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in Germany, France and Italy.
A preliminary comparison**

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Abstract: *This paper addresses the link between immigration and poverty by comparing income-support schemes in Germany, Italy, and France. Generous welfare states are notable because of low poverty rates, but also minimal differences between key sub-groups, such as men and women, natives and immigrants. Differences in poverty among social groups are important, because they shape public attitudes about poverty (Waldfogel, 2001). Because of immigration's high political salience in Europe, it is important to understand how well states minimize immigrant/native-born poverty gaps. The aim of this paper is to reach a preliminary understand of whether and to what extent the immigrant population is included in public policies tackling poverty in three Western European countries. The paper begins by giving the historical background of immigration in each country and then goes on to analyze the income-support schemes and its effectiveness on the migrant population. It concludes by pointing out differences between these schemes, as well as the common problems pushing the immigrant population in a disadvantageous position.*

Keywords: *Migration, Income-support schemes, Immigration policy, Immigrant poverty*

JEL Classification: I38

Introduction

From World War II, migration has been one of the key issues in Western European countries. While the controversies surrounding the topic have been increasing more and more after the migration crisis of the 2010s, immigrants residing in EU countries are faced with problems regarding citizenship, housing, education, and social exclusion so much so far that they end often trapped into poverty. Indeed, the increase in poverty and social exclusion rates in the last decade, and the rising inequalities in Europe (Baldini *et al.*, 2018) affected the most vulnerable groups of populations, such as children, women, and immigrants.

A relatively strong aversion to inequalities, which can be justified, for example, by the principles put forward by John Rawls (2001), argues for the introduction of high minimum social benefits to provide the most vulnerable in society with an adequate standard of living. The historian Cobban (1965) has been among the first to prove that poverty is inefficient for national economy. Adversely, according to neo-classical economics, differential social benefits would create a strong disincentive to work. The theory of optimal taxation developed in the Seventies by Mirrlees (1971) explains the terms of the trade-off between social equity and economic efficiency. It maintains that efficiency and equality were at odds with each other, to the extent that Okun (1975) termed the relationship between the two variables «the big trade-off». It was thought that society had to pay an economic-growth cost to reduce the asymmetries and inequalities that arose from market competition. Therefore, in neo-classical models, inequality has been considered as a favorable factor for growth, since the concentration of resources in the hands of a small group could increase their savings capacity, and, thus, their attitude to invest. This principles has been anyway challenged not only by empirical evidence

(Acemoglu, 2013, Ostry *et al.*, 2014), but also by a new line of thinking called «equality economy». The latter considers especially two far-sighted arguments: first, a long-term analysis is needed, attempting to elucidate economic performance over decades rather than years. Secondly, compared to traditional economic theories, it is necessary to include new variables of innovation and productivity, such as social, cultural and political factors, which have a pre-eminent role in the «new economy of inequality and redistribution». Economists have produced new arguments showing the reasons why good economic performance is not only compatible with distributive fairness, but may even demand it (Alesina, Rodrik, 1994).

Certain elements reminiscent of this approach have been incorporated into UE recommendations. The recommendation (2008) on active inclusion set out common principles and practical guidelines for a comprehensive strategy based on three integrated pillars: *i*) adequate income support, *ii*) inclusive labour markets and *iii*) access to quality services. This was built on the 1992 UE Council Recommendation on common criteria on sufficient resources and social assistance in social protection systems, acknowledging the right of every person to such support. The 2013 European Commission's Social Investment Package again reiterated the importance of an active inclusion approach and stressed the importance of adequate minimum income support. It acknowledged that «most Member States have some sort of minimum income scheme», but went on to comment that «the adequacy of these schemes can, however, often be improved. The level should be high enough for a decent life and at the same time help people to be motivated and activated to work» (Frazer, Marlier, 2009). In 2014, the European Commission advised well-designed adequate income support schemes to fight poverty and to increase labor market participation in order to reach the Europe 2020 target of reducing the number of people living in poverty and social exclusion by at least 20 million (European Commission, 2014).

Some scholars claim that these schemes, which were implemented in many countries in Europe, have not been focused on providing the most disadvantaged groups with resources to ensure the achievement of acceptable standard of living, but instead, they aimed solely at involving targeted groups in the labor market (Reyneri, 2015). This approach was problematic, for the reason that poverty is something that cannot be understood only through unemployment or lack of income, but it has a multidimensional effect that encompasses many other deficiencies such as deprived health, lack of education, low quality of work, inadequate living standards (Shepherd, 2006; Thorbecke, 2008). Furthermore, the nexus “more employment equals less poverty” is becoming lesser and lesser unquestionable (Bassanini *et al.*, 1999; Brewer *et al.*, 2006; Neumark, Wascher, 2006; OECD, 2009; Reyneri, 2015), and income support schemes in Europe usually do not allow recipients to exit poverty (Gustafsson *et al.*, *et al.*, 2002). As a matter of fact, not all poor households get the right to receive benefits, although measures significantly lessen the intensity of poverty overall (Whelan *et al.*, 2003; Atkinson *et al.*, 2017; Baldini *et al.*, 2018).

The increasing inadequacy of minimum income protection is a case in point. Several authors demonstrated that social assistance levels eroded in a substantial number of countries over the past decades, a development which was particularly outspoken in the Nineties (Nelson, 2008; Van Mechelen, Marchal, 2013). Consequently, today, even in the most generous settings minimum income protection for jobless households falls short of the at-risk-of-poverty thresholds, especially for immigrant families.

Even if at different extents by country, immigrants are often at the bottom of the earnings distribution and suffers disproportionately from wage compression. In the past,

Reitz and colleagues (1999) have shown how this matters for immigrant earnings across a range of countries. Similarly, there are also reasons to expect immigrant-specific poverty risks, even given identical individual and family characteristics. These reasons are related to the market, State, and family processes that shape poverty. As much previous research has shown, many immigrants face underemployment and overrepresentation in the lowest status, poorest paid jobs (Heath, Cheung, 2007; Kogan, 2007; Van Tubergen, 2006). Poverty gaps between native-born and immigrant couples is particularly extreme in many European countries, because the effects of individual employment disadvantage are magnified in endogamous partnerships, compared to single householders and intermarried immigrant/native-born couples (Kesler, 2015). Immigrants have limited access to income transfers, so inequalities in poverty are reproduced even beyond labor market outcomes and family circumstances.

In order to address the link between immigration and poverty, and specifically the public policies against poverty and its impacts on immigrated population, this paper will provide a preliminary analysis of the socio-economic conditions of immigrants in three countries – Germany, France, and Italy – chosen as the diverse cases of Western European countries and welfare regimes. The aim is to understand whether and to what extent the immigrant population is included in public policies tackling poverty in these three countries. In order to conduct such analysis, two separated and then integrated research steps cover each country's case. Firstly, the historical background of migration in each country is given, by also dealing with issues such as social inclusion and cultural diversity, as well as different approaches to immigrant integration policies. Secondly, we focus solely on the issue of poverty. One public policy against poverty in each country – namely, ALG II (*Arbeitslosengeld II*) in Germany, the RSA (*Revenu de solidarité Active*) in France, and the REI (*Reddito di inclusione*) in Italy – are inspected by examining whether these policies are inclusive and fair for the immigrants or not. As well as analyzing the requirements and implementations of these measures and elaborating on their effectiveness on the immigrant population, the total immigrant population in each country and immigrant population share in each measure are analyzed too.

1. Historical backgrounds of immigration in Germany, France, and Italy.

Migration to, from and within Europe has shaped social, political and economic development throughout history. This remains true today and will continue to be so in the future but the form that it takes will vary from place to place. In 2018, 22.5 million non-EU citizens were residing in EU member states, and 17.6 million citizens of EU member states resided in a country different from where they were born within the EU. At the same time, 92% of the EU population was native of the EU member states where residing in. In 2018, 3.2 million people were given first residence permits to move to and reside in an EU member state. Just a few years earlier, in 2014, it was 2.3 million. 588.000 people also made first applications for asylum in EU in 2018, well above the levels of a decade earlier, but declining by more than half from the level of 2015 (Lulle, King, 2016). Yet there is a more varied picture beyond these general numbers. Patterns of integration also vary across Member States, with diverse employment rates and levels of social inclusion from one country to another (Giancola, Salmieri, 2018).

We here examine substantial dimensions of foreigners' inclusion into anti-poverty schemes in 3 UE countries (see Table 1): Italy, France, Germany. We chose those three specific countries because of their past policies on immigration and welfare: France with

the assimilationist policy and Germany with a long tradition of divergent immigration policies (Brubaker, 1992). Italy has instead a younger immigratory history, since shifted from a country of migration to a country of immigration on the eve of the Seventies (Pugliese, 2002).

Table 1. Percentage of migrant population in France, Germany and Italy

<i>Population 2018</i>	France	Germany	Italy
Nationals	93	88,3	91,5
Non-EU	4,7	6,6	5,9
EU-Mobile	2,3	5,1	2,6
<i>Immigration Annual flows 2017</i>			
Within EU	55	57	30
Outside EU	45	43	70
<i>Emigration annual flows 2017</i>			
Within EU	37	42	63
Outside EU	63	58	37

Source: Eurostat, 2019

Although it is *de facto* a receiving country, Germany has commonly not been considered a “classical place of immigration”: its history is not shaped by immigration in the same way of the United States, Canada or UK, and it also does not have a colonial past like France or UK. The arrival of ethnic German resettles and guest workers to West Germany during the post-colonial period was the starting point of the country’s path to become the immigration country that it is nowadays. Showing a rapid recovery in its economy after the 1948 currency reform, Germany was faced with a labor shortage (Hansen, 2003). As a solution, in 1955, West Germany signed a labor recruitment treaty with Italy, which was then followed by the negotiation of guest-worker schemes with Greece, Spain, Turkey, Morocco, Portugal, Tunisia and Yugoslavia between 1955 and 1968 (Gesley, 2017). “Guest workers”, who worked mostly as low-skilled laborers in the industrial sector were expected to come back to their home countries once they were no longer needed in Germany. However, most guest workers stayed in Germany and profited from family reunifications, contributing to increasing fertility rates (Gesley, 2017). Due to the 1973 oil shock and economic recession, the labor recruitment programs in Germany started to be discontinued, and although guest workers were encouraged to return back to their home countries, most of them decided to remain (Kahanec, Tosun, 2009). On the basis of the initial conception of guest workers, however, integration policies had long been neglected by German governments (Orendt, 2010). Besides, the increasing diversity created by immigration contradicted the concept of German nationhood that has been traditionally grounded on ethno-cultural criteria (Kurthen, 1995). Since the citizenship law in Germany was based almost only on ethnicity, there was no plain path to citizenship even for long-term resident immigrants and their children. This meant that the immigrants in Germany could benefit from the welfare state, but not from the nation state, which created a conflict over inclusion due to the transnational scope of the welfare state and the territorial nature of the nation state (Brubaker, 1990; Halfmann, 1997). In times of shrinking welfare budgets, foreigners could be excluded from the welfare benefits in order to increase their access to the citizens.

Overall, as Süßmuth (2009) suggested, there existed a longstanding public and political pretense that Germany is not a country of immigration. Only with the Migration Act of 2005, the government formally recognized Germany as an immigration country.

Today, immigration to Germany shows shifting patterns, since the German state places an emphasis on skilled migration, which can be exemplified by the ‘green card’ program launched in 2000 for 20.000 high-skilled non-EU workers (Hansen, 2003).

Hence, whereas the “face” of migration was «large-scale, Turkish, low-skilled, and labor driven for about 50 years, recent migration has increasingly become small-scale, European, and family driven» (Süssmuth, 2009: 5).

Table 2. Types of resident permits issued during recent years. France, Germany and Italy (%)

		2015	2016	2017	2018
France	Work	9	10	11	13
	Family	43	40	37	37
	Education	31	31	32	31
	Other	17	19	20	19
Germany	Work	5	8	10	13
	Family	69	27	29	35
	Education	7	9	9	12
	Other	19	56	52	40
Italy	Work	14	3	3	4
	Family	61	46	44	51
	Education	8	8	7	9
	Other	16	43	46	34

Source: Eurostat, 2019

In 2018, the Federal Statistical Office reported that approximately 20.8 million people in Germany had a migration background, which applies to one in every four people (DESTATIS, 2019a). Another research by the German Federal Statistical Office (DESTATIS, 2019b) in 2018 showed that the biggest group of resident foreign nationals was Turkish (13.5%), followed by Polish (7.9%), Syrian (6.8%), Romanian (6.4%) and Italian nationals (5.9%). Data clearly shows that although the arrival of immigrants to Germany is increasingly becoming small-scale, Germany is and will be a country of immigration. And even if since the Migration Act of 2005 successful steps have been made in terms of integration, Germany is still a country both of poorly managed and in need of a forward-looking framework for migration and integration in policymaking to achieve social cohesion and equal opportunity (Süssmuth, 2009). At the same time, Germany is also the country with the highest return rates (Table n. 3):

Table 3. Irregular migration and return rate in France, Germany and Italy

		2015	2016	2017	2018
France	Ordered to leave	79950	81000	84675	105570
	Persons returned	12195	10930	12720	15445
	Return rate	15%	13%	15%	15%
Germany	Ordered to leave	54080	70005	97165	52930
	Persons returned	53640	74080	44960	29055
	Return rate	99%	>100%	46%	55%
Italy	Ordered to leave	27305	32365	36240	27070
	Persons returned	4670	5715	7045	5615
	Return rate	17%	18%	19%	21%

Source: Eurostat, 2019

Unlike Germany, France has always been an immigration country because of its long colonial past. It also had a wide supply of unskilled immigrant workers since it did not have to rely solely on guest-worker agreements as Germany (Hansen, 2003). In the middle of the 19th century, dynamics of population in France started to change rapidly: As far as France was becoming a major industrial power during the course of the century, governments worked to resolve domestic labor shortage through foreign labor recruitment and welcomed immigrants both from European neighboring countries and from colonies. Migration in this period was also influenced by a principle guaranteeing asylums to victims of persecution: individuals ran away from totalitarian regimes such as soviet

Russia, Nazi Germany or fascism in Italy under Mussolini and Spain under Franco (Thierry, 2009). Just like Germany, with the oil crisis and increased unemployment, to enter France as a migrant worker was made harder in the Seventies. However, since this shift in immigration policies coincided with the recognition of family reunification, net migration has never fallen below zero (Geddes and Scholten, 2016).

Immigration to France has long been directly associated with the concept of «assimilation». For a very long time, discourses on immigration in France barely even included the term «integration», which would generally imply privatizing the cultural, ethnic and religious differences and creating a certain threshold of homogeneity in public life. In contrast to the integration model, the French approach to immigration has rather been aimed at transforming the immigrants into “Frenchmen”, making them adopt the French values which pretend to be universal (Barou, 2014). Since it was believed that political inclusion entailed cultural assimilation (Brubaker, 1990), unlike Germany, France adopted universalistic policies regarding citizenship where non-natives and their children could easily acquire citizenship (Giancola, Salmieri, 2018). The assimilation approach, however, has been challenged both by the right and left views: the exclusionary right argued that some groups cannot be assimilated, and favored an assimilation policy which is a «selective policy, racist and unequal, that built its notions on assimilability on the hierarchy of races and religions» (Lacroix, 2015: 1). The multiculturalist left, on the other hand, initiated some transformation in the assimilation model by slogans such as the “droit à la différence” (right to be different) in the Eighties or the somewhat acknowledgment of the French “diversity” in the 2000s. The Jacobin-Republican model, however, still maintains its strength (Beauchemin et al., 2011).

Table 4. Social inclusion in France, Germany and Italy in 2018

		Median equivalised net income (18+) in €	Overcrowding rate household (18+) in %	Persons at risk of poverty (18+) in %	At risk of poverty rate of children in %
France	Nationals	23059	5,9	14,4	14,8
	EU Mobile	19050	15,4	24,6	-
	Non-EU	15164	27,5	50,1	49,3
Germany	Nationals	22964	6,2	18,9	13,9
	EU Mobile	22283	15	18,9	-
	Non-EU	18488	16,5	26,3	26,3
Italy	Nationals	17867	22,7	25,2	22,8
	EU Mobile	12393	43,9	40,2	-
	Non-EU	11438	55,3	45,7	43

Source: Eurostat, 2019

According to Eurostat estimations, there were 7.9 million immigrants (foreign-born people) in France in 2016, standing for 11.8% of the whole population¹. In 2018, INSEE (National Institute of Statistics and Economic Studies) assessed that 46.1% of the immigrants in France were born in Africa. Algerians (13%) and Moroccans (11.9%) represented the widest amount of population among all immigrants. The rest of the immigrants were born in Europe (33.5%), Asia (14,5%) and America and Oceania (6%) (INSEE, 2019). Coherently with the above-mentioned concept of «assimilability» and the existence of discriminatory approaches against people of Sub-Saharan and Maghrebian origins, data about immigrant population share in France shows that a great part of

¹ Eurostat, File: Foreign-born population by country of birth, 1 January 2016 (2017, April 10). Available at: [https://ec.europa.eu/eurostat/statistics-explained/index.php/File:Foreign-born_population_by_country_of_birth,_1_January_2016_\(%C2%B9\).png](https://ec.europa.eu/eurostat/statistics-explained/index.php/File:Foreign-born_population_by_country_of_birth,_1_January_2016_(%C2%B9).png)

immigrants are still having hard time finding their place within French society (Barou, 2014).

Compared to Germany and France, the history of immigration in Italy is much shorter: Italy did not receive such huge migration flows like Germany and France until the mid-Seventies, when immigration exceeded emigration for the first time (Veugelers, 1994; Colombo, Sciortino, 2004). With the oil shock of 1973-74, which, as mentioned, pushed German and French government to adopt restrictive policies toward immigration, significant migrant flows started to emerge in Italy (Pastore, 2008). Although it had been considered just as a “transit country” during the time, Italy continued to have a higher number of foreign residents for longer (Zincone, 2006; Arango, 2102; Del Boca, Venturini, 2016).

Italy became an immigration country within the context of a global economic crisis and deindustrialization also as a country with a huge informal and underground economy and a long history of regional inequalities. For all these reasons, immigrants in Italy did not have access to relatively well-paid and protected industrial jobs from the beginning (Bonifazi, 1998). Indeed, foreign workers often tended to have unstable legal and economic status, since they were mostly «self-employed, non-unionized, hired seasonally, or exploited in the underground economy» (Veugelers, 1994: 35). Additionally, they use to have a lower educational attainment (Peris Cancio, 2010) (See table n. 5).

Table 5. Education in France, Germany and Italy (%)

		Population by low educational attainment (25-34) %	NEET (18-24) %	Early school leavers (18-24) %
France	Nationals	18,5	14,7	8,3
	EU Mobile	39,6	17,7	17,3
	Non-EU	47,2	26,1	18,8
Germany	Nationals	9,3	6,2	7,8
	EU Mobile	28,3	11,6	24,2
	Non-EU	44,9	21,3	24,7
Italy	Nationals	36,6	23,9	12,3
	EU Mobile	35,6	32,7	32,5
	Non-EU	60	35,3	39,4

Source: Eurostat, 2019

Although immigrants’ employment in Italy was limited to low skilled jobs in the industrial, construction and agricultural sectors at first, it then expanded into the family services sector, where foreign women dominate nowadays care services to the elderly (Del Bolca, Venturini, 2016). Making the “migrant-in-the-family” model of care become the norm in Italy, the domestic workers have received significant support to enter the country, in contrast to the restrictive immigration policies regarding other sectors (Van Hooren, 2010). The attitude of the native population towards immigration, on the other hand, seems to be ambiguous: whereas many Italians are aware that immigrants are needed for the country’s economy and are in favor of a settlement process (Finotelli, Sciortino, 2009), immigration has many negative connotations for a fairly large part of the Italian population, which is mostly resulted from the media and politicians associating immigration with criminality (Van Hooren, 2010). Nowadays, the fear of welfare overuse has become another factor affecting the Italians’ negative views on immigration (Colombo, 2018). In January 2019, immigrants consisted the 8.7% of Italy’s total population. 23.1% of all the immigrants were Romanian, followed by Albanians (8.4%), Moroccans (8.0%), Chinese (5.7%) and Ukrainians (4.6%). From 2004 to 2012, immigrant population steadily increased, from 1.990.159 to 4.052.082. After a slight

decrease in 2012 because of the financial crisis, immigrant population increased in 2013 before to stagnate from 2014 (ISTAT, 2019).

2. Policies against poverty in Germany, France and Italy.

From the late Nineties to the early 2000s, Germany was being called the «sick man of Europe» (Dustmann *et al.*, 2014, 167). The so-called “Hartz reforms” resulted from a changing economic and political setting: low economic growth and high unemployment rates (13.4% in 2002) were calling for policies designed to tackle with the issue. Based on four different laws, reforms were gradually implemented, from Hartz I and II (in 2003), Hartz III (in 2004) and Hartz IV (in 2005). Although each law focused on one specific key element, they were all complementary to each other’s. Overall, the reforms had three aims: «(a) improving employment services and policy measures, (b) activating the unemployed, and (c) fostering employment demand by deregulating the labor market» (Jacobi, Kluve, 2006: 2). Whereas the first three laws were focused mostly on increasing employment demand and the efficiency of the labor market, the fourth one was a benefit reform to “activate” unemployed.

Hartz IV brought together the basis of the former unemployment (*Arbeitslosengeld I*) and welfare benefits (*Sozialhilfe*). The reform introduced the *Unemployment Benefit II*, also called ALG II in short, which is given to long-term unemployed individuals who exhausted their Unemployment Benefit I entitlements. ALG II is paid monthly, by the local job centers (*Jobcentre*), for a period of 12 months. After this period, beneficiaries should apply for it again to prove they still meet its requirements. Since January 2019, single people and single parents used to receive 424 euros per month. For partners over 18 years old, the benefit was 382 euros and different amounts of benefits were granted for children and people aged between 18-25 years old too (European Commission, 2020a). Aside from the monthly cash benefit, ALG II includes assistance with additional needs, such as heating and accommodation. Whereas the Federal Government covers the ALG II benefit and its administration, local authorities are responsible for the costs of housing and heating (Stiller, 2010). Although it is called an “unemployment benefit”, it is possible to benefit from ALG II while earning an income providing that income is not enough to support one’s or one’s family minimum cost of living (BUF, 2011). To be eligible for ALG II, people should be able and disposed to work at least three hours a day, since the main aim of the benefit is to end one’s dependence on it.

Aside from this, beneficiaries should be aged between 15 and the statutory retirement age and unable to meet their necessary needs and/or the needs of their household. During the application process, potential beneficiaries have to inform job centers about savings and whether they own a house or a car too (European Commission, 2020a). For foreigners, eligibility requirements are as follows: they have to legally reside in Germany at least longer than three months from the moment of application. They also should not be in Germany simply for the reason of seeking for jobs. Non-EU citizens are obliged to have a residence permit which allows them to work in Germany too (BUF, 2011).

People who benefit from ALG II are also obliged to take part in “integration” measures designed to make sure of their ability to find a job. With the slogan of “promoting and demanding”, ALG II requires its beneficiaries to take their own initiative to actively seek employment in order to ensure their return to work as soon as possible (Huster *et al.*, 2009). The integration measure is made up of employment activation

schemes such as advice, counseling, vocational training, further education, placement and occupational integration services (Zschache, 2018). Another requirement for ALG II is to seek jobs nationwide and accept every “reasonable” job vacation: whether or not a job offer is reasonable depends on an evaluation made by the head manager in the job center. Once decided to be reasonable, even if the offered job requires skills lower than the beneficiary qualification and is available too far from where he/she lives, there is no way to refuse (Jacobi, Kluve, 2006). Refusing to be included into integration schemes or refusing to accept employment offers can result in the reduction or withdrawal of benefits (Zschache, 2018).

Following the Hartz reforms, a significant increase in labor market participation and employment has been registered, with the economically active population increasing 4.9% between 2004 and 2011 (Bouvard *et al.*, 2013). Of course, there are no empirical assessment of the exact impact of the Hartz reforms on the increasing levels of active population. Nonetheless, Hartz reforms have been judged as highly effective (Bauer, King, 2018). Overall at-risk-of-poverty rates decreased from 13.5% to 12.6% between the years 2004 and 2005 (Petzold, 2013).

It is important, however, to note that the actual impact of the Hartz reforms is hard to ascertain due to many different factors. In addition, the increase in the employment rates cannot be automatically regarded in a positive way, since the quality and duration of the jobs created have to be considered too. ALG II is also often claimed to result in lowering of the wages and a loss of full-time jobs: at-risk-of-poverty rates for employed persons, for instance, have increased from 4.9 % to 7.1 % between 2005 and 2010. Further, among 3.34 million ALG II beneficiaries at the end of January 2011, over 40% (1.42 million) had been continuous receivers since 2005 (Petzold, 2013). Around two-thirds of them had found a job during the period, but the number of hours or the hourly wages were too low to reach the level of ALG II (Bouvard *et al.*, 2013).

In France the *Revenu de solidarité active* (The Active Solidarity Income, RSA in short) was introduced in 2009, replacing the previous *Revenu minimum d'insertion* (RMI) and *Allocation Parent Isolé* (Single Parent Benefit, API). Previous RMI was a means-tested scheme, given to people with no income or an income under a given threshold. This was higher for households with more children, as well as for households living as a couple instead of single persons. RMI was paid for three months and then extended for up to one year (Legros, 2009). When introduced, the monetary component of the RSA had two parts. The first was the so-called “basic RSA” (*RSA socle*), the principle of which was to provide each household with a flat monthly level of resources depending solely on the number of household components: any euro received by the household then reduced the amount of personal RSA paid to one component. The second part was the so-called “RSA activity” (*RSA activité*) which was a financial support for employed persons belonging to a modest household. Basic RSA provided for an essential minimum income support, while RSA activity functioned as a permanent work incentive scheme, which allowed beneficiaries to retain 62% of their earned income. This monetary assistance guaranteed the household a level of monthly resources which increased with the amount of its income from employments. If the household’s overall resources (wages, social benefits, pensions, etc.) were greater than the amount of guaranteed income determined by its family configuration and the level of its employment income, it was outside the scope of the scheme.

In July 2016 the RSA activity was eliminated and the basic RSA went on to be known as RSA, from then on calculated as a differential allowance which supplements the household's resources up to a level depending on the family configuration and the

presence of income. This guaranteed income is not open neither to people under 25 without dependent children nor to students. On April 1, 2017, for a single person, the active solidarity income (RSA) amounted to 537 euros on the basis that other benefits (including housing benefits) often supplement the disposable income of beneficiaries of these social minima. In 2017, 36.0% of households receiving the RSA lived above the poverty line (DREES, 2019).

The main idea behind the RSA is that if poor people were staying unemployed, it was because the wages they would get were lower compared to the RMI so that they did not have any incentives to get off welfare. In other words, RSA was introduced to solve the “welfare-without-work problem”. Therefore, the main difference between the former RMI and the RSA is that only 38% of the income, instead of 100% for the RMI, is deducted from the RSA. To put it differently, for each euro earned, a household benefiting from the RSA gets 62 cents, compared to zero in the case of the RMI. The aim of this difference applied to the RSA is to make work always more gainful than unemployment. The main goal, in other words, is to make sure that «returning to work is always more profitable than staying on welfare, and that work should give everyone the guarantee of escaping and being protected from poverty»².

Eligibility requirements for RSA are as follows: potential beneficiaries have to be more than 25 years old or pregnant or have one or more dependent children or prove a minimum duration of professional activity. Unless is a single parent, a student is not eligible. The monthly income of beneficiary’s household should not exceed a fixed threshold three months earlier the application. Receivers should be living in France in a stable and regular way. The non-French beneficiaries who are nationals from the European Economic Area are required to have been living in France during at least three months prior to apply. Nationals from other countries, on the other hand, are needed to have had a residence permit which allows to work in France for more than five years before their application (European Commission, 2020b).

RSA beneficiaries have the chance to receive individualized social or employment support from a single caseworker, which is obligatory for the beneficiaries that earn less than the RSA basic amount. However, as the analysis of European Income Network on the RSA (2014) suggests, many people do not expect much from this support and consider it just a mere imposition. In fact, only 52% of RSA beneficiaries refused to be supported by a named caseworker, while 23% did not received such support at all. The situation clearly proves a weak coordination of support at local level.

A review of the literature seems to prove an overall positive effect of the RSA on multiple dimensions: it stimulates the increase of employment rates; it ignites active participation in the labor market, although primarily by part-time jobs (Mikol, Rémy, 2009); it improves beneficiaries’ standards of living and gives support to part-timers (Bonnetoy *et al.*, 2009), arguably more than the former RMI, since it offers higher total earnings. However, the main aims of the RSA – to reduce poverty and unemployment rate - have not been fully accomplished: 6 years after RSA implementation, unemployment increased only marginally (from 9.1% in 2009 to 10.4% in 2015). Showing a steady decrease since 2015, French unemployment rate has anyway never gone lower than the rate registered in year of the RSA implementation (INSEE, 2016). One reason for the impact on unemployment unmatching expectations can be that RSA made returning to work easier for a limited share of the unemployed population with high-medium qualifications and/or no work-life balance requirements (Legros, 2009).

² Extract from the *Letter of mission* from the President of the French Republic and the Prime Minister to the High Commissioner for Active Solidarity against Poverty, in Anne, L’Horty (2011: 2).

One of the main criticisms addressed to RSA is related to the long-lasting conception of “deserved poverty”. A quote from Martin Hirsch, the former High Commissioner for the RSA, states that: «I also insist on the fact that only people who work will receive greater benefits than they do now. With the RSA, we will not be giving one penny more to the inactive, but we will considerably increase the purchasing power of the working poor» (Périvier, 2011: 7). This quote is exemplary in showing that the RSA is situated on «a dual vision of poverty», where there are the deserving poor from one side and the hard-working-poor from the other. Duality, of course, is dangerous since it ignores many possible social and personal factors that can lead unemployment. Another criticism is that although RSA offers a higher monetary gain than the previous RMI, the amount is anyway below the poverty threshold (Legros, 2009). Lastly, the scheme is also criticized on the basis of the low-quality jobs it offers to poor people and the difficulties aged jobseekers and people with disabilities find when applying for the scheme (Legros, 2009).

Differently from the French RSA and the German ALG II, which were implemented in the second half of the 2000s, the Italian *Reddito di Inclusione* (The Inclusion Income, REI in short) was introduced much later, in March 2017. Until REI, Italy did not have any universal minimum income program at a national level, but only some limited provisions, locally organized. These schemes were merely targeted to specific social categories, such as the aged population and people with disabilities (Ferrari, 2018). As Sacchi and Bastagli (2005) suggest, from the national unification (1861) up to the mid-Nineties, social assistance in Italy was neglected to a large extent. The national report on Italy by the European Commission project *Combating Poverty in Europe* clarifies the reasons for such neglect by drawing the traditional framework for the social assistance sector in Italy, as it follows: «categorisation of welfare recipients, and absence of a global approach to the complexity of needs; pulverisation of the bodies providing benefits and services; decentralisation of social assistance functions to regions and municipalities since the 1970s, ensuing territorial inequality in the provision of benefits and services; scarcity of resources and organisational weakness of the sector; dominant role of catholic organisations and the Church; and fragmentary nature of secular and public initiative» (Madama *et al.*, 2013: 21).

The *Reddito di Inclusione* is a single national measure which provides for a personalised programme of social and labour inclusion aimed at lifting individuals out of poverty. The measure is universal based on means testing, in consonance with a single national indicator for economic status – *Indice di Situazione Economica Equivalente* (ISEE)³ – which is calculated based on the effective disposable income and spending capacity of a person. The applicant’s family unit must not be collectively in possession of: an income exceeding 6.000 euros, immovable property assets other than the household exceeding 20.000 euros, movable property assets exceeding 6.000 euros, increased by 2.000 euros for every family member following the first, up to a maximum of 10.000 euros.

As is the case of all territorial social services provisions, residence and stay requirements are needed, which in this case we could define as “qualified residency” requirements. These amount to 24 months and entail the beneficiary to be an EU citizen, or to hold the right of residence or of permanent residence, namely to be a third-country citizen in possession of an EU residence permit for long-term residents, or to have resided in Italy on a continuous basis for at least two years upon submitting the application. These

³ ISSE is the indicator of equalized economic conditions, which considers both income and wealth.

requirements leave out of account a considerable group of persons in extreme poverty, left in the care of emergency social services, especially in large cities.

When the law was initially drafted, it also included requirements concerning the state of members composing the family unit: the presence of a family member below the age of 18; and or the presence of a person with disability and at least one of the parents; the presence of a women with an established pregnancy; the presence of at least one worker aged 55 or over who has been unemployed during the last three months.

Before REI, schemes such as *Reddito Minimo di Inserimento* (RMI), Social Card and the New Social Card had been introduced. Whereas RMI was given only to the residents of some municipalities (Ferrara, 2005), the Social Card program received criticisms for not being universal, involving a very limited number of households and providing a very low financial amount. However, it is important to note that because the New Social Card granted an amount much higher than the Social Card (changing from 231 euros per month for an household of two components to 404 euros for families with at least 5 members) and involved an obligatory program of “re-activation”, it has been labelled as the «first [Italian] attempt to combine an income maintenance scheme with a social or work-related reinsertion path» (Baldini *et al.*, 2018: 12).

Since its introduction in March 2017, REI got progressively extended by a series of legislative steps: in July 2018, with the Budget Law 2018 (art. 1 paragraph 192) REI became a truly universal guaranteed minimum income, that is to say, dependent only to the means test and to the acceptance of a “labour market reinsertion pact” (Baldini *et al.*, 2018). People could benefit from the measure without qualifying the previous family requirements such as the presence of a minor, a disabled person, a pregnant woman or an unemployed member aged over 55 (Raitano *et al.*, 2018). To be eligible for the benefit, recipients should just meet specific economic requirements based on ISEE values no more than 6 thousand euros, a value of real estate (other than the house being dwelled) not exceeding 20 thousand euros, as well as not having motor vehicles registered 24 months prior to the application. All Italian and EU citizens can have access to REI, whereas the non-European citizens are required to hold a long-term EU residence permit. All beneficiaries, however, are required to have lived in Italy, on an ongoing basis, for at least two years in the time of application (Gori, 2019).

As shortly mentioned above, REI is based on two measures: firstly, it is an economic benefit distributed via an electronic card, and amounts between a minimum benefit of 187,5 euros and a maximum benefit of 539,82 euros per month depending on the number of components of the household (Gori, 2019). Its duration is 18 months, extensible to 12 more months in case the family is still in poverty. However, the new application can only be made 6 months after the termination of the previous REI benefit (Baldini *et al.*, 2018). Secondly, REI is a social assistance program aimed at achieving the social and employment inclusion of beneficiaries. Provided local social assistance services, the reinsertion program is personalized and includes training or job or social activation. However, due to the lack of a binding national framework for social assistance, which is a long-lasting problem for Italy, there exist wide regional inequalities regarding the social assistance benefits of REI. In April 2019, REI was replaced by a new measure, called *Reddito di Cittadinanza* (Citizenship Income), which is more generous and with a longer duration but also with stricter conditionality rules if compared to REI (Jessoula *et al.*, 2019). Since REI is a measure implemented and terminated in a period close to nowadays, it is not easy to evaluate the actual long-term impacts of the measure on poverty or employment. In 2018, however, the short-term effects of the measure were analyzed: Baldini and colleagues (2018) concluded REI had supported the poorest part of

the population, even if it has had more success in reducing the intensity of poverty rather than the incidence of it.

4. Policies effectiveness on immigrants.

In Germany, as it is in France and Italy, the share of immigrants in welfare programs exceeds their share of the country total population: in 2010, 20% of all ALG II recipients were foreigners compared to a population share approximated to 9%, when in 2007, 8.4% of ALG II beneficiaries were Turkish citizens and the corresponding population share in Germany was about 2% (Riphahn *et al.*, 2010). In 2018, according to the German Federal Employment Agency, 55% percent of ALG II recipients had a migration background. In that case a person has a migration background when parents or least one of the parents was not born a German citizen⁴. According to the German Federal Employment Agency such a significant share of recipients was due to refugees' lack of qualifications and language skills. As Brenke (2010) emphasizes, among ALG II recipients, high numbers are observed for children, immigrants and single parents. Brenke (2010) also points out that among children benefitting from ALG II, the number of foreign ones is twice as high as of the German ones. Nonetheless, the comparably high participation of immigrants in ALG II scheme does not seem to directly conclude in the reduction of their poverty. Aside from immigrants' high participation in ALG II giving insight about their levels of poverty, many poor migrants do not have access to ALG II due to administrative obstacles complicating their application or the continuity of the benefit. Non-EU nationals receiving benefit from ALG II, but lacking a permanent residence permit, run the risk of losing the right to stay or to get their residence permit prolonged (Riphahn *et al.*, 2010). Turkish immigrants represent an exception since they are protected by the European Convention on Social and Medical Assistance. For EU nationals, on the other hand, the general perception in the public opinion of a "welfare tourism" seems to make their chance to receive ALG II lower. Although the European Court of Justice agreed that the German state can exclude immigrants from benefiting ALG II when those latter are not trying «to be integrated integrating into the labor market» (Blauberger and Schmidt, 2014). EU nationals may encounter several kinds of obstacles also related to the high emphasis the ALG II scheme puts on the obligation to actively search jobs nationwide as well as to passively accept whatever kind of job offer.

According to INSEE (the French National Institute of Statistics and Economic Studies), among the 1.88 million RSA beneficiaries in December 2017, 16% were foreigners, compared to 7% of the total population share (DREES, 2019). INSEE defines foreigners as persons who reside in France and do not possess French nationality, but another nationality. Persons of French nationality who also possess another nationality (or several nationalities) are considered as being French. Nonetheless, a foreigner is not necessarily an immigrant since he/she may be born in France (minors, in particular). Aside from initial problems affecting both French and the foreign population such as the issues of "tested poverty", the drawback of increasing low-quality jobs and beneficiaries still living below the poverty threshold, RSA scheme encountered problems affecting specifically immigrants' access. The main drawback of the RSA is that most of the immigrants from countries outside the European Economic Area (EEA) cannot qualify

4 *Jeder zweite Hartz-IV-Empfänger hat Migrationshintergrund*, (2018, April 10). Retrieved January 2, 2020, from: <https://www.dnn.de/Nachrichten/Politik/Jeder-zweite-Hartz-IV-Empfaenger-hat-Migrationshintergrund>

for it, since they are required to have had a residence permit allowing them to work in France for more than five years before of their application (European Minimum Income Network, 2014). Important to note is that the time requirement has been increased from three to five years broadening the gap in availability between French citizens and foreigners (Sainsbury, 2012). Another issue with time requirement is that it leaves out women who entered France through family reunification, since they would have to spend at least five years in the country: for those latter being unable to receive any benefit usually means a strong restriction of their autonomy (OECD, 2018).

Sainsbury (2012) further evaluates the RSA scheme for showing «both inclusionary and exclusionary effects»: the measure tightened work requirements, but lowered the minimum age at 25, which can benefit youth people with immigrant background. Also, the administrative delays regarding the RSA, as mentioned earlier, specifically push refugees and forced migrants in a disadvantageous position, since they have to face with periods with no income, curbing their integration process. Furthermore, local support of the RSA for migrants falls shorter, particularly because of language barriers.

Looking at Italy, in 2017 the share of poor households composed only by non-nationals was about six times higher than that of the ones composed exclusively by nationals (29.2% vs. 5.1%) (ISTAT, 2018). Between January 2018 and March 2019, the total share of the non-EU citizens among the REI beneficiaries was 11% (INPS, 2018), compared to the approximate 8% of share in the total population. Although an exact comparison is not possible since the two data are from different years, it can be estimated that around half of the poor foreigners in Italy did not ask for or receive REI, which can be explained with multiple reasons. Firstly, non-EU nationals are required to stay in Italy for at least two years with a residence permit, and this can curb their ability to receive the benefit also because in case of unemployment they might have problems regarding their residence permit too. Another reason is that bureaucratic procedures and certificates such as the ISEE might make it difficult for immigrants to access to REI, especially if they cannot benefit from linguistic support or have to prove (OECD, 2019). Additionally, persistent regional differences in the implementation of the REI scheme can harden immigrants' way of getting out of poverty, in the case that they live in a poorly managed local area. With *Reddito di Cittadinanza* (Citizenship Income), which replaced REI in April 2019, non-EU nationals will need a long-term residence permit and will have to be living in Italy for 10 years, the last two years continuously.

This initial categorisation of the law was later surpassed with the 2018 Budget Law, which transformed REI even before its implementation, giving a categorical boost towards the expansion of the provision's target group. As drafted in the legislative decree 147 of the 15th September 2017, REI is a measure which explicitly tends to universality, thus, to reach all persons living in condition of absolute poverty. However, it hasn't accomplished this objective so far. The issue at stake mainly concerned resources: according to the decree, the expected allocation of resources to the *Fondo Povertà* – Poverty Fund (1.759.000 euros in 2018, and 1.845.000 euros per year, starting from 2019) – made possible to reach 1.800.000 individuals, namely 38 % of the population living in absolute poverty (approximately 4,7 million people). It is an unprecedented initiative in Italian poverty policies.

Based on a cross-sectional analysis, we try to highlight the main points of the three selected schemes. Policy: in the three countries, policy decisions about minimum income schemes are made at national level. However, in the Italian, case only after decades of

regional laws, a national level scheme has been finally established a measure⁵. Delivery: in the three countries responsibility is shared between the national and regional/local levels. Minimum income schemes covered in this review can be divided into some main types though the boundaries between these categories are inevitably rather fluid: France has a complex network of different, often categorical schemes and sometimes overlapping schemes which cover most people in need of support. In Germany, the traditional general scheme has been transformed in the last decade. It is now a complex and differentiated system of categorical schemes, which are clearly defined and do not overlap in coverage. Furthermore, it seems that those schemes cover in principle (but not in practice) all people in need of support. Italy has a general scheme of last resort with additional categorical benefits which cover most people in need of support. Rights based benefits and discretionary benefits: in all three countries, minimum incomes are paid on either a strictly rights basis (i.e. on the basis of strict criteria set out in legislation, as Italy), or on a predominantly rights basis with some discretionary elements. However, in France and Germany there are substantial discretionary elements. Mechanisms for establishing levels of benefits and uprating: there are clear mechanisms for establishing the level of payments which are based on a set of clearly detailed indicators normally considering of household composition. The most common approach is related to establishing minimum living standards (e.g. through prices, basket of goods, the absolute poverty line, reference budgets). In Germany, the benefit level is deduced from the expenditures of lower-income groups, measured every five years by means of an Income and Consumption Sample. In France the level of benefits is set (mainly) on a subjective or arbitrary basis. In Italy there is a mechanism for establishing the level of payments which is based on a (set of) clearly specified indicator(s). The mechanism can be based on median/mean income or proportion of it (e.g. national relative poverty line). Conditionality rules: very strict conditions for minimum income recipients is the rule and, in many cases, these have been tightened during recent years with the economic crisis. These most frequently involve: registering with public employment service; signing an integration/insertion contract or employment plan; engaging in job search activities; accepting job offers; participating in activation measures whether training, personal development or community service; having used all possible entitlements to other social security benefits; selling or making use of one's own assets (e.g. selling or renting a property); and keeping the benefits administration informed of any changes in personal life-circumstances. In Germany, in the Social Code Book II there are exceptions to the obligation to look for and accept a job. For example, because of the care of a child up to three years or the home care of a family member. In Italy, conditionality increased with the *Reddito di Cittadinanza*. In France rules a limited conditionality. Duration: in Germany there is no limit to the length

⁵ The main income-support regional laws approved in this first season configured a fragmented framework: the *Minimo vitale* in the Valle d'Aosta region (1994), the *Reddito di cittadinanza* in Campania region (2004), the *Programma di promozione della cittadinanza sociale* in the Basilicata region (2005), the *Reddito di base per la cittadinanza* in the Friuli Venezia Giulia region (2006), the *Reddito di garanzia* in the Autonomous Province of Trento and the *Reddito minimo garantito per inoccupati, disoccupati, precariamente occupati* in the Lazio region (2009). The second wave of regional laws is contextualised in a completely different setting compared to the previous one, namely in the period following the 2008 economic crisis. This second wave concerned provisions such as the *Reddito minimo di inserimento* in the Molise region (2012), the *Reddito di dignità regionale e politiche per l'inclusione sociale attiva* in the Sardegna region (2015), the *Misure di inclusione attiva e di sostegno al reddito* in the Valle d'Aosta region (2015), the *Reddito sociale di cittadinanza* in the Calabria region (2015), the *Programma per un reddito minimo di inserimento* in Basilicata region (2015), the *Misure di contrasto alla povertà e sostegno al reddito* in the Emilia Romagna region (2016), the *Fondo regionale per il reddito di inclusione sociale Agiudu torrau* (2016) in the Sardinia region, and the *Reddito di autonomia* in the Lombardia region (2016).

of time benefits can be received as long as eligibility criteria continue to be met. In France there is a periodical reassessment, but not necessarily limitation in time, while in Italy there is a time limited up to 18 months. Take-up: in Germany between 1/3 and 2/5 of all eligible beneficiaries do not apply for these benefits. In France over a quarter of the poorest households, i.e. those below the 40%-median income poverty line, live in a household that receives neither housing benefit nor minimum income. As for the Italian case, it is too soon to draw conclusions, but despite being very recent measures, they have had a strong level of impact in a short time. According to ESPN experts, the most common reasons identified for non-take-up are psychological barriers (such as ignorance and shame) or mental illness; or avoiding stigma attached to social assistance and loss of privacy; institutional barrier and inadequate information and publicity, lack of knowledge about entitlement and eligibility rules experts (Raitano *et al.*, 2018). 2015). Many times, the benefits are perceived as being too low compared to procedures of application. Too much red tape, bureaucracy and complexity of regulations as well as lack of effective outreach and mediation to potential beneficiaries are effective barrier to ask for the minimum income.

Conclusions

Germany, France and Italy have followed specific and unique pathways in both immigration policies and policies against poverty. The three Western European countries, although showing certain differences with respect to poverty alleviation/elimination measures, have a lot in common too: As illustrated in this paper, the German ALG II puts a great emphasis on joining the labor market and makes it a strict requirement to its beneficiaries to actively search jobs nationwide. The French RSA stresses the return to work as well as the relevance of “deserved poverty”. The measure also comes from a long tradition of categorical measures. What stands out about the Italian REI, is that it is the first minimum income measure at a national level therefore implemented relatively much later than in Germany and France. Although the social assistance service it offers can improve the standards of living for many beneficiaries, regional inequalities and lack of a binding national framework might create a drawback.

Overall, what brings these three different examples of minimum income schemes together is firstly that even if they are perceived as universal ways of reducing poverty, these measures are not able to fully counteract the poverty of the most marginalized social groups, among which immigrants outnumber natives citizens. Furthermore, the heavy emphasis on employment as a way to escape poverty that can be argued to be more intense for Germany and France - is problematic, since it comes from the idea that “more employment means less poverty» ignoring other social dimensions leading to poverty. The overall picture seems to prove that only the concurrent implementation of a pervasive intervention of public social policies and services in the multidimensional dimension of poverty (health, housing, education, etc.) can make it possible to compensate for wide inequalities and income gaps among families and specifically between native and immigrant population (Figari *et al.*, 2013; Aaberge, Brandolini, 2015; Kangas, Ritakallio, 2019).

Through our review we observed that in Germany, France and Italy the inclusion of the immigrant population in the income measures exceeded their share of the total population, but to a lesser extent than the “weight” of immigrants coming from the poorest groups. Besides this fact giving an idea about the poverty levels of non-natives, it should

be considered that many immigrants are having a hard time or be excluded from benefiting the measures or the proper social assistance. The reasons for such hardship vary: the requirement of a residence permit which should allow non-EU nationals to work and puts a time requirement such as 5 years in the French RSA and 10 years of in Italy with the new *Reddito di Cittadinanza* (Italian Citizenship Income). Furthermore, within the category of immigrants, it can be noted that it is precisely the most vulnerable ones who could be in greater difficulty in accessing the income benefits: children, women, forced immigrants and immigrants lacking a legal status.

At this point, we should question whether the exclusion of newly migrants from minimum income policies is a perverse effect of inattentive criteria and procedures or, rather, a targeted political choice. At first glance it seems that the politics of immigrant-excluding welfare reforms are more about general opposition to immigration and multiculturalism than about concerns over the economic effects of immigration and the sustainability of the welfare state. We should then probably ask what the role of national identity and the specific welfare state regime is at play in the “translation” of public opinion into the production of immigrant-excluding welfare reforms. Considering all these, EU institutions are definitely in need of suggesting and igniting more inclusive measures approaching poverty in a broader framework.

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