, there was a significant decline in the number of arrivals - approximately 76% compared to the previous year. Despite this, the initial reception centers remained overloaded. The occupancy rate was approximately 170,000 people [7, p.123]. In practice, each new government's attempts to address the 'security threat' have resulted in a pendulum effect. The Salvini decrees adopted in late 2018 exemplified the implementation of a securitisation policy, by effectively stripping people of the possibility of obtaining humanitarian protection and denying access to state-funded courses and legal aid, leading to a surge in living costs and an increase in illegal immigration. The rise in migration flows and broader security concerns have been a focus of public attention. Economic difficulties, compounded by migration issues, have come to be perceived as a threat in terms of their social and economic implications. As the study shows, 70% of Italians surveyed supported a "closed-door policy." [8, p.115]. Moreover, about 80% of respondents say they would like to see fewer migrants in the country [9, p.170]. By 2020,



the ‘Lamorgese Decrees’ had sought to address the issue of illegal migration. The ‘special protection’ scheme was reinstated for migrants. This enabled individuals to obtain documents if they had family or employment in Italy, and the local network of support centres for people awaiting a decision on their applications was also reopened. Although the Lamorgese decrees helped to temporarily ease the strain on Italy’s immigration system, they faced issues with addressing its underlying problems. At the same time, social discontent grew over the perceived leniency towards migrants and the increase in their numbers resulting from such policy. In 2023, Giorgia Meloni’s political discourse shifted once again towards tightening the situation for migrants, including measures to reduce Italy’s ‘attractiveness’ to prospective migrants, by revoking ‘special protection’ and cutting the budget allocated to funding initial reception centres. The ‘Cutro Decree’ also cut funding for integration programmes and restricted convertibility of temporary residence permits into full work permits. The Italian central government has effectively moved away from the traditional concept of multiculturalism, under which the state provides financial and institutional support for the country’s cultural diversity. Instead, this has been replaced by a stricter model, under which a migrant’s employment is classified as successful integration. At the same time, the issue of cultural integration is not regarded as a priority area of state policy. Responsibilities regarding migrants were shared between Italian businesses and local municipalities. When hiring a migrant, local companies also undertook to fund initial language and orientation courses. The provision of basic social support, however, remained the responsibility of local municipalities or non-governmental religious charitable organisations. The extent to which an individual was integrated into Italian society depended to some extent on the level of financial development of the region in which they lived. This could arguably lead to the increased risk of migrants being marginalised and the formation of parallel ethnic communities

2. Comparative analysis of Western European models: Germany, the Netherlands, Italy

A comparative analysis of these models reveals differences in how these countries manage their integration processes. The main differences lie in the distribution of responsibilities within the state and in choosing the overall goals of integrational policy. This can range from a moderate integration policy to a more pragmatic economic approach. The first area of comparison is the degree of state centralization. Germany and the Netherlands are countries with relatively strong institutional systems. Both countries have nationwide regulated standards. Unlike the Dutch model, the German model is based on economic pragmatism. The principle of “fördern und fordern” emphasizes the mutual responsibility of the state and the migrant. This symmetry allows migrants to actively integrate into the economy, while the state funds language courses for them. Whilst the Dutch system placed the responsibility for learning the language and culture of the country on the individual, there has recently been a shift in this system. Previously the search for and completion of language courses was entirely the individual’s responsibility. The 2022 reform allowed the state to restore government support to migrants in this regard [5, p.32]. While the German government’s introduction of the “Opportunities Card” in 2024 signals a move toward liberalization, assisting with the shortage of skilled workers. Nevertheless, a high degree of centralization does not necessarily serve as a safeguard against a high influx of foreign nationals, which could overwhelm local administrative bodies, as V. Radchenko points out [3, p.110]. Italy’s system differs from those of Germany and the Netherlands. The “first contact” model demonstrates a dualistic approach. Border control serves a primary security function, while responsibility for long-term social integration falls to local municipalities or non-governmental religious organizations, leaving the process decentralized. Thus, the success of a migrant’s integration depends both on the economic development of the region and on

how quickly the individual finds a job. The second criterion for comparison is how successful integration is defined by each state. In the Netherlands, the signing of a “declaration of civic participation” serves as such a marker, while Germany emphasizes educational attainment. In Italy, however, issues of cultural assimilation are not a priority of state policy. The existence of an employment contract can be regarded as a sign of a migrant’s successful integration. While Germany and the Netherlands are adapting their laws in line with a consistent policy direction, the Italian government is subject to a cyclical pattern in which each change of government affects perceptions of integration. The geographical location of Germany and the Netherlands also allows these states to formulate their policies with a longer-term perspective, whereas the Italian government is forced to address the issue of newcomers at the very outset. Such an approach received support from the local Italian population, in the context of raising concerns about migration, as per study [8, p.115]. It should also be noted that public perception of migration in European societies remains different. According to sociological data, in 2016 a significant proportion of the population in Germany (57%) and Italy (44%) viewed migration as one of the key problems [10, p.465]. Thus, public sentiment exerts a relative influence on the formation of states’ integration policies, either reinforcing the trend toward tightening them or influencing their revision depending on the political context.

Conclusion

The study demonstrates that the German model shows a more pragmatic economic approach, with symmetric responsibility between citizens and the state, whilst the Dutch system focuses on sociocultural assimilation. The Italian model on the other hand, is subject to a “pendulum effect.” However, the Italian approach maintains an “emergency response” system across all administrations. The scientific novelty of this study lies in a comprehensive comparison of changes in the integration models of the three states, taking into account recent legislative changes. The

practical significance of the study lies in the fact that the trends identified in this text can be used to adjust integration policy both at the national level and at the level of EU institutions.

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QƏRBİ VƏ CƏNUBİ AVROPADA MİQRASIYA VƏ İNTEQRASIYA MODELƏRİNİN MÜQAYİSƏLİ TƏHLİLİ: ALMANİYA, NİDERLAND VƏ İTALIYA TƏCRÜBƏSİ

Xülasə

Bu tədqiqatın məqsədi Almaniya, Hollandiya və İtaliyanı nümunə tədqiqatları kimi istifadə edərək, müasir miqrasiya və integrasiya modellərinin təhlilini aparmaqdır. Mövcud Avropa problemləri kontekstində onların effektivliyini qiymətləndirmək üçün tədqiqat metodu hökumət strategiyalarının müqayisəli təhlilinə, eləcə də yeni gələnlər üçün hüquqi və sosial integrasiyanın araşdırılmasına əsaslanır. Tədqiqatın nəticələri göstərir ki, Almaniya miqrantların əmək bazarına uyğunlaşmasına diqqət yetirdiyinə görə daha sabit integrasiya sisteminə malikdir. Hollandiya integrasiyadan əvvəlki tələblər sistemi vasitəsilə mədəni və dəyər əsaslı integrasiyaya xüsusi diqqət yetirir. İtaliya yüksək miqrasiya təzyiqi və qısamüddətli anti-böhran tədbirlərinin yayılması səbəbindən ciddi çətinliklərlə üzləşsə də, tədqiqatın elmi yeniliyi bu integrasiya modellərinin müqayisəli təsnifatındadır. Nəticələr miqrasiya və sosial siyasətlərin hazırlanmasında istifadə edilə bilər.

Açar sözlər: miqrasiya, integrasiya modelləri, Almaniya, Hollandiya, İtaliya.

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СРАВНИТЕЛЬНЫЙ АНАЛИЗ МОДЕЛЕЙ МИГРАЦИИ И ИНТЕГРАЦИИ В ЗАПАДНОЙ И ЮЖНОЙ ЕВРОПЕ: ОПЫТ ГЕРМАНИИ, НИДЕРЛАНДОВ И ИТАЛИИ

Резюме

Цель данного исследования — провести анализ современных моделей миграции и интеграции на примере Германии, Нидерландов и Италии. Для оценки их эффективности в контексте современных европейских вызовов метод исследования основан на сравнительном анализе государственных стратегий, а также на изучении правовой и социальной интеграции новоприбывших. Результаты исследования показывают, что в Германии система интеграции более стабильна благодаря ориентации на адаптацию мигрантов к рынку труда. Нидерланды уделяют особое внимание культурной и ценностной интеграции посредством системы требований к предварительной интеграции. В то время как Италия сталкивается с серьезными проблемами из-за высокого миграционного давления и преобладания краткосрочных антикризисных мер. Научная новизна исследования заключается в сравнительной классификации этих моделей интеграции. Полученные результаты могут быть использованы при разработке миграционной и социальной политики.

Ключевые слова: миграция, модели интеграции, Германия, Нидерланды, Италия.

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