



SCUOLA
NORMALE
SUPERIORE

Faculty of Political Science and Sociology
PhD Dissertation in Political Science and Sociology
36th Cycle

Needed but not wanted. Making policies on low-paid labour migration in Denmark, Italy, and Poland

Scientific discipline sector: **SPS/04 (Political Science)**

Candidate
dr.ssa Dorothea Pozzato

External Reviewers:

Prof. Anna Triandafyllidou

Prof. Pawel Kaczmarczyk

Supervisor:

Prof. Guglielmo Meardi

Academic year 2024/2025

Abstract

The contradiction between the economic demand for low-paid migrant workers and the political portrayal of such immigration as unwanted is not a new phenomenon. Although debated for more than three decades, this needed but not wanted paradox shows no signs of being resolved. Instead, long-term developments such as demographic decline and sudden crises like the Covid19 pandemic have accentuated Europe's reliance on low-paid, yet essential migrant workers. At the same time, the rise and success of anti-immigrant populist parties across Europe have strengthened governments' restrictive stances towards unwanted immigration.

This thesis investigates how and why the paradox persists in policymaking across different times and national contexts. Adopting a longitudinal and cross-country comparison, it examines the development of labour migration policies in Denmark, Italy, and Poland—three countries that became immigration destinations at different historical moments: Denmark in the 1960s, Italy in the 1980s, and Poland in the 2000s. This design allows the analysis of how the paradox has been managed in policymaking across distinct time-periods and regional contexts, revealing both divergence in timing and convergence in dynamics.

Methodologically, the research combines 69 semi-structured interviews with policymakers, civil servants, union representatives, and civil society actors with extensive archival research. This empirical foundation provides systematic insights into the drivers, conflicts, and actor constellations that shape labour migration policy over time.

To grasp the complexity of a controversial policy problem, the analysis combines the interests, ideas, and institutions (3 I's) framework with migration governance perspectives that move beyond a purely state-centric approach. While most studies that analyse the paradox remain within one theoretical tradition, this thesis integrates interest-, ideas- and institution-based approaches, and situates them within broader governance processes. By considering the dynamics between state and non-state actors involved in labour migration policymaking, this work highlights how shifting power relations, conflicts, and alliance-making contribute to the persistence of the paradox.

The findings demonstrate that, despite significant differences in migration histories and institutional settings, all three countries followed a strikingly similar policy sequence. An initial *denial phase* was characterised by political inaction and minimal supervision during the early transition into immigration countries. A subsequent *negotiation phase* saw governments respond to economic partners and civil society demands for reform through attempts at comprehensive legislation balancing security-, economic- and migrant rights-oriented demands. This was followed by an *anger phase*, in which populist actors politicised immigration, mobilised public fears, and reversed earlier reforms, thereby narrowing viable policy options within utilitarian- and securitarian-oriented frames. Finally, a *disillusion phase* emerged, marked by pessimistic acceptance of the paradox's insolvability, corresponding to a lack of radical reform in favour of incremental, consensus-dependent adjustments within the prevailing securitarian-utilitarian policy framework.

These findings suggest that this patterned sequence explains policy convergence across diverse cases. Countries with different “immigration ages” are positioned at different stages of the same underlying process. By identifying the common dynamics through which the paradox is reproduced, the thesis contributes to comparative migration studies and to broader debates on the relationship between economic imperatives, political contestation, and institutional inertia in policymaking.

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LIST OF ABBREVIATIONS:

3F	United Association of Danish workers (Fagligt Fælles Forbund), trade union of blue-collar workers
ANCI	National Association of Italian Municipalities
ANPAL	National Agency for Labour Activation Policies (Agenzia Nazionale Politiche Attive del Lavoro), underneath the Ministry of Labour
ASGI	Association of Legal Studies on Immigration (Associazione Studi Giuridici sull'Immigrazione), Italian CSOs of migration legal experts
CEE	Central Eastern Europe
CGIL	Italian General Confederation of Work (Confederazione Generale Italiana del Lavoro), left-wing trade union
CISL	Italian Confederation of Workers (Confederazione Italiana Sindacati Lavoratori), Christian Democratic union
CSO	Civil Society Organisation
DA	Danish Employers (Dansk Arbejdsgiverforening), main employer association
DI	Danish Industry (Dansk Industri), representing companies in all branches of industry
DFP	Danish People's Party (Dansk Folke Parti)
EU	European Union
FH	Trade Union Confederation (Fagbevægelsens Hovedorganisation), main trade union
FOA	Trade union of public sector workers (Forbundet af Offentligt Ansatte)
FZZ	Forum of Trade Unions (Forum Związków Zawodowych), centrist
GEC	Global Economic Crisis
ILO	International Labour Organisation
MLG	Multi-Level Governance
NSZZ	Solidarity (Niezależny Samorządny Związek Zawodowy „Solidarność”), conservative trade union
OPZZ	All-Poland Alliance of Trade Unions (Ogólnopolskie Porozumienie Związków Zawodowych), social democratic
PiS	Law and Justice (Prawo i Sprawiedliwość)
PO	Civic Platform (Platforma Obywatelska)
SD	Social Democrats (Socialdemokratiet), centre left Danish party
SME	Small Medium Enterprise
TCN	Third-Country National
UK	United Kingdom (the)
UIL	Italian labour union (Unione Italiana del Lavoro), social-democratic roots
V	The Left (Venstre) liberal, centre-right political party
VoC	Varieties of Capitalism

Acknowledgments

This dissertation would not have been possible without the intellectual, institutional, and personal support I received throughout these five years.

I am deeply grateful to the academic community at the Scuola Normale Superiore for providing a stimulating, safe, and supportive environment in which to develop this work. Thank you to my supervisor, Guglielmo Meardi, for trusting and encouraging me at the beginning of this journey to explore the direction I wished to go, and for guiding me when I struggled to see the way forward. Your guidance, intellectual generosity, and patience throughout these years have been invaluable. I am also grateful to Iraklis Dimitriadis for his thoughtful feedback and support, and to all the professors, researchers, and administrative staff who contributed to my intellectual development during my time at the Scuola. My gratitude extends to Prof. Melissa Siegel for sharing her passion and experience during my graduate studies, and for inspiring me to continue research on migration.

My sincere thanks goes to Anna Triandafyllidou and Pawel Kaczmarczyk for their encouraging comments and feedback, for offering helpful suggestions to improve this research.

To my fellow PhD students, Clelia, Daniela, Francesco, Nicolo, Giuseppe, Walter, Delina, Maria Chiara, Hande, and Lorenzo—thank you for the good times we shared and for making me feel I was not alone on this journey. Sharing doubts, fears, hopes, and ideas with you has been essential for getting through the challenging moments and celebrating the breakthroughs.

This research would not have been possible without the trust and generosity of my respondents, who made space in their schedules to share their experiences and insights with me. I am deeply indebted to each of you.

During fieldwork, I was hosted by the Faos Centre in Copenhagen, where everyone was incredibly kind and welcoming. I presented preliminary findings of the Italian case there for the first time, and I am grateful to all participants for their positive reception, feedback, and engaging questions. I am particularly indebted to Søren Kaj Andersen for taking the time to help me establish contacts for interviews. In Poland, Maciej Duszczyk, Pawel, and Guglielmo

helped me to connect with potential respondents. At the NCCR in Switzerland, I thank Didier Ruedin and Robin Stünzi for their support and hospitality during the final writing stage.

Thank you to Tomasz Drabowicz for reading an early version of the Poland chapter, and for the valuable comments that helped me improve the analysis. To Nicola Quondamatteo, Raffaele Bazurli, Laila Omar: thank you for finding the time to read parts of the final version of the thesis, your feedback certainly improved it and gave me the confidence for the 'final push'. Over the years of summer schools, conferences and workshops I had the luck to get to know and be inspired by many researchers. I want to thank – in no particular order – Giacomo Solano, Raffaele Bazurli, Federico Alagna, Maria Schiller, Cathrine Talleraas, Andrea Ricci, Andrea Pettracchin, Francesco Pasetti, Laila Omar, Ayesha Hossain, for their friendship, intellectual exchanges and encouragement. Also, IMISCOE conferences would not have been as fun without you!

Writing a PhD thesis is at times a lonely endeavour, and I am thankful to my friends for their unwavering support. Emanuela, Masci, Manuela, Greta, Claudia, Dina, Rebecca, Maria Laura, Chiaretta, Carlo, Silvia, Carola, and Aram. Special thanks to Manuela and Masci for opening the doors of their home in Catania after I submitted the thesis. Spending the week with you in my favourite place warmed my heart.

Many things happened during these years. We moved to Italy, Josue started school, met new friends, and, while I was collecting my data and writing, Zeno was born. Your sleep was at times paced by the transcription of my interviews, at times it was challenging to combine fieldwork and taking care of you, but we managed. The rhythm of writing this thesis has been shaped by Josue and Zeno, and I could have not asked for better comrades. Thank you for having shaped it in such a sweet and fun way. There were also more demanding times, when we had to pull ourselves together, and you have been wonderful in doing that too.

I had the luck of sharing challenging and beautiful times with Tim, thank you for all the decisions we took together, me doing this PhD in Florence and moving to Italy being one of them. It has not been always easy, but you were there to listen, criticise (constructively, of course!), and encourage me. This project is also thanks to the support of my parents – Paola and Bruno – and my sister, Emanuela. I could not have participated to many of the

conferences and could not have had the intense writing sessions without your help with the kids. I am deeply grateful for the times you took a train to Florence so that I could travel to conferences and fieldwork. But above all, thank you for the unconditional love, for our caravan holidays, biking trips, and for being wonderful grandparents and aunt. A special thank also to Gezim for hosting me this summer while I did nothing else than writing, and for cooking delicious meals. Thank you to my parents in law – Antje and Andreas – and to Jan for the conversations, your genuine curiosity about my research, and your encouragement throughout this journey.

Finally, writing this dissertation was also an exercise of reflection and engagement from a different perspective to my families' migration history. My maternal grandparents moved to Turin from Sicily during the 1970s; my grandmother's family sold the mill their great-grandfather bought with the hard-worked earnings in the United States to finance the move, dreaming of a better future for their children in the North. I remember getting lost in language as a child when visiting my grandparents and hearing them switch to Sicilian. Every summer the whole family would spend some holiday back in the village in Sicily, and we would go by night train with my cousins. My paternal grandparents moved from Veneto to Latium working as day labourers, were displaced during the WWII and moved to Southern Piemonte after the war. Theirs is a story of many moves following work opportunities from the countryside, to private homes for domestic labour, and factory work. I cherish those memories and experiences. Researching labour migration is perhaps a way to pay homage to their stories and the countless other stories like theirs.

PART I

SETTING THE SCENE

1 Introduction

«Migrants need Europe. But Europe also needs migrants. A closed Europe would be a meaner, poorer, weaker, older Europe. An open Europe will be a fairer, richer, stronger, younger Europe – provided you manage migration well»

Secretary-General Kofi Annan's address to the European Parliament upon receipt of the Andrei Sakharov Prize for Freedom of Thought, Bruxelles, 29/01/2004

1.1 The puzzle: needed but not wanted

Low-paid labour migration is both of central relevance for the functioning of host societies and a contested issue in policymakers' circles and in the public arena (Afonso & Devitt, 2016; Castles, 2004b). Departing from the early 1990s, the process of globalization accelerated the interdependence and connectedness of different regions of the world. In this context, the outsourcing of the least profitable portion of production to developing countries together with the surge in global value chains, has led to think that low skill jobs would gradually diminish in developed countries – and thereby the need for low paid foreign labour (Castles et al., 2014). Instead, the growing importance of the tertiary sector, together with the increasing global interconnectedness, triggered developed economies' demand not only for highly skilled workers, but also for workers to fill low-prestige, low-paid occupations (Sassen, 1988). In the current economic system, the demand for these jobs is high, especially in sectors such as agriculture, care, hospitality, and construction (Kosic & Triandafyllidou, 2003; Lusi & Bauder, 2010; Ruhs & Anderson, 2012; Stalker, 2000). These trends led some scholars to argue that migration fulfils a structural necessity for the global world order (Bauder, 2006; Cohen, 1987; Piore, 1979; Ruhs & Anderson, 2012).

Recently, the Covid19 pandemic highlighted the relevance of migrant workers for the functioning of host societies, as immigrants were overrepresented in several of the so-called essential occupations (Fasani & Mazza, 2020; Fernández-Reino et al., 2020). Furthermore, the ongoing digital transformation has generated demand for a new category of service-sector employment, most notably platform-based work and gig economy jobs. This emerging labour

market is characterized by its reliance on hyper-flexible work, where immigrant workers have become disproportionately concentrated in these sectors, often filling roles in food delivery, ride-sharing, domestic services, and various forms of on-demand labour (Van Doorn et al., 2023).

However, while countries are actively competing for the recruitment of highly-skilled migrant workers, the category of migrant workers in low-skill occupations is much less enthusiastically accepted (Helbling & Kriesi, 2014; Igarashi et al., 2022; Naumann et al., 2018). In public and political discourse, the commonly held view is that low-paid migrants are unnecessary and a burden for the host society (Dennison & Dražanová, 2018). In Europe, public discourses of the recent years stressed the strain that migration flows put on the management of the state and on public finances. Far-right populist parties obtained increasing consensus by adopting anti-immigration positions, exemplified by the case of Brexit, where immigration of low-paid workers and of asylum-seekers was the main argument for leaving the European Union.

There is a contradiction between economic needs and political claims, which is reflected in the policies adopted by governments. Migration is considered a powerful trigger of change in the cultural, social, political, and economic spheres of both origin and destination societies. Therefore, policy processes, especially on the regulation of low-paid immigration, implicate a high deal of actors' involvement, strong public opinions, political opportunism, contrasting views and interests over how it should be managed. It follows that the existing policies that regulate low-paid labour migration are often contradictory, give space to irregularity and thereby to vulnerability and social exclusion. Low-paid labour migration represents an intractable policy controversy, with no unanimously shared understanding of how the issue should be formulated and what the solutions should be (Scholten, 2013).

The existence of a paradox of states accepting migrants deemed undesirable has been observed as early as the 1990s (Cornelius et al., 1994; Freeman, 1995; Guiraudon & Lahav, 2000; J. F. Hollifield, 1992; Joppke, 1998). However, despite decades of policy development and the establishment of increasingly sophisticated migration governance systems, the needed but not wanted paradox appears to persist. This persistence raises fundamental questions about the nature of migration dilemmas and the mechanisms that sustain them. Why do states continue to grapple with the same contradictions that characterized migration

policy debates forty years ago? The permanence of this paradox becomes even more puzzling when considering the diversity of migration experiences across Europe. Countries with longer immigration histories have had ample opportunity to develop policy solutions and learn from decades of experience managing labour migration flows. Meanwhile, newer immigration destinations theoretically possess a latecomer advantage, as they can learn from the successes and failures of other immigration countries, potentially avoiding policy pitfalls. Yet neither experience nor learning opportunities appear to have resolved this fundamental tension. This raises critical questions about whether the needed but not wanted paradox represents a solvable policy challenge or an inherent structural feature of contemporary migration governance. Hence, this thesis takes the case of low-paid labour immigration to investigate how and why the needed but not wanted paradox is maintained along time, and across countries with different ‘immigration ages’.

1.2 Research Question

This thesis focuses on policy development on a contested policy issue, namely, the regulation of low-paid labour migration. Immigration is still a highly contentious political issue. Yet, while political parties across EU countries compete on being tough on immigration, the number of labour migrants is steadily increasing in almost all countries (Joint Research Centre, 2024; OECD, 2024). The Covid-19 pandemic exposed the high dependency of countries in the rich European core on migrant workers – often from more peripheral countries – and the interdependence between societies that migration generates (Jaroszewicz et al., 2024). Moreover, as labour shortages are growing across all EU countries, political debates across the continent suggest that immigration, contentiousness notwithstanding, is considered a corner stone in addressing current and future labour demand. In sum, while politically contentious, labour migration is viewed as a key solution to several socioeconomic challenges faced by EU countries.

At the same time, although migration and diversity literature has expanded significantly over the last decades, the subset of literature focusing on labour migration policy dynamics remains limited (Devitt, 2024; Laubenthal, 2017; Oğuz, 2020; Pastore, 2014b). Particularly in the recent decade, academic and policy attention has shifted predominantly toward refugee inflows, transnational dynamics, and migration-related diversity (Pisarevskaya et al., 2020).

In Europe, the scholarly focus on the recent governance crisis related to refugees inflows has inadvertently sidelined the analysis of policy changes related to the evolving structural demand for migrant workers (Laubenthal, 2017).

Furthermore, the existing literature mainly adopts a state-centric approach, or focuses on the role of one actor, thereby neglecting the role of multiple institutions and inter-actors' relations which are involved in shaping labour immigration policies (Caponio & Jones-Correa, 2018; Zincone & Caponio, 2006). Hence, this thesis aims at shifting the focus back on the role of destination countries' institutions and actors for labour migration policy change, and it does so by moving away from a state-centric perspective to the complex governance network of state and non-state actors that contribute to the shaping of migration policy. This thesis investigates the following questions:

How does the paradox of a needed yet not wanted labour force unfold in the development of policies within countries and among countries with different immigration ages?

- How do Ideas, Interests and Institutions shape the direction of policy over time?
- How do inter-actors-dynamics contribute to influence the direction of policy over time?

This thesis analyses the mechanisms that produce, reproduce and transform the constellations of policies and practices related to low-paid immigration. It departs from the assumption that forms of marginalization and criminalization of low-paid – yet essential – migrant workers are linked to the modalities of regulations. Hence, by looking at immigration policy development over time and in countries with different immigration ages, it aims at identifying the factors and mechanisms that lead to changes and continuities on policies regulating low-paid labour migration. The within-case and across-cases comparisons allow for a comprehensive analysis of the multiple ways in which political, economic, and societal drivers, as well as inter-actors' dynamics interact to ultimately shape labour migration policymaking.

In particular, I operationalize key concepts connected to the research questions as follows:

- With **labour migration policymaking**, I indicate the process of policy development on low-paid labour immigration. It is important to underline that immigration for work

does not react exclusively to labour immigration policies, but to the constellation of policies on immigration (i.e., family reunification, study, asylum...), and on other aspects of economic organization (i.e., policies in the field of employment, education, or training) that impact the supply of migrant labour (Pastore, 2014b). This implies that also other policies have an impact on the relationship between low-paid labour supply and demand matching. For instance, all migration happening through the channels of family reunification, study, or asylum will ultimately approach the labour market of the country of residence. Policies on integration, industrial relations, and economic production will also determine the immigrant's trajectory on the labour market. In the analysis, the thesis focuses on labour migration policies (i.e., entry quotas, work schemes, seasonal programs, regularization campaigns), but at the same time it acknowledges the role of other policies for shaping the dynamics of foreign labour demand and supply matching.

- With **ideas, interests, and institutions**, I refer to the 3 I's theoretical approach developed in Hall (1997) and in Palier & Surel (2005). An in-depth account of this approach is provided in Section 2. Ideas, interests, and institutions represent three traditions of analysis in social sciences. In this thesis, I operationalize these three variables as:
 - Interests: refers to the preferences of actors within and outside the political system regarding policy options on the regulation of immigrant labour, and the alliances they form to pursue them.
 - Institutions: refers to the “formal and informal procedures, routines, norms and conventions embedded in the organizational structure of the polity” (Hall and Taylor 1996: 938) – that constrains, enables, and shapes the policy process and direction.
 - Ideas: refers to the worldviews, values, beliefs and knowledge that inform how actors define a problem and perceive different policy options.
- With **inter-actors' dynamics**, I refer to the role that actors involved in the policy development have on the final policy outcome. In particular, this thesis is inspired by the governance literature, in that it recognizes that authority and responsibility over labour immigration is shared across a plethora of state and non-state actors, at the

supra-national, local and central level. Actors' agency is constrained and enabled by evolving power relations.

This thesis investigates how and why the needed but not wanted paradox persists across different times and national contexts. It takes the case of three 'most different' European countries that became immigration countries in different historical periods to analyse factors and inter-actor dynamics that shaped labour migration policy development from early beginnings to the present. Through the analysis of Denmark, Italy, and Poland, the research compares labour migration policymaking that started respectively in the 1960s, in the 1980s, and in the 2000s. In this way, the evolution of how the paradox has been managed in policymaking is explored through distinct time-periods and across distinct regional contexts.

1.3 Why is it relevant?

This research journey started during the pandemic. As borders closed in 2020, at the peak of the Covid19 pandemic, European governments were faced with the compelling issue of how to ensure essential services and sectors to continue working, without migrant workers. Across Europe, campaigns were launched to recruit essential workers – especially in agriculture. It quickly became clear that a significant number of so-called low-skilled occupations, that “anyone could do”, were actually dependent on migrant workers. As Hansen observed:

The meatpacking, agriculture, construction, textiles and garments, domestic labor, and retail sectors across the United States, Europe, the Middle East, and Asia depend on tens of millions of poorly paid and poorly treated workers. These sectors are basic to modern life; indeed, it is unimaginable without them. What we eat, where we shop, how we live, and how we raise our children are made possible by cheap labor. (Hansen, 2023, pp. 280–281)

Yet, the pandemic-induced awareness of the essential nature of low-paid migrant workers for national economies across the world did not come together with a renewed political and public debate on the nature of the contemporary organisation of labour and economic migration (Abdou & Ruedin, 2023; Anderson et al., 2021; Pozzato, 2025a). Instead, as the pandemic crisis faded away, anti-immigrant rhetoric intensified, while mainstream left-wing parties increasingly adopted restrictive positions to chase electoral success (Cable, 2024; Kapelner, 2024). The very workers deemed essential remain politically unwanted.

Although the pandemic crisis put the essential yet neglected role of poorly-paid migrant workers on the spotlight, the tendency to view migration policy through crisis-driven frameworks obscures how the needed but not wanted paradox operates as a structural feature rather than a contingent policy failure. The dialectical relationship between economic imperatives and political reluctance has fundamentally structured European low-paid labour migration governance for decades. Hence, instead of treating this paradox as exceptional or context-specific, this dissertation captures its structural character by examining how it manifests across different contexts.

This paradox reveals both continuities and changes in policies across varying historical times, economic conditions, and political configurations. In other words, it is not contingent but structural; hence, it can and it should be studied across time and place.

This dissertation employs a comparative case study approach examining low-paid labour immigration policymaking from the early phases up to today in Denmark, Italy, and Poland. These three European Union member states represent distinct regional contexts within Europe, each with different immigration temporalities. Denmark became a country of immigration during the 1960s, in a context characterized by limited globalization, embryonic European cooperation, and nationally-designed guest worker programs. Italy witnessed a rapid transformation from emigration to immigration country during the late 1970s, in a period of neoliberal economic restructuring, progressive EU consolidation, and closure to labour immigration in North-Western Europe. Finally, Poland initial phases as an immigration destination are connected to joining the EU in the early 2000s, in a context of globalisation, EU increased role in migration regulation, and intensified anti-immigrant sentiment across Europe.

Furthermore, these three countries occupy different positions in the core-periphery hierarchy within the EU (Arnholtz & Leschke, 2023; Szelewa & Polakowski, 2023). Structural asymmetries between countries are an important factor in shaping the nature of mobility flows and their socio-economic impact; however, epistemologically, immigration to core countries dominates the EU migration scholarship, whereas research on immigration to Central Eastern Europe remains sidelined (Nagel, 2025). These epistemic imbalances in EU migration research result in knowledge silos with a one-sided focus on isolated aspects of

international migration, with insufficient attention to how interdependent and asymmetrical economic structures affect EU countries' strategies to govern migration (Nagel, 2025). By comparing three countries positioned differently within the EU hierarchy, this thesis contributes to a more comprehensive understanding of the dynamics involved in labour migration governance.

The investigation draws on archival research, document analysis and 69 semi-structured interviews with state representatives, trade unions, employers' organisations and civil society organisations to analyse (1) the relevant actors in different countries and time, their drivers and power dynamics; (2) changes and continuities in labour migration policies over time; (3) context-specific challenges as well as similarities in policymaking dynamics across cases.

The historical and comparative analysis shows that more than country differences, temporality-related differences mattered in how the needed but not wanted paradox unfolds in policy. This challenges the assumption that labour migration policymaking is intrinsically different across countries with very different socio-political and economic traditions.

1.4 Current policies and policy gaps: a quick overview

Generally, the regulations on low-paid labour migration reflect the contradiction of being economically necessary and publicly undesired. As outlined by several authors, there are fewer legal entry options for migrant workers filling low-skill jobs than the high-skill counterparts (See for instance Lim, 2023; Macaluso, 2022; Paul, 2018). Across European countries, there is not a harmonious and comprehensive regulation scheme for low-skilled migration, which mainly happens through temporary programs, through intra-EU mobility, or through other channels, despite the sectorial demand for migrant labour.

The main rationale behind legal pathways to entrance for low-paid third nationals follows a 'shortage logic', where legal admission is tied to labour shortages in the national labour market that cannot be filled by country nationals, EU citizens, or already resident foreign citizens (EMN, 2020). However, the notion of whether there is a labour shortage and of whether the only solution is foreign labour, are not univocally agreed upon, but are contested (Ruhs, 2020). It follows that the final solution to counter a perceived labour shortage is highly

dependent on a political process of balancing the competing interests and powers of different actors (Ruhs & Anderson, 2012).

The existing regulations present challenges in terms of providing legal pathways of entrance for the category of low-skilled work in that they are very limited in respect to the actual demand. As pointed out, the official data on immigrant workers employed in low-skill jobs are often unprecise and an underestimation of the actual demand of this category of immigrants (The Expert Council's Research Unit & MPI Europe, 2019), with many workers being recruited among already residing migrants, asylum-seekers, EU citizens (who do not appear in the Eurostat statistics) or migrants that arrived through informal channels (Popp, 2020). It follows that the demand for low-skill labour, apart from the limited entrance within legal categories, is fulfilled through irregular entry, stay, and/or work. Here, the central issue is the contradiction between state regulations providing narrow possibilities for regular entrance and stay of foreign workers and market demand for immigrant labour. This contradiction leads to the fact that migrant workers experience periods of irregularity and vulnerability (Castles, 2004; Ruhs & Anderson, 2010). Importantly, the allocation of migrant workers to these precarious positions is not colour-blind but follows racialized patterns, with workers from peripheral geographies being channelled into the most vulnerable segments of the labour market, through formal immigration categories and processes of racialization that devalue their skills and limit their mobility (Raghuram, 2021).

1.5 Structure of the thesis

The thesis is structured in three parts.

Part I outlines the theoretical and methodological underpinnings of the research. Chapter 1 introduced the empirical puzzle, research questions and their theoretical and empirical relevance. Chapter 2 discusses the existing literature and constructs the theoretical framework for analyzing labour migration policies over time and across cases. Drawing from broader theoretical approaches and debates on (migration) policy change, developments in migration regimes, and agency within governance structures, I outline how the combination of different institutionalist and governance approaches are useful to capture changes and continuities in the governance of the needed but not wanted paradox. Chapter 3 introduces

the methodological foundations of the research. I outline the philosophy of science, the case selection rationale, as well as the methods adopted. Specifically, to allow for data triangulation, I combine archival research with 69 semi-structured interviews with key informants.

Part II presents the empirical research of the three country cases over time. Starting from Denmark, Chapter 4 introduces the migration dynamics and policy developments from the 1960s to today. Chapter 5 investigates the role that interests, ideas, and institutions, as well as inter-actors' dynamics played in labour migration policymaking, from the early immigration phase to today. Taking a longitudinal approach, the chapter follows migration policy development, shedding light on drivers and dynamics from the establishment of guest worker programs in the 1960s to the most recent policy developments.

Chapter 6 moves to analyse the Italian case, and it introduces the migration dynamics and policy developments from the 1970s – when the migration balance first turned positive – to today. Subsequently, Chapter 7 investigates how interests, ideas, and institutions, as well as inter-actors' dynamics interacted to shape the Italian labour migration trajectory over time.

Chapters 8 and 9 focus on migration dynamics and labour migration policy development in Poland, from the early 2000s – when membership to the EU triggered mobility and the restructuring of migration policies – to today. Also for the Polish case, the analysis explores the role of interests, ideas, and institutions, and inter-actors' dynamics for the development of labour migration policies up to today.

Finally, Part III concludes. Chapter 10 compares how low-paid labour migration policy developed across cases, to discuss differences, and especially similarities that emerged in the dynamics shaping policymaking over the needed but not wanted dilemma. By zooming in how interests, institutions, and ideas interacted to shape labour migration policy in the three cases, common features of the policymaking process are outlined. In particular, similarities are found in the ways in which specific drivers and actors played a central role in specific phases of migration policy trajectory. Whereas the early phases saw a prevalent role of economic and civil society actors (and their ideas and interests) in pushing for labour migration legislation, the second phase of migration and policy maturity witnessed a growing

role of political actors and electoral-driven logics which narrowed the space for alternative policy proposals. Departing from this observation, the Chapter develops a conceptual framework to explain how the needed but not wanted paradox unfolds in policy, over time. Finally, Chapter 11 offers some concluding reflections.

2 Theoretical Framework

This Chapter presents the literatures and academic debates that this thesis engages with. As this research investigates drivers and dynamics of policy development over a contentious policy problem, it draws from and connects different strands of literature. Accordingly, the chapter is organized as follows.

Section 2.1 addresses the ‘needed’ part of the paradox and discusses the literature engaging with the question of why sectors of the economy are dependent on low-paid migrant workers. Historical structuralist theories are particularly useful to shed light on mechanisms of exploitation rooted in the capitalistic organization of modern societies. At the same time, recent literature on migrants’ agency and transnationalism emphasizes the nuances of reality. Finally, the last part presents works in the critical tradition that investigate the link between racialization and the needed but not wanted character of migrant workers.

Section 2.2. moves to the other sphere that this research aims at investigating, namely the politics of policymaking on low-paid labour migration. This section is divided in three parts. Section 2.2.1 discusses the evolution of European labour migration regimes, shedding light on the different policy approaches and political debates on low-paid labour migration over time. The second section reviews the migration policy literature to frame low-paid labour migration as an intractable policy problem. Finally, Section 2.2.3 looks at the role and interaction between a contested policy problem and its progressive politicization.

Sections 2.3 and 2.4 introduce the theories from which I draw the framework for the analysis. Section 2.3 discusses the 3 I’s approach, and it explains how a combination of the three traditions allows to move behind a one-dimensional research focus, and to instead consider the interaction of factors and drivers connected to interests, ideas, and institutions. Ultimately, section 2.4 discusses governance perspectives to frame the analysis of multi-actors’ interactions.

2.1 The drivers of low-paid immigration

The recruitment of low-paid, precarious workers goes back a long way (Castles, 2004a). The historical-structuralist approach takes the structural inequalities within and between countries to explain the movement of low-paid workers (Castles & Kosack, 1973; Sassen,

1988). As argued by Cohen (1987), capitalism has always needed quasi-free or unfree workers in labour-intensive sectors. These workers are recruited to the core countries from the periphery. Works within the historical-structuralist tradition emphasize the role of institutions and unequal social structures in shaping the demand for low-paid labour immigration to developed areas.

Segmented labour theories provide an explanation for the continuous demand for both unskilled and highly skilled labour in developed economies. In his seminal work on the relationship between migrant labour and advanced industrial economies, Piore (1979) argued that core countries continuously generate demand for immigrant labour due to the segmentation of labour markets into primary and secondary sectors. The former is characterized by employment security, strong unions, employment benefits and high wages. Conversely, work in the latter is atypical, low paid and unregulated. The labour market is further segmented according to gender, race, and also migration status, with international migrants from disadvantaged areas largely being employed in the atypical, unsecured jobs. As he explains, "The jobs migrant workers fill are necessary to the functioning of these economies... The demand for migrants is, thus, structurally built into modern industrial economies" (Piore, 1979: 19). Racialised immigrant workers, regardless of their qualifications (Raghuram, 2021), fulfil the functions of providing services demanded by workers in the primary market, and of allowing sectors with high fluctuations and low margins of profit to maintain low wages – and therefore remain profitable (Bauder, 2006). Building on Piore's work, Sassen (1988) developed a global systems perspective that positions labour migration as an integral component of economic globalization. Her analysis of global cities demonstrates how deregulated labour markets create demand for low-wage service workers, often drawing on transnational migration networks established through colonial ties and economic integration.

Another frame to explain the allocation of migrants in the labour market is provided by hierarchy theory. Hierarchy theory emphasises the role of social status as a motivation for people to accept or not a job. Accordingly, it is not only income, but also the accumulation of social status that induces people to engage in the labour market (Piore, 1979). As migrants' frame of reference for their social status remains their community of origin, they do not have

a motivational problem to work in jobs at the bottom of the social status hierarchy (Lusis & Bauder, 2010). This perspective is important because it moves beyond purely economic explanations to incorporate how social status, power relations, and transnational positioning shape both migrant behaviour and employer practices in labour markets.

Drawing from the critical Marxist tradition on labour migration, influential works contend that state policies deliberately create precarious conditions for migrant workers to maintain their exploitability (Cohen, 1987; Mezzadra & Neilson, 2013; Paul, 2018). The main argument within this strand of literature is that states create a docile, precarious workforce at the advantage of the core economic system through the establishment of restrictive entry possibilities, exclusionary citizenship rights, and an overall precarious legal status.

While this tradition offers valuable insights into the role of structural inequalities for the development of labour migration regimes, critiques highlighted the risk of oversimplification of complex interactions between states, migrants, and economic actors in favour of deterministic interpretation of migration policy development (Boswell, 2007; Castles et al., 2014).

Instead, migration scholarship advocates for more nuanced theoretical frameworks. To better grasp the complexity involved in migration governance, the interactions between competing interests, multiple agencies and political, institutional and economic logics must be taken into account. For instance, transnational approaches underlined that these theoretical frameworks typically explain segmentation by referring exclusively to processes occurring within receiving nations, thereby overlooking how economic, social and cultural factors in migrant source areas fundamentally contribute to segmentation processes (Faist, 2008; Lusis & Bauder, 2010; Portes et al., 2002). Generally, this literature stresses the significance of transnational factors in the social reproduction of migrant workforces, as economic remittances and household budgets in source areas can influence the types of employment migrants are willing to accept in the destination country (Bauder, 2006; Lusis & Bauder, 2010; Samers, 2008). Additionally, recent scholarly work focuses on the role of migrants, their networks, and family ties to explain how migrants navigate through the journey and negotiate precarious employment conditions (Ambrosini & Hajer, 2023; Bakewell et al., 2012; Berntsen, 2016; Triandafyllidou, 2019).

While acknowledging these theoretical limitations and the importance of transnational and migrants' agency perspectives, this dissertation aims at investigating the demand-side of policymaking dynamics that shape the 'needed but not wanted' paradox. However, in investigating the research puzzle, the dissertation remains aware of the broader transnational dynamics involved. Rather than treating destination country policies as isolated phenomena, the analysis recognises that these policies interact with and respond to transnational migration flows, global economic pressures, and migrants' own agency when entering the labour market. This approach acknowledges that, while the primary analytical lens remains focused on destination countries, the policies examined are embedded within and shaped by broader processes.

Finally, when studying policies on low-paid labour migration, the role of racisms and racializing practices should be included. Considering the connection between race and labour market, critical studies have investigated the intersections between modern forms of racism and neoliberal governmentality in establishing hierarchies of immigrants' desirability (Davison & Shire, 2015; Roberts & Mahtani, 2010; Simon-Kumar, 2015). Although neoliberal migration policies are made on paper to favour individual merits, and not immigrants' ethnicities, they intersect with race in multiple ways (McDowell, 2008; Simon-Kumar, 2014, 2015). For instance, by promoting the figure of the contributing immigrant as the desirable subject, they place all who are described as unable to be contributors – that is, racialised low-paid workers, dependent family members and refugees – as undeserving guests. Furthermore, by failing to acknowledge structural inequalities between different groups, the responsibility of failure to contribute is placed exclusively on the individual and on its abilities (Simon-Kumar, 2014).

In migration policymaking, racialisation intertwines with class as migrants are differentiated according to their recognized skills and educational attainments, nationality and first language (Glick Schiller & Salazar, 2013; Raghuram, 2021). As outlined by Simon-Kumar, the desirable ideal migrant becomes an 'entirely classed concept' (2015, p. 1186), fitting the neoliberal ideal of a highly mobile, productive, and self-sustaining individual.

Whereas neoliberal migration policies are designed to attract the desired highly skilled migrants, undesired migrants are filtered and directed into low-paid, low-status slots in the

labour market, despite of their skills and education (McDowell, 2008, p. 495). Thus, low-valued jobs are ethnicized, giving space to an underclass of ‘poverty migrants’, described as costly to taxpayers and undeservingly in need of welfare (Danaj & Wagner, 2021). The undesirability of low-paid immigrants in the public eye makes their active recruitment a contentious issue, so that states offer limited possibilities of regular entrance and stay for this category. At the same time, the economic demand for migrant workers is structural. This is not the outcome of shrinking populations in OECD countries or increased aspirations and capabilities of the local workforce. Instead it is a demand embedded in decades of policies favouring economic and labour market liberalisation, which have fuelled the growth of precarious, unwanted jobs (De Haas, 2023).

2.2 The polity and politics of migration policymaking

This section zooms in the dynamics of migration policymaking. It starts from an overview of migration regime formation in Europe and on how this process contains inherent contradictions. It then discusses the literature on the liberal paradox in migration regimes to provide a theoretical context to the ‘needed but not wanted’ paradox this thesis investigates. Finally, it engages with broader theories on complexity, on intractable policy problems and especially on how they have been applied in migration studies to frame low-paid labour migration as a ‘wicked’ policy problem.

The concept of migration regime encompasses a country's complete set of migration policies and practices that regulate migration. It recognizes the historically contingent and inherently contradictory nature of state approaches to immigration: “a country’s migration regime is usually not the result of consistent planning. It is rather a combination of implicit conceptual frames, generations of bureaucratic conflicts, and series of quick fixes to emergencies, driven by changing political configurations of actors”(Sciortino, 2004, pp. 32–33). As highlighted in the quote, migration regimes are framed as inherently contradictory. They comprise norms, policies, institutional structures that emerge from conflicting and time-dependent drivers. Migration cuts across questions of security, culture, economy, and rights at national and international levels. Hence, countries are inevitably faced with trade-offs when developing their migration policies (Hollifield & Foley, 2022). The different loci of political bargaining on

these various aspects is viewed as inevitably leading to internal incoherences ‘by design’ (De Haas et al., 2016).

As this thesis adopts a longitudinal approach to labour migration in three different countries, it is useful to provide an overview of the development of distinct yet interconnected migration regimes in the three regions. In so doing, the following chapter serves to provide a contextual background and broader framing for my study of labour migration policy development in Denmark, Italy and Poland. Importantly, this premise allows to view labour migration policy developments as part of broader geopolitical and economic developments which in turn shape migration policy direction.

2.2.1 The evolution of migration regimes in Europe

As outlined in the research conducted by De Haas and colleagues (Castles et al., 2014; de Haas et al., 2019), Europe witnessed a change in migration direction after WW2. During the post-war period, Europe turned from a region of emigration (mostly via colonialisation and economic emigration) to a region of immigration. Decolonisation, post-war reconstruction and economic growth led to an increase in the number of migrant workers to North-Western Europe. Later, the establishment of the EU and the internal freedom of workers’ movement contributed to a growth in intra-EU mobility.

Starting from around 1945, a first phase of economic expansion in North-Western Europe was characterised by mass production in large factories. To respond to labour demand, guest workers programs were established to recruit labour initially from Southern Europe, Ireland and Finland, and later from Turkey and the Maghreb (Castles et al., 2014; Kindleberger, 1967).

These state-led efforts to recruit cheap workers for labour-intensive sectors had a one-sided focus on providing temporary labour supply. These policies conceived migrant workers as temporary labour units, so that visa permits were normally granted for a limited period and for specific working sectors. Initially, entry of family members was not envisioned. However, different type of pressures led to a relaxation of family reunification regulations (Bonjour, 2011; Castles et al., 2014). Amongst others, competition between labour-importing countries motivated policymakers to make their country more attractive for potential guest workers,

by for instance, reducing the time after which a worker was entitled to bring dependent family members (Bonjour, 2011). Other pressures came from national courts and legal activism for limiting states' possibilities to hinder family reunification, from inter-ministerial dynamics and competing logics on family reunification, and ultimately from employers sponsoring a guest worker' spouse to enter as a guest worker (Castles & Kosack, 1973; J. F. Hollifield, 1992; Joppke, 1998).

The 1973 oil crisis led to a freeze of guest workers' programs across Western Europe. The discourse shifted fundamentally, emphasising the negative aspects of migration: integration challenges, unemployment concerns, and societal tensions (Castles, 2011; Castles & Kosack, 1973; Cohen, 1987; De Haas, 2012). This period witnessed the emergence of restrictionist policies that would define migration governance for decades, while the nature of the demand for migrant labour changed. Despite this first attempt to stop inflows, the migrant population did not significantly diminish throughout the 1970s and 1980s, as part of guest workers settled in the country. Although many returned following the freeze and rising unemployment levels, sustained family migration accounted for the continued growth of immigration (Castles et al., 2014). As pointed out by Hammar (1990), many former guest-workers and their families had become denizens: although they had not acquired the legal status of citizens, they acquired civil and social rights on the basis of long-term residence, and therefore they could not simply be sent away during an economic crisis.

The trajectory of these initial migration policies highlights some of the contradictions intrinsic to the dynamics between labour migration policymaking and migration flows. These include the lack of a long-term perspective on the consequences of labour migration schemes, the belief in the temporary nature of immigration, the contradicting demands and interests which led to partial openings to family reunion and to a shift towards permanent settlement.

This phase was embedded in the broader shift towards neoliberal economic policies happening in the 1970s, that focused on deregulation and flexibilization of labour markets, and privatization of public companies. Industrial production was outsourced to low-wage developing countries, so that many sectors where migrant workers were employed – such as textile, manufacturing, mining – progressively lost importance. The deindustrialisation of Western European economies significantly impacted resident migrants and ethnic minorities,

while racism and marginalisation contributed to justify the division of disadvantaged groups between 'deserving' and 'undeserving' poor (Castles, 2015, p. 54). Furthermore, the shift to a neoliberal paradigm in economic policy shaped the nature and characteristics of subsequent labour immigration inflows.

The dismantling of the industrial production did not lead to a declining demand for low-paid migrant labour, instead, the nature of the demand changed. During the 1980s economic recovery, the growth of the service sectors led to a sustained demand for cheap labour, while the demand in not relocatable sectors such as construction or agriculture was maintained (Sassen, 1988). The turn to neoliberal principles in employment regulations favoured deregulation and precarisation of work through the expansion of labour practices such as subcontracting, temporary work, and casual labour (Castles, 2015; Standing, 2015).

The fall of the Soviet Union in 1989 reconfigured European political identities: with the collapse of communism, the ideological antagonism that had structured post-war politics disappeared, creating a political void in the definition of 'us' versus 'them' (Triandafyllidou, 1998). In this context, Islam and Muslim immigrants became available as the new Other against which European identity could be defined, paving the way to future systematic racialization of cultural and religious difference as threats to national cohesion (Fekete, 2009; Mernissi, 2003).

From a migration dynamics perspective, the fall of the Soviet Union initially led to a surge in asylum inflows towards EU countries. In a second phase, it opened up East-West Europe labour mobility. Gradually, Eastern Europe became the new 'labour frontier' for Western and Southern Europe. During this period, the closure of labour migration entry channels in North-Western Europe was substituted by the demand for labour of the rapidly growing Southern European economies. In particular Italy and Spain began to attract migrant workers from North and West Africa, Latin America and Eastern Europe, in a time where intensifying European integration began to pressure for tightening and reinforcing border controls (Colombo & Sciortino, 2004).

Beyond these geopolitical shifts, globalization processes fundamentally transformed the scale, direction, and diversity of migration flows to Europe (Castles et al., 2014). The

liberalization of international trade, the acceleration of capital mobility, and advances in transportation and communication technologies facilitated unprecedented levels of human mobility (Castles et al., 2014; Solimano, 2010). Migrants from 'new' origins arrived in countries with limited historical experience of cultural diversity, while traditional immigration destinations received populations from an expanding array of source countries. This 'age of migration' was characterized not only by the volume of mobility but by its differentiation: economic migrants, asylum seekers, family members, students, and temporary workers crossed borders with mixed and overlapping motivations (ibid.).

This transformation in migration patterns challenged the foundational assumption of the nation-state system: that territorial boundaries and ethno-cultural boundaries should coincide (Sayad, 1991). The increasing visibility of cultural, religious, and linguistic diversity within European societies made explicit what had previously remained implicit: that the 'imagined community' of the nation (Anderson, 2008) required constant boundary work to maintain coherence in the face of demographic transformation. Globalization thus forced societies to confront whether national identity could accommodate diversity or required ethnic and cultural homogeneity to remain coherent (Triandafyllidou, 2020). The political responses to this challenge varied, but populist entrepreneurs strategically exploited the anxieties generated by globalization's disruption of the assumed correspondence between territorial and cultural boundaries, channelling economic insecurities and cultural disorientation into exclusionary nationalist projects towards those deemed culturally incompatible (Norris, 2005; Swank & Betz, 2003).

The EU enlargements of 2004 and 2007 fundamentally reconfigured European labour migration dynamics by incorporating Central and Eastern European countries into the Union's free movement regime (Galgóczy & Leschke, 2013; Scholten & Van Ostaijen, 2018). The effect of these accessions was twofold. On one hand, the enlargement represented a change in the European migration regime, as the migration that was taking place from Eastern Europe since 1989 was redefined and legalised as EU-internal mobility. On the other hand, this new mobility regime opened up to new migration corridors – in particular from Poland, Romania and Bulgaria to Western and Southern Europe (Pennix, 2018).

This period marked another significant shift in the political approaches towards labour migration policymaking. Policymakers' attitudes toward labour migration became more positive again, particularly regarding the economic benefits of intra-EU mobility and highly skilled migration (Menz & Caviedes, 2010; Ruhs, 2006). Academic and policy discussions acknowledged the economic potential of managed mobility, which increasingly became a buzz word in policy circles (Balch, 2013; Menz, 2010b; Papademetriou, 2013). At the same time, rising immigration salience and the electoral success of anti-immigrant parties across Europe prompted mainstream politicians to adopt increasingly restrictive positions (Dennison & Geddes, 2019; McGovern et al., 2025). This political convergence around "tough on immigration" rhetoric generated extensive legislation strengthening border controls and restricting entry for racialised migrants, family members, and asylum seekers – increasingly framed as a security issue (Huysmans, 2000). Hence, this period saw heightened policy attention to managing different categories of migration more selectively, rather than a wholesale shift away from labour migration (Beine et al., 2016; De Haas et al., 2016).

Although the post-enlargement free movement regime legalised previously irregular East-West flows, it did not tackle the issue of de-regulation and poor wages (Pennix, 2018). On the contrary, free movement facilitated wage competition and labour market flexibilization at the lower end of the labour market. These dynamics manifested through various forms of precarious employment arrangements, including irregular employment contracts that circumvented standard labour protections, expanded use of temporary work agencies, extensive sub-contracting chains that obscured employer responsibilities, and the strategic deployment of posted workers provisions that allowed employers to apply home country wage and social security standards in host countries (Refslund, 2016; Wagner & Hassel, 2016). This combination of legal mobility rights with weak enforcement of labour standards created a race to the bottom in working conditions, where Eastern European workers' legal right to mobility was systematically exploited to circumvent Western European labour market regulations and wage standards (Arnholtz & Leschke, 2023; Bruzelius & Seeleib-Kaiser, 2023; Meardi, 2012).

Importantly, the EU enlargement process was managed primarily through an economic lens without an adequate political counterbalance to neoliberal market forces. This market-

oriented approach, which neglected the social impacts of liberalisation, contributed to both increased worker vulnerabilities and broader challenges to European integration (Meardi, 2012). The fallacies of a merely economic-oriented management of the EU enlargement became visible with the rise of Eurosceptic and anti-immigrant political opportunism. The political exploitation of Eastern European migration became a central component of Eurosceptic campaigns. In Western European countries, the free movement has been linked by far-right populist parties to economic anxieties and fears of unfair competition (Toshkov, 2024). In Central Eastern European countries, the large emigration of workers has been depicted by Eurosceptic parties as mostly benefiting the economies of core EU countries while causing brain-drain and demographic decline at home (Nagel, 2025; PiS, 2014).

The 2008 global financial crisis served as a tipping point to reshape labour migration policies and public attitudes, although its impact has been highly differentiated across sectors and countries (OECD, 2010; Pastore, 2014a). Broadly speaking, the crisis intensified pressures for enacting restrictive labour migration policies, while favouring anti-immigrant parties and political campaigns against low-paid migrant workers, who were increasingly viewed as causing wage dumping (Dennison & Geddes, 2019). Nevertheless, economic demand for migrant workers did not disappear, and migrant stock did not fall, reflecting the structural dependency of European economies on foreign labour, as well as the variegated impact of the crisis (Bonifazi & Marini, 2013; Castles et al., 2014; Farris, 2015). Hence, although political rhetoric emphasised closures towards labour migration, policies on paper reveal a different picture.

Generally, European countries attempted to make new immigration more difficult, protect labour markets for native-born workers, clamp down on migrants in irregular situations, and encourage the return of migrant workers – most notably Spain, the UK, and Ireland (Pastore, 2014a). The United Kingdom, after having adopted the most liberal entry schemes for newly accessed member states, aimed at reducing labour immigration inflows by implementing a points-based system and by encouraging resident workers to take up jobs in occupations where migrant workers were concentrated (Devitt, 2014). In Southern Europe, the dramatic rise in unemployment rates amongst natives and migrant workers led to renewed waves of emigration – especially of university educated, young workers – to North-Western Europe,

renewing debates about brain drain (Lafleur & Stanek, 2017). In Spain, the change in government in 2011 contributed to a U-turn in policy direction, with a virtual closure to new entries of non-EU foreign workers, the reintroduction of restrictions to the freedom of movement of Romanian and Bulgarian nationals, and limitations to basic fundamental rights of undocumented migrants (Arango, 2013; Pastore, 2014a).

At the same time, countries like Sweden and Germany shifted toward more liberal approaches to address emerging labour shortages. Similarly, Poland, which escaped recession altogether, maintained liberal entry schemes to address labour shortages while managing continued emigration pressures. Also the other Visegrad countries were able to recover quite quickly, and developed liberal policies to address labour shortages while implementing return migration incentives (OECD, 2010).

Politically, one of the key legacies of the 2008 crisis was the rise in support of populist parties, as economic uncertainty fueled anti-establishment sentiment across the continent (Algan et al., 2017). Right-wing populist parties gained increasing support, framing migration as both an economic threat and a cultural challenge (Mudde, 2007). The economic crisis and the envisioned austerity measures thus strengthened anti-establishment, protest parties across Europe that leveraged anti-immigration sentiment as a core mobilization strategy.

The 2015 refugee crisis shifted the political and policy debate to forced migration and Mediterranean arrivals. This period marked a reinforcement of the securitization pattern in European migration policy, as the migration-security nexus was amplified (van Houte et al., 2023). Furthermore, the dominant focus on asylum and crisis narratives contributed to make sectorial labour demands invisible in public and political debates. Despite growing labour shortages in low-paid sectors, and expected demographic decline, it was not until the 2020 Covid19 crisis that the essential nature of migrant workers in key sectors took the spotlight.

As it will be delved in the analysis of the three country cases, the current juncture presents new challenges with demographic decline, slowing intra-EU migration, and persistent labour shortages in critical sectors. This creates ongoing tensions between political rhetoric focused on control and restriction, and economic realities driving continued demand for migrant

workers, exemplifying the persistent contradictions that characterise European migration regimes.

2.2.2 Conceptualising labour migration as an intractable policy problem

Starting from the 1990s, in a context dominated by growing public attention on immigration, and on the growing presence of ethnic and religious minorities, debates arose in Western Europe on whether immigration was out of control; that is, whether states' ability to control immigration flows shrunk (Bhagwati, 2003; Sassen, 1996). Followingly, a flourishing literature emerged that analysed the reasons behind perceived migration policy failures. In particular, some scholars reject the notion of states' limited capacities to regulate immigration, or the notion of states as passively reacting to different interests (Boswell, 2007; Castles, 2004a; McGovern et al., 2025). Rather, several studies highlighted that countries increasingly recur to sophisticated tools and means to block unwanted immigration (Ambrosini et al., 2025; Carling, 2007; Mitsilegas, 2012). Furthermore, countering political economy accounts that view the role of the state as a broker of different interests on immigration (Freeman, 1995), critiques have stressed the complex nature of interest formation, institutional mediation of influence, and state autonomy in policy formulation (Boswell, 2007; Castles, 2004b).

Scholars studying the policymaking process on migration in liberal democracies introduced the concept of the liberal paradox, as unwanted migrants are officially rejected but covertly accepted and tolerated (Hollifield et al., 2014; Hollifield, 1992; Joppke, 1998). In his seminal article, Hollifield argued that "liberal states are trapped in a liberal paradox—in order to maintain a competitive advantage, they must keep their economies and societies open to trade, investment, and migration. But unlike goods, capital, and services, the movement of people involves greater political risks" (2004, p. 885).

Rather than framing the issue as states' inability to control inflows, scholars talk of the contradictory demands that states need to balance vis-à-vis immigration.

The notion that states have to be both open and closed to immigration to satisfy competing demands, suggests that immigration policies are neither totally restrictive nor liberal, but they are increasingly complex, often contradictory and deliberately uncoordinated (Boswell &

Geddes, 2010). In her theory of the functionalist imperatives of the state, Boswell (2007) argues that in the case of labour migration, responding to multiple demands might challenge state's legitimacy, therefore, "a state unable to meet all functional requirements may have an interest in the persistence of contradictions and inefficiencies in policy", and that "such malintegration usually takes the form of a gap between proclaimed, restrictive migration policy, and the de facto toleration or covert implementation of more liberal measures" (Boswell, 2007, p. 93).

Czaika and De Haas (2013) identified various gaps that can be found in the policy process. There is a gap between politicians' rhetoric and actual objectives, resulting from the conflicting imperatives of market needs, popular demands and institutional obligations that elected politicians have to balance (Czaika & De Haas, 2013; Schultz et al., 2021). Furthermore, gaps can be found in the discrepancy between policies on paper and their implementation; and ultimately in policies' ability to affect migration (Czaika & De Haas, 2013). Importantly, these gaps reflect not just policy failures but often deliberate ambiguity in policy design to accommodate conflicting demands from different stakeholders. It follows that policies regulating low-paid labour migration are often symbolic, ineffective, and estranged from the complexity of the issues at hand, thereby creating irregularities, and an overall dysfunctional labour migration regime. Symbolic policies are then enacted to satisfy public demands for control while accommodating economic imperatives.

These contradictory dynamics render low-paid labour migration what policy scholars term an intractable or 'wicked' policy problem. Intractable policy problems are characterised by their resistance to conventional policy solutions, their tendency to evolve and worsen when subjected to traditional policy interventions, and their embeddedness in broader socio-political conflicts that transcend the immediate policy domain (Rein & Schön, 1993). Low-paid labour migration exemplifies these characteristics as policies consistently fail to achieve stated objectives while generating unintended consequences that exacerbate the original problems. Intractable problems involve value conflicts and competing visions of social order that cannot be reconciled through rational policy design alone. Furthermore, they are embedded in a broader struggle between competing economic, societal, and political drivers. Hence, the intractable nature of low-paid labour migration policy stems from its intersection

with fundamental tensions in liberal democratic governance. The simultaneous need to satisfy economic demands for cheap labour, popular pressures for immigration control, and rights-based obligations toward migrants creates an impossible policy equation where any solution necessarily fails to fully address all competing demands (Schneider & Ingram, 1997).

2.2.3 Politicisation of immigration policy

The alienation of the policymaking process from the issue at hand has been further compounded by the progressive politicisation of immigration, which transformed labour migration from a technical policy issue into a symbolic battleground for broader political conflicts (Ambrosini, 2025; Scholten, 2020).

In public policy and political sociology research, politicisation is conceptualised through two dimensions: salience and polarisation (De Wilde, 2011; Hutter & Grande, 2014; Van der Brug et al., 2015). When a topic becomes salient in the public arena and it is subject of divergent positions, it is considered politicised. Importantly, politicisation can be driven either by public authorities (top-down) or by societal actors (bottom-up).

From a demand-side perspective, scholars have emphasised the role of socio-economic transformations in creating constituencies receptive to anti-immigrant appeals. The losers of modernisation thesis (Kriesi et al., 2006) argues that economic restructuring, deindustrialisation, and globalisation created groups of voters who felt economically insecure and culturally displaced. These voters, typically lower-educated, older, and employed in declining industrial sectors, perceived low-paid immigration as a direct threat to their economic position and social status.

Cultural explanations complement these economic accounts by emphasising the role of value change and cultural backlash in driving support for anti-immigrant parties. Specifically, the silent revolution toward post-materialist values among educated middle classes generated a counter-reaction among traditional, authoritarian-minded voters who felt their cultural values were under threat (Inglehart & Norris, 2016). Immigration became a proxy for broader anxieties about cultural change, European integration, and the erosion of national sovereignty (Mudde, 2007). This cultural dimension explains why anti-immigrant parties often

combined opposition to immigration with Euroscepticism, traditionalist social values, and appeals to national identity.

Supply-side explanations focus on how mainstream parties' strategies and institutional factors created opportunities for anti-immigrant party mobilisation. The cartel party thesis (Katz & Mair, 1995) suggests that mainstream parties' convergence toward the centre and their incorporation into state structures created space for outsider parties to mobilise excluded voters. Regarding immigration specifically, mainstream parties' reluctance to politicise the issue—either due to liberal consensus or fear of being labelled racist—created what Meguid (2005) terms “issue ownership” opportunities for niche parties.

Finally, politicisation of immigration policy also reflected specific political opportunity structures that facilitated anti-immigrant mobilisation. For instance, the aftermath of 9/11 provided a framing of migration as a threat to national security, with the immigration-security nexus becoming a central political issue amongst political decision-makers (Adamson, 2006; Ambrosini, 2025; Huysmans, 2006). The 2004 EU enlargement created new migration flows that became visible to publics previously insulated from large-scale immigration, particularly in countries that opened their labour markets immediately (Favell, 2008). Finally, the framing of the 2015 surge in refugees inflows as a crisis further exacerbated the politicisation process. The integration of these developments with existing economic anxieties and cultural concerns created what Rydgren (2007) terms a “master frame” that links immigration to multiple social problems.

Among the most significant implications of increased concern around international migration has been the electoral success of populist far-right parties, that's political message increasingly revolved around anti-immigrant agenda and rhetoric (Mudde, 2013). Despite their electoral success, the influence of populist far-right parties on actual migration policies has shown contrasting results (Lutz, 2019). While these parties have succeeded in shifting mainstream political discourse toward more restrictive positions, their direct policy impact has been more limited and variable across countries.

However, their influence on politicisation itself has been profound, making immigration a permanent fixture of electoral competition and constraining the politically viable policy

options (Pozzato, 2025a; Van der Brug et al., 2015). Politicisation has a strong impact on the nature of policy debates on low-paid migration as it converts them into issues of symbolic politics, where migration becomes representative of broader political agendas (Scholten, 2020). This symbolic deployment means that while politicisation draws attention to migration policy, it simultaneously silences the underlying structural challenges that require substantive policy responses (Schinkel, 2013). That is, public and political discourse focuses on symbolic aspects of migration—such as border security, cultural integration, or welfare dependency—rather than addressing the complex governance dynamics that generate a structural demand for low-paid labour.

2.3 The 3 I's analytical framework

Public policies have traditionally been studied through the analytical framework of either interests, ideas, or institutions. Hence, these dimensions became to constitute three distinct traditions of analysis, providing explanations for policy developments that were based on one of the three variables. At the same time, research that combines the three dimensions remains uncommon (Palier & Surel, 2005).

This research sees the process of change to be 'layered', and adopts the concepts of interests, institutions and ideas to investigate the complex interactions and mechanisms involved in policy change. Hence, instead of positioning this study within one tradition, and looking at policy development exclusively with the lenses offered by that tradition, I aim at investigating the plurality of possible drivers for policy development, and how these interact in shaping the final policy landscape. The aim of this investigation method is not to assess the primacy of one tradition over the others, but instead it is to examine a posteriori what are the relevant dynamics and how the interactions in place in a given time and context shaped the evolution of labour migration policies.

In what follows, I outline the main features of the three approaches to analysis, and then I discuss how a combination of the three can provide for a fruitful analysis.

2.3.1 Interests

Interests refer to the preferences of actors within and outside the political system, and the power coalitions they form to pursue them (Hall, 1997). On one hand, rationalist approaches emphasize that actors with clearly defined preferences pursue their interests through strategic action to maximize their gains (Scharpf, 1997; Kingdon, 2011). On the other hand, critical approaches focus on the role of power, underlining how power asymmetries between actors influence policy outcomes, as more powerful actors advance their interests at the expense of others (Pierson, 2000; Mahoney & Thelen, 2010).

Interest-based explanations look at the processes of coalition formation and mobilizations aimed to institutionalize their preferences in policy design. Regarding migration policies, Freeman's (1995) client politics model suggests that concentrated benefits for employers and diffuse costs for the public create favourable conditions for expansionary immigration policies, despite public opposition. The societal costs of immigration are diffuse among the wider population, whereas the benefits are concentrated for smaller groups such as employers. Consequently, public interests are tendentially not organized, whereas groups benefiting from liberal migration policies are successful in lobbying for policies favourable to their interests.

Interest-based approaches emphasize that interest advancement and power consolidation drive policy choice and policy change. Hence, policy developments are shaped by interests that actors have, and their degree of power over the policymaking process (Palier & Surel, 2005).

Analytically, this involves identifying the constellation of relevant actors, mapping their interests in labour migration policy, and examining the strategic alliances they form to pursue these interests. By analysing these power dynamics, we can better understand how competing interests shape policy outcomes in low-paid immigration governance.

2.3.2 Institutions

Institutions are the 'rules of the game' (North, 1990) that structure policymaking in ways that favour some outcomes over others. Hence, institutions can be defined as the "formal and

informal procedures, routines, norms and conventions embedded in the organizational structure of the polity” (Hall and Taylor 1996: 938). The policymaking process is both constrained and enabled by the characteristics of the institutional environment.

Historical institutionalism is particularly influential in explaining policy continuity. Path dependency highlights the role of ‘history’, demonstrating how past policy decisions shape and limit future policy options: "Once a country or region has started down a track, the costs of reversal are very high. There will be other choice points, but the entrenchments of certain institutional arrangements obstruct an easy reversal of the initial choice" (Levi, 1997: 28). Path dependency is a useful concept in explaining how certain policy options are enabled while others are more difficult to be adopted. However, this approach has been criticised for its shortcomings in explaining why change happens (Béland, 2009; Schmidt, 2011). Recent scholarship has developed more nuanced theories of institutional change to strengthen institutionalism ability to explain why and how change happens. In particular, Thelen (2004) criticises the punctuated equilibrium model that views change as primarily occurring during critical junctures triggered by exogenous shocks. Instead, she identifies mechanisms of gradual institutional transformation, including layering, conversion, drift, and displacement (Streeck & Thelen, 2005; Mahoney & Thelen, 2010). These mechanisms help explain how substantial policy evolution can occur incrementally through ongoing institutional adjustments rather than exclusively through dramatic ruptures.

Discursive institutionalism, firstly developed by Schmidt (Schmidt, 2008; Schmidt, 2011), provides a more dynamic approach to institutional adaptation and change. By emphasizing the role of ideas and discourse as drivers of change, this approach is useful to explain how actors use communication to construct or contest rules, norms and practices (Schmidt, 2011).

Institutional perspectives in migration policy studies emphasize the role of past policy choices to explain why policy change is difficult, and why countries will react differently to similar economic pressures for migrant workers. In a comparative study of different European migration regimes, Hansen emphasised the role of path dependency in creating institutions that are difficult to change and that influence subsequent policy development (Hansen, 2002).

The embedded constraints perspective (Hollifield, 1992; Joppke, 1998) highlights how supranational and national institutions – such as the EU and courts – conditions immigration policy options. For instance, Guiraudon (2000) argued that the characteristics of institutional venues influence immigration policy making. In her account, restricted and highly technocratic institutional settings outside of public view is conducive to more liberal migration policies.

Scholars writing within the Varieties of Capitalism tradition argued that migration policy convergence across states is unlikely due to differences inherent to the different models of capitalist economies (Menz, 2008). Hence, the characteristics of labour immigration policies – more or less liberal – are dependent on the type of capitalistic institutions in place. The work of Ruhs (2018) finds some evidence of patterned immigration policies depending on whether a country falls within the coordinated or liberal market economy types.

This analysis takes a longitudinal approach and examines how path dependency influences immigration policy development across cases, how different institutional structures constrain policy directions, and how the interaction between institutional configurations and external pressures creates opportunities for either policy stability or change.

Before moving to the next section, I reflect on how institutional approaches interact with interests. On one hand, interests cannot be understood outside the institutional context in which they are formed and interact, because they cannot be defined solely through the analysis of the social group studied (Palier & Surel, 2005). Specifically, each institutional configuration generates its own interest constellation by creating differential access to resources, establishing particular patterns of winners and losers, and defining which actors have legitimate standing in policy debates—thus shaping not only who participates in politics but what they seek from it (ibid.). On the other hand, institutional arrangements can serve as strategic resources or obstacles for policy actors in the pursue of their interests (Thelen, 2004). Through processes of institutional layering and conversion, actors can strategically repurpose existing institutions to advance new objectives, transforming arrangements originally designed for different purposes into tools for pursuing contemporary political goals. This dynamic reveals how institutions don't simply constrain interests but become sites of

contestation where actors work within existing frameworks to create new possibilities for political action (Palier & Surel, 2005; Thelen, 2004).

2.3.3 Ideas

The concept of 'ideas' in policy studies is broad (Campbell, 2002; Swinkels, 2020). Recent years witnessed an ideational turn in political science, as a growing number of studies suggests that ideas are an important variable to explain policymaking processes. However, a result of the increased attention to ideas across a variety of subdisciplines is the blurriness of the concept, which has been used in different conceptualisations (Kamkhaji & Radaelli, 2022). This makes it challenging to understand how ideas matter in explaining policy development. In what follows, I shortly discuss the ideational approach in public policy study, and then I define how ideas are conceptualised in this thesis.

Generally, the ideational approach examines how cognitive frameworks, normative principles, and causal beliefs influence policy development (Béland & Cox, 2011; Schmidt, 2008). Parsons defined ideas as "claims about descriptions of the world, causal relationships, or the normative legitimacy of certain actions" (Parsons 2002: 48). At a policy level, ideas shape how actors interpret the issue at stake and its potential solutions, and thereby they contribute to shape agenda-setting, policy formulation and implementation (Surel, 2000). In a recent literature review, Swinkels suggests that the different ideational approaches can be broadly divided into three categories: ideas as sense-making heuristics that guide people's actions, ideas as strategic tools to craft political discourse, and ideas as institutional frameworks that shape policymakers' range of alternatives (Swinkels, 2020).

Ideas as heuristics refer to the conceptualisation of ideas as a set of beliefs, or cognitive maps through which individuals make sense of the world. Ideas provide interpretive frameworks that help actors make sense of complex social problems, and offer potential policy solutions (Hall, 1993). Hence, the cognitive/heuristics approach 'departs from the micro-level of individual beliefs to explain macro-level phenomena in policymaking' (Swinkels, 2020, p. 285). This approach emphasizes the influence of policymakers' belief system in shaping the policy outcome. For instance, Saskia Bonjour (2011) highlighted how moral values and societal norms should not be overlooked when studying policymakers' policy choices. Her study of

family-reunification policymaking in the Netherlands between 1955 and 2005, showed that policies on family reunification were dependent not only on material interests, but also on policymakers' beliefs. Therefore, the underlying ideologies of different groups determine actors' understanding of the problem, of the interests and values at stake, and of the best solution (Bonjour, 2011). Especially in cases where there is no clear-cut evidence of the outcome of a policy, the ideologies and morals of the actors involved are of extreme importance in determining the policy direction (Bonjour, 2011).

Ideas as strategic tools for political discourse refer to the conceptualisation of ideas as 'weapons' in the political struggle, as narrative strategies to mobilise support. This conceptualisation is largely linked to discursive institutionalism. Here, actors play a central role in engaging with different ideas, interpreting and communicating them in a strategic way to build coalitions, shape political agendas and ultimately push for their preferred policy alternative (Schmidt, 2011). This approach is concerned with understanding how and to what extent policy entrepreneurs can bring ideational change in the dominant discourse. The level of the analysis is generally the meso-level of actors' interactions and entrepreneurship in policymaking (Swinkels, 2020).

Finally, ideas as institutional frameworks refer to the conceptualisation of ideas as 'worldviews', 'blueprints', or 'ideologies' (Blyth, 2001). Rooted in historical institutionalism, this conceptualisation views ideas as external societal norms and paradigms, which determines the range of policy alternatives that decision-makers are likely to perceive as legitimate. Differently from ideas as heuristic, the institutional framework depicts ideas as external to the individuals (Swinkels, 2020), as structural constraints delimiting what is seen as feasible or legitimate. Differently from ideas as strategic tools for agency, ideas as institutional frameworks are theorised as relatively fixed, taken-for-granted clusters of norms that shape how actors construct problems and responses, and limit the range of 'legitimate alternatives' (Bosso 1994: 184 in Boswell & Hampshire, 2017). Hence, the institutional frameworks approach departs from the macro-level of policy paradigms to analyse how these structures shape policy domains.

At the normative level, ideas contribute to the construction of the problems that enter the policy agenda; further, they shape the assumptions behind policy proposals and establish the

criteria for evaluating and legitimizing policy choices (Béland, 2009). At the discursive level, ideas function as weapons in political struggle, helping actors frame issues to mobilize support or opposition (Béland, 2009; Blyth, 2001; Schmidt, 2002). Hence, these accounts show how ideas can serve both as constraints, as they delimit what policy options seem thinkable, and as ‘discursive weapons’ used by actors in the political struggle to mobilise support (Boswell & Hampshire, 2017).

In investigating the origins and evolution of labour migration policymaking, this thesis looks at how dominant policy paradigms on labour migration emerged and changed over time. To do so, it also considers the ideational role of policy actors and policy entrepreneurs, and the discursive strategies they adopt to hinder or enable policy change over time.

Before moving to the next section, I reflect on how ideational approaches interconnect with interests and institutions, and how they can be combined in an analytical framework.

On one hand, interests might shape ideas as ‘weapons’ to push for the desired policy outcome (Mukand & Rodrik, 2018). Hence, policy actors might mobilise narratives to support the policy option closer to their interests. On the other hand, the interests of policy actors are partly defined by the dominant worldviews (P. A. Hall, 1993). These macro-level ideational structures shape not just the strategies actors employ, but their fundamental understanding of their own identity and interests. Furthermore, ideas and interests interact recursively across levels: micro-level strategic deployments of ideas can gradually sediment into macro-level paradigms, while macro-level worldviews are continuously contested and reshaped through micro-level political struggles (Mukand & Rodrik, 2018). The relationship is thus better understood as dialectical rather than hierarchical, with ideas and interests co-constituting each other through ongoing processes of political contestation and institutional development.

Similarly, the relationship between ideas and institutions is dialectical. On one hand, institutional settings works as filter to which ideas can access policymaking arenas (Campbell, 2002). Hence, the diffusion of policy ideas is institutionally mediated. For instance, Soysal (1995) demonstrates how national governments in Europe incorporated the global level ideas on human rights expansions into citizenship policies, by tailoring them to their country’s

dominant norms and institutions. On the other hand, the ideational turn highlights the role of ideas and ideas mobilization for institutional change and stability, as ideational frameworks work to legitimate existing arrangements and provide blueprints for reform (Blyth, 2002). Furthermore, ideas influence institutions through cognitive frameworks that shape how policy actors interpret institutional constraints and opportunities, as well as through beliefs on how institutions should function to achieve desired outcomes (Béland, 2009, 2025).

In the analysis, interests, ideas and institutions are adopted as the set of variables to explain policymaking development in the three countries. It is argued that policy developments are shaped by the groups that participate, their interests and ideas, by the dominant ideas at a given time and society, and by the institutions that enable and constrain the viability of various policy options. When investigating policy continuity and policy change, the interplay at different times and contexts of these three elements offer an analytical tool to explain how the paradox of a needed but unwanted workforce unfolds in policy.

2.4 Agency beyond the State

This thesis engages with different groups that have a stake and a degree of influence over migration policymaking processes. In so doing, it acknowledges that labour migration policymaking involves a network of different groups at the vertical and horizontal level. This thesis aims at filling the gap in the migration literature on economic migration by shifting the focus from a state-centric perspective to the network of state and non-state actors that contribute to the shaping of migration policy.

In what follows, I review the scholarly traditions that adopted a governance approach to immigration, to then discuss how this thesis positions itself within the existing works.

The concept of governance gained popularity in the social sciences literature starting from the early 1980s. Since then, the interest of the scholarly community in governance increased steadily (Levi-Faur, 2012). At the same time, the concept has been adopted and further elaborated within different disciplines in the social sciences. Increasingly, scholars realized that even typically state-led policies and domains could not be explained exclusively through a state-centric framework. The divide between international and domestic policymaking has

become blurred, while the role of non-state and private actors in matters of public interest such as peacekeeping, climate change or public health has increased.

The Multi-Level Governance approach was firstly formulated to analyse the functioning of EU integration processes. Drawing from the governance tradition, the MLG framework shifts from a state-centric perspective (Hooghe & Marks, 2001) to a more nuanced picture, that allocates authority at different levels: upwards to the supranational level, downwards to local institutions, and out to non-public actors (Panizzon & van Riemsdijk, 2018). Hence, the cornerstone of the MLG approach is the emphasis given to the complex systems of interaction and coordination across different levels of actors embedded in policy networks.

However, together with its popularity, MLG faced the criticisms of being a theoretically vague concept, as Peters and Pierre (2004, p. 88) argued: “While multilevel governance has the virtue of being capable of being invoked in almost any situation, that is also its great problem. Any complex and multifaceted political process can be referred to as multilevel governance”.

In migration studies, the MLG approach began to be adopted by scholars working on integration, in particular following the surge in interest in the role of local level actors. Authors turned to analyse the role of cities, local authorities and of the third sector in shaping practices of immigrants’ reception (i.e., Vertovec, 1996; Careja, 2019). In these cases, fluid arrangements and horizontal movement of authority to non-state actors involved blurring the division between private and public jurisdictions, as well as cooperation between the local governments, bureaucracies, local NGOs and the third sector. However, a review of the literature shows that only few studies explicitly look at the dynamics between different actors at the different levels of governance, whereas the majority focused on one level or in the interrelation between two levels of governance (Caponio & Jones-Correa, 2018).

In what follows, I sketch out how I reframe and adapt concepts from MLG and governance frameworks to look at the case of labour migration policymaking. In engaging with the governance frameworks, the central theoretical concept for this thesis is the emphasis on labour migration policy as the outcome of a dynamic multi-actors’ interaction.

While the migration literature adopting a MLG framework has mostly focused on integration and asylum reception, labour migration policy literature remains state-centric, or focuses on the role of one group for influencing policymaking. Instead, this research maps out the labour migration policymaking arena, to analyse the interactions and dynamics between the different actors involved. Drawing from Campomori and Ambrosini's critique (2020) that the emphasis on MLG as a negotiated order among actors neglects an in-depth investigation of conflicts, I adopt their battleground conceptualisation. In their research on the governance of asylum-seekers reception at the local level, they argue that this conceptualisation discloses how policymaking is the outcome of inter-actors' dynamics that are more complex than the negotiated coordination involved in a MLG perspective. In so doing, they argue that the asylum policy field can be framed as a "battleground upon which different actors engage with their own interests, values and frames" (Campomori & Ambrosini, 2020, p. 3). Although their work focuses on interactions regarding asylum-seekers reception at the local level, their conceptualisation is helpful to grasp the interests and ideas of the actors involved in policymaking. The battleground concept allows for a more nuanced understanding of labour migration governance, as it emphasizes the role of competing ideas, interests and institutional positions of the actors involved, thereby offering a more realistic representation of migration policymaking processes as a combination of negotiation, coordination, non-coordination and competition. Hence, important for the analysis of policy development is the notion that central government power operates within significant constraints, as policymaking involves multiple actors across various venues, each with distinct institutions, networks, interests and ideas, often in contradiction. As argued in Carney:

"There are major limits to central government power: policymakers operate within a policymaking environment out of their full understanding or control. That environment can be summed up by six concepts: there are many policy *actors* (policy makers, influencers, analysts) spread across many venues (levels and types of government); each venue has its own *institutions* (formal and informal rules), *networks* (relationships between policymakers and influencers), and *ideas* (ways to understand the world and interpret its policy problems); and, actors respond to *context* (including the socio-economic conditions relevant to policy) and *events* (such as the crisis prompting policymaker attention to lurch to a policy problem, or the election of new policymakers)." (Cairney, 2021, p. 2)

In the analysis, the following actors are considered: at the state level, I focus on elected politicians and high-level civil servants in relevant ministries, notably the Ministry of Labour, of the Interior, and of Foreign Affairs. At the non-state level, I focus on economic actors, notably trade unions and employers' organisations, and on civil society organisations.

Political Parties

Generally, the migration debate cuts across conventional left-right political distinctions, revealing complex and often contradictory positions within both camps (Massey, 1999; Natter et al., 2020; Schultz et al., 2021; Sciortino, 2000). Sciortino argues that migration divides each party internally between those close to the party's economic tradition and those close to its socio-cultural tradition (Sciortino, 2000, p. 225). Right wing parties are divided between their culturally conservative electorate demanding restrictive immigration policies, and employers demanding liberal policies. On the other hand, left wing parties are divided between human rights advocates and civil society in favour of solidarity with migrants, but at the same time they are reluctant in liberalizing migration flows as they voice the concerns of trade unions (de Haas & Natter, 2015). Hence, both sides of the political spectrum face ideological and electoral challenges, which might lead to similarly fuzzy policy outcomes (ibid.).

The literature on the impact of party politics on policy direction provides mixed results. Abu-Chadi (2016) analysed immigration policies of nine European countries, Australia and Canada between 1980 and 2006, showing that left-wing governments are more likely to pass liberal immigration reforms, but only if they are in control of both executive and legislative powers. Similarly, Consterdine and Hampshire (2020) analyse policy variations on labour migration in five European countries from 1990 to 2016, finding little evidence supporting the hypothesis that immigration policies are increasingly converging across countries. Instead, they find strong evidence that labour migration policy responds to changes in domestic party competition.

In contrast, Natter and colleagues (2020) analyse drivers of immigration policy reform in 21 Western immigration countries over the 1970–2012 period, and do not find statistically significant partisan effects on immigration policy direction, including entry policy on labour migration. Hence, they argue that both sides of the political spectrum, when in power, “are faced with the same interest groups and international context in migration policymaking and therefore policy trends have been overall coherent across the left/right spectrum” (Natter et al., 2020, p. 15). Finally, Schultz and colleagues (2021) conduct an analysis of 33 OECD countries between 1980 and 2010 to examine the pattern and drivers behind their immigration policy and argue that right-wing and left-wing governments do not enact

significantly different policy mixes. Instead, their results show increasing convergence of immigration policies adopted across countries, supporting the ideas that similar structural constraints and competing pressures limit policymakers' room to manoeuvre (Schultz et al., 2021).

Civil Servants and Bureaucracies

Civil servants received limited attention in the literature on migration policy (Paquet, 2020; Wakisaka, 2022), that mostly focused on street-level bureaucrats and their role in the implementation phase (Alesina & Tabellini, 2004). Nevertheless, national administrations are not merely executors of policies formulated by politicians, but they have a distinct authority over policy development.

Civil servants follow a different logic than politicians, as they are motivated by longer-term career prospects rather than electoral results (Alesina & Tabellini, 2004). Aberbach et al. (2009) distinguish between the considerations brought by civil servants and those of politicians within decision-making:

“Civil servants bring facts and knowledge; politicians, interests and values. Civil servants bring neutral expertise – will it work? while politicians bring political sensitivity – will it fly? Civil servants thus emphasize the technical efficacy of policy, while politicians emphasize its responsiveness to relevant constituencies.”
(Aberbach et al., 2009, p. 6)

The theoretical distinction between bureaucratic and political contributions to policymaking suggests that while politicians bring interests and values focused on constituency responsiveness, bureaucrats contribute facts, knowledge, and assessments of technical efficacy. In the migration context, this division implies that informed bureaucratic input could lead to more evidence-based policies.

However, the actual influence of bureaucratic expertise on policy outcomes remains contingent on several factors.

First, not all bureaucratic systems possess the technical capacity or knowledge on migration dynamics, especially in countries with no prior immigration (Wakisaka, 2022). In that case, ideas and beliefs, rather than expertise, might drive policy decisions (Brumat & Vera Espinoza, 2024). Second, bureaucracies may be subject to politicization through systems of patronage,

where appointments, and other forms of support are based on political loyalties, personal relationships or political connections, thereby blurring the distinction between political and administrative considerations (see for instance Bach et al., 2020 for an overview of dynamics of politicisation of senior-level civil servants in 18 EU countries). Third, even when bureaucrats maintain relative autonomy and have expertise on the issue, their influence may be constrained by political preferences or co-opted to legitimize politicians' preferences rather than genuinely inform policy development (Boswell, 2009; Pettrachin & Hadj Abdou, 2024). Finally, inter-ministerial coordination involved in the governance of immigration might give rise to turf wars between bureaucracies at different ministries, as they are likely to have contrasting worldviews (Natter, 2018). This might contribute to contradictory immigration policies.

Consequently, while bureaucrats potentially serve as conduits for incorporating technical expertise into migration policymaking, their actual role in shaping policy outcomes depends on their institutional capacity, operational autonomy, and the broader political and organizational context within which they operate (Fernández-Rodríguez & Célleri, 2024; Paquet, 2020; Wakisaka, 2022).

Employer associations

Generally, it is agreed that employers have an interest in the expansion of labour supply (Caviedes, 2010; Freeman, 1995; Menz, 2016). At the same time, the literature has somewhat neglected the active role of employers' interests in shaping policies, often reducing their influence to mere characteristics of the receiving state's labour market or immigration policy rather than examining their strategic policy engagement (Okólski, 2020; Scott, 2013). Furthermore, it has been noted how much of the 'demand-side' approaches to the study of employers' role in migration policies tend to conceptualise the interest of employers for migrant labour exclusively in terms of meeting specific skills or shortages (Forde et al., 2024). However, these approaches neglect the peculiarities of employer groups as well as of the national and sectorial labour market contexts.

Firstly, employers are not a homogeneous block, so that the rationales and strategies to engage with migration are fundamentally heterogeneous (Forde et al., 2024). The influence

of employers varies considerably across sectors and skill levels, with larger industries typically possessing greater political resources and more compelling arguments for skilled migration, whereas sectors dependent on low-paid labour often encounter stronger public resistance or are too fragmented to allow for effective lobbying (Caviedes, 2010; Menz, 2013).

Furthermore, national contexts shape employer organisation preferences and influence over labour migration policies (Freeman, 1995; J. Hollifield et al., 2014; Wright, 2017). For instance, comparative immigration politics literature argued that in countries of immigration such as the United States and Canada, employer associations have a longstanding tradition of lobbying for expansive labour migration policies. Conversely, reluctant countries of immigration such as European countries, employer organisations are generally reticent in engaging in lobbying for looser entry policies (Wright, 2017).

Another way through which national contexts shape employers' preferences and role in shaping labour migration policies is suggested by research in the VoC literature, which emphasises how different labour market institutions determine both employers' preferences and relative lobbying power (Menz, 2010b).

The literature focusing specifically on the role of employer associations is scarce (Forde et al., 2024). Generally, employer associations recur to multiple channels to influence migration policy, engaging directly with government officials while simultaneously working through business associations and forming strategic coalitions with other stakeholders. Their success ultimately depends on their capacity to frame migration as an economic necessity rather than a political choice, thereby depoliticising potentially contentious policy debates (Menz, 2016). Politicisation is an important factor affecting employer associations' lobbying power. Political salience theories suggest that the ability of employer associations to influence policymaking diminishes as public attention to immigration increases, with business preferences more likely to prevail in low-salience, technocratic policy environments (Afonso & Devitt, 2016; Culpepper, 2010).

Ultimately, employer strategies emerge from the interaction between their economic interests, institutional contexts, collective action capabilities, and the broader political dynamics surrounding immigration. Hence, employer strategies and rationale for engaging in

policy advocacy are not fixed, and might differ across countries and sectors, so that their role and position on labour migration should be seen in interaction with other actors and institutions.

Trade Unions

The role of trade unions in influencing labour migration policy, as well as their position towards migrant workers is also not fixed.

Trade unions face competing pressures that shape their policy preferences and advocacy strategies. On one hand, they have taken a hostile position to increased migration. On the other hand, they have pushed for mobilizing for vulnerable foreign workers and for their integration (Afonso & Devitt, 2016). Unions' positions evolved significantly over time, as they grapple with changing labour market dynamics and membership composition (Krings, 2010). This strategic shift reflects both normative commitments to worker solidarity across national boundaries and pragmatic considerations about union membership expansion and long-term institutional influence.

Furthermore, the relative power of trade unions is linked to their position in national socio-economic decision-making processes (Marino et al., 2017). Hence, in countries and historical periods where unions had a central role in these processes, they also had significant influence over labour migration policies. Research from Penninx and Roosblad (2000) comparing trade unions role in seven North-Western European countries in the 1960-1990s period, highlighted that countries where trade unions had a strong position, they were able to bargain from a power position, so that importing labour would not jeopardise labour relations. Where they were weaker, their impact was limited, and governments often set migration rules without significant union input.

Several interconnected factors explain variation in union positions across different contexts and time periods.

First, the composition of union membership fundamentally matters, as unions representing sectors with high concentrations of migrant workers are more likely to adopt pro-migrant positions (Penninx & Roosblad, 2000). Second, institutional contexts significantly shape union

strategies, with corporatist systems providing unions greater opportunities to influence migration policy through institutionalised social dialogue mechanisms (Knudsen et al., 2023; Menz, 2010a). Third, unions' relationships with political parties critically affect their migration policy positions, as the stance of social democratic parties on migration can either constrain or enable union advocacy efforts (Afonso, 2012). Fourth, the level of economic insecurity among union members influences their openness to pro-migration positions, with periods of high unemployment typically generating more restrictive union stances (Marino et al., 2017).

Therefore, unions increasingly adopt sophisticated positions that distinguish between different types of migration flows and policy instruments. They may support migration programmes that facilitate the organisation of the immigrant workforce, while simultaneously opposing temporary worker schemes that potentially undermine established labour standards (Haus, 2002). At the same time, changes towards the free movement of labour in the EU and an increased fragmentation in migrants' legal and labour market status makes unions' strategies and role towards the organisation of the foreign workforce challenging (Marino et al., 2017; Pennix, 2017).

Taken together, these dynamics highlight that unions' role in decision-making and their strategies over immigration are neither static nor uniform but rather the product of shifting memberships, institutional opportunities, political alliances, and economic pressures, requiring constant recalibration in response to changing national and transnational contexts.

Civil Society Organizations

Although not directly involved in labour migration advocacy, civil society organisations play prominent roles in migration policy debates (Statham & Geddes, 2006). CSOs impact is mostly visible in their advocacy and moral framing of migration issues that can prove powerful in public debates, and their provision of services and integration activities (Ambrosini & Van der Leun, 2015).

However, their influence encounters significant structural constraints relative to other stakeholders. Most importantly, migrants themselves often lack the organisational capacity to mobilise their interests effectively compared to established interest groups, creating a

participation deficit in migration policymaking (Eggert & Giugni, 2015). This organisational deficit creates space for proxy representation through various civil society organisations, including human rights groups, migrant advocacy organisations, and religious institutions that claim to speak on behalf of migrant interests. However, this representational arrangement may not always align with migrants' own preferences and priorities, potentially introducing distortions in policy advocacy that reflect organisational rather than constituency interests (Ambrosini, 2021; Nicholls, 2013). Furthermore, in some contexts, CSOs might victimise migrants, and thereby support the narrative of migrants and newcomers as passive actors in need of assistance (Ambrosini, 2021; Baglioni et al., 2022).

Civil society organisations face substantial resource constraints that might limit their policy influence. Generally, migrant advocacy organisations operate with limited budgets dependent on public funding, while relying heavily on volunteer labour (Baglioni et al., 2022). These resource limitations affect their capacity for sustained policy engagement and professional lobbying activities, thereby constraining their ability to compete effectively in policy arenas.

Civil society organisations achieve greatest effectiveness when they successfully build broad coalitions that incorporate other stakeholders such as employers, trade unions, or local governments (Ambrosini, 2021; Chimienti, 2011). These multi-stakeholder coalitions can potentially overcome the resource and legitimacy constraints that individual organisations might face in isolation.

3 Methodology

This chapter outlines the methodological framework employed to investigate how the paradox of a needed yet not wanted workforce unfolds in policy over time in Denmark, Italy, and Poland. The research adopts a qualitative approach grounded in comparative case study design, examining both temporal dynamics within each case and cross-national variations across the three countries. This methodological choice reflects the complex, context-dependent nature of migration policy processes that require deep understanding of causal mechanisms, policy discourse evolution, and institutional dynamics.

The chapter is structured to provide a comprehensive account of the methodological pillars underpinning this research. Specifically, I begin by discussing the philosophical foundations that inform my approach to knowledge production and social reality. Subsequently, I present the research strategy, detailing the comparative case study design and its temporal dimensions. The chapter then examines the specific methods employed, followed by discussion of the abductive coding approach used in data analysis. Finally, I reflect on ethical considerations, methodological limitations, and my positionality as a researcher.

3.1 Philosophy of science: critical realism and interpretivism

This research is grounded in critical realist ontology. This approach posits that social reality exists independently of our knowledge of it, while acknowledging that our understanding of this reality is mediated through social structures, mechanisms, and human interpretation (M. Archer et al., 1998; Bhaskar, 2008; Bhaskar & Lawson, 1998). This ontological stance is particularly suited to migration policy research as it recognizes that policy outcomes result from underlying causal mechanisms operating within specific structural contexts, rather than merely observable correlations between variables.

Critical realism's stratified view of reality—distinguishing between the empirical (observable events), the actual (events whether observed or not), and the real (underlying structures and mechanisms)—provides a robust framework for understanding the migration policy paradox. The 'needed yet not wanted' tension represents a real contradiction embedded within capitalist labour market structures and democratic political systems, manifesting through actual policy processes that may or may not be empirically observable. Furthermore, critical realism's emphasis on emergence and structural causation aligns with the research focus on how macro-level economic needs interact with meso-level institutional arrangements and micro-level political dynamics to produce policy outcomes. This ontological position acknowledges that policy processes are neither fully determined by structural forces nor entirely contingent on individual agency but emerge through the complex interplay of structure and agency over time (M. S. Archer, 1995, 2003).

The epistemological foundation of this research draws from critical realist and interpretivist traditions, recognizing both the existence of objective causal

mechanisms and the necessity of interpretive understanding of social meaning-making processes. This synthesis reflects the nature of the research question, which requires both explanation of causal processes (how the paradox unfolds) and interpretation of meaning-making processes (how policy actors construct and navigate the paradox).

The critical realist epistemology acknowledges that while social reality exists independently of our knowledge of it, our access to this reality is mediated through conceptual frameworks and interpretive processes (Bhaskar, 2008). This position accepts the possibility of knowledge about causal mechanisms while maintaining epistemological humility about the fallible nature of such knowledge. Critical realist epistemology supports systematic causal inference through process tracing while recognizing that mechanisms operate in open systems where their effects may be counteracted by other causal forces.

The interpretivist dimension recognizes that policy processes are inherently meaningful human activities embedded within intersubjective frameworks of understanding (Bevir & Rhodes, 2003). This requires attention to how policy actors construct meaning around the migration-labour nexus, how they interpret structural constraints and opportunities, and how these interpretations shape their actions (Giddens, 1984; Yanow & Schwartz-Shea, 2006). Importantly, interpretivism here is not anti-realist but rather acknowledges that social structures partly consist of shared meanings and that actors' interpretations are themselves causative.

The integration of critical realist and interpretivist epistemologies is theoretically coherent because both reject crude empiricist assumptions while maintaining that systematic knowledge is possible (Smith, 1998). Critical realism provides the framework for understanding how structural mechanisms operate, while interpretivism illuminates how these mechanisms are mediated through actors' meaningful interpretations and practices. The research thus seeks both causal explanation and interpretive understanding, viewing these as necessarily complementary rather than competing forms of knowledge.

These philosophical foundations are bounded to the assumptions underlying the research questions and research design choices of this work. Firstly, in focusing on a paradox or policy dilemma, the research acknowledges the complexity involved in policy dynamics. Thereby, it

assumes that policy outcomes result from multiple, interacting causal mechanisms operating within complex polity, where their effects may be modified by contextual factors, and competing forces. Secondly, investigating complex policy dynamics requires careful attention to understand how similar pressures may be interpreted differently by policy actors depending on their institutional positions, ideological commitments, and cultural frameworks. That is, the interpretive lenses through which actors understand economic needs, migration flows, and policy options become part of the causal process itself (Hay, 2002). It follows that both the structural constraints within which actors operate and the meanings they attach to their actions are considered causally relevant, with actor interpretations serving as mediating mechanisms between structural forces and policy outcomes.

Ultimately, I briefly reflect on the methodological choices guiding this research and their connection with the 3 I's analytical framework. Traditionally, the interests, ideas, and institutions traditions are linked to different methodological approaches as they focus on distinct aspects and explanations of a given phenomenon. However, in this research, the 3 I's framework is not applied as three separate traditions pursued in parallel, but rather to explore how they interact and overlap in policymaking. From a critical realist perspective, interests, ideas, and institutions are understood as dimensions of social life that co-constitute one another through underlying mechanisms. From an interpretivist perspective, their boundaries are fluid. As it emerged in the analysis, the 3 I's overlap at times in determining policy development. Focusing on the interplay between the 3 I's therefore, aligns with the assumption that policy outcomes emerge from the complex interaction of structures and agency over time, rather than from a single explanatory logic. Methodologically, this justifies an approach that traces how the 3 I's overlap, reinforce, or contradict each other in labour migration policymaking, rather than treating them as isolated variables. In this way, the analysis aims at reflecting the layered and dynamic character of policy processes.

3.2 Comparative Case Study

This research adopts a comparative case study design. A case-oriented comparative approach is useful in research aiming at the in-depth understanding of complex processes and dynamics rather than at establishing relationships between variables (Della Porta, 2008). There has been a lot of debates on the advantages and pitfalls of comparative and case study methods in the social sciences. While some have argued that case studies cannot produce generalizable results (see for instance: King, Keohane & Verba, 1994), others have outlined their potential for theory-generating and theory-testing through an in-depth investigation and understanding of the case studied. In migration studies, the comparative and case study methodology has been widely adopted, resulting in “some of the most innovative scholarships in the field” (Brettell & Hollifield, 2015, p. 19).

In what follows, I outline the approach adopted, and I justify its strengths and the rationale behind my methodological choices.

The strength of case-oriented comparative approaches lies in the production of thick, detailed knowledge of cases, either for the intrinsic value of the specific case, or for causal-analytic purpose (Della Porta, 2008). Rather than testing a specific relation amongst variables for generalization purposes, this thesis aims at providing an in-depth investigation of the empirical puzzle, while acknowledging that the explanation of complex policy processes is provided by the combination of different factors. This approach is useful not only for theory building, but also for theory testing (Ruffa, 2020). The comparative case study approach lends itself well to an in-depth investigation of the dynamics of policymaking on an intractable policy problem, as well as to a reflection on the applicability and explanatory power of different theoretical accounts.

In setting up the comparative framework, case selection is extremely relevant. The selection of cases in comparative research is not merely a technical decision but fundamentally shapes the analytical possibilities and the type of knowledge that can be generated from the study. Hence, case selection strategies should be purposive and aligned with research objectives, whether seeking to test theories, explore causal mechanisms, or build new theoretical insights (Seawright & Gerring, 2008). By looking at three country cases over time, this thesis

develops a comparison across two dimensions: (1) over time, through the longitudinal, within-case analysis of immigration policymaking; (2) across cases.

Firstly, the within country analysis contributes to draw the historical trajectory of immigration policymaking, covering different periods of immigration (de)politicization and policymaking – and thereby contributing to a better understanding of institutional radical and incremental changes. Studying policymaking processes from the early beginning in each case provides an in-depth understanding of policy development as it allows for contextualisation and perspectivisation of policy choices. In other words, the historical approach to each case policy development improves the validity of my conclusions and ‘internal’ interpretation, as the studied period covers different phases of labour migration politics and policy.

Secondly, the across country analysis which privileges three most-different cases within the EU allows the research to delve into how competing and overlapping drivers shape solutions to the needed but not wanted dilemma, as well as to highlight the similarities across cases.

The selection of Denmark, Italy, and Poland as the cases of this comparative study follows a most-different systems design logic, where cases represent maximum variation across key dimensions while sharing the common challenge of managing the “needed but not wanted” workforce dilemma. This selection strategy serves multiple analytical purposes that align with the research aim of understanding complex policy processes. Importantly, it enables the investigation of the central puzzle driving this research: how and why this paradox has endured across different time periods and national contexts within European capitalism.

Before delving into the main features of each selected case, I shortly discuss the rationale behind choosing a most-different cases design.

A comparison of most-different cases is useful to “discover whether similar mechanisms and processes drive changes in divergent periods, places and regimes”(McAdam et al., 2001, p. 82). Hence, the comparison of uncommon cases allows to investigate how similar mechanisms intersect with varying case- and time-contextual features to then develop into distinct policy trajectories. Such a comparison can highlight not only these underlying mechanisms, but it can also reveal how they combine with contextual features of each case

(McAdam et al., 2001). Therefore, what is significant for the purpose of this research is the structural similarities rather than the many contingent differences across the three cases.

The case choice for the comparative study follows a two-step logic. First, case selection was made according to the national socio-economic models in which European countries can be grouped. Second, the different migration historical trajectories were considered when making the selection. While I present these criteria sequentially for analytical clarity, both dimensions operated concomitantly in the selection process rather than hierarchically. The choice of these three countries answers to the thesis objective of explaining policy outcomes in a European context, and they reflect the ways in which different migration regimes and national socio-economic models interact in shaping similarities and differences in labour migration policy. Hence, the selection of these three countries involved a balancing between their representativeness of different European socio-economic models and immigration policy trajectories, while also offering strategic analytical value for examining the research puzzle.

The first step in case selection involved selecting countries from Europe's three main regions and their respective socio-economic models. Regarding Northwestern Europe, the selection focused on countries within the coordinated market economy model, as they represent cases where the needed but not wanted paradox manifests in more complex ways compared to liberal market economies. The pool of Northwestern European countries with coordinated economies included Germany, Austria, Denmark, and Sweden. These countries feature models of labour market coordination, industrial relations, and welfare that on one hand should theoretically minimise the need of low-paid migrant workers, on the other hand, heighten the tension between commitments to social solidarity, wage equality, labour market regulation and economic pressures for flexible labour. Amongst these four countries, I excluded Germany and Austria because their political model is more conservative than Sweden and Denmark, which have a stronger tradition of Social Democratic governments. These two countries followed a different migration policy development. Sweden maintained a liberal migration policy until the early 2020s, and only recently it is witnessing a turn to restrictive, anti-immigrant position (Simonsen, 2019). Contrarily, Denmark opted for stricter policies since the early 2000s, with the Social Democratic party showcasing a progressive

alignment to the right-wing anti-immigrant stand. The country – contrary to Sweden – was an early advocate of welfare chauvinism, stressing the preference for ‘contributing’ immigrants and assimilation to Danish values as conditions to access welfare benefits (Jørgensen & Thomsen, 2016). Finally, Denmark's distinctive features make it particularly valuable as a least-likely case for examining the needed but not wanted dilemma in labour migration policies, unlike Sweden, where policymakers have traditionally supported liberal immigration policies (Berg & Spehar, 2013; Elwert et al., 2023; Johansson, 2014). The country's exceptional commitment to equal treatment of all workers, combined with strong collective bargaining mechanisms, should theoretically eliminate the incentives for recruiting low-paid migrant workers that drive this dilemma elsewhere (Andersen & Navrbjerg, 2008; Due et al., 1994; Floros & Jørgensen, 2020). By selecting Denmark, this study investigates whether and how – even in institutional contexts designed to prevent labour market segmentation and exploitation – the structural tensions between economic needs and political preferences for immigration control emerge, thereby providing a more rigorous examination of the universality of this phenomenon across European socio-economic models.

The choice of Italy and Poland follows a paradigmatic case logic as these two countries are exemplificative of the socio-economic models of Southern and Eastern European contexts respectively. The former presents a mixed market economy characterized by segmented labour markets, large informal sectors, and fragmented welfare provisions. These features create structural demand for migrant labour while generating political backlash against immigration. Poland is exemplificative of the socio-economic trajectory followed in Eastern Europe, characterised by neoliberal restructuring, weak labour market protections, and a rapidly growing economy with important sectors basing their competitiveness on low-paid labour (Bohle & and Greskovits, 2007). Furthermore, Poland has increasingly become heavily dependent on migrant workers to fill labour shortages, particularly in low-paid sectors, while facing significant public and political resistance to immigration (Duszczuk & Matuszczyk, 2018; Szelewa & Polakowski, 2023).

The second selection criteria refer to the historical trajectories in immigration policy within Europe. In adopting this categorization, I follow an historical trajectory of migration regimes (Pastore, 2014b). The different migration regimes in which Denmark, Italy and Poland can be

grouped reflect the EU-level differences in dealing with immigration, yet all the three countries share the same policy dilemma of regulating a workforce that is needed yet unwanted.

Denmark immigration policies fall within the North-Western European trajectory of early-on immigration flows and comprehensive immigration regulations to filter and select immigrants (Castles et al., 2014; Geddes & Scholten, 2016). Denmark represents an underexplored yet strategically important case within Northwestern European migration regimes. While migration scholars have typically focused on larger countries with higher immigration numbers like Germany, Sweden, or the Netherlands, Denmark remains relatively neglected. At the same time, Denmark shares core characteristics with Northwestern European migration regimes: labour migration inflows structured through formal recruitment programs, followed by increase in family reunification and asylum arrivals, strong state capacity for migration management, and well-developed mechanisms for integrating migrants into comprehensive welfare systems (Bade, 2008; Castles et al., 2014). Furthermore, it is the European country that witnessed the most radical turn in immigration policy approach, as its legislation shifted from being considered one of the most generous in 1983 to one of the strictest since 2002 (Mielcke Hansen, 2016; Reynié, 2023). This turn also affected political dynamics, as Denmark is often considered as a 'first-mover' in proposing and implementing restrictive immigration policies (Ravn et al., 2022). Politically, the centre-left Social Democratic party turn to right-wing anti-immigrant position as winning electoral strategy is increasingly held up as an example by other European centre-left parties (see for instance, Reynié, 2023; Pace, 2025 for the UK; Majmurek, 2025 for Poland).

Italian immigration policies fall within the Southern European migration regimes. This model typically encompasses Italy, Greece, Spain and Portugal, as they share similar historical trajectory and institutional characteristics in managing labour migration (Pastore, 2014b). Italy represents a paradigmatic case study within the Southern European migration regimes, embodying all the defining characteristics that scholars have identified as distinctive to this regional model. Italy exemplifies the historical transformation from an emigration to immigration destination, the geographic positioning as a primary Mediterranean entry point for African and Middle Eastern migration flows, and the institutional features of relatively

weak state capacity for migration management combined with a large informal economy (Ambrosini, 2001; Finotelli, 2009; Reyneri, 1998). Italy's frequent use of regularization programs, its reliance on family-based migration policies, and its significant dependence on migrant labour in agriculture, construction, and domestic care sectors make it a paradigmatic case of the Southern European migration regime model. Moreover, Italy's ongoing role as a transit, destination, and renewed emigration country underlines the interconnected and continuously evolving patterns of mobility regimes within the EU. Italy provides a most-likely scenario for the needed but not wanted dilemma because its large informal economy and reliance on migrant labour in important sectors like agriculture, construction, and domestic care creates substantial demand for low-paid workers, while simultaneously facing strong public opposition to immigration, external and internal pressures to restrict migrant flows. The country's frequent use of regularization programs for undocumented workers exemplifies this contradiction, as policymakers acknowledge the economic necessity of migrant labour through ex-post legalization while maintaining restrictive entry policies, thus creating a cyclical pattern that perfectly illustrates the tension between economic needs and political preferences regarding low-paid migration (Finotelli & Arango, 2011; Zincone, 1998).

Finally, Polish immigration policies fall within the Eastern European trajectory of ongoing emigration flows and of recent immigration flows. Poland is a paradigmatic case of Eastern European migration regimes, embodying the distinctive trajectory from post-communist transition to EU membership that characterizes this regional model (Kicingier & Koryś, 2011; Okólski, 2021). Since the fall of communism in 1989, and after accession to the EU and the Schengen area in early 2000s, the nature of migration to and from Poland has been in flux. These developments led to a significant emigration of Poles, estimated at almost two millions (Ziolek-Skrzypczak, 2010). Emigration, coupled with declining birth rates raise a problem of labour shortages. Hence, concomitant to the EU accession, Poland began to turn to foreign workers to deal with sectorial shortages. Recently (2017–2020), Poland became one of the largest recipients of foreign workers in Europe, mainly from neighbouring non-EU countries (Eurostat, 2021). The combination of acute economic demands for cheap migrant labour, available supply from neighbouring countries, weak institutional barriers to labour market deregulation, and strong anti-immigration political pressures makes Poland an environment where the needed but not wanted dilemma would be expected to emerge most clearly, thus

serving as a most likely case that contrasts with Denmark's institutional constraints that – theoretically – prevent such dynamics.

Beyond these two primary selection criteria, the three countries share an important ideational characteristic that shapes the political dynamics around immigration policymaking. In the European context, Denmark, Italy and Poland are characterised by a similar idea of nation, one based on belonging through the same ethnic, language and religious background (Bauder, 2013). This underlying idea provides a common denominator in the degree of ease of welcoming and integrating immigrants in these three societies:

Table 1: Overview of dimensions for case selection - Denmark, Italy, and Poland

	Socio-Economic Model	Immigration trajectory	Idea of Nation
Denmark	Cooperative	1960s - Northwestern model	Based on ethnicity, language, religion
Italy	Mixed	1980s - Southern model	
Poland	Embedded neoliberalism	2000s - Eastern model	

The three-country comparative design facilitates drawing broader conclusions, that fit regional patterns across the EU. Aiming at bridging the analytical divide between Northwestern, Southern, and Eastern European migration regimes, this comparative case study investigates how Danish, Italian, and Polish immigration policy trajectories respond to similar structural drivers while revealing both convergent pressures and divergent institutional responses that transcend binary divisions between liberal versus restrictive or old versus new immigration countries.

The choice of a longitudinal analysis allows to study both the labour migration policy trajectory and key transformative events. The former refers to including not only modern policy developments, but also the early socio-economic and political processes leading to the establishment of the first regulative frameworks for labour migration. The latter refers to the

focus on key events such as the 1973 and 2008 economic crises, the 2015 migration crisis, the 2020 pandemic crisis, and the 2022 Ukraine crisis. This approach allows for the analysis of how the policy paradox adapts to changing socio-economic and political circumstances. The temporal design enables several analytical advantages, including process tracing of causal mechanisms over time, critical juncture analysis of key decision points, path dependence examination of how early policy choices constrain later options, and ultimately policy learning assessment across cases and time periods (Mahoney & Rueschemeyer, 2003).

Furthermore, by adopting a longitudinal perspective, this research overcomes the dominant narrative of migration as a modern crisis, instead investigating how contemporary dilemmas around the needed but not wanted migrant workers have been addressed in the past, and examining the role of early policy choices in shaping subsequent institutional developments (Mahoney & Rueschemeyer, 2003; Thelen, 2003). This temporal approach reveals path-dependent processes and policy learning mechanisms that help explain why similar economic pressures produce different policy outcomes across these three regional contexts (Pierson, 1993). Moreover, the comparative design allows for the identification of both region-specific patterns and cross-regional dynamics, contributing to theoretical debates about convergence and divergence in European migration governance. This approach aims at providing empirical insights into how different institutional configurations of actors mediate the fundamental tension between economic needs and political preferences regarding migrant labour.

3.3 A comprehensive approach to data collection and analysis

The methodological approach integrates historical institutionalism with discursive institutionalism to provide a comprehensive analytical framework for understanding policy development and change.

Historical institutionalism enables analysis of path dependency, institutional layering, and how historical legacies constrain contemporary policy choices across the three countries. This approach illuminates why certain policy options become locked-in while others remain foreclosed, and how critical junctures create opportunities for institutional reconfiguration (P. A. Hall & Taylor, 1996; Pierson & Skocpol, 2002; Thelen, 2004). Furthermore, following this

approach, I situate policy change within its historicity and institutional structures rather as a single, discrete outcome (Margheritis, 2025; Zapata-Barrero, 2024).

Institutions undergo continuous transformation through both incremental adjustments and significant reconfigurations, driven by internal dynamics and external pressures (Pierson & Skocpol, 2002; Thelen, 2003). This perspective recognizes that institutional arrangements surrounding migration policy evolve through complex processes, rather than remaining fixed over time. Accordingly, this research traces how institutional frameworks adapt to changing economic demands, political pressures, and social expectations regarding migrant workers.

Furthermore, path-dependent processes mean that contemporary policy options are shaped by earlier decisions, policy feedback effects, and accumulated institutional arrangements (Hansen, 2002; Pierson, 1993; Thelen, 2004). Understanding current migration policies requires examining how historical experiences with labour migration, integration challenges, and political responses continue to influence present-day approaches.

Historical institutionalism provides an analytical strategy that develops contextually grounded explanations of policy change through detailed examination of institutional interactions and temporal processes (P. A. Hall & Taylor, 1996; Pierson & Skocpol, 2002; Thelen, 1999). While not primarily historical in scope, this research incorporates historical depth to understand the origins and evolution of contemporary policy arrangements. This approach necessitated gathering extensive archival materials and conducting interviews that illuminate long-term developmental patterns and their continuing influence on current policy debates.

Discursive institutionalism complements this temporal analysis by examining in which institutional settings and how ideas, discourse, and meaning-making processes facilitate policy change (Schmidt, 2008; Schmidt & Radaelli, 2004). This framework reveals how policy actors use discursive strategies to navigate the tension between economic necessity and political resistance inherent in the "needed but not wanted" paradox. The discursive dimension is particularly crucial for migration policy, where public narratives, framing contests, and ideational entrepreneurship significantly influence policy trajectories.

The synthesis of these approaches allows for analysis of both continuity and change in migration policy. While historical institutionalism explains policy persistence through institutional inertia and path dependency, discursive institutionalism elucidates mechanisms of endogenous change through narrative shifts, coalition building around new ideas, and the strategic deployment of discourse by policy entrepreneurs (P. A. Hall & Taylor, 1996; Schmidt & Radaelli, 2004). This combined framework enables examination of how discursive processes interact with institutional structures over time, revealing how actors use ideas and discourse to either reinforce or challenge existing institutional arrangements. Furthermore, the state constitutes a differentiated entity composed of multiple actors across various levels and sectors, each potentially holding distinct interests, ideas and preferences regarding migration policy. Rather than assuming state coherence, the analysis examines how different governmental actors, agencies, and levels of administration may pursue competing objectives or prioritize different aspects of the migration-labour relationship.

In approaching comparative case-study research, the combination of these two approaches is well-suited to pay attention to causal mechanisms, while at the same time investigating how these mechanisms operate through discursive processes (Schmidt & Radaelli, 2004). Specifically, it allows to trace both the material processes driving policy change and the discursive processes through which these material pressures are interpreted, contested, and resolved.

3.4 Fieldwork and data collection

This thesis adopts a combination of qualitative methods to allow for triangulation of multiple sources of evidence. In particular, document analysis and semi-structured interviews provide the backbone of the analysis. In the following sections, I clarify the process and rationale for selecting sources, respondents, and the challenges that are connected with these choices.

3.4.1 Archival research

Regarding the data for the analysis, I depart from archival research of relevant documents concerning the policies of interest outlined in the previous section within the 2000-2020 period in the three countries. Following Vivienne Schmidt (2008) conceptualization, the

collected documents include both coordinative texts (i.e., parliamentary debates, ministerial directives, written questions to the ministers), and communicative texts (i.e., newspapers' articles and interviews).

The sources considered include:

- Policy documents
- Institutional reports and explorative studies prepared for parliamentary debates
- Minutes of parliamentary discussions and other institutional meetings
- Reports, calls for actions of state institutional bodies as well as of interest groups (i.e., trade unions, employers' organizations, CSOs)
- Newspapers' interviews with relevant actors

The texts included were selected by searching documents containing the following general key words: immigrant/foreign workers, low-skilled/paid immigration, immigration. Additionally, the research was tailored to the country and time's context by searching for more specific key words, such as: labour shortages, guest-workers, non-Western immigration, regularization campaign, irregular immigrants, Ukrainian workers, elderly care, agriculture.

For coordinative texts, I conducted systematic searches of parliamentary archives and relevant ministry databases (for more recent material)¹. Communicative texts were identified through a combination of manual selection and searches using the Factiva digital archive. All documents were screened to ensure explicit connection to low-paid labour migration policy discussions.

¹ Transcripts of Parliamentary debates, committees reports and meetings, written questions and answers are available online at the homepages of the Danish Parliament (<https://www.ft.dk>), Italian Parliament (<https://www.parlamento.it/home>), and Polish Parliament (<https://www.sejm.gov.pl>). For the Italian case, I also relied on an online collection of legislative material on immigration from 1992 to 2017 (<https://briguglio.asgi.it/immigrazione-e-asilo/archivio-completo.html>). For the Danish case, I could access an online depository of all legislative material from 1946 to today (<https://themis.dk/synopsis/docs/Betaenkninger.html>), and I selected relevant documents related to immigration legislation.

I conduct a qualitative analysis of the collected documents concerning the political process shaping the migration policy of each country. The underlying assumption is that through the analysis of these documents, the decision-making processes are tracked, and the interests, beliefs, and rationales behind a certain policy direction are made explicit.

3.4.2 Doing Interviews

In-depth interviews with key actors are the backbone of the analysis. Qualitative interviews allow for an in-depth understanding of the initial findings from the document analysis. They are specifically useful for understanding the actors' beliefs and interests regarding the overall model of migration and labour market.

To identify and select respondents, I followed a two-step procedure combining theoretical and snowball sampling methods (Kingdon, 2003; Tansey, 2007).

In a first stage, I drew a sampling frame of potential respondents based on their involvement in the political process according to policymaking theories. Additionally, based on the document analysis, I selected the institutions that were mentioned, such as specific ministerial directorates, political actors, NGOs, trade unions, employer associations. The list of names and contact details of potential respondents was identified by screening the names of actors within selected institutions that were especially active in immigration-related issues.

In a second stage, I expanded my list of respondents through snowball sampling. Snowball sampling provided useful for reaching actors who play or played a central role in immigration policymaking but might have not been included in the list of respondents or might not be easily reachable, for instance because they retired.

The interviews of this thesis classify as 'expert' or 'elites' interviews (Dexter, 2006; Littig, 2009; Richards, 1996). This type of interviews presents specific challenges. Obtaining access to elite respondents becomes increasingly challenging with higher positions, often requiring navigating through gatekeepers such as assistants, or secretaries who must be convinced of the research's value (Brandl & Klinger, 2006; Lilleker, 2003). Additionally, elite respondents' demanding schedules mean scientific research may not rank highly among their priorities, making them highly selective about interview requests.

Furthermore, the hierarchy between interviewer and interviewee is inverted in elite interviews. Elite respondents are accustomed to discussing their expertise and this makes them likely to dominate and direct the interview (Lilleker, 2003; Van Audenhove & Donders, 2019). To handle such situations effectively, interviewers must demonstrate considerable flexibility, allowing respondents to guide conversations while maintaining focus on research objectives (Littig, 2009). Crucially, researchers must establish themselves as competent partners. This requires extensive preparation to ensure familiarity with the subject matter and the ability to engage as quasi-experts in preliminary meetings. Hence, for the interview process to obtain valuable material, questions need to be specifically tailored for each respondent and well informed on the specific aspects of the policy process of interest to pierce through official speech and reveal valuable information. At the same time, the interview needs to remain flexible enough to allow interviewees to lead the conversation without losing sight of the information that is actually sought (Harvey, 2011; Littig, 2009; Van Audenhove & Donders, 2019).

The semi-structured interviews focused on five main issues and are then adapted to the country case as well as to the institutional role of the different groups of respondents. In overall, questions were organized around the following issues:

- Respondents' professional trajectory and responsibilities, their role on immigration
- Their evaluation of major developments in labour migration dynamics and migration policy over the time
- Their evaluation of specific immigration policies (context-dependent)
- Their assessment of what have been the major challenges with regard to labour migration regulation, as well as expectation for the future
- Their experience and interactions with other relevant actors in the field

To increase the chances of access, I relied on the personal/academic network of the universities and research centres I was affiliated to and on a systematic recruitment strategy. The latter involved sending concise yet informative letter of contact, as well as a short description of the project and its purpose. To facilitate the scheduling of the interview, both online/phone and in person interview possibilities were offered to the respondents. Interviews were anonymous and confidential, apart from few cases where respondents

agreed to have their name. In overall, I conducted 69 interviews, as highlighted in the table below:

Table 2: Interviews by type of respondent and country

	Italy	Denmark	Poland
Civil Servants (i.e., Ministry of Labour, Interior, Justice, Foreign Affairs, Migration)	7	7	5
Elected Politicians	4	4	1
Employers' associations	2	4	2
Trade Unions	6	6	2
Civil Society Organizations	6	0	2
Experts/think thanks	4	4	2
Total	29	25	14

Comparatively, I conducted fewer interviews in Poland as the relevant period for migration policy (2004 – 2024) is shorter than in the other two cases, and most of the respondents have been involved in policymaking from its beginning until today, reducing the need for a larger interview pool.

In all three cases, interviews lasted on average 60 minutes and were conducted both online and in person. Some respondents preferred in-person interviews, whereas others preferred online interviews, probably because online meetings are easier to fit in the schedule and easier to reschedule in case of respondents' sudden change of plans.

Additionally, I participated to a number of workshops, seminars and conferences on labour immigration and immigration policy. This allowed me to observe inter-actors' dynamics and to record their public narrative on immigration. Furthermore, they were occasions to conduct informal conversations and to get further contacts for interviews.

3.5 Data analysis: abductive approach

This research adopts an abductive approach. Abduction is outlined as a reasoning combining deduction and induction. The researcher discovers new concepts, ideas or explanations by finding surprising events, which cannot be routinely explained by pre-existing knowledge (Charmaz, 2006). Thus, by abduction, the researcher goes beyond data as well as pre-existing theory (ibid.). Using abductive reasoning means “to iteratively move between data and pre-existing knowledge of theories” (Timmermans & Tavory, 2012, pp. 168–169). The process

leading to the research question and sub-questions of this thesis, as well as to the analytical framework is characterized by a continuous iteration between the empirical material and the theoretical framework.

Firstly, the framework for the analysis draws from theoretical perspectives on the drivers of immigration policy as outlined below:

The theory	Framework for the analysis
Interests	How do actors' interests shape policy?
Ideas	How do ideas shape actors' position towards a certain policy direction?
Institutions	How do institutions constrain or enable a certain policy direction? What are the continuities and ruptures?

The second theoretical framework that I adopt for the analysis looks at the inter-actors' dynamics. This thesis engages with different groups of actors that have a stake and a degree of influence over migration policymaking processes. The analysis delves into the different dynamics characterizing Italian, Danish and Polish immigration policymaking within and among this plethora of state, civil society, and international actors. I plan to focus on the following groups:

- Central state actors: civil servants involved in migration policymaking within national state institutions
- Trade unions representatives involved in immigration issues
- Employer organizations
- Local actors: Civil Society Organizations involved in immigration issues

During the coding, I followed a two-step process. The two-stage coding approach ensured that theoretical insights remained grounded in empirical evidence while enabling analytical generalization beyond the specific cases studied (Charmaz, 2014a).

The initial coding stage involved close reading of documents and interview transcripts to identify emergent codes that remained faithful to the data. This inductive process generated first-order codes that captured participants' own language and categories, including how different actors framed migration issues, described policy challenges, and explained their

positions. Codes emerged directly from the empirical material without imposing predetermined theoretical categories, allowing for the identification of unexpected patterns and themes (Charmaz, 2014b; Timmermans & Tavory, 2012).

The second stage involved grouping initial codes into broader analytical categories that connected empirical observations to theoretical concepts. This theory-guided approach focused on the codes with the greatest analytical relevance, using them to interpret the empirical material through different theoretical frameworks. This process identified relationships between codes and developed higher-order themes that linked empirical patterns to theoretical mechanisms. The coding moved from descriptive to analytical, organizing emergent themes around key analytical dimensions: interests, institutions, ideas, and category of actors. This stage enabled to identify how these elements combined to produce policy outcomes across the three cases. This allowed me to cluster insights according to immigration policy drivers and inter-actor dynamics, and thereby to move beyond simple description of policy processes toward explanation of underlying causal mechanisms.

3.6 Reflections on methodological challenges, research assumptions and author's positionality

Throughout the research process, it is important to be aware and reflect upon the challenges and potential limitations that each research choice entails. In this section, I outline some of the methodological challenges of this research and reflect on ways to improve the internal validity of the study's research design. Furthermore, I reflect upon the research process, some of the choices and assumptions made, as well as my role of researcher.

This research focuses on policies that regulate low-skill labour immigration. In so doing, I adopt a narrow categorization that classifies 'people on the move' according to the main reason for migrating. However, this choice presents conceptual and methodological challenges that require careful consideration.

Firstly, the term "low-skill" is problematic as it carries devaluative connotations and reflects a hierarchical understanding of skill that privileges formal educational credentials over other forms of competence and expertise (Anderson, 2010). This framework fails to recognize the

diverse competencies required in sectors typically labelled as low-skilled, including physical endurance, emotional labour, cultural knowledge, and the ability to perform demanding tasks under difficult conditions (McDowell, 2008). Moreover, this classification obscures the gendered and racialized dimensions of skill recognition, where care work and manual labour—often performed by women and ethnic minorities—are systematically devalued compared to knowledge work associated with higher social status (Kofman & Raghuram, 2015). Practically, the term low-skill presented translation and cultural challenges across different national contexts. During fieldwork in Denmark, I discovered that this terminology was unfamiliar and created confusion among respondents, reflecting different national framings of labour market segmentation and skill categorization. Consequently, I adapted my approach to use “low-paid” terminology, which better captures the economic conditions and precarious nature of these employment relationships without making evaluative judgments about workers' capabilities.

Secondly, migration is a fluid phenomenon, where different reasons for moving are blurred. Especially in the last decade, the sharp division between economic and forced immigrants proved to be unable to effectively capture the multifaceted reality of immigration (Crawley & Skleparis, 2018). Yet, the regulative framework on immigration has been slow in adapting, maintaining instead the traditional categorization. This research – as it looks at policymaking processes on issues connected to immigration and demand for low-paid labour – adopts the traditional categorization and focuses on policies and political debates on low-paid labour immigration. However, it is important to be aware that this narrow division does not fit the reality in certain circumstances. For instance, much of the actual immigrant workforce in low-paid occupations is recruited not through the existing regulations on entry for manual work, but rather among immigrants who fall in the category of asylum-seekers, undocumented, or family members. This aspect has to be considered when studying labour immigration policymaking, as the policies on labour immigration do not capture the actual reality of immigrant labour demand and recruitment. To address these limitations, I allowed a degree of flexibility in my approach, remaining aware that policy debates often encompass broader immigration categories that intersect with low-paid labour markets. During interviews and document analysis, I paid attention to how policymakers themselves navigate these

categorical boundaries and how policies ostensibly designed for other immigration streams (asylum, family reunification) *de facto* shape low-paid labour migration outcomes.

Methodologically, an issue related to doing interviews on past events is accuracy. Accuracy issues related to retrospective storytelling might include memory inconsistencies, the interpretation of policy processes depending on their medium/longer-term outcome, the respondent's evaluation of policy and political processes depending on the positive or negative political leverage he/she might have gained from the issue (Tansey, 2007). To minimize these challenges, I adopted triangulation techniques. Archival research and document analysis was combined with interviews; in cases where several respondents had worked together on a specific policy, I could cross-check their recalling. In these ways, I could corroborate the data to minimize biases and inaccuracies as much as possible. Nevertheless, there is an unavoidable 'bias' in retrospective narratives that needs to be acknowledged.

The qualitative methods adopted raise the issue of language. While I am fluent in Italian, I have some basic knowledge of Danish, and I do not speak Polish. Hence, interviews were held in Italian for the Italian case and in English for the Danish and Polish cases. This might have affected the quality of data collected in cases where respondents were not confident in speaking English. Furthermore, the language barrier shaped the sample, since individuals who did not feel confident being interviewed in English were unable to participate.

To mitigate potential data quality issues arising from language barriers, I employed several strategies: providing interview questions in advance when requested, allowing respondents time to clarify technical terms, and conducting follow-up communications in writing when necessary. Additionally, I relied on translation services for policy documents in Danish and Polish and cross-referenced technical terminology with native speakers familiar with migration policy.

When approaching the field, it is important to be aware of researcher's own positionality. My personal background and positionality – being a young, Italian, female researcher – inevitably impact the fieldwork, especially in the way it might shape the interviewee/interviewer dynamics. In terms of my connection with the researched context, the fact that I am Italian, studied and lived in Denmark, and had no personal ties with Poland prior to this research,

gave me different levels of familiarity with the three contexts. In turn, this inevitably impacted both my assumptions and the interaction with respondents.

Having lived as a privileged migrant in Denmark, in close connection with the (privileged) German minority before starting my doctorate gave me hands-on insights about migrants and minority experiences, ongoing public and political debates, and the cultural logics underlying Danish migration and integration policies. I accessed the fieldwork in Italy as a return migrant – this facilitated a more self-reflective and distanced approach in interpreting what I was observing, as I could recognize taken-for-granted institutional patterns while maintaining enough critical distance to question them, though I remained vigilant about assumptions rooted in my deeper familiarity with the Italian context. The fact that I entered the fieldwork in Poland with no ‘insider knowledge’ on one hand made me rely more on extensive preparation and cross-checking my impressions with colleagues, on the other hand it allowed me to approach the case with fewer preconceptions and to probe more systematically for contextual explanations that might otherwise have been taken for granted.

In terms of access and content, being viewed as an outsider doing research on a contentious topic in Danish politics might have limited the degree of access and might have led to respondents opting for the official policy narrative rather than exposing their personal interpretations. These trends varied according to the different groups I interviewed. For instance, trade unions and employer associations respondents were very interested in the research object, and when contacted reacted positively. During the interviews, respondents were spontaneous and freely answered my questions. Contrarily, Ministerial officials were reluctant in agreeing to have the interview, even when I was referred to them by other respondents or by their connections. However, it remains unclear to me to what extent this reluctance resulted from my ‘outsider’ position, from the contentiousness of the migration issue in the political arena, or from specific ministerial culture. Probably, it is a mix of the above, but the speculative question of how the interview would have been different had I been viewed as an ‘insider’ remains unanswered.

In Italy, being viewed as an ‘insider’ researcher from an Italian university, speaking Italian might have pre-emptively ensured on one hand, a degree of trust from contacted respondents. This was then reflected in the degree of confidence in exposing their personal

views during the interview. On the other hand, non-answers and struggles to get access to certain groups of actors such as employers' associations and anti-immigrant parties, might reflect suspicion towards insider researcher on a politically salient issue, which might have been less prominent with a foreign researcher. The difficulty in reaching certain groups was mediated by the collection of newspapers' interviews, parliamentary debates, and interrogations. Furthermore, interviews with respondents that worked closely with these groups were useful to gain insights into the position of those actors with regards to labour migration policymaking.

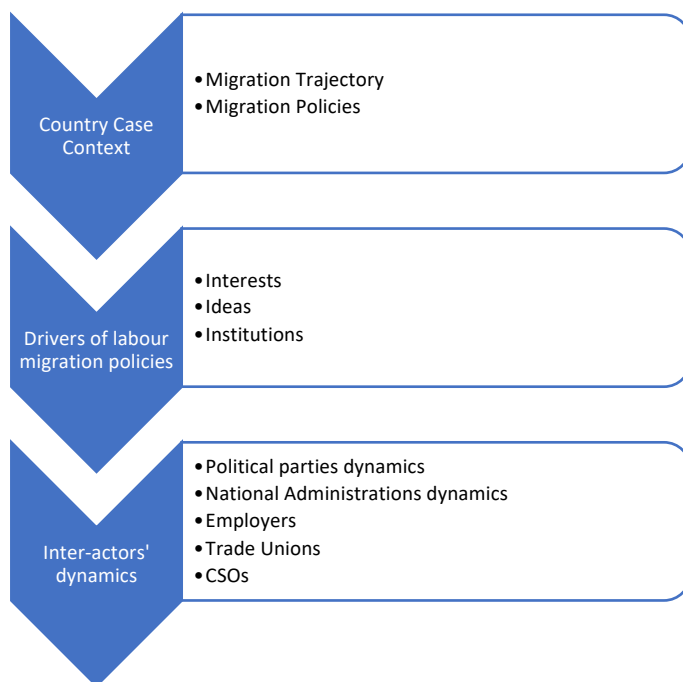
In Poland, respondents were generally interested and available in participating in the interview, although this mostly reflects self-selection as most contacts were provided through network. Being perceived as an outsider likely shaped how respondents presented their positions, some provided rich contextual explanations and historical background than might have been necessary for a Polish researcher, while others may have adapted their discourse to an outsider researcher. To minimize the impact of my limited familiarity with the Polish case, I sequenced the fieldwork strategically: beginning in Italy, then Denmark, and finally Poland. This allowed me to approach the least familiar case with a clearer research direction developed through the earlier fieldwork stages.

Ultimately, by entering in contact with a reality, the researcher becomes part of the same social reality that he/she chooses to study. Being aware of this and self-conscious about how personal background and world views interrelate with the subject of the study contributes to have a better understanding of the researcher's influence on the research process.

PART II

LOW-PAID LABOUR MIGRATION POLICYMAKING IN DENMARK, ITALY, AND POLAND

The second part of the thesis moves to the investigation of the three case studies. The analysis of the policy development in each case studied is organised as follows. A first chapter outlines the context of the country migration history and policy developments. Afterwards, the analysis focuses on the drivers of labour migration policymaking to investigate how factors connected to interests, ideas and institutions shaped the direction of labour migration policies from their early beginning to today. Finally, the last chapter zooms in the dynamics of relevant actors' involvement in labour migration. In this way, policymaking drivers and dynamics are made explicit, and similarities across the three cases become apparent.



4 Sixty years of immigration to Denmark

This section examines Denmark's migration policymaking dynamics and their underlying drivers over time. Beginning in the mid-1960s, the analysis reconstructs the evolution of labour migration policies within the context of economic and political developments. The opening sections provide a comprehensive overview of migration trends and policies from the 1960s to the present day. Chapter 4 is structured around two distinct phases: the initial migration period characterised by low political salience of immigration policy, limited actors' involvement, and absence of institutionalised migration governance; and the post-2000 era, marked by heightened political salience, the rise of far-right anti-immigrant populist parties, and the institutionalisation of migration governance. Hence, the analysis' division reflects this fundamental transformation in migration policymaking dynamics, which is explored in greater detail in the subsequent analysis. Chapter 5 examines the key drivers of labour migration policy, distinguishing between three critical factors: interests, institutions, and ideas that have shaped policy development. The final section illuminates the roles, positions and inter-actors' dynamics of the main actors involved in migration policy formation. The analysis of the Danish case reveals the dynamics that contributed to a dramatic 180-degree transformation—from a tolerant, humanitarian approach to immigration legislation to policies now considered among the most restrictive in the European Union. Within this general policy development, the analysis sheds light on the inherent dilemmas, contrasts, political and economic drivers that shaped the policy paradox of a needed yet unwanted workforce over time.

4.1 1960s – 2000s: migration and policymaking dynamics

Like many other European countries, Denmark experienced net emigration – mainly to North America, New Zealand and Australia – until 1960s (Matthiessen, 2000). This emigration flow was mostly motivated by the sluggish economic growth and high unemployment levels in Denmark up to the end of the 1950s (P. J. Pedersen, 2000).

Starting in the 1960s, immigration rates increased, driven by a period of economic growth. Labour shortages in the industrial sector were solved through the recruitment of guest workers, primarily from Turkey, Yugoslavia and Pakistan (Matthiessen, 2009). Many guest workers relocated from West Germany to Denmark, while others were recruited directly in their home country. Migrant workers were predominantly employed in blue-collar positions within the manufacturing and food-processing sectors, where they filled shortages in unskilled jobs that Danish workers were reluctant to take (Andersen et al., 1990).

Trade unions remained sceptical of guest workers inflows, underlining the risks of competition, unemployment, and ‘adaptation problems of people from southern countries’ (Vad Jønsson & Pedersen, 2012, p. 101). However, as employment levels continued to rise, the unemployment argument of trade unions became less valid; hence, trade unions accepted the idea of allowing guest workers, while at the same time advocating for structured regulations on entry and residence of immigrant workers (Sane, 2000; Vad Jønsson & Pedersen, 2012). To this end, the so called Elkær-Hansen committee was set up by the Ministry of Labour in 1969. It included the representatives of the main labour market institutions, and officials from the ministries involved in the economic and social integration of foreign workers (ibid.). In autumn 1969, the committee presented a proposal for new regulations regarding the issuing of work permits (Bauer et al., 2005). In overall, the proposal aimed to bring in more regulations in the recruitment process. Accordingly, to obtain a work permit, new prerequisites were necessary: firstly, the applicant had to present a job offer from a Danish employer, accompanied by the employer’s statement indicating that Danish labour was not available for that task. Secondly, the applicant had to join a health insurance society and an unemployment fund. Thirdly, the employer was obliged to find housing. Finally, the social partners had to be involved throughout the process of recruitment (Vad

Jønsson & Pedersen, 2012). However, as it was a period of growing labour shortages, employers' statements were easy to obtain (Andersen et al., 1990).

Although the statistics of that period did not distinguish between nationalities and types of residence permit, according to Pedersen (1999), the immigrants from Yugoslavia and Turkey were respectively below 500 units in 1965 – the first year in which separate counts were made of nationals from these countries – and the situation remained stable until 1967. Concerning the immigration from Pakistan, information is available starting from 1971 when they were around 2000 units (Matthiessen, 2009).

The entry for guest workers from non-EEC countries was closed following the 1973 Oil crisis, which led to a steep increase in unemployment and to new waves of Danish emigration – mainly to Sweden (P. J. Pedersen, 2000). In 1974, after the closure of the guest workers' entry scheme, the foreign resident population stood at 89,855, representing approximately 1% of the total population.

The table below shows the stock of foreign nationals in Denmark divided by nationality.

Table 3: Foreign residents according to nationality, 1974-1984.

	EU member states and (Former) Yugoslavia			Non-Western countries			Total	Total
	Nordic countries	North America	Yugoslavia	Turkey	Pakistan	Other countries		
1974	21,774	28,895	6,779	8,138	3,733	20,536	39,186	89,855
1975	21,945	30,683	6,892	8,129	4,982	21,300	41,303	93,931
1976	21,096	29,450	6,396	7,857	5,178	20,877	40,308	90,854
1977	21,419	29,211	6,434	8,628	5,400	20,563	41,025	91,655
1978	21,886	29,605	6,674	10,299	5,557	20,394	42,924	94,415
1979	22,432	30,177	6,955	11,985	5,912	20,154	45,006	97,615
1980	22,608	29,308	7,126	14,086	6,400	20,268	47,880	99,796
1981	22,390	29,379	7,317	15,838	6,598	20,078	49,831	101,600
1982	22,147	28,418	7,402	16,705	6,822	20,420	51,349	101,914
1983	22,201	28,296	7,344	17,240	6,750	21,221	52,555	103,052
1984	22,334	28,424	7,397	17,827	6,659	21,421	53,304	104,062

Source: Matthiessen, 2009:12

Similarly to other Western-European countries, the economic downturn and the subsequent closure to guest workers did not lead to a long-term reduction of immigration. That is,

immigration inflows slowed down, but continued through family reunification (Hovden & Mjelde, 2019).

At the same time, guest workers were particularly vulnerable to unemployment as they filled the unskilled positions in the labour market, resulting in unemployment levels that were 3-4 times higher than the one of the Danish population (Nannestad, 2004; P. J. Pedersen, 2000; Roseveare & Jorgensen, 2004). Later immigrants who entered through asylum and family reunification faced additional disadvantages, as they arrived in a period of economic downturn and high unemployment (P. J. Pedersen, 2000). This situation, combined with the relatively high level of minimum wages and low variance in wage distribution characteristic of the Danish labour market, created significant entry barriers for immigrants and refugees (ibid.).

This pattern was reflected in their reliance on social assistance: a survey conducted by the Danish National Institute for Social Research found that in the late 1970s and the early 1980s, unemployment caused immigrant families to rely more on public assistance than their Danish counterparts (Vad Jønsson & Pedersen, 2012). Nevertheless, although immigration and integration were increasingly seen as problems to be solved, the topic was not high on the political agenda until the 1980s. As outlined by Green-Pedersen and Krogstrup: “questions to the minister relating to the issue accounted for 1–2 per cent of the total number of questions before 1980” (2008, p. 621). There was widespread agreement on the freeze of entry for work, but the regulations on refugees and family reunification were not object of political battleground (Farbøl et al., 2019; Jensen, 2001).

Departing from the 1980s, Denmark witnessed an increase in refugees’ and asylum-seekers’ arrivals. The initial inflows were from Sri Lanka, Iran, Iraq and Palestine, and from the 1990s also from former Yugoslavia, Afghanistan and Somalia (Roseveare & Jorgensen, 2004). Hence, from the 1980s there was a shift in focus in the media and in political debates from immigrant workers to refugees (Jensen, 2001).

Entry and residence in Denmark for foreign nationals was still regulated by the Aliens Act of 1952. However, the Act contained relatively loose rules on immigration, so that entry to Denmark was unsystematic (Bejder, 2025). This implied that street-level bureaucrats had a

degree of policy discretion in approving or rejecting applications for work permits. Furthermore, many immigrants could circumvent regulations on entry for work by entering the country on tourist visas (Vad Jønsson & Pedersen, 2012). To deal with these inconsistencies, the Social Democratic government set up the Foreign Law Committee in 1977, composed of legal experts tasked with the elaboration of a proposal for a comprehensive legislation.

In 1982, the Committee produced a report with proposals for a new Aliens Act, which led then to the approval in April 1983, of the first encompassing legislative framework on immigration. The 1983 Aliens Act has also been described by many commentators and policymakers as one of Europe's most generous, especially because of the innovative and beneficial conditions for asylum-seekers and their families (Mielcke Hansen, 2016). By approving the 1983 Act, the Social Democratic party and the allied left-wing parties aimed at positioning Denmark as a pioneer country in humanitarian legislation for forced migration, going beyond the requirements of the UN conventions. Amongst the most innovative provisions, there was the introduction of the concept of the de facto refugee, encompassing broader cases than the ones defined by the Geneva Convention, and the legal right for refugees to family reunification comprising not only the spouse and children, but also the parents.² However, there was little attention to immigration for work, as at the time there was a shared agreement on blocking entry for work, and a low demand.

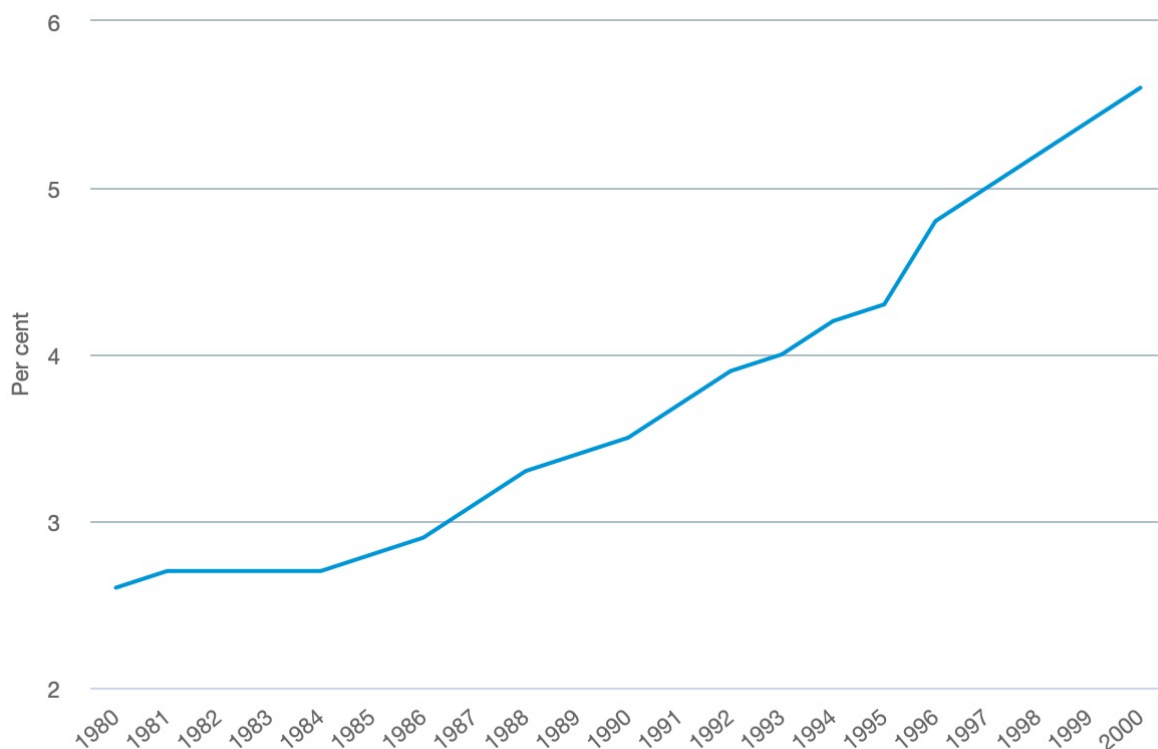
Throughout the 1980s and 1990s the numbers of the immigrant population continued to increase. By the beginning of the 1980s, the foreign-born population was equal to 2.6% of the population. In 1990 and in 2000, the percentage was of 3.5% and 5.6% respectively³.

² Cf. §§ 7 and 9 Udlændingeloven (Danish Aliens Act), Act nr. 226 from 08-06-1983

³ Data available at Statistik Danmark, 2025:

<https://www.statbank.dk/statbank5a/selectvarval/saveselections.asp>

Figure 1: Share of foreign-born of the total population, 1980 – 2000



Source: Statistics Denmark, 2025

The Danish national agency for statistics, Statistics Denmark, categorizes the resident population into:

- Immigrants: foreign-born, from foreign citizens' parents
- Descendants: born in Denmark, including Danish citizens, whose parents are either immigrants or descendants with foreign citizenship
- Danish: Danish citizens who have at least a parent born in Denmark and of Danish citizenship.

Departing from 2002, Statistik Danmark started to further categorize the immigrant and descendants' population into 'Western' and 'non-Western'. The former refers to EU member states, Iceland, Norway, Switzerland, USA, Canada, Australia and New Zealand. The latter to all the other countries. This categorization has been also applied retroactively to previous years' statistics, and it has a widespread use in research, political and media discourses in Denmark (Elmeskov, 2019). The problematic construction of categories based on nationalities will be discussed in later chapters.

Starting from the early 1990s, the foreign population increasingly diversified, with an increase in the group defined as non-Western (Andersen et al., 1990). Hence, whereas German and other Scandinavian immigrants used to be amongst the most numerous groups, the Turkish, Iranian and Pakistani population increased, as shown in the tables below:

Table 4: Stock of foreign-born population, 1980 and 1990

Country of origin	1980	Country of origin	1990
Germany	26 333	Turkey	29 431
Sweden	15 979	Germany	23 123
Turkey	14 086	Sweden	13 708
Norway	13 872	Norway	13 141
Pakistan	7 845	Pakistan	12 006
UK	7 598	Yugoslavia	10 504
Yugoslavia	6 222	Poland	9 662
Poland	6 467	Iran	8 591
USA	5 769	UK	8 547
Finland	4 054	Lebanon	7 938

Source: author's elaboration based on Statistics Denmark data

Although the different ethnic groups were rather small, the topic of immigration had become increasingly controversial. In particular, the number of refugees increased after the approval of the 1983 Aliens Act, so that many policymakers and part of the media began to criticize the very liberal entry requirements for refugees, suggesting that they might act as an attraction factor for 'bogus' asylum seekers (Jensen, 2001). Furthermore, the persisting high unemployment and sluggish economy led to a heightened awareness of immigration as a burden on public expenditures that politics had to act upon. The focus was especially on the high unemployment levels amongst immigrants and on the clustering of immigrant groups in certain areas at the peripheries of Copenhagen (Vad Jønsson & Pedersen, 2012). Hence, the debate increasingly revolved around issues of integration of immigrants and their descendants – especially the groups from Muslim countries – into Danish society.

From a political point of view, the pro-liberal approach supported by the alliance of left-wing parties with the centrist-left Social Democratic party began to crack as several SD mayors of

municipalities with high density of disadvantaged immigrants openly expressed criticisms on the national strategy of their own party (H. T. Andersen et al., 1990). Hence, the Social Democrats witnessed internal fractions along the stand that the party should adopt on immigration. In 1985 and in 1986, the SD party supported provisions aimed at tightening the 1983 Aliens Act, in particular by introducing carriers' liability and by removing the legal requirement for asylum for the category of the de facto refugees (Farbøl et al., 2019). Throughout the 1990s, the Aliens Act was repeatedly revised to limit the numbers of asylum application and family reunification, and to reduce the financial support to immigrants and refugees. These measures were the result of an increased polarization in society with regards to immigration, which was accompanied by a dissatisfaction with the immigration policy line of the Social Democratic party, seen by many as 'too soft' (Jensen, 2001; Mielcke Hansen, 2016).

During the same period, on the far right of the political spectrum, the Progress Party, an anti-establishment party founded in 1972, began to focus its political program away from a ultra-liberal agenda to an anti-immigrant agenda, thereby increasing its influence in Parliament (Yding Brunbech, 2011). In 1995, Pia Kjaersgaard, one of the main figures in the Progress Party, founded the nationalist Danish People's Party (DFP), which up to today combines an anti-immigrant, anti-Muslim stand, with a defence of the national welfare state (Ringsmose, 2003). This new profiling aimed at presenting the party as the representative of working-class electorate, dropping its previous neoliberal views to instead adopt a protective stand towards national values and welfare for those who belong to the nation. In the 1998 election, the newly founded party gained almost 8% of the votes. The elected Social Democratic – Radical Left government struggled to find agreements especially regarding the immigration policy. In particular, the SD party was internally thorn between a hard-liners position which echoed the 'popular opinion', and the idealist position, which stressed the humanistic values of solidarity and support of the weakest (Jensen, 2001; Vad Jønsson & Pedersen, 2012). Ultimately, the government resigned in 2001, leading to new elections.

4.2 2000 – 2020: migration and policymaking dynamics

The 2001 election campaign was run in the aftermath of the 9/11 terrorist attacks. In a context where Muslims and Islams were depicted as a threat to "Western values", moral

panic around immigration was strategically used by the right-wing opposition to profile themselves as hard-liners, and to weaken the SD who did not have a unified stand (Green-Pedersen, 2006; Vad Jønsson & Pedersen, 2012). The elections were won by the right-wing alliance led by the centre-right Venstre (V) leader Anders Fogh Rasmussen, and the Danish People's Party (DFP) became the third largest party, winning 12% of the votes (Yding Brunbech, 2017). Although the party did not participate in the government, it acted as an external support party. With this format, it was able to shape restrictive immigration policies. In June 2002, Act nr. 365 introduced the most important changes in the 1983 Aliens Act, to the extent that Denmark has since then been described as having one of the most restrictive immigration laws in Europe (Mielke-Hansen, 2016). The most controversial change, as it was seen as infringing human rights conventions was the 24 years rule, according to which a foreign partner was allowed to join the husband or wife in Denmark only if both were at least 24 years old. Apart from limiting family reunifications, the government claimed that this measure would have hindered forced marriages, while giving immigrant women the possibility to get an education before marrying. This patronizing attitude however reflects the instrumentalization of gender equality to marginalize especially Muslim women, and to construct a civilized 'us' versus an uncivilized 'them' (Andreassen & Siim, 2010).

Departing from the 2000s, immigration and integration issues have taken a central space in the public debate. From 2002 to 2016 the Aliens Act was amended 93 times, which is equivalent to one modification to the law every two months, and 42 times between 2017 and 2019, meaning more than once per month (Meilland, 2022). In comparison, between 1986 and 2000, the law was amended 25 times, averaging one to two times per year (ibid.). The large number of amendments in the legislation hints at the importance of the topic for Danish politics, where the governing logic has been to restrict undesirable immigration. This has coincided with the alignment of the largest left-wing party Social Democrats with tough immigration policies. Followingly, there has been a generalized parliamentary consensus on a restrictive approach to immigration – directed to both limit entry of unwanted categories of immigrants, and to limit immigrants' access to social benefits (Reynié, 2023).

Following the Copenhagen Summit of December 2002, EU leaders decided to open for an expansion of the European Community to eight Eastern European countries, including Poland

(CVCE, 2012). In Denmark, the EU enlargement was accompanied by concerns on the impact of the free movement of labour from the newly accessed countries on the Danish labour market and on the welfare state. Trade unions in particular stressed the dangers of increasing de-regularization of the labour market and risks of wage dumping (Andersen & Arnholtz, 2008). At the same time, the Danish People's Party stressed the threat of the right to free movement for the financing of the welfare state: "If thousands and thousands of the many millions of new EU citizens were to end up letting themselves and their families be taken care of in Denmark, that would be enough to seriously threaten our welfare system." (DFP leader Thulesen Dahl quoted in Vad Jonsson & Pedersen, 2012:134).

Between 2003 and 2009, the Danish government decided to adopt transitional restrictions to counter those risks⁴ (L. M. Pedersen & Thomsen, 2011). In particular, the new EU citizens were allowed to obtain a work permit if they had a job offer from an employer that was covered by a collective agreement, they were not entitled to social benefits in Denmark, and family members were allowed to enter Denmark, upon showing proof of having suitable housing and sufficient economic means to self-provide. On the 1st of May 2009, this special scheme was totally repealed. The availability of immigrant workers from the newly accessed EU countries was functional to a booming economy with bottlenecks on the Danish labour market, so that inflows of Eastern Europeans immigrant workers were generally accepted as a contribution to the development of Danish society (Vad Jønsson & Pedersen, 2012). The availability of Eastern European workers was however not without problems: trade unions and exponents of left wing parties have been recurrently denouncing the emergence of unregulated markets in the sectors where foreign workers are overrepresented (Refslund, 2016).

Throughout the 2000s, the Polish and Rumanian population significantly increased. Since 2015, Polish immigrants are the more numerous immigrant group in Denmark, and

⁴ The Eastern Agreements (*Østaftalen*) constituted an interim limited restriction of the basic EU principles. In the first instance, a broad agreement was reached in December 2003 between the Liberal Party, the Conservative People's Party, the Social Democrats, the Socialist People's Party, the Social Liberal Party, and the Christian Democrats. The Eastern Agreement was subsequently revised in April 2006 and in June 2007. The text is available at: <https://bm.dk/media/6554/oestaftalen-af-december-2003.pdf>

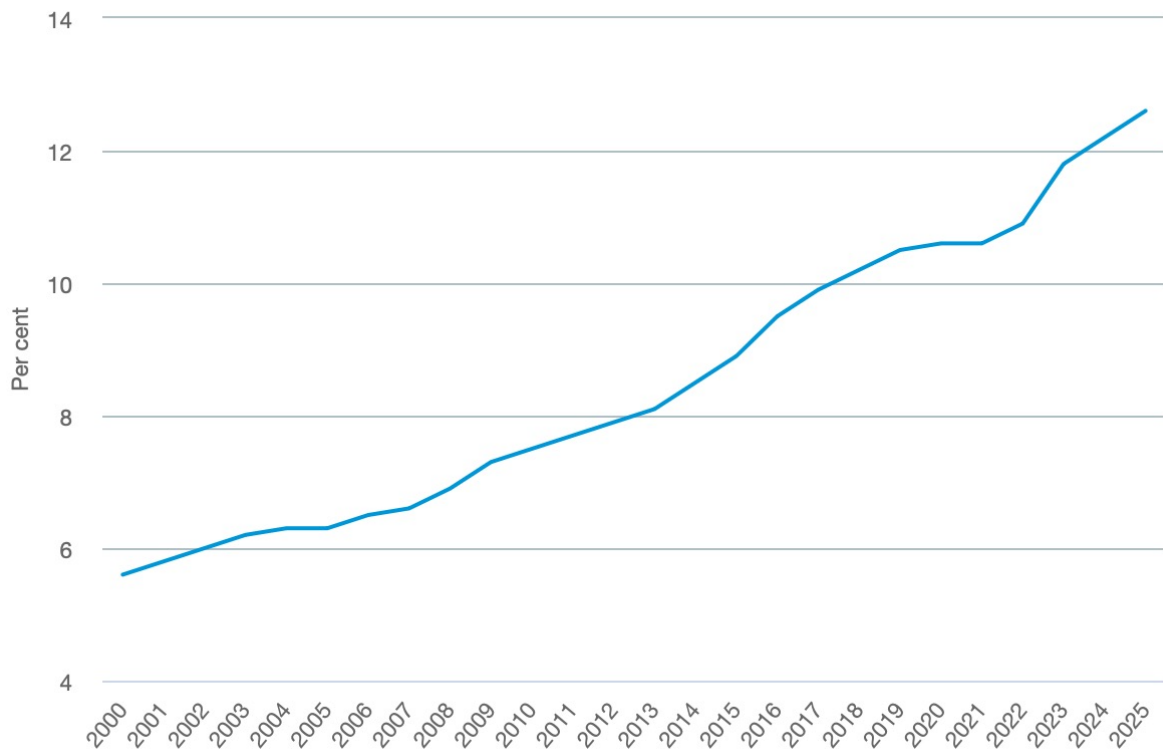
Rumanians are the fifth group⁵. Although a prominent characteristic of CEE immigrant workers is their high educational attainment, several studies confirmed that they often are overqualified for the work they obtain in Denmark (Arnholtz & Hansen, 2013; Simkunas & Thomsen, 2018).

The Syrian civil war and consequent 'refugee crisis' led to an increase in asylum applications also in Denmark, so that politicians began to implement tougher measures to limit access to asylum and to welfare benefits (Bak Jørgensen, 2020). In this context, the centre-left Social Democratic party, led by Mette Frederiksen, have exploited their position in the opposition to position themselves as the hardliners on asylum, de facto adopting the Danish People Party agenda on immigration (Meilland, 2022). Since being elected as prime minister in 2019, Mette Frederiksen adopted a series of restrictive legislations on immigration and asylum, with limited possibilities to entry for low-paid work and for family reunification, and with further cuts on the financial help provided to unemployed immigrants and refugees (Meilland, 2022).

The chart below shows the trend between 2000 and 2025 in the share of foreign-born population:

⁵ In this case, I look at the foreign-born population. Data retrieved from Danmark Statistik, available at: <https://www.statbank.dk/statbank5a/SelectOut/PxSort.asp?file=202447114459458002920FOLK2&PLanguage=1&MainTable=FOLK2&MainTablePretext=Population%201.%20January&potsize=5040>

Figure 2: Share of foreign-born of the total population, 2000 - 2025



Source: Statistics Denmark, 2025

As of 2025, the foreign-born population in Denmark represented the 12.6% of the total population of 6 million people (Statistics Denmark, 2025). The population having non-Danish background represented the 16% of the total population, and the largest groups are, in decreasing order, Turkish, Polish, Ukrainian, Romanian, and Syrian (ibid.).

In contrast to other European countries where the issue of irregularly working or residing immigrants takes often centre stage in political debates, there is a widely shared belief that the phenomenon is not particularly widespread in Denmark and Scandinavia (Jørgensen & Meret, 2012; Roseveare & Jorgensen, 2004). Apart from the geographical location, the main reasons for this are the highly regulated labour market and the strict and interconnected control systems across public and private sectors administrations. At the same time, the perception of irregularity as not being a Scandinavian issue is also reflected in the limited literature available (Jørgensen & Meret, 2012). Few studies noted that migrant workers are overrepresented in precarious and atypical jobs in sectors like agri-food, gastronomy, cleaning and construction, which might result in forms of irregular work, contracts, and residence (Jørgensen & Meret, 2012; Larsen & Skaksen, 2019; Simkunas & Thomsen, 2018).

Ultimately, even highly regulated systems can generate informal practices and irregular arrangements, which suggests that irregularity may be less about weak institutions and more about inherent tensions within capitalist labour markets and their reliance on flexible, expendable workforces in general (Floros & Jørgensen, 2020).

4.3 Post 2020 developments

The past years saw a steady economic growth and record low unemployment level (STAR, 2022). Labour shortages have been dealt with by growing state's efforts to increase citizens and residents' participation in the labour market. This included several measures such as increasing the retirement age, shortening education length, abolishing a national holiday, and providing incentives for the employment of the disabled and the long-term unemployed. As stated by the Prime Minister Mette Frederiksen: "everyone, who can work, must work" (Finans, 2023). The stress on the importance of contributing to the labour market is coupled with the Danish generous, yet costly, welfare system, which requires full participation in the labour market in order to be maintained (Vad Jonsson, 2018).

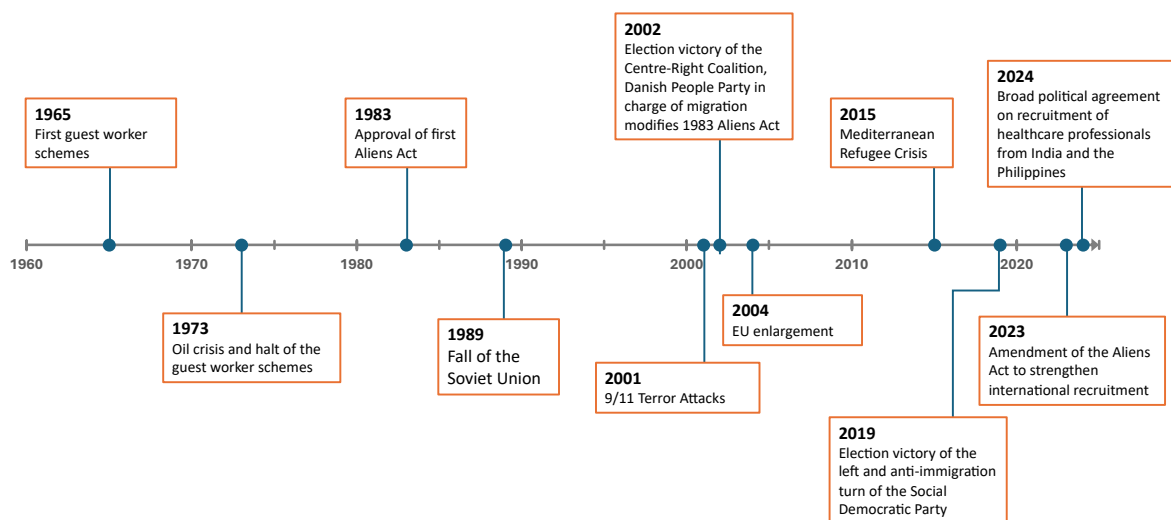
Labour shortages have also solicited a renewed debate on relaxing regulations and attracting immigrant workers. Projections of a demographic decline in all Europe have been used by employers' organization to advocate for opening to the possibility of recruiting from outside the EU. However, the widespread negative view of immigration – especially from non-Western countries – makes policymakers sceptical and reticent to see increasing non-EU immigration as a substantial part of the solution.

On the 29th of June 2022, a broad majority in Parliament voted in favour of introducing new measures for facilitating recruitment of non-EU workers. In April 2023, the Parliament adopted the Bill L46 amending the Aliens Act to strengthen international recruitment. Particularly, the Law lowered the minimum salary that a worker must earn in Denmark to be able to obtain a work visa. Furthermore, it added a more extensive list of professions (including vocational jobs) in the so-called positive list scheme. A migrant worker who is being offered a job in one of the professions currently experiencing labour shortages is allowed to apply for a residence permit under this scheme. The objective is to facilitate the recruitment

of workers for low/medium skill professions, as the pre-existing legislation de facto blocked the possibility for this category to obtain a work visa.

Together with this change, debates are ongoing on how to further improve recruitment from third countries. Among others, the governing parties agreed on a proposal on the establishment of partnerships with India and the Philippines for training and importing workers for the elderly care sector. In January 2024, the governing parties reached a broad agreement with the majority of Parliament to improve recruitment of healthcare professionals from third countries, including entering in partnerships with India and the Philippines (ISM, 2024)⁶. By referring to similar plans being enacted by Germany, the proposal suggests setting up training facilities in India and in the Philippines, where healthcare personnel will receive Danish language and healthcare training, in order to be able to work in elderly homes in Denmark (ibid.).

Figure 3: Migration timeline Denmark



⁶ Agreement between the governing parties (Social Democracy, Venstre, Moderates) and opposition parties (Radical Left, Green Left, The Conservatives, Liberal Alliance) on the 24/01/2024 'on better and smoother frameworks for the recruitment of foreign healthcare personnel from third countries.' Available at: <https://www.ism.dk/Media/638416885011618780/AFTALE~1.PDF>

5 The factors explaining immigration policymaking in Denmark

This chapter focuses on the drivers behind Danish labour migration policymaking from its early origins to the present day. Combining data from interviews and documents, it analyses how factors related to interests, ideas and institutions have shaped policy development over time. The analysis is organised in two main sections that reflect the objective of understanding the patterns that transformed Danish immigration policy from an overall optimistic stance to a predominantly negative one. By looking at the developments over time, and by situating policy decisions within the context in which they took place, Chapter 5 investigates why and under what social, economic and political conditions, low-paid labour migration policy has oscillated between more optimistic and welcoming approaches and restrictive, exclusionary ones. The chapter traces these policy dynamics to reveal the complex interplay of domestic economic and political pressures, institutional constraints, and ideological changes that have determined Denmark's approach to labour migration over the past decades.

5.1 Immigration policymaking between 1965 – 2002

5.1.1 Interests: guest workers between economic demand and temporariness

In this section, I look at the role that interests played in the evolution of immigration policy. In so doing, I refer to the theoretical discussion of Section 2.3. I especially focus on identifying the interests of relevant actors in shaping labour migration policy, and the power dynamics involved for the pursuit of these interests. Here, I analyse the initial phase of guest workers inflows, looking at the interaction between economic interests and political dynamics in shaping the initial regulations on entry and residence.

When Denmark began to recur to guest workers to fill labour shortages in unskilled occupations, it was already a widespread practice throughout Western Europe, so that Danish policymakers could look at developments elsewhere – mostly Germany – to design their regulative framework. As the term suggests, immigrants entering for work were considered temporary workers—a supply of labour during a period of economic growth and shortages in manual work—who would have left when no longer needed.

In the 1960s, Denmark witnessed the economic growth that other Western European countries were experiencing since the 1950s. Faced with contingent and expected labour shortages, the main employers' organisations and liberal politicians began to propose the guest worker model as a potential solution. In 1964, the centre-left Social Liberal Minister of Trade argued for foreign labour as the solution to easing shortages in the workforce:

All the indications are that Denmark will have a labour problem for a long time to come. There are two ways of solving this: either by limiting production and work to the productive capacity of existing manpower, or by obtaining extra manpower. If we choose the latter, we can stabilise growth at a higher level than by choosing the former. To the extent we cover our need for more labour by importing foreign workers, we create higher economic activity and higher production. Other countries, e.g. Sweden, Switzerland and Germany, have created higher growth and welfare for themselves through this means. Denmark has now reached the point where we also have to include this option in our considerations. (Doc. DK1 – Minister of Trade Hilmar Baunsgaard for Aktuelt)

From the documents analysed, two positions emerged on how to solve the issue of increasing the available supply of labour.

On one hand, employers' organization, liberal parties and part of the centre-left looked at attracting foreign labour as a solution – successfully adopted by other European economies.

On the other hand, trade unions, especially the unions of semi/unskilled workers and of women, the Social Democratic party and the Socialist Party argued against adopting what it seemed the easy solution but would ultimately lead to integration issues and wage dumping. Instead, they advocated for incentivizing the labour market participation of the Danish workforce, primarily through increased women's participation in the labour market, and for technological investments.

In line with the corporatist tradition of governing labour market dynamics, the Danish case is paradigmatic of a negotiated outcome between the economic partners and policymakers. Hence, the final policy outcome was the result between the mediation of trade unions and employers diverging interests. Trade unions, especially in the low-paid, manual jobs where immigrants were employed, were interested in a strong regulation of immigration to avoid unfair competition with their members, low trade union enrolment among guest workers, and potential tensions with the local workforce. Employers were interested in maintaining a stable and high employment rate, stressing how foreign labour was the obvious and easy solution to avoid bottlenecks in production. In 1965, when the first guest workers were hired in the meat sector, the economic partners had agreed about the numbers and conditions of employment.

From a political perspective, policymakers at the central level did not get involved in setting up a regulative system. On one hand, there was the belief that guest workers would have stayed in Denmark temporarily, on the other hand, it was considered employers' responsibility to provide decent housing and working conditions. Hence, political action started as a reaction, only after issues of exploitation, irregularity, poor housing, and xenophobia emerged.

At the beginning of the 1970s, as labour shortages became less acute and issues related to housing and living conditions of guest workers became more visible, the debate on guest workers and their impact on society gradually started. In this regard, political actors were considered responsible for not having foreseen a policy framework for the successful residence and integration of guest workers. The quote below is taken from a 1970 newspaper's chronicle by Jens Fisker, the Director of the Confederation of Danish Employers (DA). In his letter, he stressed how guest workers had to be viewed positively, as they

contributed to Danish economic growth. Furthermore, he called politicians for the establishment of a regulative framework, able to reap the benefits of foreign labour, and to minimize the negative externalities:

Denmark has received new people before but never had any conscious immigration policy [...] For financial reasons we should therefore say "Welcome Mustafa". However, the social problems must not be overlooked. They can be terrible - to put it bluntly: 100,000 guest workers in ghetto-like urban areas in Copenhagen will inevitably lead to theft, rape, murder and bloody clashes on a scale that bears comparison with the big cities of the United States. [...] The crucial thing is that we remember that guest workers are not poor supplicants whom we can treat as if we were gentlemen. On the contrary, we must recognize that the guest helps us more than we help him. But it is necessary that this realization is translated into a policy, which has been thoroughly worked out by specialists from the various ministries whose areas are affected, and that is probably all of them, including the church ministry. (Doc. DK2 – DA Director Jens Fisker, commentary in The Danish Employer magazine, 1970)

Figure 4: Welcome Mustafa - drawing from The Danish Employer magazine, 1970



"Mustafa and his comrades should not walk out in the cold. It is in accordance with our own narrow self-interest to invite them inside."

The commentary highlights the positive view of guest workers' contribution held by employers, as they are depicted as central contributors to the Danish economic growth. At the same time, with rising numbers of guest workers, issues related to their poor living conditions were identified as an area that had to urgently be regulated by policymakers.

However, because of the temporal nature of guest workers, there was limited interest amongst national-level policymakers to set up ad-hoc integration and welfarist policies for this group (Vad Jønsson, 2013).

The temporal dimension is an important aspect to consider with regards to the role that interests played in shaping labour migration policy – specifically, the transition from understanding immigrant workers as ‘guests’ to residents.

Initially, the short-term nature inherent in guest worker schemes was viewed as an advantage for labour market flexibility. Employers argued for the recruitment of foreign workers rather than expanding opportunities to women and unemployed because of the possibility of deporting migrant workers when not needed anymore:

Guest workers are especially welcome. First and foremost because this reserve does not cost anything, in contrast to a reserve of unemployed or housewives. If we do not need the labour, it can just be deported. (Doc. DK2 – DA Director Jens Fisker, commentary in *The Danish Employer magazine*, 1970).

Hence, the temporality aspect of guest workers schemes was particularly emphasised by employers as a cost-effective solution that provided maximum labour market adaptability without the long-term social and economic obligations associated with permanent residents or domestic workforce expansion.

The temporal dimension became debated after the 1973 crisis, as high unemployment levels pushed guest workers to return to their origin countries.

In today’s narrative, the fact that many guest workers settled with their families in Denmark is mainly described as a possibility made available by the too lax regulations, and overly optimistic view of immigrants’ integration in the Danish society. However, the analysis of parliamentary debates and newspapers interviews of the time shows that state’s interests played an active role in preferring settlement. As outlined in the quote below, national actors were not passive and unaware of the impact of family reunifications, but they considered the latter as potentially beneficial for the state’s economic and societal interests. For instance, the leading expert in economics and statistics at the Ministry of Labour, argued for the preferability of immigrants to guest workers. Drawing from results published by the West German Central Bank on the economic effects of immigration, he argued that settled

immigrants rather than guest workers were beneficial for the balance of payment deficit - worsened by the 1973 crisis. In a 1974 article titled: "For the sake of the currency: immigrants instead of guest workers?" he argued that:

The primary goal of migrant workers in western countries is to earn money to support family and relations in the home country. Only foreign workers who have brought their families here, and who have lived and worked in the West for many years, have savings on a level with those of the native population. (DK7 - Kaj Westergård, Danish Labour Market Agency, in newspaper *Aktuelt*, 17.06.1974).

As further argued, guest workers were benefiting from bilateral agreements according to which the income earned in Denmark would have not been subject to Danish taxation. Hence, from a financial perspective, there was an interest for a well-integrated immigrant worker and his family rather than for a guest worker that created a form of capital flight. Accordingly, a segment of the economic and political decision-makers advocated for the long-term settlement of guest workers as being in the best interest of Danish finances. This, combined with the objective difficulty in implementing state-led deportations of migrant workers, meant that the focus shifted toward integrating the immigrant population, which also implied a view of family reunification as more beneficial than capital flight.

5.1.2 Ideas: solidarity and fairness towards guest workers

In this section, I analyse how different ideas competed in shaping the policy framework in the early stages of Danish policymaking on labour migration. I look at the political debate to outline the competing values that different political forces appealed to when advocating for a liberal or restrictive approach. In the next section, I investigate how the dominant ideas shaped the regulative framework on immigration.

The economic downturn and high unemployment levels of the 1970-1980s led to conflicting views of immigrant workers and their families. Immigrants were especially vulnerable to job loss, as they mostly constituted the expendable part of the labour force. Furthermore, in a period of sluggish economic growth, it was particularly difficult to find a new job. The crisis of industries and production systems where migrant workers filled manual and unskilled positions made it particularly challenging for migrants to re-enter the labour market (Farbøl et al., 2019). Hence, faced with a changed socio-economic situation, the necessity of establishing an immigration and integration framework became more pressing.

The agreement on a ban on further recruitment of guest workers was widely shared, however, political parties struggled to find a consistent approach to favour immigrants' integration, in particular on the issues of schooling, language, low employment levels and housing. As guest workers increasingly began to be viewed as long-term residents, there were unclear ideas about responsibility allocation across ministries and across the national and local levels. Furthermore, it was unclear how and to what extent to adjust a universalist welfare system to include immigrant workers and their families (Vad Jønsson & Pedersen, 2012).

At this point in time, there was a cooperative attitude, as immigration was considered a transversal issue to all political forces. Furthermore, it was still a minor issue that did not dominate the public debate and did not involve strong positions from the political parties.

In overall, centrist parties and left-wing parties referred to principles of equality and fairness towards immigrant workers and their families when debating the guiding approach that the Danish government should adopt in policymaking. Politicians on the centre and on the left emphasized the contributing role that guest workers played for the Danish economy and societal prosperity, as outlined in the following excerpt from a Parliamentary speech by the Social Democratic spokesperson:

Denmark is a welfare society, a society with high social and material prosperity, a society which was created in a time of economic boom and increase in production. The condition for this increase in production and this increase in prosperity was that the production apparatus was supplied with the necessary labour. The supply of foreign labour was absolutely necessary at the time to meet the requirement of economic growth. The guarantee for the development of prosperity included many immigrants. They have now for many years contributed with their work to our society, and they have, in our opinion, the right to the claim of being considered as equal citizens in society. (Doc DK4 – SD spokesperson in Parliament, Jytte Andersen, 20.11.1980)

This statement reflects the prevailing Social Democratic ideology that viewed immigration through the lens of economic contribution and reciprocal obligation. The discourse positioned immigrants not as burdens but as integral partners in Denmark's economic success, thereby establishing a moral foundation for equal treatment based on their previous value to Danish society. The emphasis on 'the right to the claim of equality' suggests a framing of immigrants' rights as earned through their economic contribution, which had to be reciprocated by the Danish state in moments of hardships, in the same way as with Danish workers.

Similarly, the socialist and radical left parties highlighted the state's responsibility towards workers who moved to Denmark not independently, but because they were recruited by Danish employers and contributed to economic growth:

The foreigners were lured here when private capital needed them. Not a single residence or work permit has been granted to the first family member of one immigrant family, without a private company demanding it. The state established a large, new population element altogether at the behest of capital (...). With the crisis, their condition has further deteriorated. (...) Their legal position is deteriorated, uncertainty has increased, and on top of that they have to suffer because the political right wing is using the crisis to drive frenzy against them." (Doc. DK3 - F1 1979, Wilhjelm of Socialist People's Party about the situation of immigrant families and other foreigners in this country)

This quote reflects how socialist parties employed a class-based narrative that portrayed immigrant workers as victims of capitalist exploitation. This framing – in line with the socialist ideology – created a moral imperative for state protection, positioning the government as responsible for the welfare of workers it had actively contributed to recruit for the benefit of capital. These quotes are paradigmatic of the ideational traditions that left-wing actors used in the early phase: immigrants were framed as workers, the capitalist system was identified as the antagonist. The dominant diagnostic framing was class, rather than cultural or religious divisions (Yilmaz, 2016).

These speeches reflect the left-wing ideology of protecting workers versus capital, which oriented the position of the Danish left parties in the first phase of immigration policymaking. In particular, from the parliamentary debates it emerges how – faced with the pressing need of establishing a regulative framework – left-wing parties and the governing coalition were driven by ideals of fairness toward a population that was portrayed both as in need of support and as having actively contributed to economic and societal prosperity.

On the right-wing of the political spectrum, Venstre (V), the main centre-right party shared similar ideals of fair treatment of immigrant workers. In doing so, it aimed at positioning itself as the rational moderate, distancing itself both from the right-wing conservatives and the left-wing socialists accused of instrumentalizing the immigration debate for their political gain. The former by using immigration as a scapegoat, the latter by using immigration to criticize Danish capitalism:

Venstre distances itself from both the left wing and the right wing's attempt to use the immigrants in the political struggle. Instead, Venstre will do everything that is possible for the immigrants to get the best

possible situation in Denmark. It may cost money initially, but it can become even more costly if an actual immigrant proletariat is created in the long term. The goal of immigration policy must be both to integrate the immigrants into the Danish society and to ensure that their cultural background is preserved. (Doc DK3 – Venstre parliamentary Brixtofte, F1 1979).

The position of the main centre-right party reflects a pragmatic approach rather than ideals of fairness in supporting an inclusive immigration policy. Accordingly, integration measures are portrayed as a long-term investment against the costs associated to an 'immigrant proletariat'.

There was also an overall optimistic attitude towards the diversity brought by immigrants. Faced with the question of what kind of integration was desirable, policymakers looked at multiculturalism and at preserving the distinct characters of different cultures as positive and enriching for Danish society. For instance, parliamentary documents show how politicians debated on how to ensure that immigrants' children would be able to learn and preserve their native languages along with Danish:

The social democratic immigration policy aims to create equality with Danish citizens, both in terms of rights and in terms of duties. It must ensure that immigrants are accepted and settle into Danish society, just as immigrants and Danes must mutually respect each other's cultural background. It is not a question of that the immigrants must become Danes, but it is a question of them having the opportunity to preserve their distinctive character and identity with us. (Doc DK4 – SD spokesperson in Parliament, Jytte Andersen, 20.11.1980)

This statement embodies the multicultural ideal that dominated early Danish immigration policy, reflecting a confidence in Denmark's capacity to accommodate cultural diversity without social fragmentation. The emphasis on 'mutual respect' and preserving 'distinctive character and identity' demonstrates how policymakers conceptualized integration as a two-way process rather than unidirectional assimilation. This ideological framework positioned cultural diversity as compatible with, rather than threatening to, Danish social cohesion.

As outlined in the quotes, the overall attitude of the leading parties was to design policies inspired by principles of non-discrimination and support to guarantee equal opportunities to the disadvantaged immigrant population. There was an underlying belief and optimism that the integration process would develop naturally. This position was legitimised by referring to the integration of immigrants in the past:

When we discuss immigration policy, we must remember that the country has received immigrant groups for hundreds of years, who have often made significant contributions to the development of society. I need only mention the Dutch on Amager, the Huguenots, and the Polish immigrants of the beginning of this century. These groups have all become well integrated into Danish social life over time. Today, we probably have relatively more immigrants than before, and they are distributed among a far greater number of nationalities and languages, but there is no new problem, and measured by an international scale, our problems are in fact manageable. (Doc. DK5 – Ministry of Interior Henning Rasmussen, SD, report on government's immigration policy, 1980)

This excerpt reveals the optimism that underpinned the early immigration policymaking. Reference to immigration that happened centuries earlier reflects how historical narratives were used to normalize the contemporary phenomenon not as an unprecedented challenge, but rather as a manageable development. The confidence in viewing contemporary immigration not as a challenge is further revealed in the report with regards to the idea of the limited role of government-led integration vis-à-vis the spontaneous smoothing out of cultural differences over time:

What the government and Parliament can do with laws and regulations is limited. The meeting between diverse cultures contains elements which are in any case a private matter, and which will only be smoothed out over the course of several generations. The actual work of carrying out a guest worker-friendly integration of the immigrants must first of all be done in the workplaces, in the residential areas, in associations and in municipalities, and if this work develops into an actual cultural exchange, so that the Danes understand that they can also learn from the values in the foreign cultures (Doc. DK5 – Ministry of Interior Henning Rasmussen, SD, report on government's immigration policy, 1980)

The process leading to integration was normalised rather than problematised. It was believed that integration would have happened spontaneously with the passing of time and through the creation of a positive environment. Hence, political responsibility was to ensure that foreigners could settle in Denmark with the same level of rights and opportunities. These guiding ideas positioned the state as a facilitator rather than an active manager of integration, reflecting a liberal confidence in social processes and civil society's capacity to manage cultural diversity without extensive state intervention. Since the majority of former guest workers entered to fill low-paid occupations, they began their settlement journey in a disadvantaged position compared to the Danish population, so that it was a widespread belief among politicians of their duty to enable immigrants' catching up with the standards of the native population.

However, the optimistic approach of the ruling parties overlooked growing concerns in the electorate. These were gradually picked up by the populist far-right Progress Party, and

partially by the Conservative right-wing party. These parties positioned themselves as having a strict approach to immigration regulations, for instance by stressing cases of guest workers' cheating the Danish tax system or reports of criminality amongst immigrant groups. Although these positions were stigmatized by the political majority, anti-immigrant narratives began to develop. In this context, populist parties amplified discourses hinting at cultural divisions between a constructed 'Muslim bloc' and an ideal 'Danish community'. As noted by Yilmaz (2016), the figure of the Muslim immigrant became increasingly used to "create the very social cohesion that is presented as preexisting and under threat" (p.8).

Throughout the 1970s and 1980s, immigration priorities changed, as entry for work was drastically reduced, while family reunification and asylum became the main reasons for entry. Hence, the main topic concerned setting up an immigration and integration framework inspired by humanitarian principles, which resulted in the 1983 Aliens Act.

From the analysis of parliamentary debates, it emerged how national politicians, while being inspired by ideologies of solidarity and of state's duty to care for the most destitute members of society, also aimed at distancing themselves from other Western countries restrictive approaches, thereby setting Denmark as a model for progressive laws. From the parliamentary debates of the time, it emerges that Danish politicians problematized the exclusionary approach adopted by other North-Western European countries towards former guest workers, and aimed at setting Denmark as an alternative progressive model, true to humanitarian and solidaristic principles.

Nevertheless, the increase in the immigrant population at the margins of society between the 1980s and 1990s led to a problematization of the ideals that pushed humanitarian and liberal immigration regulations. In the same period, neoliberal ideas of self-sufficiency, individuals' responsibility over the State gained space in Europe, eroding the post-war consensus on the European social model. This ideational shift was not coincidental but reflected broader transformations in European capitalism following the economic crises of the 1970s and the perceived fiscal pressures on welfare states in an era of globalization (Schierup et al., 2006). Amongst other effects, this included shifting the burden of socio-economic productivity and successful integration towards the individual immigrant (Jørgensen, 2011; Schierup et al., 2006).

This ideological shift is visible in the emphasis given to societal vis-à-vis immigrant responsibilities. As outlined in the earlier paragraphs, initial parliamentary discussions placed the responsibility of immigrants' poverty and marginalisation to the aim of 'exploiting guest workers as much as possible to the advantage of Danish society in general and companies with a lack of labour in particular' (Petersen, 1970:141 cited in Vad Jønsson & Petersen, 2012). Later, ideas of individual responsibility contributed to the legitimisation of shifting the blame for immigrants' higher unemployment and poverty rates to individual characteristics. For instance, the 1987 newspaper' interview with Per Madsen, the Social Democratic mayor of Ishøj, a municipality at the periphery of Copenhagen where immigrants made up around 13 percent of the population, became quite popular as it represented the first strong stance from within the Social Democratic party against a 'too generous' immigration policy:

Between 25 and 30 per cent of immigrants in Ishøj are unemployed, while the corresponding figure for Danes is only around 6 per cent. More and more of the immigrants use the social system as a background for their poor life [...] They do not understand that our system is intended to remedy a social situation and is intended as an aid to self-help. Previously, they were prepared to fend for themselves and gladly took the jobs that others did not want (...) But the younger generation has started to find out that it is easier to get assistance. (...) Immigrants now stick more to their own norms and way of life, simply because there have been more of them, and the municipality cannot cope with many more before they come to dominate. Just look at the town square – they stand together in large clusters. They do no harm, but they still seem provocative to the Danes by their massive gatherings. (Document DK15 – Ekstra Bladet interview with Ishøj mayor Per Madsen)

This interview marked a fundamental ideological turning point, where immigrants' framing shifted from workers exploited by capital to racialised foreigners exploiting the welfare system. The mayor's rhetoric reveals how ideas about welfare dependency and cultural incompatibility started to challenge the optimistic multiculturalist and solidaristic framework of the left-wing party at the national level. This ideological shift also introduced a narrative of irreconcilable differences between Danish and immigrant values, which provides the legitimacy for future racializing practices.

In the next section, I analyse how the leading humanitarian ideals – and the emerging dissatisfactions – played out in the drafting and approval of the 1983 Aliens Act.

5.1.3 Institutions: the 1983 Aliens Act between competing ideas and political interest

As it became increasingly clear that a new, disadvantaged population was settling in the country, the imperative of approving a comprehensive governance structure became more

pressing. Considerations inspired by humanistic and egalitarian ideals (as discussed in the previous chapter) were the cornerstone of policymakers' approach towards the need to establish a comprehensive regulative framework on immigration. As remarked by the SD Minister of Interior Rasmussen in a 1980 report on the government immigration policy, "up to now there has been a fairly high degree of agreement in the Parliament on the long-term goal of Danish immigration policy" (Doc. DK5). Hence, immigration was not a contentious topic in the political arena; on the contrary, the main political parties across the spectrum were cooperating to what was seen as a minor policy problem.

In 1977, the SD government tasked an experts' Committee to provide politicians with a set of proposals for a systematic immigration legislation. These were delivered in 1982, and they were divided into a majority and a minority proposal. The majority had a stricter approach, whereas the minority's proposal had in overall a more lenient attitude. In 1983, Erik Ninn-Hansen, the Conservative Minister of Justice of the newly elected centre-right government, presented to the Parliament a Bill based on the majority's proposals. However, an alternative parliamentary majority, formed by the opposition parties Radical Left, Socialist People's Party (SF), the Left Socialists (VS), together with the Social Democratic party (SD), supported the minority's proposals. In June 1983, the Parliament approved the minority proposal supported by the left-wing coalition that was formed on this issue with a broad majority, as only the populist Progress Party voted against the adoption of the act.

Although the Conservatives (K) and the Liberal Party (V) supported the Act in Parliament, their support stemmed from pragmatic political calculations rather than genuine belief of its suitability to govern immigration. Instead, the right-wing coalition's primary motivation was to prevent the fall of their government over an issue that remained peripheral to the broader political agenda. Consequently, the approval of the 1983 Aliens Act must be understood as the result of strategic political bargaining between the governing centre-right alliance and the left-wing majority established on the issue, rather than reflecting substantive agreement on the legislation's underlying principles or practical implications.

The fragility of this consensus became apparent in the immediate aftermath of the Aliens Act's approval. The rising public dissatisfaction regarding a perceived too lax immigration regulation prompted the centre-right government to tighten entry requirements. This was

accompanied by the growing awareness that immigration moved from a peripheral concern into one that could be strategically used to gain electoral support:

I hope that no one will try to make political money out of the situation we are in, and that they will refrain from seeking to weaken the very basic legal guarantees for the people in need, we are talking about here. I think it is very important that this problem is solved together. (Doc. DK. 8 – SD Ole Espersen, Parliamentary Debate 22/3/1985)

As outlined in the quote, the 1980-1990s period was characterized on one hand by mainstream political parties attempting to maintain immigration as a transversal issue; on the other hand, by the increasing instrumentalization of immigration for electoral purposes, creating space for populist narratives.

The emergence of this political opportunity structure enabled the populist Progress Party to exploit a growing disconnect between elite humanitarian discourse and popular anxieties. Progressive politicians found themselves increasingly vulnerable to accusations of elitism and detachment from ordinary citizens' concerns and lived experiences. This dynamic is exemplified in the following statement by Pia Kjaersgaard, who would later establish the anti-immigrant Danish People's Party:

When the Social Democracy talks about 'the People', it cannot be about 8-10 progressive people, but about 62 percent of the population who agree with the Progress Party on the refugee policy, including social democratic voters! This is what I would call 'I know it better' academic arrogance. (Doc. DK8 – Progress Party Pia Kjaersgaard, Parliamentary Debate 22/3/1985)

The quote highlights how the first populist party in the Danish Parliament exploited the contradiction between progressive immigration discourses of the centre and left parties and the electorate preference for a stricter approach. The Progress Party began to instrumentalize the immigration debate to position themselves on the side of 'the people', voicing and amplifying fears and anxieties connected to an increasingly diverse population. The left-wing parties' idealistic refusal to see immigration as negative, was strategically exploited to depict them as 'arrogant academics', detached from people's fears.

This strategic exploitation of elite-mass contradictions proved particularly effective because it addressed genuine grievances with a simplified explanatory narrative depicting the progressive elites as estranged from people's everyday experiences. Hence, immigration became the new dimension of the centre-periphery conflict. The left-wing parties' initial

response – characterized by continued adherence to humanitarian principles and dismissal of popular concerns as illegitimate or misinformed – inadvertently reinforced populist narratives about elite arrogance. Meanwhile, populist entrepreneurs capitalized on intensifying public anxieties about broader societal changes by strategically framing immigration as the root cause of these concerns.

The period thus witnessed the emergence of a populist opportunity structure: a configuration of political conditions that enabled anti-establishment parties to successfully challenge mainstream consensus (Mudde, 2007). This structure comprised three key elements: first, a policy domain (immigration) where elite preferences diverged significantly from popular sentiments; second, mainstream parties' unwillingness or inability to acknowledge and address these popular concerns; and third, the presence of entrepreneurial political actors capable of exploiting these contradictions for electoral gain.

To summarize, while humanitarian ideals initially provided the normative foundation for the 1983 Aliens Act, this consensus proved both shallow and politically unsustainable. The commitment to maintaining Denmark's humanitarian reputation, avoiding the restrictive policies adopted by other Western nations, together with the reading of immigration within the left-wing ideological tradition guided the position of the centre-left. However, this idealistic approach increasingly conflicted with popular anxieties about immigration's social and cultural consequences. The left-wing parties' failure to address these concerns created a political vacuum that populist parties successfully exploited. Consequently, immigration evolved from a consensual policy domain characterized by cross-party cooperation into one of Denmark's most polarized political battlegrounds, fundamentally altering the country's political landscape and providing space for anti-immigrant populist policies.

5.2 Immigration policymaking between 2000s – 2020⁷

By the end of the 1990s, the immigration topic had become an increasingly polarizing and debated issue. As outlined in the previous section, the 1970s crisis and stagnating economy of the following years led to a halt to immigration for work, while the family reunification and asylum categories received most of the attention already from the early 1980s. Therefore, large part of the political debate up until today revolved around issues of integration of the older immigrants' cohorts and their descendants, and of tightening regulations on entry and residence of third-country nationals. Rather than labour migration issues, the dominant narratives focused on the threat that the 'non-Western' immigrants posed for the Danish culture and way of living. Hence, the debate has been dominated by issues of integration of the racialised Muslim minority and criminalisation of asylum-seekers and refugees from the MENA region.

Especially low-paid labour migration has been neglected in the political and public debates. On one hand, the EU enlargements of 2004 and 2007 provided the economic sector with a less visible, less controversial workforce. On the other hand, the Danish debate has been shaped by the belief that the knowledge-based economy of Denmark would only create a demand for highly skilled foreign workforce, while the demand in low-paid, low-skill occupations would have gradually disappeared. However, departing from 2020, increasing labour shortages across all skill-levels, a declining demography, and a record low unemployment rate, are forcing policymakers to come to terms with the demand for low-paid workforce, as highlighted in the following quote by a statistic expert at the Ministry of Migration and Integration:

Just ten years ago, it was said in Denmark that these jobs would disappear. It has not been the case because people are now so wealthy that they can afford cleaning or delivery services... Previously everyone bought the grocery in the grocery shop - But nowadays people are so wealthy that they don't think they spend time on that. So, it's driven out to them. So, ten years ago everyone said that we would not have this low skilled employment anymore. But now... we need a lot of unskilled labour. So far at least,

⁷ The following sections draw upon material prepared during the PhD that has already been published (Pozzato, 2025b)

it has been solved by the EU region. But perhaps it will not be enough in the future. (I DK9 – Civil Servant, Ministry of Migration and Integration)

The growing demand for low-paid labour is therefore challenging the debates and the political priorities with regards to immigration. The following sections investigate how the topic of labour migration has evolved throughout the past 20 years, with a special focus on the early 2000s – with the paradigm shift to a restrictive approach to immigration – and on the post 2020 period, where a renewed attention to low-paid labour migration is emerging.

5.2.1 Interests: restricting unwanted immigration

This section investigates how political and economic interests shaped labour migration policies in three key moments: namely, the 2001 elections, the 2004 negotiations on the EU enlargement to Eastern Europe, and the post-2020 rising labour shortages. Taking a chronological order, the section firstly highlights how logics related to political interests favoured the dominance of the Danish People Party in setting the policy direction on immigration in general. Followingly, it zooms in the debates between political and economic actors on the labour market impact of the EU enlargement. In particular, it shows how a supra-national decision was perceived as a win-win scenario for political parties and employers' organizations. At the same time, the availability of EU workers has been functional to trade unions' stance against opening to non-EU low-paid workers. Finally, the analysis moves to the present debates on loosening entry regulations for TCNs in light of sectorial shortages. In this context, the section focuses on how the tension between restrictive interests of trade unions and expansionist interests of employers is played out and received by politics.

The 2001 elections, won by a centre right coalition supported by the recently established Danish People's Party, represent a paradigm shift in Danish immigration policymaking. From a niche issue, immigration became a central topic, which could impact elections' results. The anti-immigrant campaign run by the right-wing coalition, and the nationalist, xenophobic agenda of the Danish People's Party secured them a landslide victory in the 2001 elections, whereas the Social Democrats collected the second worst electoral result since the post-war period (Goul Andersen, 2003).

The 2001 election is often referred to as the time of a paradigm shift in Danish immigration policy, as from there on the Danish People's Party led the immigration debate. As outlined in some of the interviews, the leader of the Liberal party (V) and Prime Minister until 2009, Anders Fogh Rasmussen, agreed on leaving immigration policymaking to the allied Danish People's Party, in exchange of their support in other policy areas:

The first thing that spring to mind is 2001 and what we call the paradigm shift in Danish foreign policy. The Prime Minister Fogh Rasmussen from the Venstre party, made a paradigm shift in foreign policy based on two things: an alliance with Danish People's Party, and a trade-off. Venstre was a Liberal Party, Danish People's Party is a very national conservative party. And the trade-off was, if you give us mandate to push on economic policy, we'll give you a mandate to push on immigration policy. (I DK13 – Labour market expert of FH, the Danish confederation of trade unions)

As outlined in the quote, pragmatic power calculations fundamentally contributed to the dominance that the DFP anti-immigrant front gained from the 2000s onwards. The political interest of maintaining governmental stability provided the rationale of the Rasmussen' trade-off strategy. This proved particularly consequential because it institutionalized the Danish People's Party's influence over immigration policy while legitimizing their restrictive agenda through governmental endorsement. This strategic calculation allowed Venstre to pursue its liberal economic reforms without the constant threat of governmental collapse, while providing the Danish People's Party with unprecedented influence over immigration policy despite their minority status in Parliament.

The central role that the populist Danish People's Party assumed in the immigration debate created a discursive hegemony, whereas left-wing parties adapted to right-wing narratives rather than articulating successful counter-arguments (Karpantschhof, 2003; Rydgren, 2010). As centrist parties gradually converged to the restrictive paradigm, the main political dynamic on immigration became government versus opposition rather than left-wing versus right-wing parties (Rydgren, 2010). Hence, immigration became a topic instrumental to challenge the parties at the government rather than a battleground between parties having different ideas, and different policy solutions to the governance of immigration. Within this political development, the main logic that guided parties' strategies on the migration issue was to position themselves as restrictive.

In this context of generalised alignment towards a restrictive approach to immigration, the EU eastwards enlargement provided an opportunity for a less contested source of mobile

workers. The 2004 EU enlargement was the key moment of debate on low-paid migration. It arrived at a time of economic stability, so that the potential inflows of workers from the new EU countries was mostly regarded as beneficial for Danish business. From the perspective of the economic actors, employers' organizations have been positive about the impact of the free movement of labour:

Especially with the enlargement of the EU there was a very positive attitude. There was also some kind of worry in some sectors of the economy, especially construction, cleaning, and transport about what was going to happen...because when you have these jobs that do not require skills, it's quite easy to change one person with the other. (I DK7 – DA, Danish Employers Confederation, director of department)

As outlined in the quote, although the overall attitude to the EU enlargement was positive, the sectors facing higher risks of labour competition and wage dumping felt threatened by the prospective of free labour movement. In particular, 3F, the trade union representing the vocational and semi-skilled workforce, emphasized the need to set controls and ad hoc regulations to avoid risks of labour exploitation and unfair competition with the Danish workers. Their position was supported by the Social Democratic and Green Left parties, who have a historical strong connection with the unions and a protectionist approach to the labour market. Also the Danish People's Party positioned itself in favour of adopting an initial transition period, especially claiming that uncontrolled opening would threaten the Danish welfare system, as all immigrant workers and their families would be able to access the generous benefits of the Danish welfare, at the expenses of Danish taxpayers. Hence, an alliance was formed on this specific issue between the progressive left parties and the populist far right party to push for the adoption of a transition period. In December 2003, a broad consensus was reached in Parliament on the East Agreement, a transitional arrangement aimed at 'limiting the possibilities for unintended use of Danish social benefits' (Doc. DK.10, 2.12.2003).

The interest in safeguarding the Danish model of a highly regulated labour market intertwined with the belief of immigrants posing a risk to the welfare state. For this purpose, social legislation was adjusted to preclude access to Danish social benefits to the new EU citizens. The Danish case is peculiar in that policy outcomes reflect an institutionalised bargaining process between competing economic interests and widely shared beliefs on the goodness of the Danish labour market regulations and welfare system. As labour immigration has

traditionally been viewed as a threat for labour-intensive sectors (Refslund, 2016), the economic partners and political parties aimed at striking a balance between the positive impact of inflows of migrant workers for the economy, and the risks of labour market deregulation. As confirmed by several respondents, Danish trade unions and employers share the same positive view of the organization of the Danish labour market, which ultimately leads to a common effort in finding compromises between their diverging economic interests (IDK22 – labour market director, DA Danish Employers Confederation).

Ultimately, the EU enlargement has been viewed positively as it provided the economy with needed hands, with perceived fewer negative externalities on politics and society.

Concerning the political sphere, as the enlargements were parts of supra-national decisions, parties did not bear responsibility to the electorate. The fact that intra-EU mobility is mostly out of the scope of national-level politics, provided a shield against critiques of too liberal migration policies:

A fascinating thing about this, is that we have the EU regulation, we have the free movement of labour in the EU, and nobody really questions that. And that is really the main driver of foreign labour. (IDK12 – Danish Industries, labour market expert)

In a context of widespread hostility towards racialised immigrants and low-paid migrant workers as causing wage dumping, the EU eastwards enlargements provided needed low-paid labour without causing a heated debate, as opening to similar-looking workers is less controversial also in the public debate:

I think also that politicians are very happy with all the Eastern European countries having joined the EU, because that provides a pool of low skilled labour from countries that are relatively similar to Denmark, to people in Denmark. (IDK1 – expert at Vive, policy-oriented think tank)

The racial element of drawing desirability according to immigrants' nationality is quite visible in policymakers' preference for filling the low-paid labour demand with Eastern European workers. Although issues related to wage dumping and workers' exploitation are present with EU workers, they do not take the same public and media attention than issues of assimilation, welfare, and societal cohesion – which are connected in public debates to 'non-Western' immigrants. Thus, the EU enlargement has been evaluated as a win-win outcome for

employers and political parties, as it de facto represented a silent liberal immigration policy towards culturally similar workers.

Additionally, intra-EU mobility – in favour of employers’ interests for cheap labour – legitimised a restrictive approach to non-EU migration, and provided an argument against opening up to non-EU workers, as explained by the Head of Cabinet of the Ministry of Labour:

We have a completely open EU. That has been to the benefit of companies and not for the workers. Because no Danish worker would go to Poland for the salary. So, that is why trade unions have been much more active on non-EU workers’ regulations, and they are against a similar open system with third countries. People from Poland can come to Denmark and work for 60, 70, maybe 80DKK? Yeah, they will do it. If we had an open system with India, as we don’t have a minimum salary, they will be willing to work for 30 or 40DKK (...) That is why we have the very strict barrier for the third countries. (I DK14 – Head of Cabinet, Ministry of Labour)

The quote is exemplificative of the perceived trade-off between EU and non-EU workers’ regulations, as a compromise between workers and employers’ interests. On one hand, the EU free movement of labour is described as a gift to the employers, where trade unions and national level policymakers could not exert much influence on. On the other hand, the availability of workers from the EU justifies a restrictive approach in the regulations of low-skilled labour migration from third countries’ nationals.

Ultimately, as the issue of immigration has been instrumentalised for political calculations, there has been an accentuation of the dualization between salient restrictive policies towards not wanted immigrant groups and silent policies towards needed foreign hands, which in Denmark were recruited through EU mobility.

Apart from the parenthesis on Eastern European enlargements, the topic of low-paid labour migration was mostly silent throughout the past twenty years. However, post-2020 developments hint at a new phase of Danish labour migration, as current shortages in essential yet low-paid sectors are nuancing the debate on cost-benefits associated with low-paid migration.

On the 3rd of October 2023, during the opening speech of the Danish Parliament, the Prime Minister Mette Frederiksen stated that “the currency of the new era in Danish politics is the ability to enact policy that can ensure a sufficient labour force” (Statsministeriet, 03.10.2023). This statement reflects the current landscape characterized by economic growth, ageing

population, low unemployment levels and labour shortages experienced in all sectors of the Danish economy. Recent surveys show how more than 200.000 jobs have been posted in 2022 without being filled, including low-paid, low-status jobs in elderly care, hotel and restaurants, and agriculture (The Agency for Labour Market and Recruitment, 2022). Thus, faced with shortages across all skill levels, and record-low unemployment since the past five years, Danish policymakers are gradually acknowledging the existing (and growing) need of low-paid workers.

This context stimulated debates on the role of migrant workers in filling shortages in essential, yet low-paid sectors.

In particular, employers have been advocating for the need to open to non-EU workers to deal with contingent and expected labour shortages. As outlined in the following quotes, the improving economic conditions in the main EU sending-countries challenges the status quo of the demand for low-paid workers being filled by Eastern Europeans:

They are going back! They want to leave...We had a lot of people coming from Poland, and with the enlargement - I think the Danish wages to Polish wages was 1 to 6. Something like that. And that is not the case anymore. Now I think it's 1 to 3. And all the countries that came into EU had this economic development. (I DK 7 – DA, Danish Confederations of Employers, director)

Together with economic considerations, the projected demographic decline throughout all European countries urges employers to establish new labour migration channels:

We had a lot of success attracting people from other countries, especially Poland, Romania, also Italy. So you can say: "well, it's going quite fine. We attracted a lot of people". But our main argument is that Europe is in a demographic decline. It is getting worse, particularly in Romania and Poland. And then you also have Germany. Italy had low fertility for many years. So, there will be a lot more competition on the EU labour market. Maybe we have been successful historically, but maybe it won't be enough in the future. So, we should open more for non-EU countries. (I DK12 – Danish Industries, labour market expert)

Hence, labour shortages, sustained economic growth, and demographic projections are arguments brought by economic actors to re-open the debate on the regulations for entry of low-paid non-EU workers. The demand for increasing openness for labour migration began to be pushed in the political agenda by employers and by a minority of right-wing liberal parties already departing from post-Covid19. However, because of the high unpopularity of the immigration topic in society, no major political party had an interest in positioning itself as the promoter of a liberalization turn in labour immigration policy. This represents a dilemma

for the governing coalition as opening to non-EU workers is both demanded by current developments of the economy, and at the same time it is perceived as against the interests of the working class and a threat to societal cohesion. Hence, the government sought to prioritize other labour market reforms to increase labour market participation of the resident population. Trade unions have also been supporting policies in favour of a more inclusive labour market, and the official position of FH, the representative of Danish trade unions is to invest in vocational education to the professions experiencing shortages, integrating already residing migrants in the labour market, as well as disabled and unemployed seniors (Doc. DK34, Doc. DK36). Nevertheless, as it emerged from talks with representatives of trade unions, the belief of a need to recruit more workers is shared, although it partially goes against their interest of increasing the numbers of low-paid workforce from abroad:

We think that companies should start from there instead of just importing cheap foreign labour. That is one answer. Then you could ask: Okay, if everything happens, refugees and people take the right educations, the handicapped, the elderly enter the labour market, would we still need more people? And I think the answer is yes, we would still need people. (I DK13 – FH, the Trade Union Confederation, migration expert).

The institutionalised process of collective bargaining favours the reaching of compromises between the diverging interests of trade unions and employers, so that the final policy outcome represents a mediated agreement between the economic partners. While in fieldwork, there were debates about a proposal presented by the Moderates' leader in 2023 to allow a facilitated recruitment process of non-EU workers also for low-paid occupations at the conditions that the recruiting company had signed a collective agreement (Doc. DK39). This proposal, which has been formulated on the 30/06/2025 as a governmental agreement forming the political basis for an upcoming law proposal, has been positively evaluated by FH, as this formula would meet the interest of extending trade unions' influence through collective agreements:

Trade unions representing people in companies with no problems like it. Because gives companies the incentive to make a collective bargaining agreement. So, it is good, we need customers, and we need money. But if you work in construction, you don't think it is a good idea because you have seen so much cheating with people who say they have a collective agreement but then we cannot access the data regarding salary and work conditions, we cannot get into the construction side [...]. But we are a trade union confederation representing 65 trade unions. So, it is a balance. On one hand, we need to listen to where the problems are. On the other hand, we would like to support a model that gives incentives to make a collective agreement. I think some version of this proposal would be a good idea, and I think it would be what you would see in the future. (I DK13 – FH, the Trade Union Confederation, migration expert).

The quote exemplifies both the rationale for the official positioning of the Confederation of the Danish trade unions, and the specific interests and considerations they have to take into account when taking an official position. Therefore, the strength of Danish trade unions allows them to bargain on the conditions under which a loosening of entry requirements can be enacted, with the aim of preserving their influential role in the labour market.

5.2.2 Ideas: filtering between needed and unwanted

The filtering of different immigrant groups is shaped by values and beliefs that emerge from collective sensemaking processes about past experiences and imagined futures.

In this section, I analyse how values and beliefs linked with sensemaking and storytelling of the past are used to justify the filtering of different categories of immigrants. In Denmark, the retrospective interpretation of its immigration history created a powerful ideological framework that promotes restrictive approaches toward non-EU migration, while simultaneously accommodating the country's labour market needs through more accepted intra-EU workers. This filtering mechanism operates through the widespread use of narratives that construct certain migrant categories as threats to Danish society, thereby legitimizing their exclusion.

This restrictive ideology rests on an unanimously shared narrative that past immigration negatively affected Denmark. This provides a coherent framework for understanding contemporary migration challenges through the lens of historical experience, and thus justifies the broadly supported, restrictive approach towards non-EU migration.

Arguments in favour of restricting migration are drawn from both the traditional right- as well as left-wing anti-immigration ideas. Nationalist narratives instrumentalise the past experiences with guest workers and asylum-seekers of the 1960s – 1990s to emphasise the threat posed by the culturally diverse Muslim minority, where Danish values and norms are not dominant. Here, the focus is on the category of 'non-Western' migrants, who are portrayed as unable to assimilate. On the other hand, trade unions' protectionist arguments depict inflows of non-EU workers as enhancing risks of social dumping and labour market

deregulation. Additionally, they connect social dumping with the availability of foreign labour by referring to episodes of exploitation of immigrant workers in the Danish labour market.

As mentioned above, the narrative of early immigration as negative for Denmark was common to almost all interviews. In fact, it was contested only by one respondent. This was corroborated by the analysis of newspapers articles and parliamentary debates, which further highlighted that this is a widely shared opinion among policymakers and economic actors alike. Consequentially, it constitutes the premise from which all debates on labour migration policymaking in Denmark depart.

Thus, the formerly generous approach entailed in the 1983 Aliens Act has been retrospectively constructed as a foundational mistake, necessitating contemporary restrictive policies. For example, in a 2023 written answer by the Social Democratic Minister of Migration and Integration to the question on whether the 1983 Act has been regrettable, the Minister stated that the 1983 law “represented an unrealistic attitude to immigration” that led to “excessive immigration, particularly from the Middle East” and created “massive integration problems that continue to characterize Denmark.” Since then, “governments have continually tightened the rules”, leading to “a strict, responsible and consistent immigration policy” (Doc. DK59).

The ethnicity of immigrant groups plays a central role in establishing who is conceived as a threat, as explicitly mentioned by the SD Minister referring to irreconcilable differences between the Danish culture and a homogeneous ‘Muslim block’. This cultural incompatibility is thus used to justify the exclusion of the different other (Gullestad, 2004). Furthermore, exclusionary practices towards unwanted migrant workers often recur to apparently neutral cost-contribution evaluations. As outlined in the following quote, the undesirability of migrants from the Middle East is explained by their low degree of labour-market participation:

Not to excuse, but to explain it, we had severe integration problems with people from Somalia, from Palestine, from Iraq and Afghanistan. You can see that a lot of women do not participate in the labour market. And unemployment rates and crime statistics go the wrong way. That is a fact. You can discuss why, but I think this has been the background picture. So, when someone says: should we open for third countries? People think it is not a good idea. (I DK13 – FH, the Trade Union Confederation, migration expert).

In a similar way, statistical data is often referenced to legitimize restrictive entry policies. For example, Danish statistics, showing higher unemployment rates under the category of 'non-Western' migrants, reinforce the idea of migration being an economic burden. However, this falls short of problematizing the factors behind the lower labour market performances, such as discrimination and segmentation, as migrants predominantly cover positions in poorly paid, less protected sectors, where unemployment rates are generally higher.

The lack of critical, qualitative assessment of such statistics is common, and discrimination in the labour market is not an issue that has been mentioned in the interviews or in the documents considered. Additionally, from two interviews with a civil servant at the Ministry of Migration (IDK9) and a representative of the trade union of care and cleaning workers (IDK24, FOA) it emerged how racialized migrants are directed towards the least protected segments of the labour market, creating a self-reinforcing mechanism of marginalisation.

A recurring opinion is that migrants do not conform with Danish values and therefore undermine the socio-economic basis of the Danish welfare system. The reliance on statistics showing lower employment rates for the 'non-Western' category, leads to a widespread perception of immigrants being unwilling to work, while benefiting from the Danish welfare system. This image is then clashing with the Danish self-identification as a hard-working people, who build welfare through a collective effort, demanding the contribution of every individual. Several respondents shared the belief that everyone benefits from a generous welfare system, and that everyone must contribute according to their ability:

In Denmark there is huge emphasis on what is called the Protestant work ethos. You must work hard and long hours. Everyone works, both genders. No one can say they don't want to help with the funding of the Danish welfare state. We take a lot of pride in our welfare state, and the Danes are very disinterested in people, who are coming here, who do not want to work. So, if you are from a country, where especially women are not seen as part of the labour workforce, then many Danes will say: well, you can't be part of Denmark. Because there is no gender inequality when it comes to accessing the workforce. Everyone must be in, so to speak. (IDK20 –Venstre Parliamentary, immigration spokesperson)

Integration is commonly understood as assimilation to Danish culture and values, which are more or less explicitly indicated as superior. For instance, the reference to gender equality and work ethic is used to distinguish between the modern, progressive 'us' Danes, and the backward 'them' group. The recurrence to a racialised understanding of gender equality serves to construct the Danish identity as liberal, while at the same time it further justifies

the marginalisation of Muslim communities (Andreassen, 2012). In contrast, immigrants from geographically closer, perceived as culturally similar countries are viewed as easier to integrate:

I never heard about any problems in integrating people from Italy. I hear a lot of problems integrating the people from Syria. (IDK15 – Green Left Parliamentary)

This reflects how the idea of cultural similarity is contextually situated. The perception of cultural differences as incompatible is contingent on the historical moment, as some of those now considered compatible have formerly been approached with the same scepticism and negative stigmas. For example, Italian immigration – although not significant in the Danish migration history – has been widely treated in a racialised way at the beginning of the twentieth century (f.e., Guglielmo and Salerno 2003 for the US and Noiriel 2010 for France). The categorisation of immigrants based on their ability to integrate is a contingent socio-political construct that has concrete repercussions on the opportunity structures that immigrants have in the country.

Restrictive practices towards non-Western migrants had a twofold repercussion for the ongoing debate on sectorial labour shortages.

The above analysis emphasized how the dominant belief of non-Western migrants as incompatible with Danish values has since the early 2000s justified the closure for low-paid migrant workers. The availability of Eastern Europeans for the demand in poorly paid sectors has contributed to the effective implementation of restrictive policies for non-EU low-paid workers.

At the same time, filling low-paid occupations with less visible EU workers has made the need for low-paid workers less obvious. Moreover, the implicit devaluation of low-skilled work leads to the assumption that any unemployed person already in Denmark could fill this demand, thereby underestimating the value of this work:

All the unemployed should, in theory, at least be able to take that work. But a lot of Danes don't want to take that job. I think there was a TV show in Denmark called 'if the Eastern Europeans went Home'. The premise was to show that they have this hotel chain, and a lot of Romanians were cleaning the rooms, and they were really good at it. And they worked extremely hard, and the employers were happy. I think that what the premise of the show was, how would a Dane respond to those working conditions? And

they were in no way able to take that because it was too hard and/or: it doesn't really fulfil my ambitions.
(I DK8 -Danish Confederation of Employers)

The quote reframes the importance that immigrant workers have in the functioning of the Danish labour market, as they are directed towards the jobs that's conditions are so poor that no Dane would want to take them. This is a reality that does not receive much attention and recognition by policymakers and economic actors. Together with this, the branding of the Danish economy as knowledge-based and highly technologized, contributes to a misperception of the actual demand for low-paid workers.

To summarise, the consensus on historical migration policy failure creates a powerful ideological foundation for exclusionary practices. The narrative transcends political divisions, with actors across the political spectrum referencing these past experiences to justify closure to non-EU migrants. The strength of this narrative lies in its apparent objectivity, as it presents itself not as prejudice, but as learned wisdom derived from concrete experience. This storytelling of the past contributes to create a hierarchy of acceptability among different migrant categories, in particular according to ethnicity. At the same time, the invisibility of EU migration, which until recently fulfilled most of the demand for low-paid labour, allowed policymakers to restrict entry for unwanted TCNs.

The power of ideational frameworks lies in their ability to reconcile contradictory tendencies within Danish society – the need for low-paid foreign labour and the desire to maintain cultural homogeneity. By constructing certain categories of migrants as fundamentally incompatible with Danish values and institutions, the filtering mechanism created a hierarchy of desirability amongst migrant workers, placing the blame mostly on non-Western migrants. By grounding restrictions in historical experience and statistical evidence, the filtering mechanism gains legitimacy across political divides while maintaining its essential function of preserving existing power structures and hierarchies. This demonstrates how ideas operate not as abstract concepts but as practical tools for managing social inclusion and exclusion.

The recent debates to liberalise entry options for lower-paid TCNs reflect a struggle between changing socio-economic contexts and dominant negative ideas. As labour shortages are increasingly visible also in low-status jobs suggests that in Danish society there are still jobs with such poor conditions that no Dane takes them. Importing labour from non-EU countries

becomes a solution that is however problematic to justify within a society that prides itself to have been able to protect its citizens from exploitative models of work:

I think that the Danish sentiment in general is that we might be a little embarrassed that we have a type of job that is so poor that Danes won't take it, that we need to even import labour to do it. [...] And so, I think we neglect the low skilled in our public debate. And we don't want them from a third country. (IDK14 – civil servant Ministry Labour)

Additionally, attracting workers from non-Western countries is commonly seen as undermining both the high-standard working conditions and welfare system of Denmark. Therefore, the key political approach to migration policy has been to link migration issues and the welfare state. Although with different nuances, both left- and right-wing parties view immigration and diversity as a threat to the welfare state, leading to a consistent strategy of entry restrictions and drastic assimilationist policies. The Danish attachment to the welfare state institutions provided the rationale for a consistent immigration policy path aimed at restricting entries of problematic immigrants. As emerged during interviews and parliamentary debates on whether to loosen entry requirements for non-EU workers, there is a strong and widely shared concern that opening will erode the foundation of the Danish welfare structures. The Danish People Party propaganda of welfare as a national pride to be protected against immigrants, subsequently reinforced by the Social Democrats, depicts non-wanted immigrants as a threat to the welfare, and ultimately to democratic institutions:

If you look at the far-right parties who have been very negative towards migration, they are all reaching out to the unskilled, either unskilled still on the labour market, or unskilled now in pension. They are the most destitute. [...] Every time you do something that will harm this group of society, you will move the vote to the right. And you don't want to have radical parties in your society because at the end of the day, I'm not sure they are real democrats. So, you will basically undermine your own democracy. That is why the welfare state argument is very strong. If you don't care about your welfare and the most disadvantaged, you push everybody to the right. (IDK11 – Civil Servant, Ministry Migration)

As outlined in the quote, a strong welfare is portrayed as a shield against polarization of society and crisis of democratic institutions. There is a great stress amongst policymakers in the left-wing spectrum not to see international labour as the easy solution, but instead to ponder carefully on the risks for the Danish societal model. In particular, as the renewed SD strategy focuses on improving welfare provisions for the working class, a liberalised system for migrant workers is viewed as negatively impacting the poorer strata of the population, as described in the following excerpt:

Low skilled labour pushes down the minimum salaries, so the salaries of those who are already at the bottom of our salary levels are being pushed down by competition from low-skilled labour. This has been scientifically proven. [...] The second argument is that you cannot uphold a welfare state, if you do not control the low-skilled labour very strongly. Because it will take away food from the least privileged person in society. Former Minister Tesfaye said this in a conference with all the EU ambassadors. And he said: you are not in trouble. He made it deliberately, to make the point, because they were all privileged people, and they talked about liberalization of migration... Yes, it is not at your expenses, but at the expenses of the lowest guy in society. (IDK10 – Civil servant Ministry of Migration)

Workers coming from developing countries are seen as more prone to accept low-wages and worse working conditions. Hence, the immigrants – rather than wider global transformations within neoliberal paradigm – are problematized as an economic threat to Danish society cohesiveness and low inequality.

Although the agreement on the need to attract foreign labour is increasingly being shared across all economic and political actors, there still is the dilemma of how to ensure that the structures inherent to the Danish society and to its labour market model will not be negatively impacted by increased inflows. This dilemma rests on the underlying idea of Danish society functioning in virtue of cultural sameness and cooperation. That is, the welfare model is supported because the members of society share a feeling of belonging. The fear that increasing the number of foreign residents will lead to questioning the fundamentals of the redistributive model is widespread across policymakers, as outlined by the following excerpts:

One of the reasons that we have this tax-financed welfare system is that there is a social construction that our taxes are paid to the benefit of the whole society. And that this society is us, and that we know each other, and we are one big family somehow, and that we take care of this. At least that's part of the rhetoric, we need this to be recognizable people somehow, and we need to be sure that - if migrants are here - they contribute. Because we give them so much in return: free schools, hospitals, and whatever. (IDK14 – Civil servant, Ministry of Labour)

Similarly:

It is very important for me, at least, that Denmark is not a factory. Denmark is a culture, it's a country where it's necessary for the country to stick together and to have what we in Danish call *sammenhaengskraft* (social cohesion), which is a feeling of mutuality. And I think that this will be a problem, to keep that feeling, if you have people from all over the world coming to Denmark. (I21 – non-elected politician, former Parliamentary, Danish People's Party)

The statement that Denmark is not a factory, but a society emerged in another interview with a politician from a left-wing party, thereby underlining how the imperative of preserving Danish values against the risk of increasing foreign workers is shared across the political spectrum.

5.2.3 Institutions: change and continuities

In this section, I analyse the interaction between path dependency and policy change. As the labour migration policy direction throughout the 2000s has been quite stable, I mostly focus on policymaking dynamics in the 2020s, where external and internal pressures stimulate the debates for a change in direction on labour migration policy. Drawing from discursive institutionalism, I analyse the role of ideas and discourse in shaping a change in policy direction, within the rooted restrictive institutional setup. As changes are ongoing, the link between ideas and institutional structures is particularly evident.

The dominant belief of immigration being negative for Denmark has dominated the past 20 years of Danish politics, and it has been reflected in the consolidation of institutional structures effectively restricting entry possibilities for low-skilled TCNs (Hervik, 2004a; Mielcke Hansen, 2016). However, current developments and future demographic projections are urging a change in recruitment policies, as it becomes increasingly evident that labour shortages cannot be solved with the local workforce only. This trend affects not only the private, but also the public sector, with municipalities increasingly advocating for recruiting foreign labour as they struggle to find personnel for elderly care and hospitals (KL, 2023). The fact that shortages in low-paid jobs are increasingly acute and at the same time difficult to be filled by the Danish workforce, accentuates the contradiction of occupations that are essential, yet economically and socially devaluated, so that very few citizens are willing to invest in them:

We set in motion a huge wave of education, which increased the number of academics tremendously over the years. This has meant that the number of vocationally trained people has fallen drastically. In 2011, almost 40 percent of young people took a vocational education. Today it is just over 20 percent. (Doc. DK44, newspaper Berlingske, 9.07. 2023)

Drawing a parallelism with the aspirations-capabilities theory to explain migration (De Haas, 2021), this socio-economic development reflects the increase in aspirations and capabilities characteristic of developed economies, where the population has both the aspiration and the possibility of obtaining higher status occupations. Parallely, the increasing wealth of citizens opened a demand for a set of services and leisure activities carried out by low-paid workers. These two interconnected societal developments lead to a tension between the increasing

demand for low-paid workers in the service sector, and a decreasing number of workers within national borders in those devalued professions.

Hence, low-skilled jobs did not disappear altogether with technologization and industrial outsourcing, they simply changed (Castles et al., 2014). However, attracting foreign workers because of shortages in these sectors, is more difficult to justify than attracting highly skilled workers. This gives rise to a conundrum for policymakers.

The following paragraphs focus on the relationship between gradually changing narratives on low-paid foreign workforce and changing regulations. In so doing, it is assumed that in order to bring changes in the institutional framework, the dominant narrative has to be adjusted to accompany the new context. Legislative changes are happening gradually, and they are accompanied by ongoing discursive negotiations.

In the analysis of the data, it emerged how the narrative changed along three lines:

A recurrent argument for Danish restrictive attitudes to foreign workforce is that in the public and political discourse labour migration policies have been mixed up with immigration policies in general. The overall negative attitudes towards immigration have therefore rippled also on labour migration, as it became politically unviable to propose liberal policies in any field of immigration. Hence, governments across the political spectrum have been adopting 'tough rhetoric' and restrictionist approaches in policymaking in the fear of a political backlash, as outlined in the quote below:

For years - including in governments I was in - foreigners and labour market policy have been mixed together, and this means that all parties have kept each other in check when it comes to foreign labour. (Doc DK45 – Newspaper interview with Brian Mikkelsen, former right-wing Minister of Economy and current CEO Danish Chamber of Commerce)

Due to contingent needs, policymakers began to adopt a narrative strategy where labour migration is being distinguished from immigration in general and treated as a labour market matter. By treating labour migration as something else than migration, policies regarding labour migration are also less problematized:

When I start with 2001, and 2015 is just to say that the background music for the whole discussion about migrant labour is the conflict that we've seen in the last 20 years regarding migrants, asylum-seekers and family reunification. And it gets mixed together. From a legal point of view, it is very different. But in the

political discourse, it gets mixed together. I think that now they kind of agreed that Danish politics should be about something else and not only migrant politics, only asylum politics. (IDK13 – FH, Confederation of trade unions, migration expert)

Along with the detaching of labour immigration from migration issues in public debates, economic and political actors in favour of attracting international workforce are also using the discursive space opened up by labour shortages to emphasize the positive role that immigrant workers have for the Danish economy. Until the Covid19 pandemic, non-Western immigrant workers were considered in the public opinion as problematic and therefore unwanted. Legitimations for attracting exactly this category of workforce happen through the re-evaluation of their contribution to the economy:

The time has come for a fundamental confrontation with the way many have perceived foreign labour - namely as something that must be limited, and which is at times almost demonized. It is crucial that we turn the whole thing completely on its head, so that instead we see the foreign workforce for what it is - a huge profit business that we must fight to get much more from, and that we must offer heartily welcome. (Doc.45 – Newspaper interview Brian Mikkelsen, Director of Danish Chamber of Commerce)

And most importantly, to the welfare:

The point here is precisely that it is not a choice between welfare and foreign labour. Foreign labour is a prerequisite for welfare, because if our companies cannot get access to the labour they need, they either earn less money, which goes to welfare, or move their business out of the country to a place where they can get labour. So, this is precisely a question of ensuring that there is money for the welfare society in the future. (Doc. 19 – Social Democratic party spokesperson Kasper Sand-Kjaer on L49 for strengthened international recruitment)

Hence, the low-paid immigrant is not depicted as a burden and a user of the welfare system. On the contrary, it is stressed how the very continuation of economic growth, and the survival of the Danish welfare system is highly dependent on foreign labour. Especially the argument of maintaining the welfare standards thanks to the recruitment of immigrants finds a broad support, because immigrants are depicted not as a benefit for private employers, but as a cornerstone for the public welfare.

Finally, another shift in narrative is visible on the re-evaluation of immigrants' skills. Hence, what follows is a clear example of how ideas are functional to promote change in the institutional settings.

Whereas the commonly accepted category has traditionally been the one of highly paid, highly specialized workforce, there increasingly is a positive narrative on the skills of

workforce in low paid jobs. The quote below from a Parliamentary debate on the modification of the labour migration legislation exemplifies this trend:

Where I live, in Ringkøbing-Skjern, it is foreign labour in our agricultural holdings and especially in the pig holdings. They are highly qualified. They are very skilled. (...) You cannot fill these positions, no matter how much you advertise them in Denmark. If we didn't have the opportunity to get foreign labour into our pig farms, Danish pig production would have a really difficult time. After all, the products we make are some of what we have been proud of for many years, and the quality of the products does not come from unqualified labour. It comes from very talented people, who we should be happy chose Denmark as a destination to work in. (Doc. 19 - Mads Fuglede, Venstre Parliamentary Debate on strengthen international recruitment)

The emphasis of the skills needed even in jobs commonly considered as unskilled is used to re-frame the immigrant workers in these sectors as valuable rather than as unskilled competitors to the Danish workers.

The strategy employed to deal with concerns of disrupting the social order by attracting immigrant workers is to filter along countries of origin. The racialization of immigrants, especially directed to the Muslim group, is used to legitimise liberalising policies that privilege certain nationalities, as they are perceived as less problematic:

If we needed to fill a lot of positions where the applicants would be young males, who came on their own and from Muslim countries, as we did back in the 1960s, then, I think there would be a very rapid political pushback. But the industry knows that. And everyone knows this, it is an undercurrent. And no one speaks of it in the Danish debate. So, it is being done in a more careful way. (120 – Venstre Politician)

The quote exemplifies how the stigmatization of certain nationalities implies that the public narrative of desirability is shaped along nationality; when talking about recruiting foreign workers, reference is made to 'accepted' countries of origin of potential immigrant workers.

The idea of undesirable migrants based on nationality is institutionalised, as shown by the case of the establishment of statistical categories which then impact policymaking and public discourse. Hence, immigration from countries perceived as less problematic is favoured, for example through the establishment of bilateral agreements with India and the Philippines for elderly care workers. The unequal organization of labour causes that the available workers for poorly paid, low-status jobs are mostly to be found abroad. For long time these jobs have been covered by less controversial Eastern European workers. Faced with persisting shortages, policymakers are forced to look for this workforce outside the EU. Here, the dichotomy between Western and non-Western immigrants, widely adopted in the media and

in official documents to distinguish between wanted and unwanted immigrants, is problematic for the electorate's support of policies attracting non-Western, low-paid workers. Hence, the racial element is used to change the narrative of who is undesired. In 2021, the Danish Ministry of Migration and Integration introduced a new statistical category, the MENAPT, to indicate MENA countries plus Pakistan and Turkey (UIM, 2020). This new category – adopted since then in public discourses and in statistics – abandons the non-Western discussion to isolate and limit the perception of unwanted immigrants to the area of the Middle East. At the same time, the rest of non-Western nationalities are re-evaluated as culturally and economically unproblematic – thus, acceptable.

The filtering between immigrant nationalities and categories (i.e., dividing between working migrants and the others) is also used to emphasize how setting up recruitment strategies for workers from non-EU countries does not mean that immigration policy in overall is being loosened. In all the analysed political debates that concerned opening strategies, the governing parties have continuously stressed how entry for unwanted categories remains blocked:

The Bill solves a very concrete challenge, which is that we have Danish companies that struggle to recruit labour, especially within some industries and within some special sectors. It is really wise for Denmark that we solve it. Then there is the second part, which is the general immigration policy. The Social Democrats are completely on target for a strict immigration policy, where we have control over who comes here, and where migrants who come here are met with tangible demands to contribute, and that must follow the laws of the country. That doesn't change this in any way. On the contrary, **this is a precise example of what you can do when you have a strict immigration policy, namely, to open up to those who it makes sense to bring here and who can contribute.** (Doc. 19 – Social Democratic party spokesperson Kasper Sand-Kjaer on L49 for strengthened international recruitment, my emphasis)

Hence, in opening for the needed hands, the government coalition is stressing how only migration that is functional to Denmark will be facilitated to enter, as long as they are able to contribute. On the contrary, the overall immigration policy remains strict for the unwanted categories.

To sum up, policymakers are currently being faced with a dilemma. The restrictions to a category of immigrants that have long been considered as undesirable are increasingly becoming unsustainable for both economic growth and welfare system. Hence, in order to deal with labour shortages in sectors unattractive for the native workforce, policymakers are cautiously setting up recruitment strategies for non-EU, low-paid immigrant workers –

marking a shift from the institutionalised restrictive path. In doing so, categories of (un)desirability are both adapted and reframed. By adapting perceptions of desirability, I refer to the policymakers' choices to focus on partnerships with countries that are publicly perceived as less problematic, while emphasizing the preservation of tough rules for 'problematic' immigrant populations. By reframing, I refer to the changing view of low-skilled immigrants, who are now being discursively separated from immigration debates, framed as skilled, and contributing to the functioning and prosperity of Danish society. This represents a case of gradual policy change, where political and economic actors discursively negotiate the meaning and interaction between low-paid migrant workers and the Danish welfare institutions.

5.3 Inter-actor dynamics

In this section, I analyse the roles and interconnections between the actors that have authority, interest, or responsibility over labour immigration in Denmark. In this case, civil society organizations are not involved in the debate, which remains insulated from civic activism.

5.3.1 Dynamics within and between political parties

In this section, I analyse how political parties positioned themselves with regards to labour migration. I focus especially on the positions taken by two parties that have been particularly involved and influential in the immigration debate. Namely, the centre-left Social Democratic party (SD), and the populist far-right Danish People's Party (DFP).

The Social Democratic party has been dominant in shaping Danish politics as it was Denmark's largest party until the 2001 elections. Throughout the 20th century it was the party that was in governments the most, shaping the early institutional set up and policy agenda (Rydgren, 2004). In the 2000s, after being in the opposition between 2001 and 2011, the party returned to the government from 2011 to 2015 and then again since 2019. The party traditionally represents the working class, with close links to trade unions. Therefore, throughout the initial phase of migration policymaking, it adopted a protectionist approach with regards to economic migration, voicing the concerns of its electorate and of trade unions on the risks of wage depression and unfair competition. As the nature of migration inflows changed from guest workers to asylum and family reunification, their approach shifted to opening according to humanitarian principles. The inflows of the 1980s and 1990s were not perceived as an economic threat to the working class, but rather as a vulnerable population.

Furthermore, it is important to contextualise the relative weight of immigration issues in the political agendas of the time. As confirmed in an interview with a SD politician supporting the liberal approach of the 1980s, at the time only a small group within the party took immigration legislation at the core of their actions, while the rest of the party did not consider it a central topic and therefore did not get involved:

There were no obvious disagreements in my own parliamentary group, so I got my mandate for the negotiations with other parties quite easily. At least no one tried to stop me from tabling the amendments. I did not receive any inquiries from the party organization either. On the whole, there was not much attention in the party about the new immigration law. (Doc. DK6 – Interview with SD rapporteur Ole Espersen, excerpt from *Welcome Mustafa* book by M. Tesfaye)

As immigration issues gained saliency in the 1990s, the liberal position of the SD became increasingly criticized, challenging the party to find a compromise between its ideological tradition and a successful electoral strategy. After the 2001 electoral debacle, the SD struggled to find its own position on immigration issues, as the solidaristic approach, while appealing to a minority of well-educated left-wing electorate, distanced them to the core of their electorate, namely, the working class. This rupture is captured in the following reflection:

There has been a class divide. From a working-class perspective, they would think: there are problems like my bike is stolen, I live with people next door who smoke weed and do crime. And then, I live in a very expensive neighbourhood called Osterbro, and there we have no problems, my bicycle is not stolen. And I think there has been a class divide, where the working class have been continuously angry, saying: Look, recognize our problems! (I DK13 - FH, trade union confederation)

The decline in working class support of the left parties is not a Danish unicum, but reflects broader political transformations witnessed in many European countries, where globalization processes resulted in the formation of new cleavage dimensions (Rydgren, 2010). This transformation fundamentally altered the social basis of political competition, as traditional class-based loyalties were challenged by new cultural and identity-based divisions. In particular, there has been an increase in saliency of the socio-cultural cleavage dimension at the expense of the socio-economic one. As long as the socio-economic cleavage was the main frame of reference for mobilization, the working-class electorate aligned with the left-wing parties' position of defenders of workers against capital (Rydgren, 2010). However, as the socio-economic dimension lost relevance, the left-wing humanitarian and liberal position on socio-cultural issues such as immigration, security, LGBTQ+ rights distanced them from the working-class base. Instead, the rise in saliency of socio-cultural concerns amongst the working class electorate progressively advantaged right-wing populist parties (Kriesi et al., 2006; Oesch, 2008). Within this overall development, the Social Democratic party remained disoriented, unable to reconcile its traditional solidaristic values with the growing cultural anxieties of its core electorate.

The dealignment between the national SD politicians and the working-class electorate was strategically exploited by the populist far-right Progress Party. Immigration was not central to its political agenda, but departing from the early 1990s, it gained salience in a context where no established party voiced the growing discontent on immigration policy amongst the population. In 1995, with the dissolution of the Progress Party and a crisis in its leadership, Pia Kjaersgaard founded the Danish People's Party, with a nationalistic, anti-immigration and anti-Islam agenda. At the same time, the party adopted a nationalistic protectionist approach to the Danish working class, by portraying themselves as the defenders of the welfare system for Danish citizens against cheating immigrants. The party gradually transformed the political landscape by articulating popular anxieties about economic insecurity through a cultural rather than economic lens. Immigration became the nodal point through which multiple sources of anxiety – welfare state sustainability, labour market transformation through neoliberal globalisation – could be rendered comprehensible through a simplified narrative of cultural threat. This articulation redirected legitimate grievances about neoliberal economic restructuring away from its actual drivers (capital mobility, deregulation, welfare retrenchment) toward a racialized target: Muslim immigrants constructed as simultaneously economically dependent and culturally threatening.

Throughout the years, the DFP gained the support of part of the SD traditional electorate, as described in the following quote:

Those who are supposed to protect the weakest, namely the Social Democrats, they were the ones who let them with no support. Somehow the Social Democrats ended up being the representative of the skilled workers and of those who slowly had come onto higher society. The people with no skills and no capital were left behind, and they were then picked up by the right-wing extremists. (I DK10 – Ministry of Migration and Integration, Civil Servant)

From the interviews and documents analysed, it emerges how the widespread feeling is that the Social Democratic party bears the responsibility for the moving to the extreme right of big parts of the population, as they have been moving closer to the interests of the educated elites both on immigration and on economic policies.

With the establishment in the political landscape of the DFP, immigration became increasingly regulated by symbolic and restrictive policies, targeting racialized immigrants. Departing from the 2001 elections, right-wing and left-wing coalitions have alternated in power, yet the

migration policy direction remained substantially stable. The success of the DFP anti-immigrant rhetoric fundamentally shaped the political sphere. The gradual movement to the right on immigration issues has normalised the Danish People's Party anti-Islamic, anti-immigrants rhetoric (Meret, 2021). Followingly, all political parties have been pushed towards adopting restrictive agendas on immigration to win support. This has also been the case for the Social Democratic party. Especially in the aftermath of the 2015 refugee crisis, the party's internal faction pushing for a tough approach has gained popularity. In June 2015, the current prime minister Mette Frederiksen won the leadership of the party and renewed its political agenda along two main shifts, namely, restoring left-wing traditional position on economic issues:

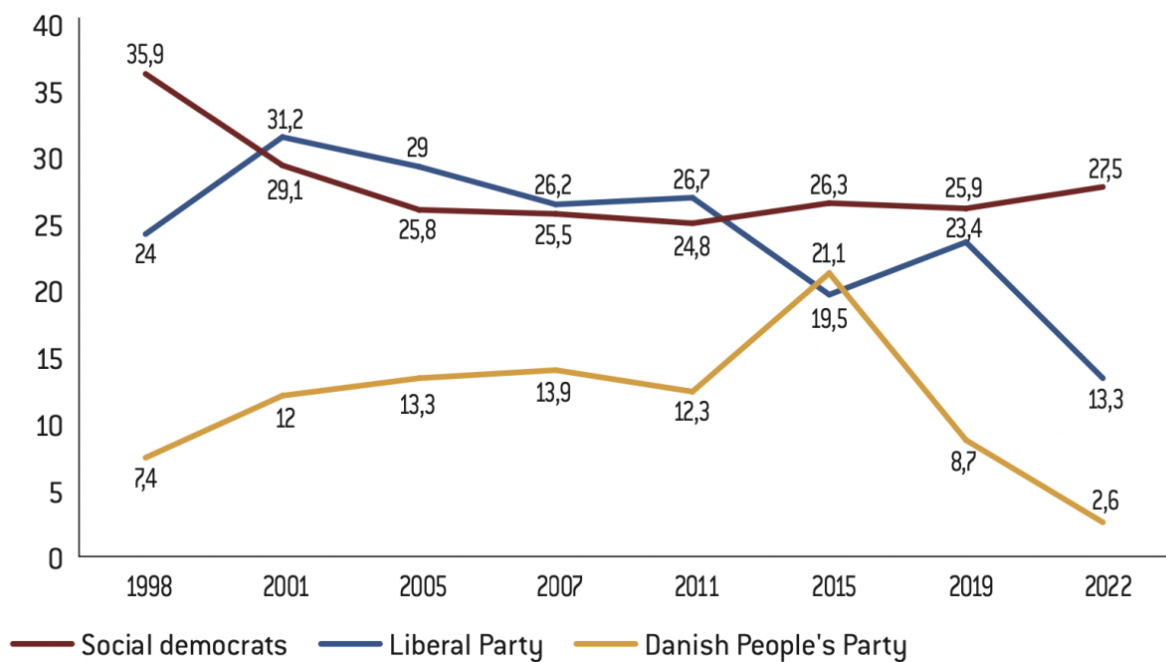
There was a very hard liberal attitude, in the economic sense in Europe. And that was reflected in the Danish crisis management, there was a very hot focus on labour market reforms, on bolstering the economy and cutting social security. The political ramifications were that we got a SD government in 2011 that was leading the country with the same economic policy of the previous right government. And then Mette came on a platform on expanding the social security net, and she did the early retirement initiative, she increased social benefits for unemployed. Her government made a bunch of good Social Democrat, progressive economic policies. And when the COVID crisis hit, they had a very strong vision to not go to the new liberal economic policies but do social democratic policies. (IDK 2 – Trade Union 3F, political advisor)

And moving to nationalist right-wing ideology on immigration:

You can see that there has been a political transition where the Social Democrats and the coalition government has adapted to the Danish People's Party's foreign policy and tried to combine a left-wing political view with a more national conservative foreign policy. And there is a debate on: has this been necessary? if you want to go left with economic policy, do you have to move to right-wing immigration policy in order to get in power, or not? (I DK13 - FH, trade union confederation)

In both the 2019 and 2022 early elections, the SD party increased its support, becoming the most voted party, with 27 percent of the votes in 2022. Parallely, the far-right nationalist DFP collected its worst results since its foundation, obtaining only the minimum votes' percentage – 2.6 percent – required to enter Parliament (Reynié, 2023).

Figure 5: Electoral results of the Social Democrats, the Liberals and the Danish People's Party in parliamentary elections.



Source: Reynié, 2023

As shown in the graph, the decline of the populist radical right coincided with the post-2015 change in the SD leadership and turn to an anti-immigrant agenda. This implies that the decline in the DFP's approval did not mean the decline in influence of its xenophobic rhetoric, which is still the guiding logic of party competition. Rather, the adoption of an anti-immigrant populist approach by the SD contributed to the DFP losing its competitive advantage to mainstream parties.

The politicization of immigration also implied a de-qualification of the debate, as the rationale through which very diverse migration issues have been dealt with has been political opportunism. This has led to the approval of contradictory policies, as they go against the stated integration objectives, and in some cases they also risk favouring exploitation and wage dumping. An exemplary case has been the proposal in 2021 of measures pushing refugees and unemployed immigrants who are receiving social benefits in forms of unpaid labour for 37 hours/week (Beskæftigelsesministeriet, 2021). The measure has been promoted as an activation policy for not working immigrants, although criticisms from trade unions and experts hint at how the main unstated goal of the policy is to appear tough on a strongly politicised migrant group:

The idea is that, if you want benefits, you have to work, basically for free, for 37hs a week. And this was inspired by Norway where the 37 hours was to be spent mostly on education. So there, the government wanted to invest in these people. Here in Denmark, the political talk is that they want them to clean dishes and do all sorts of menial work. Even though the official numbers of the employment effects were very, very low. So, the government knew that it would not work, but it was about sending a signal. And I think these signals are important when talking about policies. (I DK19 – Danish Institute for Human Rights, expert)

The quote reiterates how ‘sending a signal’ is often prioritized in migration policymaking, at the expense of the actual policy impact. The politicization of migration and the dominant restrictive paradigm urge politicians to seek immediate consensus through the approval of visible yet highly symbolical harsh policies. The strength of the consensus-seeking driver is especially clear in the 37hours policy, as the SD government proceeded regardless of trade unions’ scepticism and opposition. Trade unions denounced risks of workers’ substitution and wage dumping in the low-paid sectors where refugees and unemployed will be directed to fulfil the 37 hours/week work requirement:

And this is kind of a very harsh migration labour market policy because it is very expensive. You probably choose the cheapest jobs, which is just to put people in some sort of activity, like cleaning. So, you will get cheap labour in cleaning companies and supermarkets etc. So, we are very nervous, in the trade union, that you would just kind of take away the jobs from the unskilled, low paid workers and getting them to unemployed refugees. (I DK13 - FH, trade union confederation)

As the labour migration debate remains deeply intertwined with integration and asylum debates, politicians adopt symbolic policies to show that they have a tough approach on migration issues. In this case, by targeting two migrant groups that have consistently being targeted as disruptive of Danish values.

When migration policy becomes primarily a vehicle for political signalling, it creates a dynamic where visible harshness is prioritized, and short-term political consensus is pursued at the expense of long-term social and economic objectives. The 37-hour work requirement exemplifies this dysfunction: designed to appear tough on migration, it simultaneously undermines labour market protections, fails to advance integration goals, and proceeds despite expert scepticism and trade union concerns.

5.3.2 Dynamics within and between Ministries

Since 2002, a Ministry of Migration and Integration has been established in Denmark, unifying all mandates which were initially spread across different ministries. This move has been

pushed by the Danish People's Party as a tangent action showing the dedicated attention on the regulation of immigration and integration issues. Concerning labour migration, the Ministry of Migration oversees the different entry and residence schemes for labour, while the Ministry of Labour evaluates the labour market tendencies and assesses needs. Ultimately, the Ministry of Finance evaluates the economic soundness of policy directions.

From the interviews, two main features of the governance system can be outlined.

Firstly, as immigration in general is highly controversial in the public debate, there is a tendency amongst the different ministries not to want to deal with it. As described in the anecdote below, engaging in labour migration policymaking is not easy, as civil servants fear the potential backlash:

We sit with the Indian delegation. During the first meeting they ask us if we need nurses. And in Denmark for the past nine years, we've been lacking nurses. And they said: we could probably produce up to 2000 or 3000 nurses within two or three years. And for us, this was just like the sweetest music ever heard. So, we wanted to collaborate with our colleagues at the health Ministry. We tried to bring them onboard, which was not easy. However, we eventually got them involved. When the Indian delegation came here in June, we made sure they met them. [...] But at the end they told us that they did not dare to bring this proposal at higher levels because they were scared that if they started promising something, they would end up being...you know the expression: give them a finger and they will take the whole arm. So, they were almost afraid to send anything to the top. There is this sensitivity linked to the whole issue [...] It is about the unions for sure. About the nurses' union, and the care workers below nurses, and we are reaching low levels of society. Because to become a social care worker, you do not need a lot of education. We are touching upon the lowest salaries in society. So, it gets increasingly sensitive. But if I was a health guy representing the top levels of the Danish government, I would have hugged *** and me, and said: come, please, help us! And still, we have not heard a word from them. (I DK11 – Ministry of Migration)

The anecdote above exemplifies a recurring theme emerging in the interviews, namely that the sensitivity of the overall migration topic leads other ministries not wanting to get involved in migration policies for fear of a backlash. Hence, there is a general tendency across civil servants to see the risks of involvement in migration policies as outweighing any potential benefits of bureaucrats' policy entrepreneurship. The Health Ministry officials' fear of "sending anything to the top" demonstrates how political sensitivity discourages taking the initiative – even at the cost of dropping a potential solution to care workers' shortages. This case also reveals the deep ideational contradictions between protection of the welfare state and of native workers, non-Western immigrant workers as threats, and acute shortages in low-paid yet essential care jobs. The official's observation that addressing nursing shortages through migration is sensitive as it touches 'the lowest salaries in society' demonstrates how

migration policy intersects with broader questions of labour market organisation and social stratification, where racialised workers are the only ones available for unwanted jobs, and at the same time are feared as triggering wage dumping in poorly paid sectors.

The second feature concerns the characteristics and internal dynamics of the Ministry of Immigration and Integration. As previously mentioned, its establishment reflected the political strategy of the DFP to bring focus on integration and immigration issues. The Fogh Rasmussen Government created the Ministry in November 2001 following an electoral campaign where immigration became the core of political debates. The newly created Ministry had the objective of implementing the stated goals of reducing inflows of non-Western migrants and refugees, and of ensuring the assimilation of the resident immigrant population. Hence, since its founding, this Ministry had a conservative, restrictive approach to immigration, which is still reflected today.

The development of the Ministry over the governments that followed is also a reflection of the changes in political attitudes of left-wing governments. As the table below shows, left-wing coalitions between 2011 and 2015 sought to incorporate migration issues within broader societal issues – a political tool to signal the left-wing idea of not viewing migration as a problem per se. However, as the 2015 refugees’ crisis unfolded, the Ministry was restored by the right-wing coalition and subsequently maintained by the 2019 Frederiksen government – reflecting the SD strategical adaptation on immigration.

Table 5: Ministry responsible of migration and integration issues 2001 - 2025.

Name	Year	Governments
Minister of Refugees, Immigrants and Integration	2001 -2011	Right-wing coalitions (Fogh Rasmussen I, II, III and Løkke Rasmussen I)
Minister of Social Affairs and Integration	2011 - 2013	Left-wing coalition (Thorning-Schmidt I)
Minister of Social Affairs, Children and Integration	2013 - 2014	Left-wing coalition (Thorning-Schmidt I)
Minister of Children, Gender Equality, Integration and Social Affairs	2011 – 2015	Left-wing coalition (Thorning-Schmidt I)
Minister of Immigrants and Integration	2015 – 2019	Right-wing Coalition (Løkke Rasmussen II and III)
Minister of Immigrants and Integration	2019 - now	Left-wing coalition (Frederiksen I and II)

Source: author’s elaboration on Folketinget data

The political scandal that involved the Liberal Minister Inger Støjberg in 2016 is paradigmatic of the tendency in this Ministry to have an anti-immigrant political agenda. Specifically, in her time serving as Minister of Migration, Støjberg gained popularity for advertising the number of restrictive policies implemented by the Ministry, some of them highly symbolic and punitive. Ultimately, she was found guilty of having breached Danish administrative law and European Convention on Human Rights for separating asylum-seekers' couples when the spouse was below 18 years (BBC, 2021). The case led to the second impeachment in Danish history, and it hints at the pattern of populist actions and anti-immigrant sentiments within the Ministry.

The politicized nature has implications for the Ministry's approach, as they have to balance the political contentiousness of immigration issues and navigate the instrumentalization of immigration by political parties:

It is a very poisonous political environment. You can be Minister of Migration for one year or two, and then you are just worn down and you have to move to somewhere else. There are always discussions, there is some kind of hatred... And you have people from both sides of the parliament who say: we are not satisfied at all. You come to us, and we say: we need more, but trade unions say: we have too many. It is political turmoil there. (I DK7 – DA, director of department)

Most importantly, the politicization and sensitivity of migration policy has implications on the quality of the policy solutions, as civil servants are not incentivised to find optimal solutions, but rather to follow the most neutral line of action. As mentioned in the quotes below, the Ministry's approach to current debates on policy change towards loosening of entry requirements is characterized by inertia:

The will to develop policies is very little within the Ministry. Politically in the Parliament, if you ask the prime minister and her counsellors, and the political parties, I think there is a will to change. But if you ask the ministry, especially this ministry is very conservative. They also had a lot of scandals. We have very few national scandals with politicians breaking the law, and they have almost exclusively been in this ministry. So, they are a bit nervous to do anything, and they are constantly getting accused of being politically deaf. And that means that they do not dare to propose anything. (I DK13 – FH, migration expert)

The fact that different administrations are not keen to get involved in a sensitive issue has repercussions on the degree and extent to which policy changes are dealt with by experts. As further explained, the high politicization of the issue leads civil servants to adopt a conservative approach to changes, preferring to maintain themselves on a neutral position rather than risking some sort of backlash:

I have been working with both Siri (immigration office) and the Ministry to discuss - not conclude - just discuss: What if we open up for TCNs working for Danish companies with the collective agreement? What would be the practical consequences? But the discussion is so difficult. They do not want to discuss, they do not want to think about it, they do not want to explore these policies. So, it is difficult. That means we go to the Parliament instead, and we discuss it with the politicians. But it also means that the policy making process becomes less qualified. Because you do not have the knowledge of the whole ministry, obviously. You have all these experts in European law and international law and Danish law, and who knows what things that can be made with what they know. It means that because they sit on their hands, policymaking is difficult. (I DK13 – FH)

As outlined in the quote, the political environment surrounding the topic dealt with in the Ministry of Migration shaped bureaucrats' attitude to one where personal risks are minimised. During fieldwork, obtaining access to interviews with civil servants has proven difficult, even when I was referred by people they knew. Agencies under the Ministry of Migration did not want to participate in the interview, stating that they could provide me with technical information on the functioning of visa schemes, but they could not answer to questions on the political development and on policy evaluation as deemed too sensitive.

5.3.3 Employers' organizations

The Danish model of labour market regulation is characterized by a strong cooperation between the employers' organizations and the trade unions. Employers are members of their specific sector's representative body, which is then grouped under *Dansk Arbejdsgiverforening* (DA, Danish Employers), an umbrella organization representing employers in the tripartite negotiations with trade unions and the government. Traditionally, the economic partners have a strong cooperation and ability to reach compromises between the interests of the two sides. In multiple interviews with trade unions' representatives, it was mentioned that strikes rarely occur, as the parts are always able to find a shared agreement during negotiations. In cases where they cannot find a compromise, politics will step in:

The political system only plays a role if negotiations break down, if it comes to a strike, and then at some point during the strike, the political system can choose to make the compromise proposal that the labour Court has formed. They can choose to enforce that as a law and by that ending the strike. But we haven't had that - on the private labour market - since 1988. We have seen that on the public. We see that both with the nurses and teachers, they have been on strike for the last ten years and they have seen the political system end their strike. But in the private sector, we have not had a strike since the 1980s. (IDK2 – 3F trade union political advisor)

Not involving politics in labour market regulations is the preferred way of both trade unions and employers' organizations, therefore, they have an incentive to reach agreements on

matters of their competence. As the Danish labour market is highly structured, competences' allocation, authority-sharing and cooperation amongst the parties are clearly defined and respected.

Focusing specifically on employers' role on labour migration policymaking, this section outlines three main features. Namely, employers' claims and position, their relationship with other actors, and strategies to reach their desired migration policy outcome.

Employers have an interest in increasing the labour force. Therefore, their traditional position is positive to the entry of economic immigrants. In the 1960s, they have been pushing for the establishment of guest workers schemes; however, the following years of stagnating growth and integration issues with former guest workers, have made their position less strong in the public debate. Subsequently, the EU enlargement has provided them with the needed manual labour, with low politicization and little room for manoeuvre to counter this movement. The growing anti-immigrant sentiments and the 2015 refugee crisis made the topic of migration increasingly harsh, so that employers' organizations have tendentially been quiet in the public sphere. However, departing from 2021, with growing labour shortages across all levels, employers' organizations are gradually more vocal in the debate. Their concern is related to shortages also in the category of migrant workers that are socially not accepted, and that have been prevalently recruited from Eastern European countries:

The Danish demographic decline is mostly in the educational groups with the low skilled work and the vocational training. We are very worried about that. We have had for many years a situation where young people take longer and longer academic educations and few of them take this vocational labour. And also, the people who come from Romania, Poland, they are mostly in these groups because that is where we really have some shortage issues. The long-term view is that it will get worse. It will be especially worse for these kinds of works, because if you look at people with long education, the number is increasing, and the other group is decreasing. Maybe there is an overall tendency that you will need fewer people in these jobs. But it is not as much as the decline in workers we see. And so, this is why we have to look in the long term. We will be fewer. It is really a demographic fact and it will not change. (IDK12 – DI, Dansk Industri, labour market expert)

The respondent especially stressed the weight of future developments in employers' concerns, as together with demographic decline, there is a decline in citizens specializing for vocational and manual occupations. Furthermore, a connected concern is the long-term projection of a decreasing supply of labour from the EU, which is coupled with the silent, yet increasing competition for foreign workforce across EU member states:

We are trying to get access to people from outside the EU. We are trying to find out what is the balance between the socially acceptable level of foreigners, and whether we can attract foreign workers. Because we have this great need for more people. And where should they come from? Because if you look at Germany, they also have labour shortages, like most other European countries. We have tried to get young people from Spain to come – but looking at the bad weather and our language, and a lot of other things, it can be quite difficult. And in the EU there is not this great labour mobility. (I DK7 – DA, director of department)

However, as all proposals regarding non-EU low-paid workers are controversial, negotiations with the government and trade unions are difficult. As further explained, the optimal policy solution would be an agreement between the economic partners, without politics involvement. At the same time, low-paid labour migration is an issue where the economic partners struggle to reach a meaningful compromise in their negotiations, so that politics plays a big role in shaping the regulations. However, this is problematic because frequent changes in legislation implies less predictability for companies wanting to recruit non-EU workers:

When our organization and the Confederation of Danish Trade Unions make an agreement and present it to the Parliament, a majority in Parliament will support it. And if we want to have the labour migration policy to be an area without a political battle, then we should try to make agreements with trade unions also on political issues. And I think most of the trade unions agree with that. But we have problems getting into agreement with them. But if we can, then we can have a political consensus with the majority of political parties. And then we would have a political system which is quite stable and has a direction. Because now the regulations are not constant, they change all the time, and that is a problem for the companies we represent. How can we develop our business in the next few years? If you change the environment all the time, it's difficult to predict it. We try to create a business environment which is predictable and stable. (I DK7 – DA, director of department)

Faced with uncertainty and a restrictive environment, employers' organizations resort to different strategies.

Firstly, they are involved in advocacy, both through the publishing of studies linking labour shortages across all skill levels with missed economic growth, and through media presence to highlight the paradoxes of the current too harsh immigration legislation. From a political perspective, although smaller right-wing pro-business parties have been supporting the liberal economic agenda, the largest liberal party Venstre has aligned to the anti-immigrant agenda of the allied DFP for political calculations. In overall, the restrictive approach to non-Western migrants has been so dominating in the past years, that employers' interest in opening to economic migration has not been made a political objective by the right-wing

Liberal party. That is, even if ideologically the Liberals agreed with employers' demands, politically it was unviable to support them:

It has been difficult to get something through the agenda for many years. Before this one-party government of Social Democrats, we had a right-wing government, but it was also a minority government who was reliant on support from the Danish People Party, so they would not do anything to improve entry regulations. We had some strange political situation, as the Social Democrats at the opposition and the Danish People's Party made alliances to restrict the requirements to enter Denmark for work. At the same time as the DFP was supporting the government! So, the Liberals were not getting anything through at all. It was even made a bit worse. (IDK23 – DA, director of department)

As explained in the excerpt, immigration issues have been appropriated by the political logic of maintaining and winning electorate approval, so that the claims of the economic partners are subordinated to political priorities. This aspect is related to the previous quote on the preference for an agreement between the economic partners, and the impossibility to reach one (IDK7). The dominant anti-immigrant position within the public arena hinders a debate that can remain as de-politicized as possible also between the trade unions and employers. Contrarily to other fields where the economic partners are able to reach compromises, they have been unable to find an agreement on labour immigration.

As both the left-wing parties and the DFP have been maintaining a hard line against low-skilled non-EU workers, the trade unions' fear of wage dumping and erosion of working conditions has been taken up and amplified. Followingly, employers' claims find little space in the political and public debates. The quote below highlights how employers' organizations do not take a vocal position in favour of immigration policy liberalization, as they are aware that their position would be perceived by the public as driven by interest for cheap, exploitable labour at the expense of society:

They always made it sound like employers were cheating. There were very few bad examples in the restaurant industry with some Chinese chefs. And it was made like it was the general picture. Of course it was only a small part of it, but they were good at using these bad examples. There were also some cases a few years ago with some Filipino lorry drivers in Padborg (Southern Denmark) with terrible work relations. And it was said: "this is what it is. Migrant labour it's just like that; you will just exploit these people!". It has been difficult to get anything. (IDK23 – DA, director of department)

Similarly, in an interview with the Head of Cabinet of the Ministry of Labour, the demands of employers' association for smoother and easier recruitment of low-paid foreign labour were portrayed as driven by the poor conditions offered by the companies:

When you listen and hear what the arguments are, it is very obvious to me that they present too poor conditions! For example, if you are doing the math of a person who needs to move from India to Denmark, or of a person that moves from Greece to Denmark. In India you have low, low, low pay and very low welfare. And so, you get an offer in Denmark: Yes, that sounds good! If you get the same offer, and you are from Greece, where salaries are lower, there is a bit of welfare, but not as in Denmark, and you still decide that you do not want to take the job...Well, then it is also that your offer is just too bad! So, I think that they go to the easy solution, which is brain drain from the countries where they are very low paid. (I DK14 - Head of Cabinet, Ministry of Labour)

As clearly expressed in the excerpt, the widespread sentiment is that employers' preference for loosening entry requirements for third country's workers is driven mostly by the poor working conditions and salaries they would like to offer, rather than the stated claims of unsuccessful recruitments within Denmark and low intra-EU mobility.

Because of the public stigma towards employers' demand for opening up, their strategy is to voice their concerns and proposed strategies, without strongly positioning themselves in the immigration debate. Alongside, employers' organizations are also amongst the promoters of the division in discourse between labour migration and immigration in general, as they see that the overall negative attitude towards Muslim immigrants and asylum seekers negatively affects public opinion also towards labour migration:

We mix it together. We try always to separate it. Because we talk so much about the fact that we want labour migration, some people will say: oh, you just want refugees here! And the thing is, the refugees are generally not so good workforce. They are not coming here to work. (IDK12 – Danish Industry)

The mixing together of different categories of immigration – one outcome of the politicized and polarising nature of the immigration debate – is perceived as highly problematic for the promotion of more liberal labour migration policies, as it leads to a generalized rejection of immigration altogether, including the categories that employers would like to recruit. Furthermore, this generalization is instrumentally used by politics to show that they have immigration under control:

And then there was the refugee crisis in 2015. Lots of terrible pictures with people walking on the highways and then trying to get to Sweden, or to come here. And I think in many politicians and in many people's mind, they were connected to migration for labour. And just after this crisis with Syria, they increased the pay limit scheme, which was completely unrelated. But the political argument was that we must make sure that people cannot just come here. (I DK12 – DI)

The sudden arrivals of asylum-seekers, as well as intra-EU mobility are examples of how politicians are not really in control of immigration dynamics. The political will to show

otherwise leads to the approval of unrelated policies which give the appearance of closed borders. These can be approved in the area of non-EU labour migration, where national governments have the largest degree of autonomy. Thus, the instrumentalization of labour migration policies as a mean to demonstrate control creates a policy environment where economic arguments are secondary to political goals. In overall, the over-politicization of immigration debate also constrained labour migration issues within a discourse that risks prioritizing public perceptions over pragmatic solutions.

5.3.4 Trade Unions

Trade unions in Denmark have a strong role in shaping the labour market. The historically high unionization of workers provides unions with the legitimacy of representing workers' interests in the negotiations. Currently, 67 per cent of the Danish workforce is unionized, and although it is a comparatively high rate, it has been decreasing in the past decades, especially in the private sector, where unionization rate is around 50 per cent (Ibsen, 2023). The institutionalized interactions between economic partners and politics gives trade unions a central position in the decision-making process involving economic migration. Especially with the Frederiksen turn to left-wing economic agenda, trade unions' influence on policymaking increased.

There are a plethora of trade unions covering the diverse sectors of the labour market. 3F is the largest and more influential trade union, covering the manual workers in the building, transport, and industrial sectors. It is also the most vocal union on labour migration matters, as its constituents feel directly threatened by the loosening of migration policies. Another union covering low-paid labour is FOA, the union for cleaning, elderly care and gardening. It is the third largest union in Denmark, however, compared to 3F, it does not appear to have a strong influence in the debate on migration. It also covers sectors such as cleaning, elderly care and gardening, that are highly ethnicized. Finally, FH is the umbrella organization of all trade unions, where the individual unions' interests and concerns are collected and shaped into the official position of the Confederation of Trade Unions when sitting in the negotiations with DA, the Confederation of Danish Employers.

Departing from the early guest workers' inflows, trade unions have adopted a protectionist – rather than solidaristic – approach to labour immigration. Hence, labour immigration is perceived as a way to introduce competitors to the Danish workforce, an instrument in the hands of employers to replace the native workers to lower the labour costs. Additionally, trade unions are increasingly engaged in denouncing issues related to wage dumping and migrants' exploitation, as well as issues related to the risk of de-regulation of the sectors where immigrants are overrepresented, with far reaching societal consequences. As outlined in this quote from a former trade unionist and current politician, trade unions fear that the increasing numbers of immigrant workers in low-skilled sectors will lead to the erosion of workers' rights and ultimately to welfare:

It will affect the whole country ... because even the doctors pay is regulated by the general developing of the wages in the society. So, if there is a lot of pressure downwards, it will affect everybody, and there will be fewer to pay taxes. Also, cheap labour puts pressure on workers that are at the margins of the labour market, the competition will be harder. For example, truck driving in Denmark was quite a good job, but they can be replaced easily. So that was decent jobs that within a very short time were taken over. (IDK 15 – The Green Left, Parliamentary politician)

Again, the connection between a highly restrictive labour migration regulation and preserving the welfare is very strongly felt. The emphasis on the interconnectedness of wage levels across sectors shows a collectivist understanding of how downward pressure in low-skilled occupations can cascade throughout the entire labour market and society, threatening the tax base that underpins generous welfare provisions. This perspective illustrates how trade union opposition to labour migration liberalization is framed not merely as protectionism, but as a defence of the social democratic foundations that define Danish society.

In the accounts of trade unions, the connection between liberalization of labour migration and negative impacts for local workers has been proved by the impact of the EU enlargement in certain sectors:

When the EU was enlarged, I was a trade union chairman, and we discussed that very much. How to deal with it, what are we going to do when they come from Poland and Lithuania? But we had to straighten ourselves about the EU enlargement. Then we had a lot of fights in a lot of building sites where they got cheap labour from Poland. They were not as skilled as the Danish labourers, but still, they could build houses for half the price. So, you got challenges all over society. Migration and social dumping are not immediately connected because they are two different challenges, but these are one of the top priorities of a lot of working-class voters. They are different. But at the end they are connected. (IDK 15 – The Green Left, Parliamentary politician)

Labour migration and wage dumping are tightly connected in trade unions' discourses against the liberalization of immigration legislation. It is also one of the most controversial debates with employers, as the latter do not acknowledge it as a pervasive issue, but as individual cases of employers' misconduct. On the other hand, trade unions witness that the sectors where immigrant workers are overrepresented – such as construction or cleaning – are also more likely to be characterized by progressive deregulation and wage dumping. In the quote above, the sector of transport is mentioned, as through the EU enlargement and posting of workers directive, the profession of lorry driver has been outsourced to immigrant workers at much worse working conditions and salary. In 2018, a scandal erupted where a big Danish transportation company was found exploiting Filipino lorry drivers living in dire conditions and working for a fraction of the collective wage for the sector. This episode has been recalled in several of the interviews. Trade unions and left-wing political actors took it as paradigmatic of the threat that loosening immigration regulations poses on the overall labour market. Contrarily, employers describe it as a deplorable case where regulations have been circumvented by one actor, while stressing that although economic immigration to Denmark has been rising, the labour market had remained strongly regulated in overall.

Furthermore, the inflow of foreign labour is often understood by trade unions and part of the left-wing parties as a threat to the very essence of the Danish tripartite model. This model is possible thanks to the high unionization levels of Danish workforce, which makes unions the legitimate partner in the negotiations. Foreign workers are often described as not having a trade union culture, causing decreasing unionization numbers in sectors where they are overrepresented:

The solution is not just to open the borders, because it will ruin our country. You will ruin a society. [...] I think there would be so many cracks in society... For example, the unions: they have a tough time organizing. That is really one of the biggest challenges I see. Typically, people coming from low pay countries, from Africa, Asia, they are not members of unions, they do not think of this. [...] So, there are so many challenges by opening the borders that would threaten the foundation of our society. (I15 - Green Left Parliamentary)

Here, elements of cultural racism emerge, when the (superior) Danish tradition of strong unions is described as endangered by the arrival of immigrants depicted as not having a trade union culture. Although there are several examples of 'Western countries' lacking a unionisation tradition, the threat is associated only to racialised migrants.

Trade unions contest a model of work which exploits immigrants' lower standards to progressively erode workers' rights. Within this framework, EU regulations such as the posting of workers' directive challenge trade unions' control over liberal market tendencies, as they provide employers with hyper-flexible workers that are willing to earn a considerably lower salary than the Danish standard in the sector, as explained by a representative of the trade union for construction workers:

Most migrant workers today never get the collectively agreed wage. They get 100 DKK/hr. They don't necessarily pay taxes on all of them. As a migrant, if I was working in my home country, maybe I would have got 40 DKK/hr. I am lucky because I work 60 hours. So, I receive 6000 DKK per week. Not necessarily being taxed. The purchasing power of 6000 Danish crowns in Romania, or in Bulgaria means that if I work for a year, I can buy a house in the village. And migrant workers know they will never get the percentage in pension pay. (I DK4 - 3F Construction, Gunde Oudgaard)

The different logics followed by temporary migrant workers makes it difficult for unions to fight irregularities in working conditions. For instance, migrants have different interests compared to long-term residents as their point of reference remains the origin country. Hence, the objectives of trade unions might differ from the ones of migrant workers. Under this perspective, trade unions favour the settlement of migrants, as this aligns their interests to the one of the resident workers:

We also see that if we have migrant workers who settle in Denmark, bring their wife, children... It is easier to mainstream. Because you cannot live in Denmark with 100DKK/hr. (...) There is a big fluctuation in the group of migrant workers. But we have some that have been here for years. And for many reasons, we want them to stabilize, also because our population is also getting older. (I DK4 - 3F Construction, Gunde Oudgaard)

Here, there is a paradox between the interest of immigrants' settlement for the normalization of employment relations along Danish standards, and the societal rejection of culturally diverse resident populations. When further asked about whether it would be preferable to welcome resident workers rather than modern guest workers, the respondent answered by making distinctions between nationalities of origin:

Yes, I think if they come from other EU countries; we don't necessarily want them from Africa or from certain places. But if they are European, that's fine. (DK4)

It is important to underline that trade unions positions are variegated. While 3F is mostly present in the public debate to voice against a liberalization of the rules, other trade unions have a more realistic attitude about it:

Trade unions know that some companies cannot operate if they have a severe lack of labour. I mean, it will also affect the job chances also for peripheral and all municipalities in Denmark that potentially will have to shut down if they cannot get workers. That will affect also the ethnic Danes working there. So, it is a complicated balance sometimes to strike. (IDK1 – Vive, think tank expert)

The growing labour shortages force unions to acknowledge the need to increase the labour force, also by opening to recruitment abroad. However, this comes together with the imperative to find a compromise between opening and tight controls to limit wage dumping risks. Hence, although all the members of the trade unions I have interviewed in 2023, including representatives of 3F, admitted that there are labour shortages that cannot be covered with the resident workforce, the official position vis-à-vis employers remains of opposition to the loosening of non-EU immigration legislation.

Lastly, the structure of trade unions in Denmark never adapted fully to a diverse workforce. The guiding principle of protection of the local workforce against liberal market tendencies excluded principles of solidarity with ‘outsider’ groups of workers. Hence, they have mostly been viewed as a threat rather than a group to invest and focus on, as outlined in the quote below:

We have to be very aware that we have to adapt to new circumstances. In my view, we have been way too slow at doing that. I think maybe as construction workers we are the avantgarde, but we are still too slow. If you take your regular local trade union in almost any Danish trade, the average age will be slightly lower than me, however, they would be men, they would be white, they would be very Danish, and they would not have particular language skills. These are the ones we have. Do you think we will win this war with that kind of troops? Never. (I4 – 3F, Construction union, Gunde Oudgaard)

The low investment on the immigrant workforce unless for the sake of the insider-group’s interests contributes to the framing of labour immigration exclusively within the lenses of a challenge for their unions’ members, disregarding other important factors in the labour experience of immigrant workers. For instance, a researcher working on ethnic discrimination in Denmark, highlighted how the issue is mostly out of the scope of trade unions’ actions:

The interesting thing in my opinion is that the issue of ethnic discrimination is nowhere to be found in the unions’ talk. They are not working on that issue. And I would say that it is a bit hypocritical that they are worried about how migrant workers are treated. It seems more than they are protecting their old members rather than being worried about the treatment of the new ones. Because if they would be really worried, then they would also try to combat discrimination. (IDK 19 – expert, Danish Institute of Human Rights)

The dominant Danish composition of the trade unions' leaders, coupled with the historical protectionist approach, contributes to a very limited framing of the issues related to the foreign workforce. This reduces trade unions' scope of action in defence of the immigrant group, which is addressed insofar as it is perceived as affecting the native workforce rights and status. Furthermore, on a discursive level, the lack of a solidaristic narrative in left-wing, pro-workers' representatives reinforces the negative approach towards immigration of both political actors and of public opinion.

5.4 Summary

Chapter 5 analysed the labour migration policy trajectory in Denmark based on three analytical frames: temporal, 3 I's, and inter-actor dynamics.

Grounded in the methodological framework presented in Chapter 3, the temporal lens highlighted how immigration policymaking can be divided into two main periods, each characterized by different constellations of drivers and varying degrees of actor centrality. Within this temporal development, the analysis of interests, ideas, institutions and inter-actor dynamics has been key to trace the main patterns, continuities and changes in labour migration policy.

During the initial phase, labour migration policymaking has been driven by the idea of the temporary nature of migration. This resulted in policymakers' limited interest in establishing a comprehensive governance framework. Instead, economic partners, their ideas and interests played a bigger role in setting up rules and conditions for guest worker programs. The institutionalised system of collective bargaining and the strong position of Danish trade unions enabled them to negotiate with employers on the scope and scale of guest workers' schemes.

Following the 1973 oil crisis and the closure of guest worker programs, national-level politicians became increasingly aware of the need to establish a modern legislation to govern the growing immigrant population. During this stage, immigration remained a low-politicised topic, where the main parties across the political landscape aimed at cooperation rather than conflict. Left-wing ideals of solidarity with previously essential workers, and of universality of

human rights drove the political process leading to the approval of the 1983 Aliens' Act, widely regarded as among the most humanitarian-focused globally. At the same time, political calculations aiming at government stability induced the right-wing government in power to approve the left-wing supported proposal. This reflects how immigration issues were considered a secondary topic by the mainstream parties. However, the growing discontent of parts of the electorate regarding the management of immigration by national-level politicians opened up a window of opportunity for populist far-right parties.

The transition to the second phase of migration policymaking coincides with the growing support of populist far-right parties whose agenda quickly moved toward the securitization of immigration. In this phase, immigration shifted from a matter of few specialists and interest groups into a political battleground. The Danish People's Party systematically exploited fears surrounding the socio-cultural implications of an expanding immigrant population, building its political ascendancy on an anti-immigrant, Islamophobic platform combined with nationalist defence of Danish welfare. Symbolically, the move to the second phase can be allocated to 2002, when the Danish People's Party became an unofficial governing partner and assumed control over immigration policymaking.

Progressively, the Social Democratic party has adopted the anti-immigrant agenda and rhetoric pioneered by the DFP, which lost its competitive advantage with respect to the centre-left since 2019. The SD party strategic repositioning involved returning to traditional left-wing positions on worker protection while embracing right-wing populist stances on immigration issues.

The politicisation of immigration constrained the available space for policy options outside of the securitarian paradigm, with political calculations of appearing tough on immigration taking the central stage. Hence, both expertise at the Ministries and economic considerations of employers and trade unions have become secondary to political calculations (see for example section 5.3.1 on the debate on the 37 hours rule and section 5.3.2 on ministerial dynamics). At the same time, the demand for low-paid labour in unprotected sectors has been filled through less visible, less politically controversial intra-EU migration. The combination of highly visible opposition to 'non-Western' immigration and silent filling of low-paid jobs with (mostly) Eastern European workers resulted in the effective closure of

third-country national work migration, while removing low-paid labour migration from public discourse.

This equilibrium began to change in the early 2020s, as a growing economy and record-low unemployment rate highlighted labour shortages across all skill levels. Concomitant trends such as the reduced emigration of Eastern European workers and Europe-wide declining demography contributed to a renewed attention to the regulation of low-paid labour migration. Contingent and projected labour shortages—affecting both private enterprises and public sector services—became discursively mobilized as part of a strategic narrative to legitimise a liberalisation of entry rules.

Hence, gradual changes to the restrictive regulative framework are discursively negotiated, leading to pragmatic adaptations that maintain restrictiveness for unwanted categories, while enabling a utilitarian liberalization of those reframed as contributors. The current opening to low-paid TCNs occurs within a strictly utilitarian framework and is still contentious; the necessity for ‘non-Western’ migrant workers remains associated with perceptions of threat to both Danish organised labour and societal cohesion. Ultimately, their acceptance remains limited to contingent utilitarian calculations that can be withdrawn when economic conditions change.

6 Fifty years of immigration to Italy

In this Chapter, I look at the evolution of immigration policymaking in Italy starting from the late 1970s up to today. Beginning from the early debates on immigration regulations, the analysis reconstructs the evolution of labour migration policies within the context of economic and political developments. The analysis of the Italian case is structured as follows. In Chapter 6, I present a comprehensive overview of immigration dynamics and policy development over time. Similarly to the analysis of Denmark, immigration policymaking development can be divided in two distinct phases: the initial migration period and the post-2000s era. In the Italian case, the two phases also coincide with political transformations that led to a shift from the first to the second republic, where clear elements of continuity and discontinuity emerged. Although there was no change in the institutional setting of the Republic, the terms first and second republic became widely used to indicate the rupture in the political party system that happened between 1992 and 1994, with the decline of traditional parties and the rise of modern parties. From a migration perspective, this political rupture coincides with the rupture from a low politicization period of migration policymaking to high politicization of migration. Chapter 7 analyses the key drivers of labour migration policy, distinguishing between three critical factors: interests, institutions, and ideas that have shaped policy development. In the final section, I investigate the positions and inter-actors' dynamics of the main political and economic actors involved in labour migration policy formation. This analysis sheds light on the interactions between different drivers of policy development, to explain the complex and at times contradicting mechanisms that shaped the policy paradox of a needed yet unwanted workforce.

6.1 1970s – 2000s: migration and policymaking dynamics

The first immigration flows to Italy started well before the 1970s, however, it was not until the mid '80s that the public and politics started to pay attention to the phenomenon (Colombo & Sciortino, 2004). This delayed recognition can be understood through the intersection of Italy's historical self-perception, economic transformation, and broader European migration dynamics.

Italy's emigration history fundamentally shaped how immigration was perceived and experienced. It is estimated that more than 13 million Italians emigrated between 1880 and 1915, making Italy the country with the largest voluntary emigration in recorded history (Scotto, 2017). Economic emigration contributed to create a conceptual blind spot for immigration phenomena, which made it difficult to recognize Italy's emerging role as a destination country (Colucci, 2018). Politicians mainly assumed that immigration to Italy was a transitory phenomenon, and that most immigrants would eventually move forward to Northern Europe (Veugelers, 1994).

The economic boom of the 1960s, fundamentally altered the country's labour market dynamics. As economic opportunities expanded, Italian workers increasingly moved into the industrial and service sectors, creating labour shortages in agriculture, domestic work, and other less structured employment areas, which were gradually filled by migrant workers (Colombo & Sciortino, 2004; Zincone, 2011).

In this context of socio-economic transformation, immigration inflows happened silently, mainly because of migrants' homogeneous distribution across the national territory rather than concentrating in main urban areas, and because they found employment in less structured sectors, such as fisheries, agriculture, and domestic work (Colucci, 2018). Among the first immigrant communities were Tunisians fishermen in Sicily, houseworkers from Cape Verde, and post-colonial migration from Eastern Africa and Libya (Pittau, 2021; Colombo & Sciortino, 2004).

The catholic church played a central role in the arrivals and placement of immigrants – prevalently women – in housework (Andall, 2000). For instance, the establishment of an

immigration channel from Cape Verde in the '60s was favoured by the presence in the islands of a community of Italian Capuchin friars who facilitated the hiring of local women by catholic families in Italian cities (Pittau, 2021):

The Italian friar was the first one to send a Capeverdean woman to work for a family in Turin, as they asked the Church to help them finding a domestic worker. At the time it became increasingly difficult to find domestic workers. In the houses, with the absence of women who used to come from the nearest regions, from the provinces, or from Sardinia, immigrants were arriving. We didn't notice that there was a transformation happening." (Massimo Ghirelli, journalist – Conference Idos attended on the 30.05.2022).

This quote captures the gradual nature of the substitution process, by taking the example of domestic work: as Italian women from rural areas gained access to better employment opportunities, immigrants quietly took their place, creating a shift that initially went unnoticed.

These national developments intersected with broader European migration dynamics that accelerated Italy's transformation into an immigration destination. The 1973 oil crisis fundamentally altered migration patterns across Europe by increasing unemployment in traditional immigration countries such as France, Germany, and the Netherlands (Zincone, 2011). This economic downturn made guest worker programs unpopular, leading to their dismissal and the implementation of stricter border controls in Northern European countries. However, rather than stopping migration flows, these restrictions created a geographical substitution effect, as immigrants who could no longer enter Western European countries were deflected toward Mediterranean countries (de Haas et al., 2019). For instance, Moroccan and Senegalese migration to Italy began in those years, as primary destination countries such as France and the Netherlands had increased immigration restrictions. During this period, Italian borders remained quite porous, and the persisting demand for labour into unregulated sectors such as agriculture and domestic work allowed immigrants to enter the labour market and to settle in the country (Ambrosini, 2001; Reyneri, 1998).

The immigration system that emerged in Italy differed markedly from the state-managed guest worker programs that had characterized Northern European countries. Instead of centralized recruitment and industrial placement, Italy's immigration was driven by job opportunities in medium-small businesses in sectors such as construction and by private households seeking domestic workers. This decentralized, demand-driven system operated

largely outside official channels, contributing to immigration's continued invisibility even as it became increasingly significant to the Italian economy and society.

Data on foreign residents in Italy are available starting from 1970, when approximately 140.000 foreigners were registered by the Ministry of the Interior (Pittau & Sergi, 1989). However, until 1991 data on the immigration presence in Italy were not consistently collected. Expired or renewed resident permits were not always updated or suppressed, and there were issues of double registrations of residence permits when the names of the residence permit holders were wrongly transcribed (Pittau, 2021).

Finally, the high number of undocumented migrants in the country made the estimation of the actual foreign population difficult. The research institute Censis estimated the foreign presence in Italy for the year 1978 to be between 200.000 and 400.000 residents (Censis, 1979).

Throughout the 1970s and 1980s, inflows were substantially unregulated. The Italian political system largely ignored the phenomenon and occasionally resorted to small regularization campaigns. Until 1986, the main document of reference was Law 773/1931 dating back to 1931, designed to ban anti-fascists from entering the country, which was integrated by numerous ministerial circulars and ad-hoc interventions to fill the gaps left by this law (Casella, 2016). These 1931 regulations – apart from being anachronistic – were in open contradiction with both the 1948 Italian Constitution, and the 1975 ILO Convention on immigrant workers, of which Italy became a signatory in 1981 (Pittau, 2021).

The overall approach of the ministerial circulars has been to limit the entry of foreign workers (Bontempelli, 2009). The first circular regulating the entry and residence of migrant workers was issued by the Ministry of Labour on the 4th of December 1963. Circular nr. 51 titled “Regulations for the employment of foreign workers in Italy” introduced provisions to fill the gaps and fragmentation of the existing legislation (Ugolini, 2019). In particular, it introduced provisions destined to have long-lasting influence in the administrative approach to labour migration policies, as it introduced the institutions of an “authorization for work” procedure (Bontempelli, 2009). The procedure foresaw that a foreigner still residing abroad had to stipulate before departure, an employment contract with an employer in Italy. The employer

was required to present this contract proposal to be approved by the police authorities (Questura) and by the provincial labour office after having cleared that the foreign candidate did not have criminal records and that there was unavailability of Italian labour. After having obtained the authorization, the employer was allowed to call the foreigner.

Nevertheless, scholars noted that already from the 1960s these regulations would be widely circumvented, and they would also remain widely unapplied (Bontempelli, 2009; Colombo & Sciortino, 2004; Einaudi, 2010). Furthermore, a series of integrative circulars issued during the 1970s introduced the possibility of regularizations of different forms of migrants' irregularity. Rather than through the envisioned entry procedures, most immigrants overstayed touristic visas, or entered the country irregularly, looked for a job onsite. After having found employment, they sought to obtain regular status either by presenting the employer's request of hiring from abroad followed by a simulation of first regular entry with work authorization, or through the routinely issued regularization campaigns (Einaudi, 2010; Reyneri, 1998). In fact, since very early, the Ministry of Labour acknowledged "the possibility of authorizing work for foreigners already in the country, provided they entered the country before a certain date. This date was continuously moved forward until it was set for the last time on December 31, 1981. For over a decade, Italy therefore practically lived in a situation of permanent amnesty" (Colombo & Sciortino, 2004, pp. 52–53). Therefore, the legal landscape was characterized by formal restrictive policies, and at the same time by lax implementation, flexible adaptation to the actual developments in the labour market integration of foreigners, and immobility of politics towards a structural reform.

Two key external events can be identified in this period that provided a push for legislative activity on immigration.

Firstly, in 1975 the ILO Convention 143/1975 on migrant workers' rights was approved in New York. Italy was a signatory country, as it mainly looked at the Convention as a protection for its emigrant workers. Nevertheless, the Convention's approval stimulated the debate in Italy on the growing immigrant population (Pittau, 2021).

Secondly, in 1977, the Constitutional Court with sentence nr. 47 urged for the Parliament to open a debate on the establishment of a new ‘modern’ immigration legislation that would replace law 773/1931:

The Court states that the subject under examination, given the sensitivity of the interests it involves, deserves reorganisation by the policymaker, which takes into account the need to enshrine in comprehensive and systematic provisions the modalities and guarantees for the exercise of fundamental human freedoms connected with the entry and residence of foreigners in Italy. (Doc. ITA1 – Constitutional Court Sentence n. 47 , 4.01.1977 – my translation)

In 1979, the Government Presidency of the Council of Minister presented to the Parliament a law proposal on measures to grant a set of rights to asylum seekers and immigrants⁸. This law was mainly focused on refugees, but it was important as it is one of the first attempts to set a conversation for the institution of a legal framework on immigration. It furthermore added how modern legislations were moving towards increasing liberalization and equality of rights between national citizens and foreign residents (Pittau, 2021).

In the same year, Law proposal nr. 18 of the 20/06/1979 on “norms regulating the residence of foreign nationals in Italy” was presented in Parliament by a group of deputies belonging to the Socialist party. They urged the political system to overcome the legislative framework of 1931 which allowed for discretion and discrimination of foreign nationals. However, both proposals did not end into anything concrete as the government fell in 1979.

The first law that explicitly addressed immigration was passed in 1986. In 1986, with increasing immigration numbers, rising unemployment rates and pressures from Catholic and civil society organizations, the Foschi Law was approved. The law aimed at regulating the inflow of non-EU workers and their families and to prevent irregular migration (Einaudi, 2010). It stated the equality between Italian and foreign workers, in line with the ILO Convention. It introduced regulations that bound the hiring of non-EU workers to labour market needs: employers had to prove that there was a shortage of Italian or EU workers for the specific job before being able to hire a non-EU citizen. Furthermore, foreign workers were

⁸ Law proposal 18/07/1979 nr. 1325 “Regulations to guarantee to foreigners and stateless people the right to asylum and the exercise of democratic freedoms within the territory of Italy” in Pittau, 2021.

not allowed to move from one job to another (Zincone & Caponio, 2005). The law foresaw a regularization program, through which around 100.000 immigrants obtained legal status. Basic rights were granted for regular migrants, such as healthcare, education and public housing access. However, it did not provide concrete instruments for the implementation of these formally acknowledged rights (Zincone, 1998). In overall, the Foschi law – while laying the premises for a comprehensive legal framework addressing immigration – remained hard to implement (Einaudi, 2010).

During the 1980s, immigration continued to increase at a limited rate, reaching half a million regular residents in 1987. Concerning the type of residence permits, the most frequent one was for dependent work (25%), followed by residence for study (21,7%), and family reunification (19%) (Pittau & Sergi, 1989). Asylum was not a recurring permit as at the time was recognized only to citizens of European nations (Pittau, 2021).

By the early 1990s, the shortcomings of the existing measures to address growing immigration, became increasingly evident, urging the political system to open up a debate.

At a European level, Italy entered the Schengen agreement in 1990 and was therefore pressured to harmonize its immigration policies to the European framework. At a national level, the political avoidance of dealing with issues of immigrants' integration and access to public services conflicted with the continuous increase in arrivals. Furthermore, the fall of the communist regime in Albania led to a drastic surge in arrivals, which received significant media attention, and required inter-governmental coordination to manage the reception (Melchionda, 2003).

The poor living and working conditions of immigrants and state's inadequacy to provide for assistance, favoured contexts of marginalization and public intolerance towards immigrants, exploited by the emerging Lega Nord party (Einaudi, 2010). The situation culminated in October 1989 in Villa Literno (Calabria), with the assassination, by a group of local youngsters, of Jerry Masslo, a South African asylum-seeker who was working in the harvest of tomatoes. This event gave rise to the first protest of immigrant agricultural workers in the Southern regions as well as to a wave of public disconcert (Colucci, 2018; Dandolo, 2020). Anti-racism demonstrations were organized, and the conditions of exploitation and irregularity of

immigrant workers appeared abruptly in the political agenda. A core argument was that regulations had to enable already residing immigrants to lead a decent life, while at the same time they had to control borders to reduce inflows. According to Zincone, “drastically limiting new arrivals was considered a precondition for the social rescue of those already in Italy” (Zincone, 1998:50).

In February 1990, a new legislation known as the Martelli Law, was approved. The law had a systematic approach to immigration, as it did not limit itself to labour immigration but it addressed all kinds of migration motives, introducing for the first time the right to Asylum in Italy (Ambrosetti & Papparuso, 2018). The drafting of the Martelli Law was characterised by a collective involvement of different parliamentary groups and of civil society organisations which pressured for granting rights to immigrants and for favouring a public climate of pluralism and racial tolerance (Veugelers, 1994). However, the final text was conditioned by public officials being concerned with conforming the text with EU requests of border controls (ibid.).

The law had the twofold objective of preventing irregular immigration and to regularize the immigrants already resident in Italy. Regarding the first objective, the law introduced for the first time the quota system for regulating economic migration according to an analysis of the Italian labour market needs. At the same time, it introduced a compulsory entry visa system for non-EU citizens, and it disposed for the enforcement of border controls and for the expulsion of irregular migrants, in line with pressures coming from Northern-EU countries (Einaudi, 2010). Regarding the second objective, the law opened another regularization campaign, through which all non-EU citizens residing in Italy could apply for regularization – regardless of their employment status (Ambrosetti & Papparuso, 2018). These measures did not prevent or decrease irregular inflows. On the contrary, it remained relatively easy to cross the borders irregularly and to subsequently obtain regularization through the many amnesty campaigns (Zincone, 1998).

It was especially in the 1990s and early 2000s that immigration and stock of foreign residents significantly increased. The fall of the URSS and of Eastern European regimes in the early 1990s contributed to the increased arrivals throughout the 1990s, especially from Albania, Romania and the former Yugoslavia (Zincone & Caponio, 2005). Between the 1990 and 2000,

the number of foreign residents doubled, going from 649,000 in 1991 to 1,341,000 in 2000 (ibid.). Hence, the following years were characterized by public and political debates on immigration and by the promulgation of numerous laws and decrees filling the gaps of the Martelli law.

In 1998, the Turco-Napolitano law was passed to address the deficiencies of the system, and up to today is the main reference document for Italian migration policy. The Turco-Napolitano Decree contributed to draw the institutional structure regulating migration. At a central level, the Ministry of the Interior has direct responsibility over the management of fluxes and applications, and it cooperates with the Ministry of Labour and Social Affairs to determine labour needs. Its main competences concern on one hand migrants' integration and rights, and on the other, aspects of public security (Ministero dell'Interno, 2017). Nevertheless, integration policies have been often poorly implemented, and public discourse of the recent years increasingly led to a minor consideration of aspects of integration and social inclusion, in favor of a major attention to the link between immigrant and safety concerns (Ambrosini, 2013b).

The Turco-Napolitano Decree has two main objectives. On one hand, it aims at tackling irregular migration and addressing security issues. On the other hand, it aims at improving measures for the integration of immigrants in all the aspects of the Italian society (Einaudi, 2010).

Regarding the first aspect, the Decree set to organize inflows of workers by the establishment of entry quotas to be updated every three years after consultations with relevant ministries, the regions and local authorities, the National Council for Economy and Labour (CNEL), trade unions, employers and NGOs. The triennial Document of Migration Policy Planning (Documento Programmatico Triennale – DMPP) is drafted by the Ministry of the Interior and the Ministry of Labour after consultations with relevant actors, and it provides the guidelines for non-EU workers' inflows in the triennium. Once drafted, non-EU workers' admission is based on a mechanism that determines the maximum annual quotas for seasonal and non-seasonal work. Annual quotas are published in the so-called Flows Decree (Decreto Flussi). Annual quotas are defined through an assessment of labour shortages and of the integration

capacity of the local territories (Perna, 2019). Concerning the first aspect, labour shortages are determined through (Perna, 2019:15):

1. Data on the labour force and resident population drawn on ISTAT Labour Force Surveys and demographic studies;
2. Consultation with the territorial branches of the Ministry of Labour, Regional and local authorities, and workers' and employers' organizations;
3. Potential labour demand for a given year, which is estimated through an ad hoc survey carried out since 1997 by the Union of Chambers of Commerce on the prospective labour market's needs in the service and industrial sectors (so-called Excelsior surveys).
4. Existing and available labour supply, including the stocks of native and foreign unemployed workers and of 'non-economic migrants', such as foreigners present in the country for family reunification or protection purposes.

The Flows Decree also considers qualitative criteria for the establishment of the annual quotas, including types of employment (i.e., seasonal, non-seasonal, self-employment), specific occupations, quotas for conversion of other permits, and workers' nationality. Regarding the latter criterion, annual quotas are used as a negotiation tool for border control agreements with sending countries, as specific shares of quotas are reserved for countries with which Italy has signed bilateral agreements on migration management (Perna, 2019).

The 1998 Decree also introduced the sponsorship system for the annual entry quotas. Accordingly, third country citizens willing to work in Italy could receive a temporary permit if they were sponsored by Italian citizens or legally residing foreigners, local authorities, trade unions or accredited voluntary associations (Zinccone & Caponio, 2005). In this way, the process of finding a job for an Italian-based employer was relocated outside Italian borders.

Regarding the second aspect, the Decree formally recognized the role of local actors in integration and social policies and provided regions with large autonomy in the management of these issues. Moreover, the Legislative Decree 286/1998 allocated a National Fund to the Regions and local authorities to finance integration projects according to their priorities (Zinccone & Caponio, 2005). However, the 2003 Finance Act (Statute n.289/2002) incorporated

the fund for integration policies into a wider Social Fund allocated to the 21 Italian regions, which are then responsible on whether to prioritize or not integration projects in their planning for social policies (Zincone & Caponio, 2005). Hence, regions and local authorities decide over policies targeting integration so that the level and type of services provided vary greatly.

The Turco-Napolitano law, although representing the most systematic attempt to provide a legislative framework, did not successfully reconfigure the procedure of entry for work to be flexible and reactive of labour market dynamics. The envisioned labour market checks, an overburdened public administration, combined with the requirement to recruit a worker in his/her home country, “turned recruitment procedures into cumbersome and inefficient processes” (Finotelli & Arango, 2011, p. 499). Hence, the mechanism for establishing entry quotas has not been able to match labour demand and supply, and it often acted as a mean to ratify already happening migratory processes (Pastore, 2016).

From a technical perspective, the methods used to collect data to assess labour market needs proved to underestimate the actual demand for immigrant workers. This is because data are principally collected in the industry and services sectors – thereby excluding the agricultural sector and the demand originated from private households (Perna, 2019). Finally, the length and uncertainty entailed in the legislation hardly suited the dynamic labour supply and demand mechanism, leading employers to hire immigrants already living in the country, and to subsequently use the annually issued entry quotas, or the often-recurring amnesties to regularize them (Caponio et al., 2012; Finotelli & Arango, 2011). In other words, the complex system envisioned for the entry for work channel contributed to the continued persistence of forms of irregularities experienced by migrant workers. Even after the 1998 Decree, regularizations will remain a used tool to deal with growing numbers of undocumented migrants in the Italian political landscape.

The approval of the first comprehensive legislation on immigration coincided with the crisis of the traditional political parties and the rise of new political forces, which shaped the future approach to migration policymaking.

6.2 2000 – 2020: migration and policymaking dynamics

With the beginning of the new century, the Italian context changed. Similarly to the Danish case, the growth of the immigrant population was accompanied by growing anti-immigrant sentiments, exploited by the populist right-wing parties.

The 2001 parliamentary elections were won by a right-wing coalition led by Berlusconi. The House of Freedom alliance comprised the populist right Forza Italia (FI), the populist Lega Nord, the post-fascist Alleanza Nazionale (AN), and centrist parties. In particular, the Lega Nord started as an anti-establishment, independentist party representing the interests of Northern Italian regions, but moved towards anti-immigrant, identitarian positions over time. Although immigration was not at the core of the political debate during the elections, the right-wing coalition had politicized immigration as a matter of security and border controls (Zinccone, 2006).

As part of electoral promises on bringing immigration under control, the leaders of Lega Nord and Alleanza Nazionale presented revisions to change the Turco-Napolitano law in a symbolic restrictive fashion. In 2002, Law 30/07/2002, nr. 189, otherwise known as the Bossi-Fini Law, was promulgated.

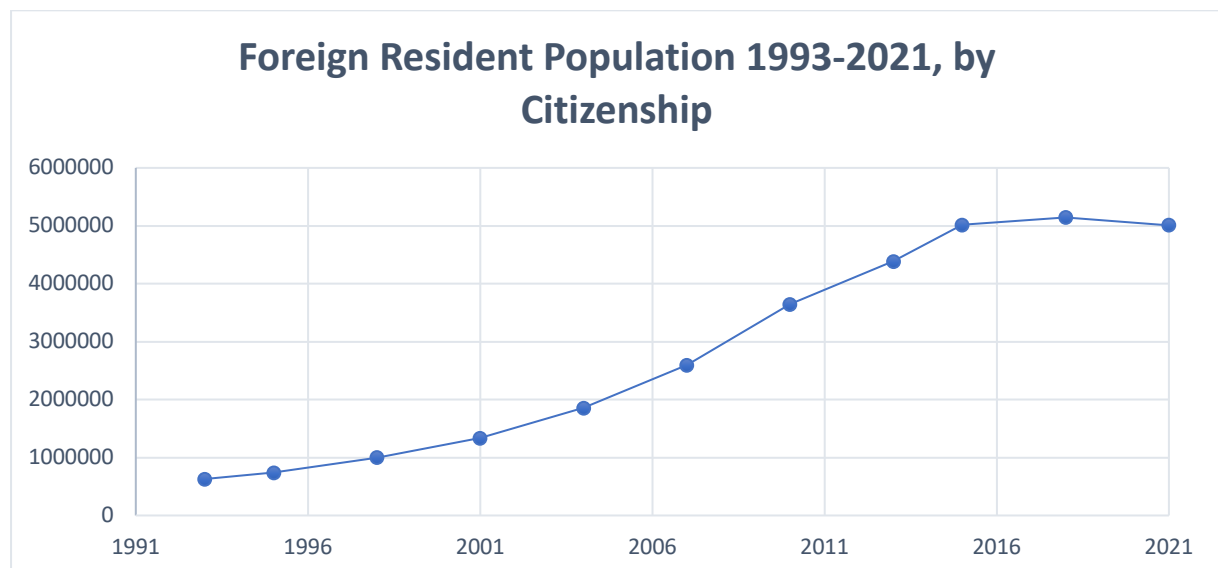
In overall, the Bossi-Fini law was characterized by a rhetoric of immigration as a security treat. The law abolished the entry through sponsorship, and made the process of hiring non-EU workers not resident in Italy more complex (Bontempelli, 2009). Furthermore, in an attempt to control and limit numbers of immigrant workers, the law introduced the 'unified contract of employment and residence', which bound legal residence to having an ongoing work contract. Immigrants whose contract expired and did not find another legal employment, did not have the right to residence.

At the same time, the government approved the largest regularization campaign in Italian history, with 647.000 irregular immigrants obtaining legal status (Einaudi, 2010). Compared to the previous measures, this campaign was more restrictive as only immigrants working in families or employed in companies were eligible to apply, thereby excluding the self-employed, unemployed and immigrant workers' family members (Bonifazi et al., 2009).

After 2002 regularization, two subsequent decrees were issued in 2006, setting the entry quotas for work for the year. The decrees extended the eligibility also to foreign workers already residing in Italy, acting de facto as an amnesty. Indeed, employers and immigrant workers in Italy saw the policy of quotas as an opportunity for regularisation (Colombo and Martini, 2007).

The EU enlargement processes of 2004 and 2007 to 12 Eastern European countries exempted many immigrants from visas and entry regulations, contributing to the progressive growth of the regularly residing foreign population. The early 2000s period also coincided with the largest growth in the resident foreign population, as shown in the figure below.

Figure 6: Stock of foreign residents in Italy, 1993 - 2021



Source: author's elaboration based on Istat data

The graph reflects the dramatic growth in the foreign resident population, which totalled 4.6 million at the beginning of 2011, with a 3.5-fold increase on the 1.3 million of the 2001 census (Bonifazi & Marini, 2013). The growth of the early 2000s made Italy one of the main EU immigration countries. In particular following the EU enlargement, the Romanian population significantly grew, becoming the largest migrant group in Italy. In overall, data from the last censuses show a very mixed immigrant population, with Romanians, Albanians and Moroccans representing the largest groups:

Table 6: Immigrant resident population by nationality at censuses.

Nationalities at 31/12/2004		Nationalities at 1/01/2011		Nationalities at 1/01/2021	
1. Albania	316.659	Romania	968.576	Romania	1.137.728
2. Morocco	294.945	Albania	482.627	Albania	410 087
3. Romania	248.849	Morocco	452.424	Morocco	408 179
4. China	111.712	China	209.934	China	288 679
5. Ukraine	93.441	Ukraine	200.730	Ukraine	227 587
6. Philippines	82.625	Philippines	134.154	Philippines	156 433
7. Tunisia	78.230	Moldova	130.948	India	153 708
8. Macedonia	58.460	India	121.036	Bangladesh	139 813
9. Serbia Mon.	58.174	Poland	109.018	Egypt	130 133
10. India	54.288	Tunisia	106.291	Pakistan	122 503
11. Senegal	53.941	Peru'	98.603	Nigeria	113 572
12. Peru'	53.378	Ecuador	91.625	Moldova	113 385
13. Ecuador	53.220	Egypt	90.365	Sri Lanka	108 595
14. Egypt	52.865	Macedonia	89.900	Senegal	104 275
15. Poland	50.794	Bangladesh	82.451	Tunisia	93 865
16. Sri Lanka	45.572	Sri Lanka	81.094	Peru	90 627
Total 16 Countries	1.707.153	Total 16 Countries	3.449.715	Total 16 Countries	3.799.169
TOTAL STOCK	2.402.157	TOTAL STOCK	4.570.317	TOTAL STOCK	5.013.215

Source: author's elaboration based on Census data

The table suggests that migration patterns changed in the last decade. While Italy became a receiving country for economic migrants since the 1980s and throughout the first years of the 2000s, the difficult economic situation after the crisis, led to a slowdown in immigration for purely economic reason, with an increase in new flows from Sub-Saharan African countries and South-East Asia.

The 2008 economic crisis hit Italy hard, with job losses, contraction in production, and rising emigration rates. Although the Italian GDP fell by 5.2% in 2009, the resident foreign population continued to grow at a more moderate pace, as reflected in Figure 6 above. Regarding migrant workers' performance in the labour market, several studies highlighted the moderate and varied impact of the crisis (Bonifazi & Marini, 2013; Pastore & Villosio, 2011; Reyneri, 2010). A notable trend is the overall minimal impact that the crisis had on foreign workers' employment rates, which reflects the structural and essential role played by migrant workers in the Italian labour market, especially considering the domestic care and agri-food sectors (Bonifazi & Marini, 2013).

In this context of economic crisis, securitarian and criminalization discourses against immigrants were instrumentalized by the populist far-right, with consequent harshening of policies.

External controls in terms of border patrolling became increasingly restrictive, with the aim of limiting the unauthorized entries. Also admission quotas started to become considerably reduced (Caponio & Cappiali, 2018). The 2009 Safety Decree signed by the Lega Minister of the Interior treated immigration as a security treat, harshening rules of detention and expulsion, and making clandestine crossing and stay a criminal offence. Furthermore, immigration became to be increasingly considered as a competence of the Ministry of the Interior – hence highlighting the securitarian approach to immigration – rather than an issue under the shared competence of the Ministries of Interior and of Labour. As for regularizations, amnesty campaigns became increasingly unviable. The last amnesties were implemented in 2009 and 2012, and they both came with narrow selection criteria. The 2009 amnesty applied exclusively to immigrants working in the care sector. The 2012 amnesty was not limited to a specific employment category, but it set very demanding criteria for employers, such as the payment of a 1,000 Euros slum sum and the provision of proof of having paid the foreign worker regularly for at least 6 months, rendering it unfeasible for many immigrants in atypical jobs (Caponio & Cappiali, 2018).

From a governance perspective, consultation procedures foreseen for the drafting of the Document of Migration Policy Planning, progressively lost their importance, leaving the central government with discretionary power over labour inflows, and reducing the consultative role of regions, trade unions and employers in the assessment of annual quotas. After 2009, entry quotas for work were considerably reduced, and kept at the level of 30,000 annual quotas, used mostly by seasonal work (Caponio & Cappiali, 2018; Ambrosini, 2023). The programming of entry quotas for work – foreseen by the 1998 Decree – has never been updated until the 2020 Covid19 pandemic.

In 2011, the events of the Arab Spring led to a surge in a different type of migration than the traditional economic migration that characterized arrivals in Italy. Gradually, the political and public debate shifted from focusing on migrant workers to asylum-seekers (Geddes & Pettrachin, 2020). The measures taken after the amnesty of 2012 have largely been

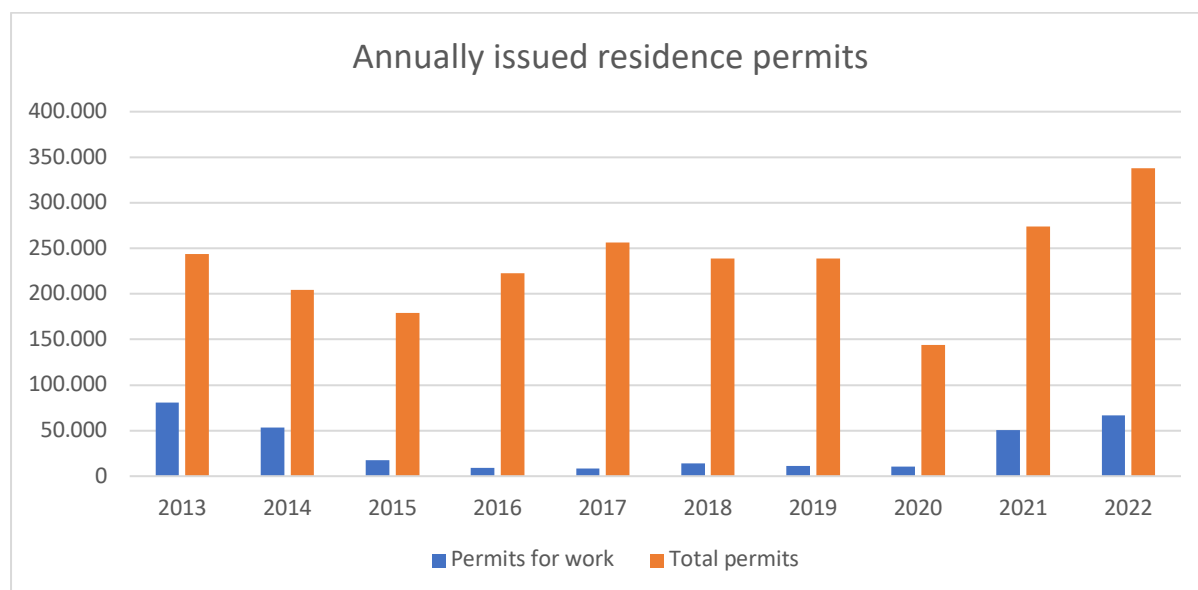
addressing issues of borders securitization, international cooperation, and of asylum-seekers' reception.

The anti-immigrant party Lega capitalized on the 2015 Mediterranean crisis to gain electoral support. In the 2018 national elections, anti-migration and securitarian discourses secured Lega the 17% of votes (The Guardian, 2018). Through an alliance with the 5 Star Movement, an anti-establishment populist party, Lega became part of the governing coalition in power until September 2019. As part of maintaining electoral promises of a hard line against Mediterranean arrivals, the party pushed for new regulations on migration governance and safety. The Safety Decrees promoted by the Lega Minister of the Interior and approved in 2018 and 2019 focus exclusively on the reorganization – in a restrictive fashion – of the norms concerning asylum, whereas labour migration faded from the political agenda and from the public debate. The highly populist character of the measures enacted, accompanied by a securitarian rhetoric emphasizing the character of threat of immigration dominated the public and political debate (Dennison & Geddes, 2022).

The hyper politicization of immigration, which started in the early 2000s and culminated with the 'refugee crisis', has been accompanied by the progressive abandonment of a constructive debate on how to best update migration policy in order to make it in line with today's immigration and labour market characteristics (FIERI, 2021).

The data on residence permits issued for work reflect this tendency. The figure below shows a declining trend in residence permits issued for work reason until 2020.

Figure 7: Annually issued residence permits, total and for work 2013-2022



Source: author's elaboration based on Eurostat data

The number of issued working permits varied by citizenship in the last five years compared to early 2000s, as shown in the tables below. In particular, in 2018 and 2019 US citizens appeared as the main population having a working residence permit, whereas in 2007 and 2010 they were not even in the top five. This is not due to a significant increase in US immigration for work purpose, but rather due to the progressive decrease in the number of working residence permits issued to citizens of other nationalities. This also hints at the progressive reduction of entry for low-skill jobs, which are also highly racialized.

Table 7: Issued working permits by citizenship

2007	
1. Ukraine	19 189
2. Moldova	18 885
3. Morocco	18 883
4. Albania	14 535
5. China	12 553
Total	150 098

2010	
1. Ukraine	40 260
2. Morocco	38 395
3. China	33 096
4. Moldova	30 371
5. India	27 615
Total	358 870

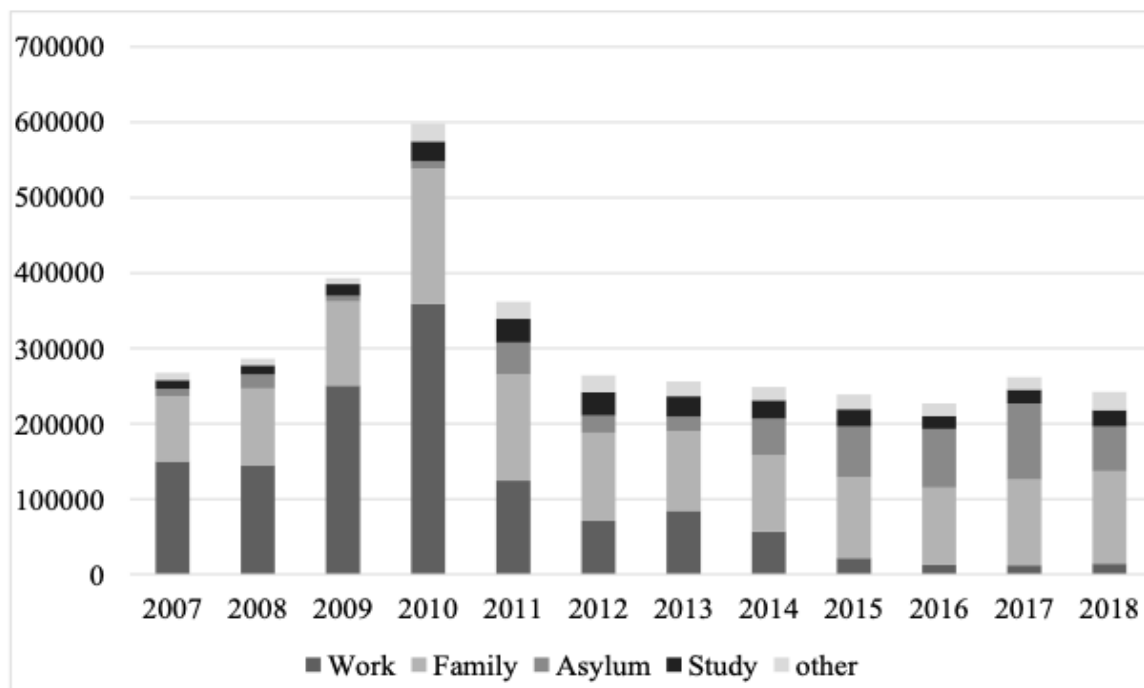
2018	
USA	3172
India	2725
Albania	1692
Morocco	1060
China	564
Total	14605

2019	
USA	2513
India	2139
Albania	1491
Morocco	640
China	274
Total	11315

Source: Source: author's elaboration based on Istat data

After 2010, the permits issued for work dramatically fell, whereas permits for other reasons – especially asylum – increased. This hints at two developments. Firstly, the reduction in work permits impacts the inflows, which become increasingly mixed, with more immigrants trying to enter through other channels (i.e., asylum or family reunification). Secondly, the reduction of legal entry possibilities affects the growth of irregular immigration, especially when there is a sustained demand in sectors such as agriculture or care (Geddes & Pettrachin, 2020).

Figure 8: Entry by type of permit, 2007-2018



Sources: OECD, ISTAT.

Source: Geddes and Pettracchin, 2020, pg. 5

Regarding the data on migration for the purpose of employment, foreign labour force has traditionally been a significant component of the labour market, complementary to the Italian workforce (Romiti, 2011). In particular, the foreign population represents an important

resource for the demand of low skill professions in essential sectors of the Italian economy. According to the Italian Ministry of Labour, immigrants are employed in the care and services sector (30.9%), agriculture (20%), hotel and gastronomy sector (18.5%), and in the construction sector (16,9%) (MLPS, 2025). This trend hints at the segmentation of the Italian labour market, where the structural demand for workers in low-wage, poor conditions occupations is filled by foreign workers.

6.3 Post 2020 developments

Until the 2020 Covid19 crisis, the subsequent governments shared a similar policy inertia on labour migration, which did not reflect the actual needs and developments of the labour market.

In this situation of stalemate for policy change, Covid19 crisis accelerated pre-existing trends in the labour-market, making immediate political action necessary. With the closing of borders due to the pandemic, the regular movements of seasonal workers came to a halt, shedding light on the criticalities of the labour migration governance, as well as on immigrant workers' vital role for the Italian economy and society. On one hand, the restrictions implemented during the emergency phase highlighted the dependency of important sectors of the Italian economy and society on the availability of immigrant workers, as immigrants were overrepresented in many essential jobs, including agriculture and care work. On the other hand, measures such as social distancing and lockdowns highlighted the conditions in which many irregular migrants worked and lived.

To tackle the acute crisis, the Italian government implemented the first measure that can be considered of opening towards immigrants' rights by approving a regularization for workers in the agricultural and domestic sector. The Legislative decree n. 34 published on the 19th of May 2020 foresees the regularization of immigrant workers employed in the agricultural and care sector. Furthermore, it introduced the possibility for currently unemployed migrants to apply for a six-months residence permit for job search. In both cases, a necessary condition for applying is to be able to prove to have been residing in Italy before the lockdown period (i.e., 8/03/2020) and continuously since then.

Several limitations in the administrative procedures and the restrictions to only two sectors contributed to a limited success of the amnesty. The most recent data published by the Ministry of the Interior show a more nuanced picture. There was a total of 207.542 applications received, of which 176.848 (or the 85%) represented by domestic work, and 30.694 (or the 15%) by agricultural work (Ministero dell'Interno, 2020). This hints at the fact that it is easier for workers in the care sector to be sponsored by their employers, compared to workers in the agricultural sector, where issues of caporalato add up to the seasonal character of work. As noted by advocacy groups and academics alike, the most likely beneficiaries are immigrants that already had a long-term, stable employment relationship – albeit irregular (Chiaromonte & D'Onghia, 2020; Ambrosini, 2023). Whereas the extremely marginalized workers such as day-labourers in the agricultural sector were excluded from regularization (De Silvestro, 2021). Furthermore, the fact that the application is employer-sponsored relies a lot on the willingness of employers to declare an informal work contract. This also contributes to explain the higher number of applications filed for at home care work, as this type of work entails a close relationship between employer and care worker.

The examination of applications received has been extremely slow. Out of 207.542 applications, only 7.046 were being processed as of 15th of August 2020. Most recent data show that as of May 2023, 65.166 work residence permits were released, equal to the 31,5 percent of the applications received (Ero Straniero, 2023). Hence, another major problem in the design and implementation of this amnesty is represented by the bureaucratic process. Firstly, there have been delays caused by the lack of personnel processing the applications and by pandemic-related limitations to administrative offices' opening hours. Furthermore, the application process involved multiple administrative entities, which contributed to the complexity and lengthiness of the overall process. Finally, the writing of the text and the following communications to the local administrative offices have been often unclear and self-contradicting, causing confusion, policy discretion by street-level bureaucrats and wrong interpretation of the law (ASGI, 2020; Gonnelli, 2021). The resulting uncertainty of the outcome often discouraged employers to expose themselves and invest in the process, while some immigrants terminated their work contract in the meanwhile.

However, although the campaign had a de facto limited impact, the political viability of an amnesty campaign for irregular migrants can be considered an important political change with respect to the earlier labour migration policy inertia. The table below provides an overview of the use of the regularization tool over the years:

Table 8: *Foreigners obtaining regular status through regularization campaigns and other policies*

Year, Legislation	Number of Beneficiaries	Government
1982, Legge Di Giesi	5000	Governo Spadolini (Centre)
1986 Legge Foschi	105 000	Governo Craxi (Centre-Left)
1990 Legge Martelli	222 000	Governo Andreotti (Centre)
1995 Decreto Dini	246 000	Governo Dini (Centre-Right)
1998 Legge Turco-Napolitano	217 000	Governo Prodi (Centre-Left)
2002 Legge Bossi-Fini	647 000	Governo Berlusconi (Centre-Right)
2006 Decreto Flussi	170 000	Governo Berlusconi
2006 Decreto Flussi	350 000	Governo Prodi
2007 EU enlargement	444 000	Governo Prodi
2009 Pacchetto Sicurezza	300 000	Governo Berlusconi
2012 Legislative Decree	99 000	Governo Monti (technocratic government)
2020 Decreto Rilancio	130.100 (as of 2024, 74% of the applications have been examined)	Governo Conte 2 (centre-left)
Total	2 665 100	

Source: author's elaboration based on Buonomo and Paparusso, 2018

Apart from the regularization, all governments that came to power from 2020 up to today re-introduced the use of entry quotas for work, which were not updated since 2009. The yearly entry quotas for work – from being blocked at 30.000 units since 2009 - have been increased by the left-wing and right-wing governments, as shown in the table below:

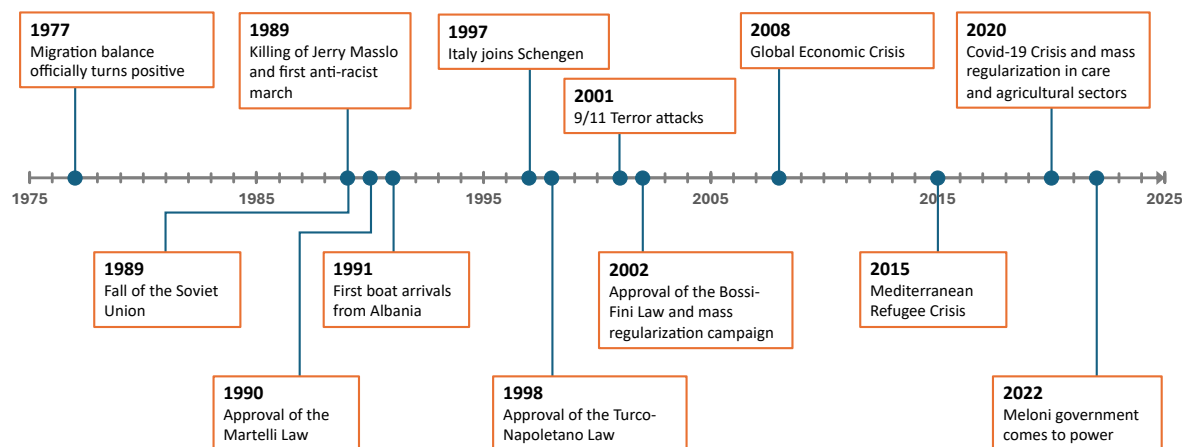
Table 9: Revised entry quotas 2020 - 2023

2020	2021	2022	2023
30.850	69.700	82.705	452.000

Source: author's own elaboration based on data from the Ministry of Labour, 2024

The opening to legal entry channels for work implies the possibility for entering and residing in Italy regularly, and it indirectly acts to deflate the numbers of irregularised migrants and asylum applicants. The fact that also the current anti-immigrant government, although openly adopting tough and zero-tolerance policies towards arrivals from the Mediterranean, tacitly continues the path initiated in 2020 of opening entry channels for work hints at the renewed importance that labour migration policy gained.

Figure 9: Migration timeline Italy



7 The factors explaining immigration policymaking in Italy

This section focuses on the drivers behind Italian immigration policymaking from its early beginning up to today. Combining data from interviews, conferences and document analysis, this section investigates how factors related to interests, ideas and institutions shaped policymaking development. The structure of the analysis follows the chronological order of immigration policy evolution in Italy. Departing from 1973 – when the immigration balance for Italy turned positive for the first time – the following 50 years of migration policymaking are embedded into a changing societal, economic, and political order. The analysis is organised in two main sections with the aim of understanding the patterns that led firstly to a slow policymakers’ reaction to growing immigration, and then to developments in governing labour migration at times of increasing politicisation.

By looking at policy and political debates over time, and by situating policy decisions within the context in which they took place, Chapter 7 traces policy shifts to reveal the complex interplay of domestic economic and political pressures, institutional constraints, and ideological changes that have determined the Italian approach to low-paid labour migration over the past decades.

7.1 Immigration policymaking between 1970s – 2000s

7.1.1 Interests: economy and society alone

In this section, I look at the role that interests played in the evolution of policymaking. I distinguish between economic, societal and political interests. In the initial phase, the immigration phenomenon was not politically salient, it happened “without us noticing, and especially without policymakers noticing” (Massimo Ghirelli, journalist at Idos Conference 30.05.2022). Hence, the political sphere did not have specific preferences to pursue. Instead, migratory movements to Italy were governed by market logics:

The immigration phenomenon happened unconsciously, without Italy realizing it was happening. Paradoxically, the most anti-market country has been the country that did migration politics with the market the most. (I3 – Former Head of Cabinet Ministry of Labour, 1980 – 2000 period)

This quote highlights how the lack of political salience can inadvertently create an economically liberal immigration regime. Initially, immigration was not managed through politics but through market mechanisms of supply and demand. This market-driven approach was not the result of deliberate policy choice. Rather, it emerged from institutional neglect, creating an initial context of unvoluntary liberal immigration regime.

When talking about interest groups’ role in influencing immigration policies, Freeman refers to well organized groups that exercise their influence on the policymaker for liberal policies (Freeman, 1995). In the Italian case, the initial demand was not organized and there was no contact between economic and political actors for crafting liberal policies. Instead, the economic groups having an interest in immigrant workers were able to meet their labour demand by acting within the existing porous regulations. The porosity of regulations and low enforcement of existing laws created an environment where economic actors could satisfy their labour needs without engaging in formal political advocacy, essentially creating a parallel system of immigration governance that operated beneath the radar of official regulations.

Economic and societal spheres were embedded in creating and sustaining the demand for immigrant workers. However, it is important to underline that it was not society, but it was wealthier families who resorted to foreign workforce for domestic work when the local

workforce moved upwards in the labour market. Here, the Church played a facilitator role, as it connected families and employers with immigrants. As Italian workers achieved upward mobility and abandoned traditionally low-status occupations, particularly in domestic services, a labour market gap emerged that was filled by immigrant workers. The Church's intermediary role shows how civil society institutions, rather than formal labour market mechanisms, became the primary channels for organizing immigrant employment.

In the Italian case, it was not the economic interests of large, organized businesses that lobbied for liberalizing immigration, but it rather was small medium businesses and private citizens benefiting from the availability of immigrant workforce and possibility of irregular employment. This contributed to the decoupling between economic actors and political actors. Small-medium businesses and private families had limited influence over policymakers, and a limited interest in shaping the policies – as long as they were able to recruit immigrant workers. The tolerance for irregularity among policymakers provided flexibility for the labour market that formal immigration channels could not offer.

This created a cycle where the very actors who most needed immigration reform were least equipped to advocate for it, while their reliance on informal arrangements reduced their incentives to engage in formal political processes. As pointed out by several respondents involved in policymaking at the time, apart from seasonal sectors, where a political concertation for the inflows of seasonal workers is needed, there were no significant employers' pressures on the national government to influence the policy direction (I3; I6). In turn, this implied that the economic interest for immigration as source of labour was not accompanied by a political long-term vision of how to integrate, provide services, and find solutions for the externalities that immigration brings:

Employers decided on immigration. The wealthier segments of society decided on immigration. There, they opened a societal wound, which we have to deal with today: the anti-immigrant sentiments and anger of the poorer citizens. This happened because the immigration phenomenon was not accompanied politically. The poorer strata experienced the negative sides: the ones that live in the outskirts, the ones that worked a lifelong to buy themselves a house in the outskirts, but then when immigrants settled there, the house lost value...It is all problems that were not addressed. (I3 - Former Head of Cabinet Ministry of Labour, 1980 – 2000 period)

According to this reflection, the combination of economic interest-driven immigration and lack of a political stirring contributed to the growing anti-immigrant sentiments amongst the

parts of the population that experienced the negative externalities of immigration. The respondent draws a diagnostic frame where the cause of subsequent anti-immigrant populism lies in the fact that immigration dynamics were not accompanied by a political vision on how to govern the 'societal' aspect that immigration inevitably brings with itself.

Hence, the economic interest factors that shaped the initial approach to immigration led to a neglect of important aspects relative to integration. This political *modus operandi* differed from the Danish one, where policymakers and economic concertation were involved – but failed anyway to properly address integration issues and societal fractures between 'poor citizens' and 'poor immigrants'. Hence, a similar outcome is observed, namely the politically unforeseen unequal distribution of costs and benefits, as some impacts of immigration concentrated in ways that corresponded with class divisions. Working-class families experienced immigration as a threat, whereas middle-upper segments experienced mostly the benefits of the availability of a cheap labour force. What the two cases share is the initial consideration of migrant workers exclusively as economic factors of production, neglecting – to different extents and in different ways – the social dimension of immigration. In the Italian case, the market-driven nature of entry and residence of immigrants was dealt with by political actors through the emergency measure of regularizations, without addressing the complex reality of societal interactions:

Regularisations addressed only one aspect of the life of migrants in Italy. They only addressed the employment aspect. But it is important to understand that immigrant workers are people, , they are not only arms. They have needs concerning family, health, housing etc. But all of this was not considered. (I2 – Former Head of Cabinet, Ministry of Labour, early 2000 period)

By focusing exclusively on the economic aspect, policymakers failed to develop institutional capacity to address the social consequences of immigration. This opacity was particularly problematic because it meant that integration challenges emerged without corresponding institutional responses, creating *ad hoc* solutions without a long-term perspective. The institutional void has been filled by catholic and civil society organisations (Ambrosini, 2013a). On one hand, they have been effective in delivering services and solutions, often in partnership with local governments. On the other hand, the availability of this network might have taken off pressures from governments to establish a national response.

7.1.2 Ideas: the relationship between national identity and immigration

In this section, I analyse how the underlying ideas of Italian identity and history defined how policymakers and society understood immigration and the policy options available to govern it.

The fact that Italy witnessed mass emigration throughout the previous centuries contributed to create a self-conception of not being a country of immigration. The institutional structures and political attention were traditionally oriented towards the management of emigration. This contributed to the idea that “Italy is not a country of immigration”. This self-definition had repercussions on policymakers’ perceptions of policy options.

Firstly, the idea of not being a country of immigration, even when faced with rising numbers of foreign residents, led to an interpretation of immigration to Italy as a contingent phenomenon rather than a long-term trend:

During the First Republic, immigration was considered as an emergency phenomenon, linked to the contingent historical phase and not destined to become structural. [...] The effect of considering immigration as a non-structural phenomenon for twenty years was the slowness. That is, we had to wait 25 years from when we became countries of immigration to realize this, and to have for the first time a comprehensive law on immigration, in 1998. Even the laws that followed one another in the meantime were partial, emergency laws that dealt with very specific aspects of specific urgencies without an overall and systematic overview. (Luca Di Sciullo – Idos Conference attended on 30.05.2022)

As outlined in the quote, the widespread idea of not being a country of immigration led to delayed awareness of the structural nature of immigration, as well as to a delay in the establishment of a governance framework. This was combined with a lax approach to the growing immigration both by politics and by the administrative apparatus. As long as immigration remained a prevalently invisible phenomenon, policymakers were not compelled to address it. The political sphere did not have a proactive approach to immigration, but it rather reacted to contingent crises. A clear example is the homicide of Jerry Masslo in Villa Literno (section 6.1), an event that led to the first anti-racist demonstration in Rome, and – for the first time in Italy – to a State funeral for an immigrant (18). As a reaction, politics opened the debate on establishing a regulative framework on immigration and approving the Martelli law in 1990.

The importance that emigration played in Italian history informed how policymakers perceived policy options.

Firstly, the migratory experience of Italian workers abroad, together with the self-identity of Italy as a welcoming country shaped the attitudes of policymakers towards a position of opening and tolerance. For instance, both the Foschi law and the Martelli law, although setting narrow criteria for entry - had an underlying positive approach to immigration, even at a time of stagnating growth and change towards a restrictive paradigm in Western Europe (Pittau, 2022; I6 – CSO expert). Secondly, the emigration past led policymakers to show policy preferences that were decoupled from reality but rather anchored to beliefs. For instance, a number of entry quotas destined to Latin American countries were kept, although there was not a strong migratory pressure to Italy from those areas:

For 5 or 6 years we decided for 100,000 entry quotas, some of which were reserved for workers from Latin America. Those were quotas that were not used, because there was no real migratory flow from those areas. It was only because of the memory of the Italian abroad, and of us looking at the emigrant citizen on the other side of the planet, thinking that he wanted to return. Even if this was not the case. The few who did return to Italy did so for 2 years and then left. Because paradoxically they could not find a place in the labour market. This is a significant paradox. And for several years, the quotas reserved for the Latin American countries were practically not used. (I 2 - Former Head of Cabinet, Ministry of Labour, early 2000 period).

This episode is paradigmatic of how ideas and beliefs contribute to policy choices, sometimes carrying greater weight than utilitarian logics of rationalizing entries and matching supply with demand.

From a societal perspective, two somewhat contrasting trends emerged.

The migratory experience that many Italians undertook contributed to a sensibility towards the immigrant workers in Italy. The struggles of today's immigrants to Italy could be felt and understood thanks to the recent emigration experience. Additionally, a widespread idea emerging from many of the documents analysed, is that of the Italian population being characterized as generous. The generosity of the Italian population is a trait often presented when talking about Italian identity, and it has been used in relation to the policymaking on immigration:

During an economic downturn, and also in comparison with Northern European countries, Italy maintained a welcoming attitude, being faithful to a piece of Italian identity: generosity. (Luca Di Sciuillo, Idos Conference attended on 30.05.2022)

Volunteer associations having a long experience in advocating for the rights and interests of Italian workers abroad, were able to shift their focus on the growing phenomenon of immigration in Italy. They were the first to provide basic support to immigrant workers and to influence society and policymakers towards attitudes of opening and tolerance (Pittau, 2021). For instance, the first statistical research on the immigrant population was systematically done by Idos, a Catholic organization which had past experiences with providing support to the Italian immigrants in Belgium. The initial optimism connected to the immigration phenomenon was largely driven by the organized civil society and by the Catholic world, and it was framed within Christian ideals of mutual help, solidarity, and charity towards the most vulnerable strata of the population.

However, this impetus was not fully grasped by politics or coordinated across levels of governance, while public concerns towards immigrants started to spread. The political sphere's inability to capitalize on the positive forces working on the ground created a gap between civil society activism and institutional responses.

Furthermore, the neglect of growing immigration was particularly consequential in hindering the development of a public debate about what immigration meant for Italian society. Without explicit political commitment to discussing questions of national identity and societal change, immigration remained conceptually external to Italian self-understanding, treated as a temporary phenomenon rather than as a structural transformation. The lack of an acknowledgment of societal transformations meant that immigration was never fully incorporated into Italian political imagination, leaving it vulnerable to being framed as a crisis when challenges emerged:

Italy, like the rest of Europe, – despite having become a country of immigration – has never officially declared itself a country of immigration. [...]No European country has ever openly accepted to be a country of immigration. Maybe silently. Which is the worst. Worse because you don't tell the truth, but the citizens see it. And that irritates them. (I.3 – Ministry of Labour)

This excerpt is useful to reflect on the role of ideational frameworks and narratives in shaping the collective understanding of national identity. The absence of a political engagement with

immigration complexities and societal transformations left a 'narrative void' which could later be exploited by populist xenophobic rhetorics. This dynamic was particularly damaging because it allowed emerging populist far-right to appropriate critical discourses about immigration, positioning themselves as the only voices willing to address immigration's downsides.

The lack of a political narrative coherently framing the transformation of Italian society into a society of immigration was accompanied by the delay in establishing an institutional and governance framework:

Immigration changes the blood of a nation. It is a positive thing, but if it changes the blood, it can also kill. It depends a lot on how you manage it. Immigration is a positive, innovative phenomenon. But it has to be properly governed, with an institutional structure tailored to do that. (I3 – Head of Cabinet, Ministry of Labour)

The quote underlines the importance of a long-term vision and governance system over the migration phenomenon, which was initially not present in the Italian case, leaving market demands and civil society's ideals to shape immigrants' experiences and integration in Italy. Ultimately, the political sphere's early reluctance to proactively engage with immigration contributed to the polarization that would characterize later immigration debates.

7.1.3 Institutions: building immigration policymaking

In this section, I highlight how the organizational structures embedded in the Italian state and society constrained, enabled, and ultimately moulded immigration policymaking. I emphasize two main features of the institutional setting – namely party politics and supra-national processes of EU consolidation – and then reflect on how those influenced the policymaking process.

Firstly, I reflect on the characteristics of the political sphere that contributed to the delay in the formulation of a legislative framework for immigration.

Throughout the first republic, the legislative activity on immigration was not politicized and it was not a political battleground. Rather, it was considered a matter transversal to all political parties, as highlighted by a researcher and witness of the time: "during the first republic, there was availability from all political parties - even very different ones, even the ones at the

opposition. There was a willingness to dialogue, to negotiate, to find mediations on immigration matters. The proof of this was that at least the first two laws on immigration, the Foschi law of 1986 and the Martelli law, were approved with a broad parliamentary consensus” (Luca Di Sciullo, Conference Idos 30.05.2022). The fact that immigration was conceived as a matter of concertation rather than opposition is also reflected by the fact that governments sought to promote a legislation on immigration through law proposal to allow for parliamentary debates rather than through a legislative decree (Pittau, 2021).

From the perspective of institutional dynamics of party politics, the dominant role of the Christian Democratic party in all the governments until 1994 meant that the issue of how to regulate immigration was addressed also through Christian ideals of solidarity. The fact that the main opposition party was the Communist party contributed to a certain alignment of interests on the immigration matter:

During the first republic, the government-opposition dynamic was embodied by Christian Democrats and Communists, and both sides were fundamentally favourable to immigration. There was a huge majority in favour of immigration, so that the Martelli Law was approved without the votes of few Lega Nord parliamentarians, the Social Movement (post-fascist), and La Malfa (Republican party)...really a tiny minority. (129 – Sergio Briguglio, expert, CSO)

While the transversal dialogue and low politicization of immigration was positive for the elaboration of an encompassing law, the concertation, combined with the instability of governing coalitions, led to delays in the elaboration and approval of a comprehensive regulatory framework.

This relates to a second feature of the Italian political setting, namely the instability of governments. The average duration of Italian governments from the beginning of the Republic in 1946 is approximately 22 months, with no government being able to remain in power for the expected five years (Fittipaldi & Musella, 2022; Müller & Strøm, 2000). The early termination of governments often implied the postponement of the legislative activity. Hence, political momentum could be lost, and the perceived relevance of immigration matters could change, contributing to a lengthier process. The fact that the process that led to the first organic law governing immigration took 25 years since the Italian migration balance officially turned positive meant that the immigrants’ presence grew in an unregulated way.

Another important aspect is how the adherence to the European Union, that in those years was being shaped as a common market with free circulation of labour, impacted the regulatory framework on immigration. In 1990, Italy officially joined the Schengen Agreement which began to be fully applied in 1998. These supranational events coincided with the beginning of the internal debate on how to regulate immigration, creating a temporal dynamic where Italian immigration policy developed within an evolving European framework. As outlined by a respondent, the restrictive approach to labour migration which Northern European countries began to implement since the 1970s, influenced the Italian legislators:

The debate on regulating immigration was happening at a time when the trend was already heading in another direction at the European level. Already at that time there was a strong push to oppose irregular immigration in every possible way. And Italy was already then considered a country 'at risk' from the point of view of the European institutions. Therefore, the path that led to the approval of law 40/98 has this type of background: there is a context in which Europe was pressing to close the entrance of so-called economic immigrants as much as possible. And therefore, there was also a lot of pressure on Italy to adopt a legislation that would go towards that direction (I6 – expert, CSO Lunaria).

European integration created a policy convergence pressure that constrained Italian policy options when migration dynamics in Italy were not aligned with the developments in North-Western European countries. The temporal misalignment in the dominant approach between Italy as an emerging immigration country and European restrictive direction on immigration, conditioned national-level policymaking. Hence, in the Italian national contexts, external pressures and constraints contributed to shape the set of available and politically viable policy options. The overall restrictive attitude that the EU and its North-Western member states had adopted, exerted a securitization pressure on Italian national policymaking.

The short-termedness of Italian governments contributed to the fact that legislations on immigration were approved as emergency measures, or as a reaction to events such as the killing of Jerry Masslo. Although throughout the years various proposals, working groups, advocacy coalitions for the establishment of a systematic legislation had been established, until 1998 migration remained governed through the re-iteration of decrees, integrated by ministerial circulars and regularizations. When the works for the Turco-Napolitano began in 1997, the political atmosphere towards immigration was changing towards more hostile positions. The rapid growth of the immigrant population, together with the Albanian crisis, contributed to a growing sense of disorientation amongst the population, increasingly exploited by the Lega Nord. Hence, as recalled by one of the Minister involved, the Turco-

Napolitano was the outcome of a political will within the centre-left to finally provide a comprehensive framework:

I increasingly appreciate that Council of Ministers meeting where we had to decide whether to reissue the so-called Dini decree (...). This decree provided for two things: the tightening of expulsions on one hand, and amnesty on the other. This decree had already been reissued five times, it had never become law because of the opposition. On one side, the centre-right did not want the amnesty. On the other side, the centre-left did not want the tightening of measures to combat irregular immigration. So, we had to decide what to do with the Dini decree. And Prime Minister Romano Prodi said: 'Enough with the emergency. Immigration is a structural phenomenon; it must be governed in all its complexity. We need to make a comprehensive law on immigration.'

It was a political choice because we did not reissue the Dini decree, we approved the amnesty and established an interministerial coordination for the start of drafting the comprehensive law on migration. (I27 Livia Turco, Minister of Social Solidarity).

The approval of the Turco-Napolitano was characterised by a relatively quick law-making process, which reflected both the political willingness to provide a systematic regulative framework on immigration and the existence of materials that have been produced in the previous legislations. As the aim was to provide a modern and systematic governance framework, the legislative process featured a strong tendency to concertation across political forces, social and economic partners, and ministerial expertise. Therefore, the final law was balanced between demands coming from the civil society, and securitarian demands coming from the Ministry of the Interior and the right-wing.

Concerning the regulations on the entry for work, the Turco-Napolitano presented both strengths and weaknesses in its approach. The instruments to regulate entry were quotas and entry for job search through sponsorship. In particular, the sponsor system was introduced to provide a legal, flexible entry with a 'security' guarantee provided by the person or entity that sponsored the migrant's visa. This instrument was conceived as a realistic response to the character of immigrant work in Italy:

Thinking about Italy, thinking about irregular work, we were aware that the challenge of good immigration governance was to make regular entry for work convenient and practicable. Convenient, because sometimes it was more convenient to hire under the table. All the more so with the strong irregular work that existed in our country. But also, to make it practicable. To make it practicable, we had to think about the labour market we faced. (I27 - Livia Turco, Minister of Social Solidarity)

The excerpt acknowledges the awareness of having to provide legislative tools able to make legal entry "convenient and practicable" for the peculiar Italian context. Especially the sponsorship system was highly debated and was abolished in 2002 by the Bossi-Fini.

Interviews with policymakers and civil society actors that participated in the drafting process reveal divergent views on the sponsor instrument (I3; I27; I29). In particular, ministerial officials were concerned with possibilities of circumventing regulations and with the implementation of expulsions if, expired the visa, the immigrant that did not find employment remained in Italy. Contrarily, civil society and left-wing politicians were optimistic that this instrument could provide the flexibility required by the sectors where migrants were overrepresented.

The Turco-Napolitano's relatively rapid legislative process reflected both political determination and extensive preparatory work from previous initiatives. The strong emphasis on concertation across political forces, social partners, and ministerial expertise represented an attempt to build sustainable consensus around comprehensive reform. This approach produced a law that balanced civil society demands for integration with security concerns from interior ministries and right-wing parties.

Yet this concertation process also revealed the structural limits of compromise-based policymaking on politically sensitive issues. The subsequent abolition of the sponsor by the Bossi-Fini Law in 2002 demonstrated how innovative policy instruments could be vulnerable to changing political dynamics.

7.2 Immigration policymaking between 2000 – 2020

In this period, the character of immigration changed: whereas immigration in the previous century was mainly economic, since 2010 the existing legal categories of migration started not to be able to capture the characteristics of increasingly mixed immigration inflows. At the same time, immigration became politically salient and associated to public security and order. This turn coincided with the neglect of a governance framework for labour immigration. Generally, right wing parties have been the ones making policies on immigration exclusively within a securitarian paradigm. Hence, the second period of immigration policymaking has also been characterized by a lack of a long-term vision on how to reap the benefits and limit the negative externalities connected to labour migration. However, Italy is faced with pressing issues in relation to demographic trends of ageing population, low birth rates, and increased emigration. Amongst the implications of those trends, one is the gaps left in the Italian labour market, in particular in essential yet low-paid sectors. In this section, I look at changes in the interrelations of different drivers and actors compared to the previous period, as well as at the reasons behind policy inertia on labour migration.

7.2.1 Interests: societal and economic needs versus political strategies

In this section, I investigate how the interests of the political and economic spheres guided the decision-making on immigration governance.

In this phase, immigration became more visible in the public arena. The terror attacks of the early 2000s in the United States and in other European countries had a strong impact on public opinion and policymakers' approach to immigration. At the same time, the increased number in foreign residents made the changes that were happening in society more evident: the concentration of foreigners in certain neighbourhoods of cities, the presence of foreign students in schools, the establishment of new shops, etc. In this phase, the political attention to immigration policy development was strengthened. Right-wing parties instrumentalised changes happening in society following the growing numbers of foreign residents to create an atmosphere of persistent moral panic (Cancellieri & Ostanel, 2015). The saliency of the immigration debates turned immigration policymaking into a matter of political struggle to gain electoral support.

In what follows, I analyse how interests were the main driver of political parties' position towards immigration policy, and how the economic sphere continued to pursue its interests vis-à-vis an increasingly restrictive landscape.

The first years of 2000s were characterized by a surge in the presence of foreign residents, which stabilized at around 5 million residents. As analysed by a respondent:

As the foreign presence in Italy began to be consistent, the first problems of an ideological nature also arose. As it happened also in other countries, when the percentage of foreigners begins to exceed 5%-6%, the first reactions appear. Because in some sectors there are more foreigners than in others. And therefore, moments of tension can arise with the native workers. Or this is simply functional to electoral campaigns of some parties. (I9- trade union UIL, labour policies area).

Here, two aspects are relevant. Firstly, there is the physiological dimension: when a growing group of people perceived as culturally or ethnically different settles in, it triggers social comparison processes and generates various forms of anxiety among the existing population (Dennison & Geddes, 2021; Lawrence, 2013). In the context of labour migration, these fears often manifest as concerns about economic competition—particularly the worry that immigrant workers will substitute the local workforce, or accept lower wages and inferior working conditions, thereby undermining local employment standards and wage levels. Furthermore, the long-term consequence of channelling immigrant workers into low-paid, precarious employment is that it creates additional societal tensions. The segregation of immigrants in poor jobs also expands the overall population living at the margins. The resulting disadvantaged underclass of immigrant workers and their families, intensifies social divisions and fuels resentment from communities concerned about increased social problems and welfare costs (Borgna, 2011).

The second aspect refers to the role of politics in shaping the public debate on immigration. The political shift that accompanied the second republic turned immigration into a politicized and instrumentalized topic as an electoral weapon rather than a policy challenge requiring substantive solutions. With the emergence of new populist right-wing parties (i.e., Forza Italia, Lega Nord) immigration started to be seen exclusively as a topic of electoral battleground. Hence, the logic behind parties' initiatives on immigration became highly dependent on gaining electoral consensus rather than addressing the underlying complexities of migration governance. The following anecdote from a former Forza Italia parliamentary

politician highlights how immigration became strategically instrumentalized in right-wing political narratives to gain competitive advantage over left-wing coalitions:

Lega Nord and Alleanza Nazionale had a sensitivity on immigration compared to us in Forza Italia that was more focal...And that emerged from the Albanian crisis. It started there, Lega and Alleanza Nazionale were the ones who insisted a lot on this issue. This arose from the fact that there was a centre-left government. Therefore, any initiative that could be useful to put the government in difficulty was taken. I think that this is how they started to focus on immigration. [...] And this thing arose precisely because the centre-left government was struggling in dealing with the Albanian situation which, to be fair, in the end they managed to resolve. (I16 – former Forza Italia Parliamentary politician)

This excerpt reveals several critical dynamics in the changed political attitudes towards immigration. Firstly, immigration issues became progressively decoupled from their substantive policy content and transformed into strategic tools for political opposition. Secondly, the position of the political right-wing on immigration was shaped not by coherent ideological frameworks, but by opportunistic calculations about governmental weakness. Thirdly, the competitive logic of electoral politics incentivized the amplification of immigration as a crisis narrative, regardless of the actual policy outcomes. This instrumentalization process fundamentally altered the nature of immigration discourse, shifting it from a domain of governance to one of political theatre where the dominant strategy follows political interest.

During the 2nd Berlusconi government (2001 – 2005), the Turco-Napolitano law was modified in a restrictive way with the Bossi-Fini law. This law symbolically sets the beginning of a new approach to immigration policymaking, where the goal became to “seek immediate consensus, which often meant writing in a law what one could then sell at a press conference” (I17 – expert, CSO activist). Focusing specifically on the regulations of labour migration, the Bossi-Fini Law, by restricting the possibilities of entry for work, created distortions in the labour market. Hence, the dominant logic was to present punitive and restrictive policy changes for electoral-driven interest, while ignoring the structural issues of the legal entry channels for work:

On one hand there is the ideological position. On the other hand, when looking for people to do certain jobs, especially our electorate - meaning the centre-right electorate - we turn to the immigrants. Why is there this contradiction? The answer is always the same: what pays the most is electoral consensus. And therefore, since it pays more to turn the political battle into slogans, saying ‘Italian first, immigrants are villains’, because this is what inflames the squares, political parties do this. The reasons are always trivial. (I16 – former Forza Italia Parliamentary politician)

As highlighted in the quote, the support that could be obtained by addressing citizens' fears through anti-immigrant discourse was the main driver behind right-wing action. At the same time, it creates a fundamental contradiction at the heart of contemporary labour migration politics: the same electorate that demands restrictive immigration policies is dependent on immigrant labour.

This contradiction operates on multiple interconnected levels. At the electoral level, politicians recognize that populist anti-immigrant rhetoric generates immediate political capital. Political success is measured not by policy effectiveness but by the ability to mobilize voters. Yet at the practical level, these same politicians acknowledge that "our electorate - meaning the centre-right electorate" actively seeks immigrant workers for jobs that native workers are unwilling or unavailable to perform. This contradiction between political rhetoric and economic reality generates the very complexity that makes migration governance so challenging. Policymakers find themselves trapped between irreconcilable political and economic interests: obtaining electoral support through restrictive discourse, while having to respond to labour supply demands by economic sectors that depend on immigrant workers. In short, political and economic drivers enter in contradiction, which is then reflected in the relationship between the political and economic sphere:

The Minister of Labour was Maroni of the Lega Nord at that point. Yet, despite the fact that Bossi-Fini Law had just been adopted, a huge demand for immigrant labour came from the regions governed by the Lega. And I can tell you, because I received the calls, the Minister was getting many solicitations for foreign workers from their own local Lega branches. In other words, these immigrants were indispensable for the economy, even if there was a cultural, identity-related, political rejection of foreigners. They wanted them as workers, full stop. Then they should have dematerialized and not have houses, mosques, customs, and habits. (I2 - Former Head of Cabinet, Ministry of Labour, early 2000 period).

This anecdote showing everyday dynamics within the Ministry under a Lega Minister highlights the conundrum within the anti-immigrant party and its electorate. This contradiction exposes how economic interests collides with political rhetoric even within the same political party. Influential parts of its electorate had contrasting interests: they had an economic interest for easy access to immigrant workers, and at the same time they supported socio-cultural rejection of immigration. This created an inherently unstable policy environment where formal restrictions must coexist with informal accommodations, generating fragmented and contradictory policy outcomes.

This tension is institutionalized in policies like the Bossi-Fini Law, which combine symbolic restrictiveness with loopholes that allow continued immigration, albeit through increasingly precarious and irregular channels.

The increased difficulties of entry and residence for work after the Bossi-Fini law had repercussions on the economic sphere, where two trends can be observed.

On one hand, economic actors adopted an opportunistic approach. Faced with the availability of irregular – or easily at risk of falling into irregularity – workers, they tapped into the pool of these vulnerable workers to economize on labour costs:

We prefer immediate benefits. One, the convenience of the policy of not depriving itself of a scapegoat; the convenience of families because all in all you can draw from a pool of people who have no rights and exploit them. Because it is convenient for all families to pay \$5 an hour instead of \$12. We stop at petty immediate conveniences without looking at the medium to long term. In the medium to long term, all of this is unsustainable (I4 – Expert, CSO Idos)

The quote highlights the role of temporality in decision-making. The preference towards immediate benefits of lowering labour costs in the short-term, is accompanied by a lack of a long-term vision by economic and political actors.

On the other hand, as labour immigration regulations were in open contradiction with the dynamics of the labour market, economic actors pressured the institutions at the central level to increase entry quotas and operated between legal grey zones given by the unclarity of the law. For example, at the local level employers interacted with the territorial administrations for a more open interpretation on the entry for work regulations, as explained in the following quote:

One of the things that happened a lot in 2002 is that Il Sole 24 Ore, the newspaper of entrepreneurship, put pressure on the Prefecture when there was an amnesty, making legal guides. It made a legal guide for regularizations, where it took all the texts vaguely ambiguous and interpreted them in favour of immigrants, without mentioning that it was a controversial issue. (...) And I remember that we (legal assistants) also benefited from this thing, precisely by bringing the guidelines of the Sole24Ore to the prefecture. Also, I remember entrepreneurs who called me angry because they had to waste time dealing with bureaucratic stuff from the Police Headquarters. They got angry, they called the superintendent, the superintendent (Questore) did not know what to say because they were not the usual communists complaining, but they were all entrepreneurs. (I17 – expert, CSO activist)

This episode recounted by a migration expert and activist highlights an example of strategies and dynamics that were enacted on the ground to minimize the negative impacts of a

restrictive regulative framework and maximize economic interests. At the implementation phase of the legislations, the policies that followed an electoral logic clashed with economic interests, often leading to regularization campaigns, where legal unclarity was exploited by both civil society and economic actors to stir the interpretation of the laws.

With the rooting of the immigration-securitarian nexus, the debate and political initiatives on how to best regulate the entry and residence for work progressively disappeared. The 2008 economic crisis accelerated this trend, also precluding the possibility of ex-post regularization through amnesty campaigns. As societal intolerance against immigrants rose, the political sphere had no interest in opening to a rationalization of the legislation, thereby adopting a 'no policy' approach. The distance between the policy landscape and the real world migratory and economic dynamics had long-term repercussions, as highlighted in the quotes below:

Entry policies for work in Italy became totally marginal. It has become the least used, if not unused, entry channel. In short, it was no longer enacted with a vision, with a long-term perspective. The impact of this lack of willingness in managing the entry channel for work has then favoured other phenomena such as the unplanned entries. The other most used channel of entry is that for family reunification [...]. This was and is the main channel of entry. However, people with a residence permit for forms of protection and family reunification are not perfectly matching the needs of the labour market. Exactly because the reasons for entry are different. (I5 – Anpal, Ministry of Labour)

In line with the European trend, economic migrants gradually became to be considered undeserving and unwanted. By suspending the programming of entry quotas for work in 2009, Italy no longer had regular entry channels for economic migrants, which de facto means making economic migration illegal. As expressed in the quote, closing legal possibilities for reasons of political calculations, created distortions through the type of entry channels used by immigrants, as well as through the imbalances in the labour market. On one hand, closure led to increased irregularity and to increased use of other entry categories. On the other hand, restrictions to labour migrants did not match the economic demands and needs of a country with an ageing workforce and population.

Here, the post 2008 developments highlight how the political interest of gaining consensus for electoral purposes hindered the viability of policymaking with a long-term perspective. The policies approved after the 1998 Turco-Napolitano were decoupled from the socio-economic reality as they followed short-term political logics of gaining immediate consensus through the instrumentalization of immigration. The legal framework has not been able to

effectively regulate labour demand and supply dynamics, in part because this was not the objective of political action.

Concerning the relationship between societal, economic, and political spheres, it follows that long-term trends already visible in the '90s, have not been acted upon. Nowadays, these unaddressed trends – such as population decline – become more pressing, bringing into light the contradictions between the political and socio-economic interests:

There is a deep schizophrenia: on the one hand, the social bodies (entrepreneurs, trade unions, institutions, families) know that the demand for immigrants is destined to grow in line with the progress of the country's demographic weakening; on the other hand, a good part of politics denies or neglects this evidence, scared of losing consensus. (I13 – centre-left PD, former parliamentary)

The contradiction between socio-economic interests and political interests carries a significant temporal dimension.

When talking about proposals for policy change to respond to contingent and future socio-economic challenges, the dominant political interests are characterized by a short-term temporal frame. The interests that spur action within the political sphere are focused on immediate rather than long-term gains. Whereas socio-economic challenges refer to future, long-term developments, political interests focus on the short-term timeframe of gaining immediate electoral support. This aspect was confirmed and emerged in many interviews with civil servants and civil society actors:

We have many issues that are set aside. Why? Always for the logic of the short term: if I have to get the consent right away, and I may have problems with this, I won't deal with it. (I5 – Anpal, Ministry of Labour)

The instrumentalization of immigration for political gains which began with the second republic, led to conflicts with contingent and expected socio-economic interests, so that it does not pay off politically to work for long-term solutions. This conflict leads therefore to the abandonment of pragmatic policymaking on labour migration.

In this situation of stalemate for policy change, the 2020 Covid19 crisis accelerated these pre-existing trends in the labour market, making political action necessary. With the closing of borders due to the pandemic, the regular movements of seasonal workers came to a halt, causing labour shortages in essential sectors:

Today, apart from motivations of rights, safety and legality, there are also motives of necessity and urgency because without foreign workers, whole economic sectors will come to a halt (Doc. ITA21 Interview to Emma Bonino, 06.05.2020)

The pandemic crisis changed the balance between the socio-economic and the securitarian drivers for policymaking, while adding pressure to quick action through the public health issue. In the crisis context, the political interests of gaining/maintain electoral support came to coincide with the socio-economic problems of providing options of legal entry and residence rather than with securitarian discourses of border closure.

Finally, after 2020, the declining demographic trends and sectorial shortages increasingly became a stringent and focal issue. For instance, the 2022 right-wing, anti-immigrant government did not close or reduce entry. On the contrary, it continued to increase entry quotas. At the same time, the anti-immigrant stance that has been successful in obtaining electoral consensus for twenty years, still dominates the logic behind political parties' choice of discursive strategy. Maintaining an anti-immigrant salient rhetoric does not solve the contradiction between socio-economic and political interests; instead, the increased urgency of solving labour shortages opened to silent measures while preserving the visible symbolic restrictive policies. However, as observed by a responder, the political system exploited – rather than solved – the inefficient migration governance for political gains, because “if there is a problem, it is a potential source of votes” (I29, Sergio Briguglio expert, CSO consultant).

7.2.2 Ideas: Party politics and the politicization of immigration

In this section, I analyse how values and beliefs contributed to the inability of renovating policies on immigration. Subsequently, I reflect on how interests and ideas are interconnected in setting a no policy approach with regards to labour immigration.

Several elements that characterize the political arena of this period are crucial for understanding how immigration has been treated. From an ideational perspective, the collapse of Italy's traditional party system in 1992 marked a transition from “party democracy” to “audience democracy” (Manin, 1997). In party democracy, mass parties with stable ideological identities mobilize loyal constituencies around coherent worldviews. In audience democracy, charismatic leaders appeal directly to volatile voters through media-mediated communication, prioritizing electoral responsiveness over ideological consistency.

The newly emerged parties of the second republic resorted to constructed narratives and charismatic leaders to win consensus. This transformation changed the relationship between political parties and policymaking, as outlined by a former politician:

We no longer have what politics once was. Before, whoever had ideas, visions, ideologies and believed that these were the best recipes for improving societal conditions, tried to convince the largest part of the electorate that his vision was the best one. At a certain moment, this mechanism got jammed. Political marketing was born, where what matters is not what I think, but what matters is what the electorate wants to hear. Because if I do not have the consensus of the voters, I cannot win the elections. Not only cannot I win elections, but I also cannot lead a party because if my party loses support, my leadership is questioned. This pushes the leaders of the parties to satisfy what are the presumed wishes of the electorate. So, they play the political game only according to what is believed to bring consensus (116 – former Forza Italia Parliamentary politician)

The new parties were not guided by stable ideological identities from which they could draw coherent visions on immigration policy. Instead, immigration became a narrative for gaining electoral support. Hence, labour immigration has not been treated as an issue that could be managed in different ways depending on parties' worldviews.

Within this political landscape, right-wing parties inflated a negative narrative towards immigration which was functional to gaining electoral support. Labour immigration has been firstly exploited as 'us versus them' narrative and then neglected.

The policy problem of labour supply and demand matching has been framed within a symbolic tough approach to immigration. For instance, the right-wing policy proposal contained in the Bossi-Fini Law, abolished the possibility of a residence permit for job search, and instead tied legal entry to the existence of a work contract ex-ante. Here, ideas and interests connect, as the ideas used in the narrative to frame immigration are functional to the interest of gaining immediate consensus. The policies implemented since then have had a highly symbolic value, without being able to effectively address neither the securitarian concerns, nor the establishment of legal channels for labour migration. The following quote exemplifies the relationship between the problem of immigrant workers' selection and its framing within a policy inspired by restrictive ideas:

We had to find some filters to regulate requests for entry for work.

Policy Problem

The filter that the Bossi-Fini law adopted was the contract of residence. You must have a residence contract before entering the country.

Policy Proposal

And that is madness. It is a normative hypocrisy, because you cannot think of anyone hiring a caregiver, a maid without ever having seen her. So, that was the big hypocrisy.

Restrictive, yet symbolic policy

Among the other things, the residence contract entailed something even more hypocritical: the employer had to certify that this person coming from abroad, would have lived in a house with a certificate of habitability. Which even the houses of Italians have! Do you think it is possible that an immigrant, after the first day of entering the country, has an accommodation with all the updated certificates on habitability of public housing, which is even more stringent than private housing? So that detonated this situation. And in fact, on 'click day' the entry applications were made by those who were already here, and who in many cases paid the employer to file the application for them. It is clear how this thing has deformed the entire system. It has pulled it towards the most unacceptable part from the point of view of the rule of law, of clarity of the norms. Because it is implausible that this normative framework can produce a positive socio-economic reality (12)

The policies produced had a symbolic value of showing the electorate that something had been done. This led to a *de facto* non-governance of immigration. The recurrent definition of Italian immigration governance as market-governed, is not the outcome of a political vision that stirred immigration within a liberalist paradigm, but rather it is the absence of a political guide. By focusing on symbolic policies with the short-term focus of elections, Italian politics left labour immigration to be self-regulated within society and the market. However, as the regulations were driven by a restrictive logic, socio-economic actors had to navigate at the edge of legality and between administrative hurdles detached from pragmatic logics, as exemplified by the quote reported above.

While immigration became a prerogative of right-wing parties, the left did not find a successful counter-narrative on immigration, able to stay faithful to the left-wing ideals and at the same time capable of addressing the anxieties of the weaker strata of the population. On the contrary, as public opinion became increasingly sensible about the topic, left-wing parties faced great constraints in countering the restrictive policies approved by the right:

All the interventions from 1998 until 2020 were promoted by anti-immigrant parties. (...) When the right was in power, it delegated the Lega for immigration policies. When the centre-left arrived, it either did not intervene, or the laws were not approved. The centre-left was shy, probably because the topic became sensitive. Apart from making restrictive laws, the right began to pump out a certain amount of propaganda, and public opinion started to follow these prejudicial lines: they steal our jobs, they feed the shadow economy, they get ahead of us in income support measures. [...] And the left-wing governments, which in theory should care about integration, equal treatment and so on, they have been very shy in their turn of government. (I4 – expert, CSO Idos)

As outlined in the quote, in the past twenty years migration policymaking has been monopolized by the right-wing securitarian paradigm, whereas the left did not have the support to reform and progressively lost the willingness to deal with a highly instrumentalized issue (I11; I27). Similarly to the Danish case, left-wing parties remained disoriented between their libertarian socio-cultural ideological tradition and the increasingly popular nationalist conservative ideology of the right-wing. The difficulty of the left to address the anxieties of working-class voters on immigration while maintaining the solidaristic ideology supported by educated middle-class electorate, led to a progressive retreat from migration policymaking. Caught between their cosmopolitan, pro-integration orientation and the demarcation demands of their traditional working-class constituencies, centre-left parties have struggled to develop coherent positions on migration that could simultaneously address economic anxieties and maintain their internationalist credentials (Kriesi et al., 2006).

Differently than the Danish case, rather than framing migration through the lens of workers' protectionism, centre-left parties maintained humanitarian and solidaristic framings that resonated primarily with educated, urban, and Catholic constituencies. However, this position creates a disconnect between optimistic migration narratives and the concrete concerns of economically vulnerable groups, central to populist mobilization:

I am not saying that you have to be against, but if you say: "we are in favour!", people say: "yes, but what about me? What about my son? What happens to him? Who am I? (...) That is: if I am white, ugly, do not speak languages, and I am left on a corner – I get angry. I am not saying that you have to limit the rights of the other group, but you cannot do the opposite operation either! Since you're poor, the rainbow yes, you go in the archive of history. That one does not willingly go in the archive of history. He fights against it, and the possibility opens for some madman who says "we'll bring you back into vogue" - bullshit - but he will go after him (I3 – former Head of Cabinet, Ministry of labour, 1980 – early 2000s).

The quote above highlights the link between the populist rhetoric and the growing alienation between working classes and the centre-left political parties. On the contrary, anti-immigration rhetoric and policies have been used by the populist right to identify a scapegoat

and to provide an illusion of providing an answer to structural problems of growing inequality and worsening conditions of the poorer strata of the population. These parties successfully exploited the growing inequalities and status anxieties generated by globalization processes, using anti-immigration rhetoric as what one interviewee described as "the modality through which to create an illusion of giving answers to problems that are much more structural" (I6). The instrumental use of migration discourse thus serves a dual function: providing a concrete target for diffuse anxieties about social change, while positioning populist parties as defenders of national sovereignty against both immigrants and cosmopolitan elites.

Ultimately, the immigration debate got polarized between securitarian and humanistic-solidaristic poles. This bidimensional vision leads to a simplification of immigration complexities for the purpose of political competition. The binary framing obscures the multidimensional nature of migration, reducing complex questions of labour market integration, social cohesion, and economic development to a political contest between security and humanitarian concerns. This discursive narrowing reflects the broader tendency for political competition to become organized around symbolic rather than substantive policy dimensions of immigration. Accordingly, the regulation of labour migration became sidelined also in the discursive repertoire, which polarised around asylum-seekers and Mediterranean arrivals.

7.2.3 Institutions: change and continuities⁹

In this section, I analyse the interaction between path dependency and policy transformation in labour migration governance. As the labour migration policy direction throughout the 2000s has been quite stable, I examine in what way institutional structures hindered policy change. Moving to the 2020 Covid19 crisis, the section analyses how and to what extent a sudden shock impacted policy direction on labour migration. While previous sections highlighted how a combination of political interests and shifting ideational frames contributed to policy restrictions and policy inertia on labour migration, here, I focus on the relationship between path dependency and institutional change. The analysis considers both

⁹ This section draws upon material prepared during the PhD that has already been published (Pozzato, 2025b)

the structural continuities and changes that characterized the transition to the second republic, and the role of crisis events in either catalysing or constraining policy change.

An element that already emerged in the analysis of the early phase is the difficulty to move beyond tools for labour recruitment that proved inefficient, such as the mechanisms regulating entry quotas. With this regard, the administrative structures responsible of governing labour migration play a big role in policy immobility. Although the inter-ministerial dynamics will be further analysed in section 7.3, here I analyse the impact that the administrative structure has on the immobility of immigration policy.

Interviews with civil servants and social partners revealed a recurring pattern: the entrenched organizational culture of national administration has undermined efforts to reform ineffective labour migration regulations. This administrative culture operates as a source of institutional stickiness, creating self-reinforcing mechanisms that resist policy innovation.

The interaction between symbolically oriented legislation driven by political actors, and the complex bureaucratic structures envisioned to manage labour migration policies systematically led to inefficient policy outcomes. That is, policies designed to signal restrictive intent to voters—rather than to function effectively—became embedded within complex administrative systems. In turn, in a context dominated by a restrictive paradigm, administrations lacked the incentive to implement meaningful change. This dynamic produces three interconnected pathologies: economic actors are compelled to exploit legislative loopholes, street-level bureaucrats are left with wide margins of discretionary power, and the fundamental policy framework remains substantively unchanged despite periodic reform attempts.

The systemic nature of this problem is captured in one civil society expert's assessment:

One of the most complicated things about managing immigration laws, complicated both for us who have to protect foreigners and for those who have to manage it, is understanding something about it. This also implies managing things that are in contradiction with each other. Because obviously, with such a ramshackle law, the bureaucracy basically has a free hand. Because it doesn't have a real rule of conduct from politics. It has fairly arbitrary indications, and the bureaucracy has its restrictive logics, and basically finds itself very comfortable with these logics. (117 – Expert, CSO).

The excerpt reveals how poorly designed legislation creates space for bureaucratic discretion, which might reinforce restrictive implementation practices. In turn, these restrictive practices become institutionally embedded over time. In practice, the wide room of manoeuvre given by the unclear and at times contradicting regulations offers opportunities of interpreting and applying them in either more liberal or more restrictive terms. However, the process risks leading to arbitrary decisions, and it is therefore highly dependent on inter-actors' dynamics and contextual factors.

Furthermore, as highlighted in some of the interviews, once a law is approved by the Parliament, it needs implementation indications, which are provided by the relevant administrations of the different Ministries. Therefore, the organizational culture of the administrations is central for how the law will be interpreted and implemented. From the interviews, it emerged how the difficulty in innovating the legal framework came also from the difficulty in changing the organisational culture, important for how laws are interpreted:

It is quite useless to wage major battles for the modification of the legislation, because often even a good reform, if it is not placed on the legs of a good administration, is completely useless. On this aspect, I collided with half the world in the past, like when Ferrero (Communist Refoundation party) was Minister of Labour. I had a contract with his party for consultancy on migration policies. He just wanted to abolish the Bossi-Fini. That is fine, I want that too. But if you do not get things moving in the administration, if you do not make training and refresher programs, if you do not support the positive energies that exist within the administration, you can make the best reform in the world, they will not care. (I17 – CSO, expert)

This episode highlights the important role played by administrative capacity and culture in blocking or supporting legislative reforms, creating a form of institutional veto power that operates below the level of formal political decision-making. At the same time, this administrative influence is quite an invisible element in the immigration policy debate. Therefore, in a time of mediatization of politics, politicians are more incentivised to campaign for great policy changes rather than investing in silent reforms of the administration.

The shift of immigration from a low-visible political topic to a politicized issue impacted how politicians responsible over immigration viewed their role. Immigration increasingly became a marketing area for individual politicians aiming at personal electoral gains, which deforms the long-term policymaking process and the overall rationale of the immigration governance framework:

It is certainly very tiring, too complicated with migration policies. We are always chasing after the personalisms of ministers who want to leave their indelible mark on the country's history. There is never the patience and realism to make those small patches that would allow the instruments to function well. (...) And we never manage to sit down at the table for making realistic improvements, free from: "Oh God this can't be done, this is politically unfeasible!" In the end we never manage to get our hands on it. (...) The ideas are all very clear. But we never manage to get there." (I10 – ANCI representative, migration area)

The reference to "personalisms of ministers who want to leave their mark" illustrates how migration policy became a vehicle for visible political actions rather than pragmatic governance. Similarly to the episode reported above, the respondent highlights how incremental ("small patches"), less visible improvements are sidelined in favour of declarations of major changes for political interests. This pattern reflects the contrast between political and policy temporalities: the misalignment between electoral cycles that reward dramatic gestures, and the longer temporal horizons required for effective institutional development. Furthermore, immigration became trapped within a political environment that treats any non-restrictive reform as politically unfeasible, hindering a rationalization of the immigration regulations.

Throughout the coding process, it emerged how the system set up to govern labour immigration is characterized by a combination of complexity of the administrative structures and procedures, together with symbolic-oriented, rather than functional policies. This combination gives rise to a system where innovation is difficult to implement, and at the same time there are incongruences between the policies, which allow for discretion.

Finally, another feature of the governance of immigration that emerged during the second republic is the declining importance of consultations with the horizontal level. Trade unions and volunteer associations progressively lost their power and legitimacy as governments' interlocutors, which in turn led to an impoverishment of the public debate and of the public awareness on issues of public interest:

Political parties, trade unions, professional associations...the so-called intermediary bodies – do not matter anymore. They have been so discredited. Intermediate bodies used to mediate between the country's gut feelings and the institutions. Voters were somehow induced, instructed to make certain choices. (...) This mechanism has broken down. With the intermediate bodies gone, we have institutionalized the country's gut feelings. (I16 – former FI parliamentary politician)

The organizational bodies that traditionally filtered and channelled popular sentiment into articulated, reflected policy positions – historically performed an ‘educational function’ of democracy, shaping public opinion rather than merely responding to it (Urbinati, 2016). Their decline has created what the interviewee characterizes as the “institutionalization of gut feelings”, where unmediated popular sentiment directly enters parliamentary discourse without the moderating influence of organizational filters. This transformation has particular relevance for migration policy, which has become a paradigmatic case of a complex policy challenge subjected to unmediated, instinctive popular sentiment.

The organizational structure put in place to oversee the entry procedures for work purposes is extremely complex. As highlighted in the quote below, the process to obtain an entry visa for work involves several segments of different administrations. This leads to a lengthy process, which does not correspond to the needs of the labour market:

The current system of entry by quota foresees an unspeakable quantity of controls, involves an unspeakable quantity of databases, competent administrations, the Ministry of Labour, the national inspectorate, a structure of the Sportello Unico which has within it these components, plus the Ministry of the Interior and the individual Prefectures... An employer should present the application for a foreign worker who is abroad, therefore who knows how he/she got to know him, submit the application, and then a whole round of back-office checks start – which mean that the times for issuing the entry permit have lengthened dramatically, exceeding a year. (I5 – ANPAL, Ministry of Labour)

A procedure to obtain a work permit that takes more than a year is decoupled from the reality of the labour market. This decoupling leads to the fact that the labour market self-regulates, in-between the laws in place. For instance, the entry system through quotas has been used for regularizing foreign workers that entered irregularly and found a job in Italy:

According to the entry quota system as it is until now, the employer must hire a worker that is abroad. And as in reality that worker was not abroad but was already in Italy, it was happening that – once the application was accepted – the worker that was already in Italy had to leave the country irregularly – with the risk of being intercepted by the border patrols and thereby expelled – go back to his/her country of origin, waste a lot of money, wait for the embassy to issue the permit, and go back to Italy! (I9 – trade union UIL)

The combination of symbolic legislation designed to signal restrictive intent with complex administrative structures that are difficult to reform, creates a stable equilibrium of policy inertia. In this way, politicians can claim credit for tough immigration laws, bureaucrats retain discretionary power within established procedures, and economic actors develop parallel systems that circumvent formal regulations.

The difficulty in entering through legal channels, together with the precarity of a legal residence – as it is connected on having a regular work contract – contributed to the presence of irregularised immigrants. The lack of innovation in the legal entry channels for work favoured the use of improper channels, and the periodical increase in numbers of undocumented immigrants, managed through regularization campaigns.

Within this framework, the Covid19 pandemic, as a sudden, exogenous shock, required a reaction from policymakers. Looking at the documents and interviews, there are elements of change as well as clear continuities with the established *modus operandi* in the Italian immigration policymaking process.

Regarding the elements of change, the pandemic context accentuated general labour market trends that were already present but not politically salient, such as workers' shortages in low-paid occupations in important productive sectors. Hence, the narrative framework of low-paid immigrants being a burden and stealing jobs was both not sustainable and not functional in a time of sudden emergency. From an (economic) utilitarian point of view:

Today many people, many young people made a choice during the lockdown period, and decided that certain conditions are not acceptable anymore, even if you need to work. Therefore, we have whole sectors that do not have workers. Hence, the instrumental political debate – but useful for a change in the system – started to say: we have to rethink the legal entry channels. (I5 – Anpal, Ministry of Labour)

From a (political) utilitarian point of view, the emergency led to a relaxation of immigration anxiety and of policymakers' overfocus on migration exclusively as a safety and securitarian issue. The crisis forced politics to renew the attention on labour immigration policy. The context of the pandemic, where workers were urgently needed – reopened the debate. On one hand, the proposition of an amnesty campaign in 2020 became a politically viable choice, whereas already a year earlier it would have faced enormous opposition. On the other hand, the context enabled a renewed debate on how to facilitate labour supply.

The changed context after the pandemic, and the more pressing concerns coming from subsequent crises (pandemic, Ukraine war, socio-economic crises) changed the narrative framework and saliency of immigration. Together with this, the increased difficulty of recruiting workers in certain sectors changed the priorities on immigration, which is now increasingly conceived as functional. Yet, the provisions taken to deal with the management

of economic immigration do not constitute a fundamental rupture with the established path of policymaking on the subject. The promotion of a regularization campaign is nothing new in the Italian landscape. Furthermore, it is important to underline that the 2020 amnesty – even in the extraordinary context of the pandemic – was anyway shaped by years of anti-immigration and securitarian attitudes, as shown by the fact that important limitations were introduced in the measure to reduce the number of potential beneficiaries:

Those elements of rigidity in the procedures were put there. Why? Because we need to set some boundaries. These limits are, however, a legacy of that right-wing attitude and of that part of the 5 Stars that still followed the Lega. (I11 – Ero Straniero activist)

The quote highlights the link between the restrictions included in the regularization and the political weight that twenty years of securitarian discourses had on migration policymaking.

Finally, its implementation has been extremely slow, as shown by the numbers, de facto leaving people in their irregular status:

This regularization is a shameful failure. So, I even think that sometimes, the political choice is enacted in the administrative functions rather than in the law. That is, in the choice of putting legs to a law or not. And this choice makes opposition even more complicated, because it is very technical, and you end up getting lost in the administrative bureaucracy. (I10 – ANCI representative, migration area)

The 2020 regularization – even if it represents a political opening after years of closure on labour migration policies – was constrained by the institutional legacy of decades of restrictive policymaking. Years of politicization and restrictions produced administrative structures, legal frameworks, and low investments in personnel that made implementation difficult. Thus, even when external crises like the COVID-19 pandemic create windows of opportunity for policy change, the accumulated weight of restrictive governance systems limits what is practically achievable. The result is a form of resistance to radical change, as its scale would exceed the available political resources, enabling policymakers to bring only minimal fixes within the existing restrictive paradigm.

The subsequent measures taken by the Conte II, Draghi and Meloni governments to reform legal entry channels for work, do not hint at a substantial renovation of the existing framework, but rather at gradual readjustments within the established path. Hence, entry quotas have been updated and increased. At the same time, the restrictive securitarian

ideology and the laissez-faire attitude that characterized the institutional framework in the past twenty years makes a radical rupture very hard to be achieved:

There has not been a radical change in the management of immigration. There are initiatives trying to put pressure for a systematic reform, because now we also have an obsolete legislation. But the political context does not allow major transformations. (I4 – Expert CSO Idos)

The quote highlights how the instrumentalization of immigration throughout the past twenty years impacts the possibilities of envisioning policy options that are other than policies within the restrictive paradigm. The combination between a dysfunctional governance framework and the persisting demand for migrant labour in precarious jobs favours the proliferation on the ground of opaque systems for circumventing the law, often at the expense of the rights of the immigrant. As confirmed in interviews with legal experts and civil society activists, the complexity and length of the procedures for obtaining the residence permit even after having obtained a work authorization leaves space for irregularity, precarity and risk of exploitation (I30; I23; Ero Straniero, 2023).

Finally, a general feature that represents a *modus operandi*, is laissez-faire as the main instrument for dealing with immigration issues. The fifty years of Italian policymaking on immigration are characterized by a widespread approach by policymakers that prefer “not to see” (I3):

The debate on overcoming the Bossi-Fini has totally disappeared from the agenda. And that is a politicians’ responsibility. That law is still there. (...) We have had technical governments with renowned legal experts, we have a government of national unity, yet none does anything to move past the Bossi-Fini. Also, in the NRRP plan the topic of immigration is not mentioned. There is a will of laissez-faire. Let’s say that our main tool to deal with immigration is laissez-faire. (I2 – former Head of Cabinet, Ministry of Labour early 2000s)

The characterization of Italian migration policy as “laissez-faire” emerged in several interviews. This is not the classical liberal laissez-faire of minimal state intervention in markets. Instead, it is a form of non-governance that emerges from political and institutional paralysis, rather than from ideological commitment to market mechanisms.

Starting from 2020, apart from the parenthesis brought by the pandemic emergency, the topic of an innovation of the legislative framework for immigration disappeared. Entry quotas have been recalculated and increased, without a fundamental rupture with a framework that proved not to be working. Even in the 2021 Nation Recovery and Resilience Plan (NRRP),

which should address the economic recovery of the country post-Covid19, immigration was not included. This hints at the approach that policymakers had on immigration, of avoiding governing it and thereby leaving it to societal and economic forces.

7.3 Inter-actor dynamics

In this section, I analyse the roles and interconnections between the actors that have authority, interest, or responsibility over labour immigration. Adopting a longitudinal perspective, I look at how the relative influence of each group of actors and their relationship changed throughout the years. The groups of actors included in the study are on one hand part of the governance structure with authority to act in the management of labour immigration. On the other hand, they are groups of actors that, while not officially involved in the policymaking process, have a role of advocacy, lobbying or service-provision.

7.3.1 Dynamics within and between political parties

The dominant logic behind political actors' actions is to win the elections. Hence, when dealing with any policy problem, the final consideration is on how to address it in order to obtain the highest possible support from the electorate. In this section, I analyse how political parties shaped their position on labour immigration.

As outlined in the previous sections, during the first republic immigration was a transversal issue to all political forces, shielded from politicization for electoral purposes. During the early phase of migration policymaking, the solidaristic and humanitarian rhetoric of left-oriented and Catholic actors was dominant in shaping the debate on immigration. Catholic political and civil society factions framed immigration in terms of Christian values of charity and fraternity. Migrants were viewed as brothers and sisters in need, and the Christian teaching was to offer support. The socialist factions viewed the phenomenon in terms of class-struggle. Hence, immigrants were included in the same category and project as the local working-classes. In practice, the egalitarian and solidaristic framings enabled a season of immigration policymaking sensible to humanitarian and inclusionary concerns.

The radical transformation of the political landscape during the end of the 1990s had important repercussion on how immigration policymaking has been treated. Similarly to Denmark, newly emerged right-wing populist parties took ownership of the immigration debate, whereas left-wing parties struggled to find a convincing counter-narrative. In this section, I zoom in the positions taken by the main parties that constituted the political

landscape of the second republic, namely Forza Italia’s ambiguous position, Lega Nord appropriation of the anti-immigrant rhetoric, and Democratic Party centre-left approach.

Starting from 1992 rise of Berlusconi’s Forza Italia and Lega Nord, the centre-right coalition defined itself as defending security, preserving the national identity, and prioritizing Italian interests vis-à-vis foreign citizens. On the contrary, the centre-left coalition maintained a rational progressive approach to the topic. These opposing standings are visible in the debates and parties’ positions regarding the approval of the 1998 Turco-Napolitano Law:

Table 10: Comparison of narratives used by left- and right-wing representatives on the approval of the 1998 Turco-Napolitano Bill

Centre - Left	Centre – Right
<p>The bill n. 3240, consists of 46 articles, divided into 7 titles, which gives it a truly organic and homogeneous character [...]. My judgment on this bill is positive, as it is a notable attempt to re-discipline the entire matter. [...] In particular, the tool of the sponsor for the access to the labour market of the non-EU foreigner is the beginning of an effort to identify more suitable entry channels for work.</p> <p>The problem of expulsions will have to be carefully studied, combining security with full respect of the constitutional norms.</p> <p>The part of the bill concerning the civil rights of immigrants is, however, a masterpiece. It is in everyone's interest that there be regular migrant workers in Italy, to whom all civil rights and even some political rights are recognized. If anything, it will be necessary to carefully verify the concrete feasibility of the provisions that these rights recognize. The problems of inflows and seasonal work must be further discussed. [...] On this specific point, not even this Bill identifies a solution for verifying the effective number of seasonal workers needed in Italy, and for making them emerge from any "illegal work". (Domenico Maselli – relatore di governo. 29.05.1997, my emphasis)</p>	<p>The approval of the bill would mean a genetic change or even the end of our society as we understand it. The underlying philosophy of the Bill is openness to immigration, "without fears and complexes about refusal". [...] I don't think it is something to be ashamed of to pose the problem of the effects of an indiscriminate opening of borders: opening at all costs is not a sign of civilization, given the risk of the very survival of our society. [...]</p> <p>The bill's report also states that the philosophy of full acceptance of immigrants will bring about peace and justice. If this goal was to be achieved, we would have to face strong contrasts caused by this genetic change in society. Multiculture may be a theoretical goal, but in practice it leads to societal unrest and tension. Every nation must protect its own interests and we must not forget that the Italian economy is in a recession and that we have employment problems. Immigrants are employed in undeclared work, because employers prefer them to Italian citizens as they accept lower wages. Thus, for the future, we will have more and more employment problems and "social cataclysms" as the labour market becomes occupied by immigrants.</p> <p>As far as the problem of public order is concerned, it cannot be ignored that often immigrants, unable to work, fall into crime" (Rolando FONTAN – Lega Nord Discussion in Parliamentary Commission 19.06.1997, my emphasis)</p>

The comparison of the quotes highlights the different stands taken by the two coalitions. The centre-left continued the approach initiated during the first republic of aiming at governing and disciplining immigration in a manner that was coherent, rational and conform to the Constitution. On the other hand, the right-wing parties started a narrative of immigration that gives voice and amplify the fears connected to the increasing number of immigrants.

Similarly to the Danish case, the centre-left has mostly been in charge and took responsibility over immigration policymaking in the early phase, emphasizing the goals of comprehensiveness and respect of immigrants' human and civil rights. However, this approach had two significant limitations. Firstly, as emerged in the interviews and in line with other literature (Però, 2005b, 2005a), the left-wing rights-based discourse failed to recognize and include the ethno-cultural peculiarities of immigrants, reducing a heterogeneous group into a homogeneous object, with little agency and participation in decision-making processes. Secondly, the abandonment of the class struggle for a moderate 'third way' in a time of welfare cuts, combined with an internationalist, optimistic frame on immigration distanced working-class communities.

Within this paradigm, anti-immigrant positions were marginalized and stigmatized, creating a political opportunity that Lega Nord successfully exploited by positioning itself as the authentic voice of citizens whose immigration-related concerns had been dismissed or morally condemned by the mainstream political establishment. As shown in the excerpt of the speech of the Lega Nord parliamentary in the table above, Lega Nord initially presented itself as voicing legitimate fears of workers and citizens. Expressions like "It is not something to be ashamed of to pose the problem of the effects of an indiscriminate opening of borders" pose the Lega Nord as the voice of the people, and legitimize the fears connected to immigration.

The new right-wing political actors promoted two main strategies to win electoral support with regards to immigration.

Berlusconi's Forza Italia adopted a strategy of political opportunism on immigration. Hence, its position on any topic depended on where the general mood of the electorate leaned towards, as exemplified by the case of the Otranto tragedy:

Good Friday 1997. Giorgio Napolitano was Minister of the Interior, and he had given orders not to allow boats from Albania to enter illegally. In the Strait of Otranto, a patrol boat positioned itself across a boat of immigrants. There was an accident and the boat sank. The political result was that the head of the right-wing opposition Silvio Berlusconi, went to lay a wreath in Otranto. Is it clear how complicated this matter is? Because the government was a Prodi government, it was not an anti-immigrant government. And the leader of the opposition, who always said that this was a pro-immigrant government, goes to Otranto, lays a wreath and says: "You evil ones, you have closed the wall of hope!" (13 – former Head of Cabinet Ministry of Labour, 1980-early 2000s).

This quote highlights the political opportunism around immigration issues, as Forza Italia positioned itself according to the perceived popular sentiment. The Otranto case shows how Berlusconi, despite typically taking anti-immigration stances, seized the moment to criticize the centre-left government when the tragic incident occurred, effectively using the tragedy to attack his political opponents regardless of ideological consistency. The political logic that characterised Berlusconi's political leadership was to take position depending on the dominant position in society, without proposing any viable policy on how to govern the issue.

Instead, Lega Nord – renamed Lega in 2014 – forged its political agenda around anti-immigration rhetoric and the defence of national identity. Originally founded as a regionalist movement that scapegoated southern Italian citizens and central government elites, the party progressively shifted its focus toward anti-immigrant and anti-EU positions. Consequently, opposition to immigration became the cornerstone of Lega's political campaigns. However, this stance lacked a pragmatic vision for effectively governing immigration flows, as it relied primarily on symbolic policies and populist appeals.

Before the GEC, the centre-right coalition led by Berlusconi's party was not cohesive on the anti-immigration position, but it contained nuanced stances.

Initially, the centre-right coalition was composed by a moderate centrist wing of Christian Democratic and liberal heritage, and by a far-right wing composed by the Lega Nord and by the post-fascist Alleanza Nazionale. Immigration policy quickly became a Lega prerogative, supported by the xenophobic position of Alleanza Nazionale. The centrist part of the coalition had an ambiguous attitude to the approach of these two parties. On one hand, it did not get involved in immigration policymaking, thereby not interfering with the restrictive and xenophobic approach of the allies. On the other hand, as the restrictions to entry for work introduced by the Bossi-Fini reform in 2002 damaged the businesses and entrepreneurs

traditionally voting for the right, the moderate wing sought to soften the hard line promoted by the Bossi-Fini, by for instance pushing for regularizations. Hence, from 2002 to around 2007, the right-wing coalition conducted a dual strategy of harshening entry conditions and stay of labour immigrants, while at the same time counting on the availability of (irregular) immigrant workforce and on regularizations. With this regard, the two large regularization programs promoted between 2002 and 2006 were approved after an ongoing tension between the liberal centrist faction acknowledging the need for labour immigration, and the populist faction using a zero-immigration discourse.

From a discursive perspective, the anti-immigrant restrictive narrative of Lega Nord policymakers was opposed by the utilitarian discourses of the moderate right actors, as the quotes below highlight.

The demand for foreign workforce is groundless because we have a lot of Italian workforce available. When I listen to proposals of increasing the entry quotas as Pisanu does (former Christian Democrat, Forza Italia politician), I think about Sicily, where the youth unemployment rate is the higher in Italy. So to the employers I say: hire Sicilian workers. (Doc. IT7, interview with Minister of Labour Maroni a La Repubblica 22.10.2004)

This excerpt from a newspaper interview with the Lega Nord Minister of Labour exemplifies the populist "Italians first" rhetoric that deliberately oversimplifies complex labour market dynamics. Maroni's argument reveals several analytical shortcomings that characterize populist discourse on immigration. First, it ignores the structural mismatch between available jobs and worker qualifications, as well as the geographical disconnect between where unemployment is highest and where labour demand exists. Second, it disregards the segmented nature of labour markets, where immigrant workers often fill positions that domestic workers are unwilling or unable to take. Third, the statement reflects a zero-sum conceptualization of employment that fails to acknowledge how immigration can create complementary rather than competitive labour dynamics. By invoking Sicily's high youth unemployment as justification for rejecting immigration, Maroni employs a classic populist strategy of presenting complex socioeconomic problems through simple, emotionally resonant solutions that neither address labour shortages in specific sectors nor tackle the underlying causes of regional unemployment disparities. Hence, the goal remains to show an anti-immigrant position, at the cost of neglecting to find effective solutions.

The following interview with a former Christian Democrat and member of the centre-right coalition highlights the divergent position on labour migration taken by the moderate members of the coalition:

We are talking about properly matching immigrant labour supply and demand.(...) If a business needs workers or a family needs a domestic worker, they cannot wait. The law needs to be streamlined. Those who can demonstrate that there is an employer with a work contract already prepared for them should be allowed to stay in Italy. We are not talking about one, ten, or a hundred isolated cases, but tens of thousands of stories. It is therefore necessary to reform the quotas, let the market self-regulate, obviously with effective controls to prevent fictitious work contracts. (Interview with Minister for Parliamentary Relations Giovanardi in *La Repubblica* 24.10.2004)

Hence, the liberal centre opposed the restrictive approach of Lega Nord on labour migration, by adopting a utilitarian narrative focusing on employers and families' reliance on migrant workers. The statements reported above illustrate the pragmatic, market-oriented approach on labour migration of moderate right-wing politicians who recognized the disconnect between restrictive immigration policies and actual economic needs.

Whereas the issue of labour migration was contested between allied parties, the common ground in the governing coalition was the harshening regulations on civil and working rights of immigrants.

The contradiction between immigration rejection and need for labour immigration reflected a deeper tension within the centre-right electorate, which simultaneously desired restrictive entry and stay policies, while benefiting from access to cheap labour. Therefore, the centre-right policy mix featured on one hand highly visible restrictive measures on entry and expulsion of undocumented immigrants, that in practice could not effectively prevent irregular entries. On the other hand, it allowed for silent openings through regularization programs and difficulties in implementing actual deportations. Finally, the EU enlargement and the progressive liberalization of visa policy with EU neighbouring countries enabled for the smoother entrance of migrant workers. As of 2007, the EU enlargement to (especially) Poland, Romania and Bulgaria contributed to the entry and residence of workers without national restrictions. Additionally, governments increasingly removed the requirement of an entry visa for citizens of Eastern Europe:

The 2010 Berlusconi-Maroni government suspended the visa requirement to all the Balkan countries, including Albania. The Gentiloni (centre-left) government, on one hand signed immigration containment

agreements with Gheddafi, on the other hand it suspended the visa requirement to Ukraine and Moldova. So, there is a rupture between the immigration that is narrated, discussed and politicised, and the real immigration dynamics as well as the actual immigration policies. (I1 – Expert, migration scholar)

In this way, the demand for immigrant labour continued to be filled by invisible migrants, able to enter and work irregularly, whereas the political discourse and salient policy of the right-wing coalition became dominated by the immigration-security nexus.

Following the 2008 economic crisis, centre-right parties progressively abandoned their economic framing of immigration to embrace the Lega anti-immigrant rhetoric in socio-cultural terms.

The events that followed the Arab Spring were instrumental to the campaign of the Lega, which since then has focused exclusively on arrivals from the sea through a securitarian lens. The surge in arrivals from the Mediterranean were functional to the Lega anti-immigrant rhetoric. During that period, the party's popularity increased to become the leading party of the right-wing coalition. The Lega position and narratives in opposition and in government solely focused on safety, borders, and Mediterranean arrivals, whereas labour migration was both neglected in debates and not governed politically.

After the crisis caused by the Covid19 pandemic, the strategy adopted by the populist far-right seems to be a securitarian, 'tough' approach towards arrivals from sea – with 'spectacular' decisions such as the war to the NGOs in the Mediterranean – and at the same time a utilitarian approach that considers the need for foreign workers in the Italian labour market.

The centre-left coalition that emerged after the first republic comprised parts of the moderate Christian Democratic party, the former Socialist party, and the Communist party. The most significant transformation has been the abandonment of the socialist project after the collapse of the communist regimes in the late 1980s. The Italian Communist Party (PCI), the largest communist party in Western Europe, was dissolved in 1991 and relaunched as the Democratic Party of the Left (PDS), with a smaller radical faction founding the Communist Refoundation Party (Maraffi et al., 2000). In the following years, the moderate line became dominant, whereas the more leftist positions increasingly turned into minor parties. With the

post-socialist transformation, the newly emerged left-wing parties moved away from the class focus to emphasise values of acceptance and multiculturality.

As immigration became increasingly politicized over the past two decades, this traditional rhetoric has been progressively attacked by the right-wing as a naïve, '*buonista*' (do-gooder) position incapable of grasping the anxieties of the Italian population. At the beginning of the 2000s, the Italian centre-left found itself in a similar dilemma as the Danish Social Democrats, with two main differences. Firstly, the Italian context is considerably influenced by Catholic ideology, so that a solidaristic approach to immigration has a stronger support. Secondly, civil society organizations and trade unions in Italy play a proactive advocacy role towards a pro-immigrant stand. On the contrary, the humanitarian principles that guided the Danish Social Democrats' policies did not have a strong external support, leading to a greater divide with its electorate. Ultimately, the Danish centre-left parties ended up adopting anti-immigration stances, whereas the Italian centre-left still maintains a moderate support for solidaristic and rights-based policy reforms.

In the exacerbation of the debate on immigration, the left-wing has been taking the role of countering the right-wing populist anti-immigrant narrative. However, whereas the right-wing coalition cohesively stood behind the anti-immigrant narrative used by the Lega since the GEC, the left-wing coalition has been characterized throughout the past 20 years by internal cleavages, reflected in different visions of immigration. These internal differences contributed to an increased difficulty in opposing to the right-wing narrative and in proposing an alternative:

From 2006 to 2008 I worked at the Ministry of Social Solidarity, while at the Ministry of Labour there was a former CGIL trade unionist. We set a table for reforming the Bossi-Fini, a proposal for a reform was produced, of which in the end nothing was done. Because the parties experience these internal cleavages, these internal difficulties in arriving at an appropriate, modern definition of this whole affair. [...] Unfortunately, there are hypocrisies emerging...We have not been able to define the goal. And this betrays the lack of a real will. Because the centre-left has not been cohesive on these issues. There is the centrist part which was not very favourable, let's say so. Because the cultural, identity motif plays a role there too. The Catholic ideology... As an anecdote: when they built the mosque in Rome, it was a drama that the minaret should not be higher than St. Peter's Basilica. (I2 – Head of Cabinet, Ministry of Labour early 2000s)

As outlined in the quote, it has been difficult to find a shared vision that could counter the popular anti-immigration stance, and that could maintain a cohesive stand.

Modern left-wing parties pursued what has become known as a third way approach—a blend of neoliberal principles in economic policies with social-democratic tradition (Bandau, 2023). Within this broad paradigm, migration is conceptualized not merely as an ethical imperative tied to ideals of an open society, but as an economically rational policy that can foster wealth creation and productive growth. Yet, this economic rationalization of immigration policy exposes a fundamental contradiction that has fractured left-wing cohesion. The cost-benefit distribution of immigration—essentially a form of labour market liberalization—operates in unequal ways. While migration generates significant benefits for entrepreneurs and capital owners through access to flexible, often lower-cost labour, it simultaneously creates inequalities and economic insecurity that disproportionately impact working-class communities who traditionally form the electoral backbone of left-wing parties.

Left-wing actors approach overlooked people's concerns about perceived community integration, public service capacity, and local security issues. The lived experiences of immigrants' criminality by citizens living in the outskirts of the big cities, their fears, their irritation faced with micro-criminality, have not been dealt with by the left (Borgna, 2011). As analysed by a former PD parliamentary, progressive political solutions failed to address critical questions on the impact of immigration, that were at the core of citizens' concerns:

The political solutions of the progressives are lacking in a crucial aspect, which affects the policies of legal admission to Italy, and which is of great importance for public opinion. [...]How and with what procedures is it ensured that immigration does not lead to the weakening of the community, the erosion of social rights, the usury of public services? Now, the argument of the answer "without immigration the economy would suffer - and with it, in the long run, also the community, public services, etc..." - is a right answer in abstract, but lame and asymmetrical. The degradation of the community is immediately perceived and personally suffered; the economy (or, better, the macroeconomy) is instead a mysterious and distant entity (Livi Bacci, 2012 – Immigration, il vademecum del riformista pg. 31).

The left-wing rational perspective, while morally grounded, failed to address citizens lived experiences of community change, public service strain, and local security concerns. Progressive political solutions consistently avoided addressing practical questions about legal admission procedures, community integration capacity, and the prevention of social service degradation. Furthermore, the left counterarguments about immigration's macroeconomic benefits appeared abstract and unconvincing to voters experiencing immediate, tangible pressures on wages, housing, and public services.

The polarization between left and right positions created additional strategic constraints. Left-wing politicians risked being branded as reactionary when resorting to security measures or labour market protections, which had become perceived as a right-wing prerogative. In this way, left governments themselves struggled to bring a pragmatic vision to the governance of immigration, whenever it clashed with the ideals of the left. Contrarily, right-wing parties did not have an interest in proposing pragmatic solutions as they benefited from the restrictive, securitarian approach they embraced.

7.3.2 Dynamics within and between national administrations

The administration is charged with the drafting of policy proposals and with the implementation of the approved laws. It follows different logics than the political sphere, as it is shielded from elections. This chapter integrates the analysis of chapter 7.2.3 by zooming in the inter-ministerial interactions and internal dynamics that contribute to shape labour migration policymaking.

Concerning the characteristics of the public administration, I mainly refer to the Ministry of Labour, of the Interior, and to a less extent of Foreign Affairs. Those administrations have been responsible for the conversion of approved laws on immigration in applicable policies. Here, I reflect on the role that the following characteristics had on the development of labour immigration policy.

Firstly, the relationship between political deliberation and administrative implementation. As explained in the following excerpt, the administration follows internal logics which are not always in syntony with the political path of a policy. That is, the political deliberation and its administrative translation into an implementable policy are decoupled:

Every law has its loophole. Laws need the implementation program, which describes how laws have to be implemented. This is responsibility of the bureaucracy. And that is when problems arise. One, because there is always a monstrous delay between the remission of the law and the definition of the implementation programme. It can be years. And then, when there is the implementation programme, there is no longer the attention of the Parliament. So, it is exclusively responsibility of the Administration. Prodi once told me that when he was Prime Minister, he asked the text of the law to be brought to the Council of Ministers, already accompanied by the defined implementation programme. This would have been the first time happening. The Secretary General of Palazzo Chigi said: "President this cannot be done. The program concerns the administration." He told this to the Prime Minister, not to the concierge! (I3 - Former Head of Cabinet, Ministry of Labour, 1980 - early 2000 period)

The delay between legislative approval and implementation creates a temporal gap where political momentum dissipates, and parliamentary oversight disappears. Hence, immigration policy shifts to bureaucratic discretion, shaping the nature of policy governance. The anecdote about Prodi's failed attempt to integrate the implementation programme into the legislative process reveals how entrenched these institutional divisions have become. The Secretary General's response to the Prime Minister demonstrates that this separation is not procedural but reflects deeper institutional cultures that resist political coordination. The decoupling between policy deliberation from the Parliament and definition of the guidelines for its implementation is a characteristic that contributed to lengthy processes of policy formulation and implementation as well as to the possibility of certain policies to be stranded, eventually leading to bureaucratic discretion. This can ultimately create a space for bureaucratic interpretation that may contradict the original legislative intent. Hence, bureaucratic culture and ideas on labour immigration are important in determining the interpretation of laws and their translation into implementable policy.

Secondly, the management of immigration has been a shared responsibility across multiple ministries, adding up to the complexity. This fragmentation is problematic for immigration policy because it requires coordination across multiple policy domains - labour markets, security, social services, and international relations, each with their own institutional logics and priorities.

As the initial inflows were mostly for economic reasons, immigration was mainly considered an economic matter under the jurisdiction of the Labour Ministry. However, starting from the 1980s, with the 1985 terror attack at the airport of Rome, and EU changing paradigm, immigration began to be associated with security issues. Progressively, the main authority over immigration passed from the Ministry of Labour to the Ministry of the Interior:

Until the end of the 1980's immigration was an economic issue. Who was the immigration expert? The trade union expert, the labour expert, the economics expert. Where do we talk about immigration? In the economics page of the newspapers. It was like we talk today about union disputes, for example, or precarious work. It was part of that galaxy. Then it came the Martelli law, and immigration was absorbed by the Ministry of the Interior which, with the excuse of the fact that immigration is a matter of border security, takes it away from the Ministry of Labour (117 – expert CSO).

The shift of responsibility from Labour to Interior Ministry is a feature that contributed to frame immigration for work firstly as an issue of border controls and of public order rather

than a matter of economic policy. The institutional approach and expertise that was developed in the Labour Ministry regarding immigration's economic dimensions was sidelined, while the Interior Ministry's security-focused approach became dominant. This transition also changed the dominant professional networks and expertise that shaped immigration policy.

Another reason for the difficulty to change the system in place is related to power. Each governance setting foresees different actors having different degrees of power over the issue.

A change in the institutionalized setting implies a change in the power structure:

Another problem is the inter-bureaucratic conflict. You do not manage to govern immigration because every ministry that was carved out in the past when the country was different from now, nowadays will not give up its competencies: foreign affairs from here to there, interior from here to there, health from here to there... And how can you govern a complex phenomenon in this way? (I3 – former Head of Cabinet, Ministry of Labour).

As it will be further outlined, bureaucratic internal logics override considerations of efficient organisation of labour migration management. The structure governing Italian immigration policy exemplifies institutional path dependency, where historical administrative divisions become increasingly difficult to reform despite changing circumstances. Once established, these bureaucratic boundaries create powerful self-reinforcing mechanisms that justify their perpetuation, even if alternative organisational models could be more effective. In particular, under the current governance system, the Ministry of the Interior has a central role in the management of immigration. Therefore, it is quite reluctant in changing the status quo:

There is a deep hostility in the public administration towards a reform on their competences which would take away from the Ministry of the Interior the almost monopoly of the governance over immigration (I13 – former PD Parliamentary politician).

And:

I once suggested to create a sort of Immigration National Service in Italy, like in the US, which would have taken different tasks from the Ministry of Foreign Affairs, Labour, Interior etc. I was defined by the then Prefect (Prefetto) ***: anti-Prefecture subject (soggetto anti-prefettizio)¹⁰. Do you understand? I had to

¹⁰ Prefectures are local-level governance institutions under the Ministry of the Interior. Prefects serve as direct representatives of the central government, playing a central role in the enforcement of national priorities, particularly in areas such as security, public order, and migration governance.

be careful. He was saying: how do you dare to middle in our business, in our competences? (I3 – former Head of Cabinet, Ministry of Labour 1980 – early 2000s)

Bureaucracies seek to protect and expand their own fields of power, therefore resisting institutional reforms. The Ministry of Interior opposition to a re-organisation of responsibilities implies the persistent dominance of approaching immigration governance as inherently connected to public order and territorial control.

The vision over immigration varies significantly across the involved ministries, depending on their competences and responsibilities. Whereas administration within the Ministry of Interior views migration through a safety and order lens, those within the Ministry of Foreign Affairs may regard migration as an instrument of diplomatic policy, and administrators within the Ministry of Labour tend to approach the issue from a labour market-oriented perspective.

Alongside power competition and diverging visions, bureaucratic rivalries generate inter-ministerial turf wars – where competition undermines collaboration. Although the processes managing immigration are institutionalized, the division of competences and power between administrations leads the different Ministries to have a certain degree of disinterest for the projects that are not under their direct supervision:

There is a complicated dialogue even between the competent administrations (...). For instance, contrast to illegal hiring is a central function of the Ministry of Labour. The Ministry of Labour sets up an important concertation system, in the sense that there are many, many subjects involved in national tables, in thematic tables... there is really a plethora of tables, even difficult to follow. But there are also functions that must be carried out by the Ministry of the Interior, that does not appear to be perfectly consistent. So, it is as if... if I am not managing the table, then I collaborate up to a certain point. (I10 - ANCI representative, migration area)

The example brought in the excerpt above highlights how Inter-ministerial turf wars between the Ministry of Labour and the Ministry of the Interior appear to undermine effective collaboration. From the analysis of the interviews, it emerged how policymakers at the Ministry of Labour criticized the administrative apparatus of the Ministry of the Interior for their inefficient management of the 2020 regularization. In turn, policymakers under the Ministry of the Interior criticized the administration of the Ministry of Labour by highlighting how the quota system does not work because the Ministry of Labour is unable to evaluate the needs of the market.

Another characteristic of the administration system that impacts the way in which immigration is managed refers to the 'people in administration'. With this I refer both to the organizational culture of the public administrations, as well as to the hierarchical structure of the administration.

The highly hierarchical structure of Italian public administration treats immigration management as a career stepping stone rather than a specialized professional domain requiring specific expertise. Immigration offices across different ministries are frequently headed by officials whose primary qualifications derive from their rank and career in the administration rather than substantive knowledge of migration issues. As one former Ministry of Labour official observed:

Immigration is a complex phenomenon. You need very competent policymakers to manage it. And how can it work if the Immigration Office at the Interior Ministry is managed by a former Head of the Police, or by a former Prefect with all other kinds of expertise...It turns into a career step, not into a role. (I3 – former Head of Cabinet, Ministry of Labour 1980 – early 2000s)

Similarly:

An Italian feature is that the Head of Cabinets and of the Legislative Offices are composed of around 50 people, who are present in all governments. They are parts of right and left-wing governments...it is always them. Because to become Head of Cabinet or of the Legislative Office, the law (they wrote it) foresees that they must come from specific parts of the public administration. From the State Council, the Prefectures, the Judiciaries. From these parts, not from others. Which means that it is basically 50 people which were in all governments in the past 20 years. (I2 - former Head of Cabinet, Ministry of Labour, early 2000s)

As reflected in the quotes, people in decision-making position do not necessarily have specific knowledge on immigration, as they might come from very different areas of competence. Not having an education or expertise on immigration might imply that the decisions made are more opinion and value-driven rather than based on knowledge. This factor is then connected to the role of organizational culture permeating the public administration. That is, choices on how to interpret and implement a law are taken based on the dominant system of shared values and beliefs. Although more research is needed in order to clearly define the character of cultural systems in different public administrations, I can highlight two tendencies that emerged from the interviews.

Firstly, faced with frequent political changes and contradictory pressures, civil servants have developed an opportunistic logic to co-exist with frequent changes of the politicians in charge of the different ministries, to “not displease anyone”:

There is a bit of opportunism to stay afloat among the controversies. For instance, the regularization took biblical timeframes for their implementation, and nobody took responsibility to say: we have to do it, let's do it. There is this opportunistic attitude, of trying not to displease anyone. But you have to displease someone, because if those are the rules you have to respect the rules. (I14 – former Head of Cabinet, Ministry of Interior)

The approach described by the respondent, manifests in systematic avoidance of decisive action, even when existing regulations clearly require specific responses. The implementation of regularization programs, for instance, were significantly delayed also because no one was willing to assume responsibility for potentially controversial decisions, even when legally mandated. This logic has crystallized into a broader laissez-faire administrative culture that resists confronting systemic problems. Rather than addressing complex and controversial issues, there is a tendency to maintain the status quo:

The cultural logics in the national administrations are very sloppy. They prefer not to see. They do not care. (...) It has nothing to do with immigration. It is a cultural process that needs to be addressed. Immigration is one of the issues... Is it possible that every year we discover there is illegal labour exploitation and gangmastering? Every time? We've been discussing this for 30 years. It means they do not want to address it. They do not know how to address it... there are shady interests, there are incapacities... it's a tangled mess. So, because of this, the only thing is to laissez faire. Laxity. Italian immigration policy is a lax policy. (I 3 – Ministry of Labour)

This systematic avoidance creates a feedback loop where persistent problems are never adequately addressed because acknowledging them would require administrative action. This bureaucratic inertia, combined with having to coordinate across several inter-ministerial offices, hinders institutional change towards a more efficient system. Therefore, the combination between complex administrative system put in place to govern immigration, and the lax approach of the public officials in charge contributes to the inability to bring solutions to decades long problems.

Secondly, the organizational culture shapes the decisions of administrative personnel at the local level. Years of restrictive logic towards immigration led to a restrictive interpretation of the laws; this culture operates independently of specific legal provisions or political directives, creating a consistent bias toward limiting immigrant access to rights and services.

Administrative personnel have internalized a gatekeeping role that assumes the primary function is controlling access rather than facilitating legal compliance or integration:

At the bureaucratic level [...] I see a great continuity in the imaginary of what an immigrant is, of what a State should do with respect to immigrants, which has remained quite constant and also quite independent of both the laws that were passed and the political diktat. However, within this context, political diktats certainly had an impact because they allowed minority groups within the bureaucracies who wanted other paths to emerge or not. (...) and the fact is that if from above, or from the surrounding context (newspapers, political rhetorics, administrators...) you get the hammering message: beat them down, beat them down, beat them down...you end up thinking that that is what you have to do. (I17 - CSO)

There, the restrictive logic and their gatekeepers' role of controlling that only who has the right prerequisites has access, make that the approved laws, when unclear, are interpreted in the most restrictive way. For instance, after the 2018 Safety Decree abolished the residence permit for humanitarian reasons, the possessors of this permit were de facto made irregulars as they could not renew it. A consequence of this provision was that the territorial offices of the Ministry of the Interior expelled from the reception centres the possessors of this type of permit, as they assumed that they were not entitled anymore to stay. As a respondent put it: "They were even more realists than the king" (I4 – Expert, CSO Idos), as not even the promoter of this law foresaw this implication for the immigrants in reception centres.

The fact that immigration matters are disciplined through a complex web of sometimes contradicting laws, leads to discretion of the administration in charge of implementing them. This also means that the degree of pragmatism in interpreting laws and implementing policies, is highly dependent on who is in charge in that moment. Hence, given the complexity and not harmonized laws, the Italian system for managing immigration responds to personalistic directions: "a lot of what could have been done, depended on the Heads of the responsible Offices" (I5, CNA). This personalistic dynamic undermines legal predictability and creates systematic inequalities in how immigration policy affects different communities and regions. The discretionary character of implementation reflects not individual administrative failure but structural inadequacy in institutional design. When legal frameworks are contradictory, political guidance is inconsistent, individual discretion becomes the default mechanism for policy implementation.

7.3.3 Employers' organizations

The role of employers' organizations in shaping labour migration policies varies depending on sectors and average size of the enterprises. Generally, the association of Italian Industry (Confindustria) maintained a disengaged position over the years, whereas the associations of agricultural employers (Coldiretti, Confagricoltura and CIA) had a more vocal role. Finally, as migrant workers are particularly demanded in small-medium enterprises, associations representing these employers (CNA, Confartigianato, Confcommercio) advocated for the establishment of entry system suitable to the specificities of small companies.

In terms of data, I was able to interview representatives of employers' organizations for domestic care (Domina) and for small-medium enterprises (CNA), whereas I did not get access to respondents from Confindustria and employers' organizations of the agricultural sectors. To compensate, I looked at documents produced by the main employers' organizations and at respondents' experience with them.

The fact that the employers' group is varied, implies that its role and its objectives vary. Furthermore, different groups have a different degree of access to policymakers, so that the activity of influencing the policymaking directions takes different shapes. Finally, the position and role played by employers' associations changed over time.

Immigrant workers have often been associated with the possibility of lowering the production costs in labour-intensive sectors with low margins and high volatility (Bauder, 2006). Nevertheless, as emerged in the previous chapters, the role of employers in shaping labour migration policies has been ambivalent. This ambivalence manifests most clearly in the stark disconnect between employers' public positions and private practices, as emerged in several interviews with trade union representatives and policymakers:

I remember these episodes of employers who publicly attacked the Turco-Napolitano law and then privately said that without immigrants they did not know how to manage (...) Sometimes I would go around talking with entrepreneurs and I could see that my visit was announced as 'a law that's too open.' Then when I had the meeting with them, they would emphasize how fundamental immigrants were. (...) I found this double standard: a public regime where immigrants were talked about as if there were too many (...). And then when talking about their own immigrants, they asked for residence permits, laws, training, parental leave... I cannot document this. In the newspapers, the prevailing positions were of concern, not like now, when they say we need them." (127 – Livia Turco, former Minister of Social Solidarity)

As recounted in the above excerpt, when immigration started to become politicised in the end of the 1990s, employers' associations – traditionally close to the right-wing – spoke of immigrants as “too many”, and of the 1998 Law as “too open”. Hence, publicly, employers' associations framed immigration through a security lens. However, in private conversations, the same employers advocated for precisely the policies they publicly opposed: residence permits, training programs, family reunification, and legal protections for their immigrant workers. This double standard created what the observer described as “two regimes”: a visible regime treating immigrants as a security threat, and a tacit regime acknowledging their economic necessity.

However, as mentioned in the excerpt, employer associations' approach recently began to change, as employers are increasingly struggling to find the needed workforce. Hence, the difficulty in recruiting workers to fill growing shortages are forcing employers to become increasingly exposed in their advocacy for migrant workers. However, although contemporary newspaper coverage increasingly features employer organizations openly discussing labour shortage problems and the necessity of immigrant workers, employers' close links to the right-wing political spectrum influences the degree and tone used to advocate for improving entry for work regulations.

One strategy adopted by employers has been to collaborate with trade unions and civil society organisations for recruiting foreign workers. For instance, when laws passed only for their symbolic value and not for their ability to regulate hinder the functioning of the labour market, employers' organizations teamed up with trade unions and CSOs to pressure the governments for a change in the law. An example of this is provided by the 2018 Safety Decree abolishment of the humanitarian protection permit, making a considerable number of immigrants with that permit irregular. As many of them were hired to be trained in different companies, employers hiring them joined a petition organized by the local CSOs to ask for a solution to the risk of irregularity these workers were exposed to:

We had a very strong interest from the Chamber of Commerce, who contacted us to build together a network for the boosting of the relationship between the economic actors and the immigrants. 105 companies have signed a letter in which they asked to have the possibility to hire asylum-seekers who had an internship in their company (Document I27 Rete Senza Asilo – Launch Conference Ero Straniero campaign)

One line of argument views employers' ambivalence through the lens of labour exploitation. On one hand, the availability in the territory of irregular migrants creates a supply of vulnerable, exploitable labour:

Who benefits from this irregularity? (...) I would say those employers who take advantage of a condition of immigrants' marginality to lower costs... and this happens in all sectors: in agriculture, in construction, in logistics everywhere... and where the theme is exactly that the ownership of rights is not recognized to the migrant, to the irregular. (Giuseppe Massafra, CGIL National Secretary at CGIL Futura 26.09.2021)

As the CGIL National Secretary noted, certain employers systematically exploit immigrant marginality to reduce costs across sectors including agriculture, construction, and logistics. The availability of irregularised migrants favours their vulnerability, at the advantage of employers – that are therefore not incentivised to tackle the issues inherent in the legislation. Although formal restrictions for entry and impossibility of implementing a total closure of borders is functional to fill the demand for cheap work, this dynamic does not apply uniformly across sectors. For instance, in relatively specialized productions, where the profit maximization is not strongly dependent on workers' wage, employer organizations have an interest in establishing strong regulations to avoid workers' irregularity, which would lead to unfair competition, as highlighted by a trade unionist:

Entrepreneurial associations are generally associations that represent important realities in industry or commerce and in general, they do not want to misbehave... then at a local, individual level, there may be an entrepreneur who behaves badly. In general, there has never been a problem with employer associations. Instead, they have an interest in fighting unfair competition, because they have the problem that if one of them exploits immigrants, it does not only damage the immigrants, but all other employers that pay contributions regularly! (I9 – UIL trade unionist, migration expert).

This quote reveals another nuance of employers' associations positioning that complicates the simple narrative of exploitation. The respondent highlights how employer associations have an economic incentive to support worker protections and regularization because irregular exploitation creates unfair competitive advantages for unscrupulous employers. On one hand, this emphasises how irregular migration status becomes a tool of exploitation not just of migrants, but of the entire labour market structure. On the other hand, it shows how employers' role cannot be simply generalized into merely driven by an interest in having an available army of docile labour. Instead, country, time, and sector's specific characteristics impact how employers will position themselves, as well as their degree of influence over the policymaking progress.

In the following paragraphs, I zoom in the peculiar role and position of employers in the agricultural, entrepreneurship, and domestic care sectors.

Concerning the role of employer organizations in the agricultural sector, two elements emerged. Firstly, by having played an historically relevant role for the country's economy, they were better provided to lobby at the central level:

Coldiretti was a powerhouse for the agricultural world. Do you want to know where Coldiretti is located in Rome? Next to the State Council, in front of the Quirinale. They have one of the most important offices in Rome. So, were there interest groups? Yes. These were for the defence of the market, especially Coldiretti which put enormous pressure on the seasonal workers. (I2 - former Head of Cabinet, Ministry of Labour – early 2000s).

Although agricultural associations have the power to lobby, their activity focus mostly on obtaining the needed entry quotas for seasonal workers. Furthermore, given the short-term and relatively unskilled type of work employed in agriculture, employers do not have an interest in hiring on specific criteria of trust, know-how etc. Therefore, their involvement in shaping policies revolves around the establishment of sufficient quotas for seasonal work. Rather than choosing a long-term perspective of investing in innovation and in workers' specialization, a large part of agricultural employers relies on the availability of seasonal workers:

Employers only have a quantitative approach: we need this number of workers to harvest. We say: we need to make a step further, because you must train these workers, you cannot keep them as low-skilled forever. The market is internationally becoming more technological, we need to keep pace with the green transition...You need competences, not only arms. Because otherwise you have a mass of workers that find themselves in the lowest strata, not only of society, but also of their working sectors. And you contribute to keep them there with this utilitarian approach. You commodify people. They need competences instead.(I8 - CGIL/Flai trade unionist)

The persistence of this quantitative approach reflects a deeper structural problem: the sector's reliance on hyper-exploitation as a substitute for innovation and technological advancement. Rather than adapting to international market pressures requiring greater technological sophistication and green transition compliance, agricultural employers maintain business models dependent on disposable, exploitable workers. The lack of investment into workers' competences is connected to the political anti-immigrant paradigm, as it does not provide incentives for avoiding that migrant workers will be placed 'in the lowest strata of their working sectors'.

Domestic work is one of the most important sector for foreign employment. Additionally, the domestic sector is the one with the highest estimate of irregular work (Domina, 2022). The domestic care sector presents a fundamentally different organizational challenge. The atomized nature of household employers makes collective organization nearly impossible, while cultural perceptions of domestic work as “not real work” (I19, Domina) further impede political mobilization.

Although there are organizations like Domina or Assindatcolf that are recognized by policymakers as legitimate interlocutors, they lack sufficient leverage to influence policy processes meaningfully. Their activity is aimed at influencing the policy landscape through information campaigns, and at supporting families to navigate the complex web of bureaucratic and legal processes in order to regularly employ a domestic worker.

The difficulty of this employers’ group in influencing policymaking creates a contradictory dynamic: official channels for hiring foreign domestic workers through quotas remain impractical for the sector's needs; yet the ease of finding irregular workers through informal networks effectively solves labour demand. As one expert observed:

Employers, starting from families, have benefited from this situation of an official borders’ closure, of a difficulty of entering for work through legal channels, which however does not manage to completely block entries. Therefore, the ones that manage to enter irregularly find employment in the informal economy, typically in families. (I1 - Expert)

Hence, although the official channel to hire a foreign worker through quotas is unfit for the nature of domestic work, the relative easiness in finding immigrant workers (i.e., through word of mouth) outside the legal channel solves the issue of labour demand in the care sector. Furthermore, irregular work is not only cheaper for the employer, but it is also easier to manage as one does not have to go through the complex system of bureaucracy. The recurrence of amnesty campaigns provides the opportunity to regularize the worker, once that the working relationship gets established.

The situation changed during the lockdowns, as irregularly residing and working immigrants – often being the care person for elderly people - would risk expulsion or fines every time they had to leave the house. In this context, the role of employer organizations was important to campaign for extending the 2020 regularization to the domestic sector (Pozzato, 2025a).

Small and medium enterprises (SMEs) in Italy's manufacturing sector face a different set of constraints. Often, immigrants started as employees in these enterprises and then either took over the business or founded their own company. The requirement inherent to the quota system to hire unknown workers residing abroad, fundamentally contradicts the operational logic of small businesses where “the average number of employees is two, three” (I7 – CNA former president). Hence, the introduction of a new worker can be disruptive to established workplace dynamics.

Concerning the role of small and medium enterprises in the policymaking process, from the interviews it emerged how they played a limited role and largely coexisted with a legal framework that did not match their needs. This group of employers did not have enough power to influence policymaking at the central level. SMEs historically favoured the sponsor system introduced by Law 40/98, as it better matched their need for personal evaluation and gradual integration of workers:

For us, the figure of the sponsor was perhaps the best solution to guarantee the entry of immigrant workers. (...) But then this system, which worked, was cancelled with the Bossi-Fini law.[..] With entry quotas, you have to hire a worker that you do not know. We pointed out that in small businesses (...) you cannot take a worker you never met before. So that is why we wanted the entry through sponsor: because it was the best way, and it was perfectly suited to the type of enterprise in our country. If 98% are micro or small businesses, then we have to reason with those structures. (I7 – CNA former president)

The abolition of the sponsorship system in 2002 created a structural mismatch between centralized policy design and sectoral realities, forcing employers toward informal hiring practices or creative legal interpretations. Significantly, SMEs demonstrate how limited central-level lobbying power can be compensated through local-level influence and partnerships with social actors:

We see that many companies, thanks also to the help of the associations, have also carried out works of persuasion within them, have created opportunities for training or relationships with migrant associations. Therefore, it was also possible to find a place for many of these workers. But in fact, it is not a task of the associations, it should be a task of the directives of this country. (I7 – CNA former president)

Rather than a single approach adopted by employers' associations, what emerges is a complex mosaic of diverse strategies, capabilities, and interests that vary across economic sectors and realities. Four key insights emerge from this sectoral analysis. First, lobbying capacity varies – from Coldiretti to the atomized household employers who cannot organize

collectively. Second, interest in lobbying and advocacy differs, with largest employer organisations such as Confindustria, preferring not to contradict right-wing parties' position on immigration. Third, economic logic differs fundamentally across sectors: agriculture's quantitative and short-term approach contrasts sharply with SMEs' need for trust-based hiring, and informal relationship dynamics in the domestic sector. Finally, policy influence operates through diverse channels – formal lobbying, local-level implementation, informal circumvention, and strategic alliance-building with civil society actors and trade unions.

7.3.4 Trade unions

The position of the Italian trade union movement on immigration reflects both its organizational structure and ideological foundations. The three major confederations emerged from the post-war political settlement with distinct ideological orientations. CGIL (Confederazione Generale Italiana del Lavoro), founded in 1944 and historically linked to the Communist and Socialist parties, maintained the strongest left-wing orientation with emphasis on class struggle and international solidarity. CISL (Confederazione Italiana Sindacati Lavoratori), established in 1950 following a split from CGIL, developed close ties to Christian Democratic politics and Catholic social doctrine, emphasizing social dialogue and reformist approaches. UIL (Unione Italiana del Lavoro), formed in 1950 by social democratic and republican currents, positioned itself as a moderate, pragmatic organization focused on collective bargaining and institutional collaboration.

Italian unions approached immigrant workers through the lens of class solidarity while recognizing the practical challenges of organizing diverse, often precarious workforces. Over time, this led to the establishment of dedicated immigration sections within union structures, transforming what began as ad hoc responses into systematic organizational commitment.

Trade unions were among the first groups to notice the increasing presence of foreign workers. Because of their presence 'on the ground', they witnessed very early the presence of immigrant workers, which at times gave rise to tensions with local workers. Trade unions developed an approach toward immigrant workers that balanced idealistic and pragmatic considerations. Their idealistic dimension emphasized universal worker solidarity and the fundamental principle of organizing all workers regardless of origin or legal status. This

approach aligned with traditional left-wing internationalism and the broader labour movement's historical commitment to inclusive organizing. Simultaneously, unions recognized the pragmatic necessity of organizing immigrant workers to prevent a race to the bottom that would undermine working conditions for all employees. Therefore, from the very beginning they criticised the emergency approach on immigration adopted by subsequent governments, and advocated for mass regularisations (Rinaldini & Marino, 2017).

As of today, trade unions have more than a million immigrant workers enrolled, who add up to all the immigrant clients that turn to their offices to have support with bureaucratic issues. According to Idos data reported in Rinaldini & Marino (2017), migrant workers tend to be highly unionized, with sectorial differences. This suggests that migrant workers trust trade unions, and that immigrants have a significant weight on trade unions' constituency, and on the demand for services:

Trade unions have at least two objectives: one is to empty, reduce the swamp of undeclared work, because otherwise irregular work competes with regular work, and risks precipitating even honest entrepreneurs who want to stay within the rules. Second, they were among the first subjects to develop a focus on immigrants as early as the late 1980s and have large numbers of immigrants among their members. For some years they have exceeded one million. Plus, customers who turn to patronage for a whole series of bureaucratic issues. Therefore, immigrants have become a significant weight of the constituency of trade unions in Italy, and of the demand for services (I1 - Expert).

Contrarily to the Danish unions, Italian trade unions – especially CGIL – developed from the beginning a structure that would be inclusive of immigrant workers; hence, although in practice there have been diverging views on migrant workers (I25; I15), the official line of Italian trade unions have been of solidarity towards immigrants, rather than protectionism and closure as in the Danish case. As emphasised in an interview with former CGIL leader Susanna Camusso (I28), the trade union leadership made a clear ideological decision of treating immigrant workers as integral part of the workers represented by the confederation, and therefore to advocate and campaign for solidarity amongst all workers.

Because of this approach, trade unions' claims often coincided with the ones of the organized civil society. Therefore, over time, they established strong cooperation ties. Apart from representing workers' interests in concertation with employers, their activity focused on providing support to immigrants in difficulty, advocating for recognition of immigrants' rights and for regularizations, denouncing discrimination and inappropriate laws.

In the political arena, trade unions were able to influence policymaking on immigration and integration during the first republic. However, during the second republic the role and effective weight of trade unions on policymaking diminished. On one hand, the beginning of the 2000s witnessed a progressive decline in trade unions' bargaining and consultative power. On the other hand, the hyper-politicization of immigration marginalised unions' influence, while real decisions were made autonomously by political actors following electoral logics rather than technical expertise. As a UIL representative noted:

On a technical level, there have been some relations with the Ministry of the Interior. But in general, the government has always done things on its own. We have always maintained good relations with the employers, with the other actors of civil society, we have collaborated a lot in recent years to try to change things. There is no antagonism with the employers on these issues, on the contrary there is a lot of collaboration. Instead, with the government, precisely because there are political constraints that condition the parties, it has become increasingly difficult. Because we ask for things that they do not want to do. (I9 - UIL)

Decisions at the central level are highly constrained by the weight that the topic of immigration has on electoral outcomes. Right wing parties defending the anti-immigrant, securitarian approach do not have any interest in opening up the restrictive policies they promoted. Left-wing parties are traditionally the main interlocutors of trade unions and civil society. However, the left-wing parties find their action constrained by the electoral sensitivity of immigration issues. Hence, it demonstrates how hyper-politicization can isolate legitimate interlocutors from policy processes.

7.3.5 Civil Society Organisations

Civil society organizations were involved in support and advocacy for immigrants since the initial inflows. The plethora of CSOs were either linked to the Church (i.e. Caritas, Sant'Egidio Community), or to left-wing movements (i.e., ARCI, anti-racism network). A peculiarity of the Italian case is the prominent role that Catholic and Protestant associations had in the shaping of policies and in their implementation, especially during the first republic:

When you talk about migration politics in Italy, you have to consider the role played by the Church. Both as a State, and as CEI (organism shaping relationship between the Church and the Italian State). This is very important, and it is a unicum, it doesn't exist in other countries. In Italy the Church weights a lot in policymaking and political processes. I remember that around the end of the '80s, I was working for the Minister of Labour, who once told me: the migration offices are the parishes. (I3 - former Head of Cabinet, Ministry of Labour 1980 – early 2000s)

This excerpt highlights the centrality of Catholic institutions during the early phases, not only as service deliverers, but especially as actors able to shape top-level political processes. Together with this political activity, Catholic CSOs worked on the ground, establishing alliances with other CSOs and local actors to provide assistance for housing, language, employment search and legal support. As emerged during the interviews, civil society organisations developed a very systematic approach to immigration, and the political acknowledgement of their expertise enabled the establishment of trusted channels with political representatives (I29). For instance, it was Idos – a Caritas emanation – to be among the first (if not the first) to collect and publish statistical data on the immigration presence in Italy. Hence, during the first phase, CSOs played a central role in the policymaking process, “they were people that we saw two/three times a week” (I2 Min. Labour).

The depoliticised nature of the immigration debate during the first republic also favoured a season of consultation with civil society, as reflected in the following quote:

During the first republic, a pact for an anti-racist Parliament was established. It was an idea of Dino Frisullo, Agostino Bevilacqua etc. (activists). They wrote a program on immigration legislation to give to the candidates to the political elections. And they got a lot of adherences, so a strong transversal group was established that was favourable to positive measures. (...) So, there was a climate...For instance, during the 1993 Ciampi government we proposed a regularization, and we were received by Napolitano that was the President of the Chamber, and he stated he was in favour. And also Bianco that was the Christian Democratic leader, the Communists of course...there was no difficulty in having politicians approve these measures. (I29 Sergio Briguglio, expert CSO)

Furthermore, the strength and cohesion of catholic organisations contributed to establish a channel of trust also with the moderate, centrist parties, as “it was not the usual communists, but it was famous Catholic organisations” (I29).

In overall, civil society played a central role in directing policymaking during the first republic and at least until the early 2000s. Their influence over policymaking contribute to the inclusion of humanitarian, solidaristic measures in both the Martelli and the Turco-Napolitano Laws:

Several CSOs were listened by politicians that completely trusted CSOs. And CSOs had a vision over immigration free from electoral interests. They had a vision because they were dealing with the problem on the ground. Sure, they neglected other problems, like safety in cities. CSOs have never been sensitive to this theme, but they knew a lot on immigrants’ living conditions, and they proposed positive things, such as reunification, health assistance for all, minors’ rights. (I29 – Sergio Briguglio, expert, CSO)

This solidaristic and optimistic ideational approach often clashed with the restrictive approach of ministerial personnel, in particular with the public officials of the Ministry of the Interior. Nevertheless, the tension between ministerial officials and civil society consultants highlights the strong position of civil society as interlocutors of left-wing politicians.

However, socio-political developments leading to the transition from the first to the second republic, progressively weakened the role of CSOs as legitimate consulting partners at the central level. Especially after the refugee crisis, the consultative role of CSOs as experts in the governance of the phenomenon vanished. Access to policymakers at the central level highly depended on who was in power, and CSOs' influence in policymaking has been strongly reduced:

In recent years the interlocution has been quite sporadic...Because at the same time this theory spread which saw intermediate bodies as an obstacle rather than an element of support to the democratic process. Therefore, the interlocution was relatively low. (I6 – expert, CSOLunaria)

The politicization of immigration and the increasing intolerance of the population towards any policies that could seem to be an opening to immigration, left CSOs with limited space of influence in agenda setting and policy proposal. Especially with the rise in consensus of the Lega under the leadership of Salvini, CSOs were delegitimized by framing them as *friends of the immigrants, enemies of the Italians*. Hence, to the claims brought up by third-sector organizations, the right-wing politicians responded by discrediting them as corrupt and wanting to *make money on migrants' skin*. This narrative against CSOs engaged in immigration damaged the legitimacy and thereby the space for action of those organizations in policymaking:

Let's say that if we talk about legislative reforms, it does not seem to me that today there are actors who can effectively influence the reforms from the outside. The most that we have managed to do in the last two or three years is to try to recover part of the damage done by the latest reforms of the Salvini's Safety Decrees. But at the macro level of intervention on the system, it does not seem to me that there are the conditions right now... and I predict that there will not be any time soon either, except in a pejorative sense and certainly not for our role. (I4 – Expert, CSO Idos)

The galaxy of CSOs working on immigration, reacted to the campaign of borders' closure and of criminalization of boat arrivals by focusing exactly on these aspects of migration. This means that they shifted focus and narrative to forced migration and borders, leaving a void on economic migration. Hence, the narrative of the past decade revolved mainly around

solidaristic values of welcoming refugees, whereas the work aspects – also as tools for integration – have been neglected:

This is another element to consider that this approach to migration policies had the effect of progressively shifting the attention of civil society to border management. (...) On the other hand, the fact that economic migration has been blocked and instead the number of asylum seekers and refugees has increased, has also shifted the attention of a large part of the anti-racist movement to reception policies. At a systemic level, there has certainly been an induction to undergo the paradigm of permanent emergency in the management of recent years (I4 – Expert, CSO Idos)

As outlined in the quote, from the point of view of influencing the public debate, the emergency approach used by anti-immigrant actors was rather suffered by CSOs. Especially the right-wing battle against NGOs involved in rescue and reception of asylum-seekers challenged the legitimacy and the role of CSOs as moral compass of society:

One could try to make a reflection of a political nature on how the non-governmental organizations have also changed, and how they have somewhat abandoned some battles, in the sense that they are not heard anymore, in my opinion. There was a very sad season in which social workers in reception, especially under Salvini, changed their position in the social recognition of this profession. In the sense that initially it was a pride to do a job that favours integration, acceptance, taking charge of everyone's needs... within a season time it almost became a thing to be ashamed of. It is really painful. (I10 – ANCI representative, migration area)

Although the politicization of immigration of the past years hindered CSOs' involvement at the central level, they have been active at the local level, often cooperating with local administrators to supply social services and provide legal assistance. Concerning service provision, local administrations rely on CSOs initiatives in favour of immigrants' reception and integration. The void left by state actors is filled by non-state actors, either in cooperation with local administrators or independently in case of right-wing administrators. Concerning legal assistance, volunteer organizations such as ASGI (Association of Legal Studies on Immigration) are able to campaign against illegal practices and decisions on a case-to-case basis, by bringing those decisions to the Courts. Hence, although their relevance at the central level and in influencing the public opinion diminished, they still play a role in the policy implementation stage. CSOs trajectory shares similarities with the one of trade unions, which progressively shifted from an influential position on migration policymaking to a marginalised position in the policymaking arena during the second phase of migration policymaking (early 2000s up to today).

7.4 Summary

Chapter 7 analysed the labour migration policy trajectory in Italy based on three analytical frames: temporal, 3 I's, and inter-actor dynamics.

Similar to the case of Denmark, labour migration policymaking can be divided into two main phases also in Italy. The analysis of policy drivers connected to interests, ideas, and institutions as well as of inter-actor dynamics highlighted how their interaction significantly changed across the two periods.

The initial phase featured a combination of economic interest for labour migration and a political idea of immigration to Italy as a transitory phenomenon. This configuration created an institutional misalignment. On the one hand, employers continued to rely on migrant workers in informal and atypical jobs. On the other hand, immigration policy remained tied to outdated regulations that failed to acknowledge structural inflows. The resulting mismatch between demand and legislations was managed through routinely recurring to regularisation schemes, a practice that framed immigration as an episodic emergency rather than a long-term reality. This emergency governance delayed the development of comprehensive legislation. During the early phase, civil society organisations and trade unions compensated for the state's limited role in providing services and support to immigrants, gradually establishing themselves as experts and advocates for modern immigration legislation.

The relatively low salience of immigration at the time allowed for cooperative dynamics among mainstream parties. Nevertheless, the low political interest in governing the phenomenon, combined with contextual factors such as the instability of governments, contributed to a delay in the establishment of a comprehensive legislative framework. The 1998 Turco-Napolitano Bill was the outcome of intense cooperation and consultation across parties, experts, and interest groups. Yet, the legislative process exposed underlying tensions: security and border control priorities, pushed by ministerial bureaucracies and EU pressures, clashed with labour market flexibility and human rights concerns promoted by left-wing actors and civil society. The outcome was a compromise that did not however resolve them.

At the same time, similarly to the Danish case, the growing anxieties shared by part of the population began to be intercepted by far-right populist parties, in particular the Lega Nord. The 2002 Bossi-Fini Bill, passed after Berlusconi's electoral victory, signalled a paradigmatic turn: securitarian framings became dominant, and electoral incentives to appear restrictive narrowed the range of viable policy alternatives. This shift also reconfigured inter-actor dynamics. Whereas the first phase had seen significant input from CSOs and trade unions, their consultative role became marginalised, as policymaking became driven by partisan competition and symbolic politics.

Following the 2008 GEC and until 2020, labour immigration policy was effectively neglected, while public and political attention shifted to the Mediterranean arrivals, reinforcing the dominance of the securitarian paradigm. The Covid-19 pandemic temporarily reopened the debate by exposing the dependence of essential sectors on migrant labour, much of it irregular and precarious. In this emergency context, the proposal of a regularisation became a politically viable choice, while entry quotas were reprogrammed. However, these measures do not constitute a structural change, but they represent gradual adjustments constrained by institutional path dependence and by the enduring politicisation of immigration as a security threat. Hence, the instrumentalization of immigration throughout the past twenty years impacts the possibilities of envisioning policy options that are other than policies within the restrictive paradigm.

8 Twenty years of immigration to Poland

In this section, I analyse the migration patterns to Poland and policy evolution departing from the early 2000s. Although the analysis focuses mostly on the past twenty years of immigration to Poland, it is important to outline few trends and peculiarities of the Polish case, which relate to earlier periods of transitioning from a communist regime to a liberal democracy. In particular, the Polish post-socialist, neoliberal model of capitalism shapes the rationale of labour immigration policies, as well as the relative weight of different actors in the policymaking process.

In 1989, the fall of the communist regime brought a progressive opening of the borders, ultimately culminating in 2004 Poland' joining the EU and thereby enjoying full freedom of movement (Okólski, 2021). The 1989 democratic transition of Poland followed a neo-liberal and pro-Western model, featuring a strongly market-oriented economic system. Especially during the first phases following the fall of the socialist regimes, the dominant logic has been of fully adopting neo-liberal recipes of growth in order to quickly 'catch up' with the West (Nowicka-Franczak, 2021). The policy of state's minimal intervention in the economy is reflected in the statement of the first non-communist industry minister Tadeusz Syryjczyk in 1990, that 'the best possible industrial policy, is no industrial policy' (Meardi, 2014, p. 17). The rapid and sustained economic growth driven by the application of neo-liberal principles has however implied that Polish citizens and migrants have encountered a labour market with limited welfare provisions, poor working conditions and low wages (Jaroszewicz et al., 2024).

The shift to a liberal market economy led to significant changes in labour law to allow for more flexible and less protected arrangements. The flexibilization of work included a widespread use of temporary employment, with Poland having the highest share of temporary employment in the OECD group (Lopez Uroz, 2020). Another change that also impacted the precariousness of immigrant workforce is the introduction of civil law contracts along employment contracts. Unlike the latter, task contracts (*umowa o dzieło*) and service contracts (*umowy zlecenia*) are more flexible, as they allow employers to hire workers for specific tasks or services without committing to long-term employment relationships. These contracts are easier to terminate and do not require the same legal obligations (such as

vacation days, sick leave, or social security contributions) as employment contracts. Especially small and medium enterprises began to use civil law contracts as a way to save costs and limit their liabilities towards the employees.

Poland joined the EU in 2004, and the Schengen area in 2007. Amongst the policy and governance changes required to become a member, the area of migration policy was of central relevance. Similar to the Italian case, Polish borders became both internal and external EU borders, which required an intensification of controls and visa restrictions with the non-EU neighbouring states. From a migration patterns perspective, the opening to free movement of labour initiated a large emigration of Polish workers to Western European countries. Consequently, migration policy focused on minimising the negative effects of emigration flows while maximising the benefits resulting from this process. As it will be delved in the next section, following EU membership, domestic labour demand has increasingly been filled with immigrant workers, mostly from the neighbouring former Soviet countries. The growing economy and the consequent demand for labour has been coupled with a progressive liberalization of – mostly temporary – labour migration regulations. In the past decade, the volume of foreign workers coming to Poland increased significantly.

Since the 2015 “refugee crisis” in Europe, migration is increasingly politicized in Poland, leading to a securitarian turn in migration politics, while at the same time maintaining one of Europe’s most liberal regulations on economic migration (Molećda-Zdziech et al., 2020; Okólski, 2021).

8.1 2000 – 2020: migration and policymaking dynamics

In the past twenty years, Poland has been on a path of transformation from a typically emigration country to an emigration and immigration country (Górny & Kaczmarczyk, 2018). Most of this transformation is linked to Polish accession to the EU and to the major changes underwent by the Polish labour market. Following EU membership, the domestic labour market has benefited from consistent EU funds for social and economic development, increased foreign investments, and increased labour market policy expenditures (Duszczek & Matuszczyk, 2018). Furthermore, admission to the Schengen area in 2007 has made Poland an attractive country for non-EU citizens as a transit to other European destinations, as well as a country of residence from which to move freely within the Schengen area.

Immigration to Poland in the early 2000s was mainly temporary from its eastern neighbouring countries. The former soviet countries did not need a visa to enter Poland until 2003, so that migration patterns were informal, regional and circular (Grzymała-Kazłowska & Okólski, 2003). In this period, policymakers were mostly focused on emigration flows rather than on the regulations of entry.

Immigration policymaking of the early 2000s has been largely shaped by the effort to harmonize national rules to EU and Schengen requirements for Poland's accession (Kicingier & Koryś, 2011). Immigration regulations have therefore been driven mostly by external factors and under the pressure of international obligations. Apart from the expectations set by the EU and the Schengen members, Poland had obligations coming from the ratification of international conventions such as the Geneva Convention in 1991, bilateral agreements, in particular with the eastern neighbouring countries which involved provisions on travel, readmission and on the flow of workers.

In 2001, the Polish Parliament revised the 1997 Aliens Act, establishing the Office for Repatriation and Foreigners, a central government agency within the Ministry of the Interior tasked with the coordination of all immigration-related activities. However, the amendments to the 1997 Aliens Act did not provide a comprehensive framework for migration governance, so that throughout the early 2000s Polish immigration policy has been described as

incomplete, reactive and fragmented (Grzymała-Każłowska & Okólski, 2003; Kępińska & Stola, 2004).

In 2003, further policy changes included the introduction of mandatory visas for its Eastern neighbours to comply with Schengen requirements and the implementation of a regularization program for undocumented immigrants. Although estimates of irregular employment were between 100.000 to 200.000 workers, by the end of the campaign, 3.512 applications were filed, out of which 2.747 (78 percent) were approved, with 1.245 Armenians and 1.078 Vietnamese receiving legal status (Iglićka & Ziolk-Skrzypczak, 2010; Szelewa & Polakowski, 2023). The extremely low numbers of beneficiaries compared to the estimated irregularly residing immigrants are explained by the poor administrative infrastructures established to manage the campaign, the requirement of having lived for five consecutive years in Poland, and the low advertisement made for the campaign (*ibid.*). A second regularization was implemented in 2007, which had however strict requirements, similar to the one of 2003, and had a smaller scope, with around 66% of the 2033 applications submitted receiving a positive outcome (GUS Poland, 2020). The largest number of beneficiaries were Armenians and Vietnamese immigrants.

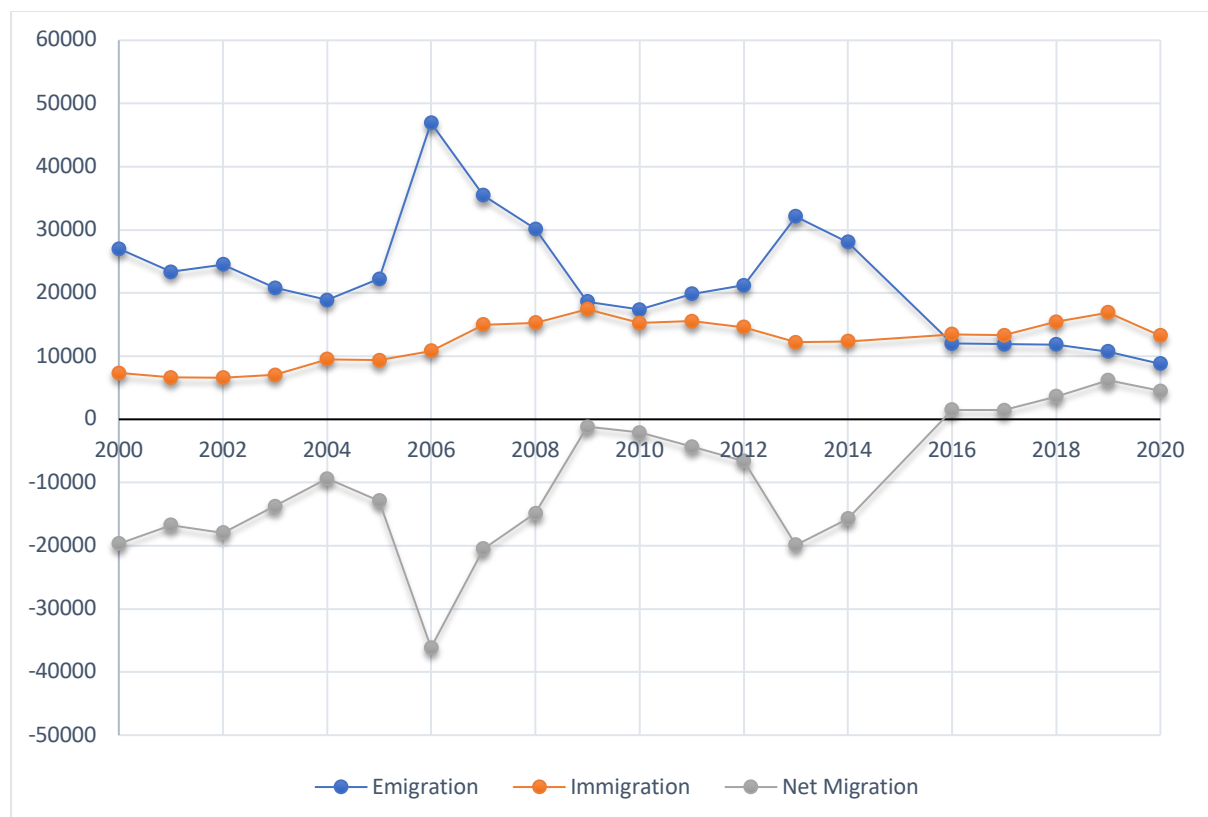
When Poland joined the EU in May 2004, its labour market indicators were among the worse among the 24 EU member states, with the highest unemployment rate (19%), lowest employment rate (57%), and disproportionate wage levels (Duszczuk & Matuszczuk, 2018). The accession of Poland to the EU, initially coupled with unrestricted entry to Ireland, the UK and Sweden, stimulated one of Poland's largest emigration flows in the postwar period. The majority of older EU members' states adopted transition periods to gradually open to immigration inflows from the newly accessed countries, with Germany and Austria being the last ones to liberalise free movement in 2011.

Sectorial labour shortages shared by most of the EU countries at the beginning of the 2000s incentivised an earlier end of the transition period in many EU economies (Iglićka & Ziolk-Skrzypczak, 2010). The combination of better opportunities in Western Europe and a scarcity of satisfactory employment opportunities at home, led Poland to become one of the largest labour exporters in the EU (*ibid.*). According to the Polish Statistical Office, in 2008 the stock

of Polish emigrants was estimated at 2.3 million, of which 1.8 emigrants were living in EU countries (GUS, 2021).

Emigration, falling unemployment levels, coupled with declining demographic trends and one of Europe’s lowest natalities, contributed to significant transformations in the Polish labour market. Hence, in the period that followed 2004, policymakers focused on incentivizing Poles’ return migration from Western Europe, and on recruiting foreign workers – largely addressing non-EU countries - for filling labour shortages in the secondary and primary sectors. Following the improving economic situation and the demand for workers, immigration to Poland as well as return migration began to increase, as shown in the graph below.

Figure 10: Poland - Emigration and Immigration flows for permanent residence, 2000 – 2020

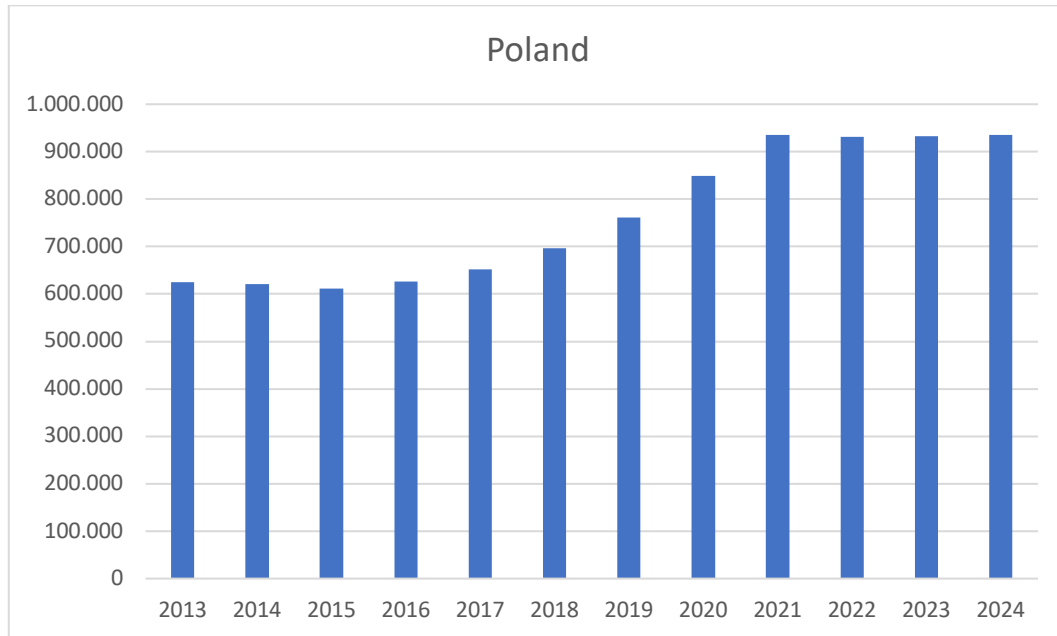


Source: author’s elaboration based on Statistics Poland data

In 2016, a positive migration balance was registered, and in the following years Poland strengthened the trend towards becoming a new country of immigration (Okólski, 2021). Increase in immigration was driven both by Poland’s sustained economic growth and demand for labour, and by external events like the worsening situation in Ukraine following the 2014 Maidan revolution and Russia invasion of Crimea.

Regarding the stock of the foreign-born resident population, Eurostat data show an increase from around 600.000 in 2011 to around 935.000 in 2024 (Eurostat, 2025):

Figure 11: Stock of foreign-born population 2013-2024



Source: author's elaboration based on Eurostat data

However, the numbers reported are often estimates and provisional, as “various entities collect slightly different data on foreigners, including the Central Statistical Office, the Border Guard, the Office for Foreigners, the Ministry of Family, the Labour and Social Policy and the National Labour Inspectorate; the methodological framework used in Polish public statistics distinguishes between temporary and long-term migrants; migration in Poland is circular and incomplete; and there is a high mobility of non-EU migrants.” (Szulecka et al. 2018:23). Specifically, the graph above does not include short-term migration (less than three months), which has been estimated by the 2021 census to be around 520.000 people (GUS, 2023). Hence, Figures 10 and 11 are indicative of migration flows’ trends rather than accurate representations of the actual volume and composition of migration to Poland.

Concerning the regulations on entry for work of non-EU citizens, since 2006 there are two main channels, namely obtaining a work permit or an employer’s declaration of intent. Obtaining a work permit is a lengthier and costlier procedure, as it involves several administrative bodies at the regional and national level (Duszczuk & Matuszczyk, 2018).

Furthermore, the issuing of a work visa is dependent on assessment of labour market shortages prepared by the Polish province where the employer is located (GUS Poland, 2020).

As a response to the demands of the economic partners asking for easy hiring procedures, the conservative coalition in power introduced in 2006 a facilitated entry through employers' declarations of intent. In particular, Samoobrona, a populist agrarian party, was for the first time in the government coalition and was responsible for employment issues. This party, although keeping a negative view of immigration in general, was responsive of farmers' demand for the creation of a simplified legal channel for seasonal immigration (Kicingier & Koryś, 2011).

The approval and reinforcement of the employer's declaration tool in the subsequent years highlights few peculiarities of the Polish approach to immigration policymaking. In particular, although the generalized view of immigration is dominated by a restrictive approach, labour migration has been treated in a liberal way by all governments. Poland is often considered as one of the EU countries with the most liberal regulations when it comes to labour migration. This relative openness is conditional to the temporary nature of foreign workers' inflows, as most of the employment contracts foresee a short-term residency. Furthermore, the majority of workers benefiting from the simplified entry procedures are citizens of neighbouring countries, therefore not too threatening of the dominant narrative of Poland as an ethnically homogeneous nation (Grzymała-Kazłowska & Okólski, 2003). Finally, until 2015 immigration was a very limited issue, treated as a technocratic policy area with low politicization and scant media attention (Łodziński & Szonert, 2016).

Since its introduction, the employer's declaration measure has been widely used as, compared to obtaining a work permit, it only requires applicants to have a declaration of willingness of a Polish employer to hire him/her (Duszczyk & Matuszczyk, 2018). Starting from August 2006, employer' declarations of intent (*oświadczenie*) allowed workers from Ukraine, Belarus and Russia to enter Poland for three months in a given period of six months. Although the procedure was initially envisioned for the agricultural sector only, few years later it was expanded to all sectors, to citizens of Moldova, Georgia, and Armenia, and it was prolonged for up to six months of work within one year (Iglićka & Ziolk-Skrzypczak, 2010). In 2007, a total of 21.797 employers' declarations of entrusting work to a foreigners were accepted,

most of which concerned Ukrainian workers in the agricultural and construction sectors (GUS Poland, 2020). The declaration of intent has since then been a widely adopted procedure by employers to recruit short-term workers from the six neighbouring countries. The table below shows the growing number of declarations of intent filed by employers in the 2007-2019 period by workers' citizenship.

Table 11: Declarations of intention to entrust work to a foreigner, 2007-2019 by citizenship

Declarations of intention to entrust work / on entrusting work to a foreigner entered in the register of declarations in 2007–2019 by citizenship

Obywatelstwo Citizenship	Oświadczenia o zamiarze powierzenia pracy cudzoziemcowi Declarations of intention to entrust work to a foreigner											Oświadczenie o powierzeniu pracy cudzoziemcowi Declarations on entrusting work to a foreigner	
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Ogółem Total	21797	156713	188414	180073	259777	243736	235616	387398	782222	1314127	1824464	1582225	1640083
Armenia (AM)	—	—	—	—	—	—	—	774	1043	1597	2786	1648	2302
Białoruś (BY)	1347	12606	4860	3623	4370	7636	5194	4017	5599	23400	58046	62805	66045
Gruzja (GE)	—	—	—	453	1774	1384	2343	2103	1366	1698	11126	28008	45137
Mołdawia (MD)	—	—	2747	5912	13024	9421	9248	6331	9575	20650	31465	36742	39414
Rosja (RU)	190	1147	674	595	963	1624	1260	1227	1939	3937	6150	6718	11262
Ukraina (UA)	20260	142960	180133	169490	239646	223671	217571	372946	762700	1262845	1714891	1446304	1475923

Source: (GUS Poland, 2020, p. 150)

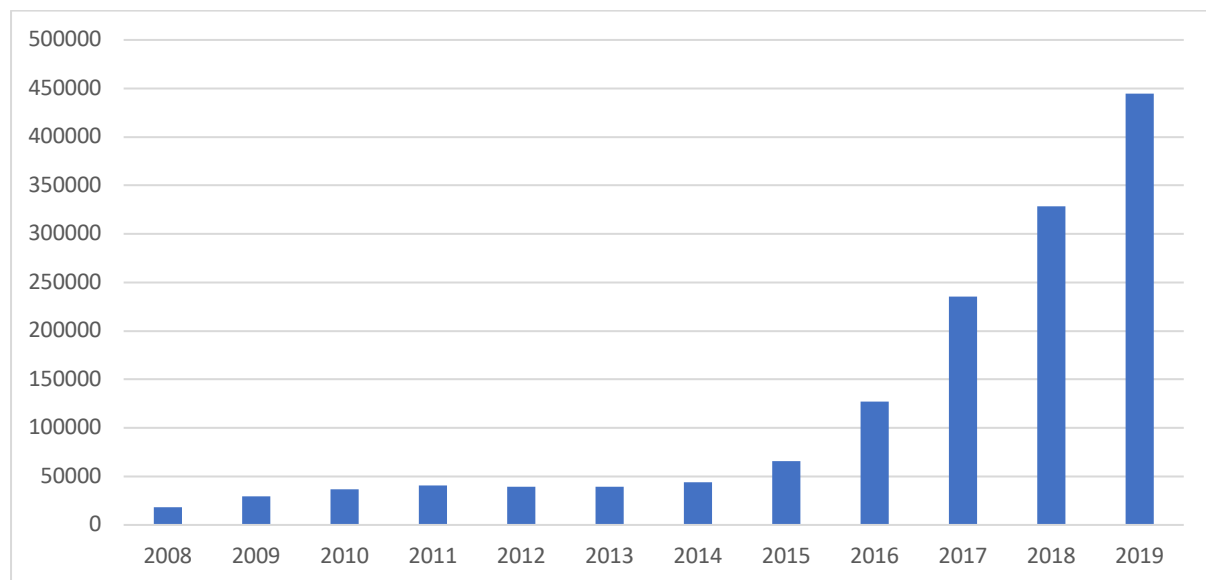
In interpreting the data on entry for work through this channel, it is important to keep in mind that until 2018, after submitting the declaration of employment intent, employers were not obliged to report whether the foreigner had arrived and whether he/she had taken up the job (GUS Poland, 2020). Therefore, the data reported for the 2007 – 2017 period does not consider cases where foreigners did not take the job in Poland, or cases where foreigners moved to Western European countries upon receiving the visa (ibid.). Research suggests that declarations of intention which were actually realised amount to around 60 percent of all the declarations presented (Duszczuk, 2015).

Data for the after 2018 period show that the largest number of declarations concerned agriculture, manufacturing, construction, transport and warehouse management, and administrative services (MRPiPS, 2024). Foreigners obtaining a permit through working agencies are registered in the administrative services category, but they are then inserted in

other sectors by these agencies. The growing number of foreign citizens finding a job through employment agencies hints at their role in recruiting workers for Polish companies.

Concerning work permits, the most used is type A, which allows a non-EU citizen to work for an employer located in Poland for a period not exceeding three years. Main requirements are an employment contract and the approval of the relevant province authority about the inability to fill the job with the local unemployed and jobseekers. In the 2008-2019 period, almost 1.5 million work permits were issued (GUS Poland, 2020). As the graph below shows, the number of work permits increased progressively, with the most dynamic growth starting from 2015. In the period 2015–2019, a total of over 1.2 million work permits were issued, which is 83 percent of all permits issued in the 2008–2019 span (GUS Poland, 2020).

Figure 12: Yearly work permits issued 2008 – 2019.



Source: author's elaboration based on Statistics Poland datasets

Data for the 2015 – 2019 period show that the majority of work permits are released in the construction, manufacture, administrative services, and transport and warehouse management sectors.

In 2018, the government introduced a work permit for seasonal work for all non-EU countries, to harmonize national regulations to the 2014 EU directive on seasonal work. This permit allows to take up work in the agricultural, farming, hotel, and gastronomy sectors for up to nine months per year. Prior to obtaining this permit, a labour market test is required.

However, citizens of Ukraine, Belarus, Russia, Moldova, Georgia and Armenia are exempted. The table below shows the numbers of applications and permits issued in 2018 and 2019:

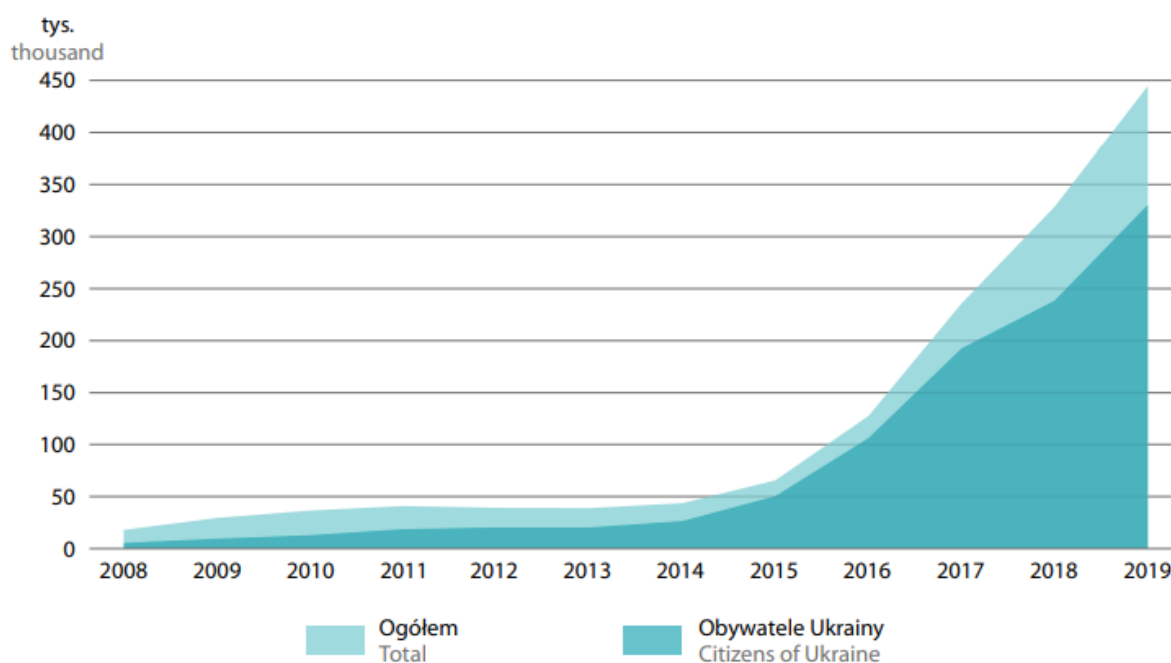
Table 12: Total applications for seasonal work permits and permits issued in 2018 and 2019

Województwa Voivodships	2018		2019		Razem Total		
	wnioski applications	zezwozenia permits	wnioski applications	zezwozenia permits	wnioski applications	zezwozenia permits	odsetek decyzji pozytywnych o wy- daniu zezwozenia percentage of positive decisions to permit issue
Ogółem Total	235282	134601	273598	131446	508880	266047	52,3

Source : GUS Poland, 2020, p.145

Similarly to the case of employers' declarations, Ukrainians are the largest group of recipients of work permits, as shown in the figure below. In total, in the analysed period, 1 million of the work permits were issued to Ukrainian immigrants. The surge in permits issued to Ukrainians after 2014 reflects both the continued demand for labour from the Polish labour market and the socio-economic crisis in Ukraine initiated by the 2014 Russian-Ukrainian conflict (Duszczuk & Kaczmarczyk, 2022).

Figure 13: Number of work permits issued to Ukrainian citizens compared to total, 2008 – 2019



Source: GUS Poland, 2020, p. 143

Other nationalities include immigrants from Belarus, Vietnam, Moldova, and – more recently – Nepal, India, and Bangladesh.

Table 13: Work permits issued by first 10 nationalities, 2015 – 2019¹¹

2015		2016		2017		2018		2019	
Ukraine	76.71%	Ukraine	83.38%	Ukraine	81.72%	Ukraine	74.4%	Ukraine	74.7%
Belarus	3.10%	Belarus	3.82%	Belarus	4.46%	Nepal	6.2%	Belarus	6.0%
Moldova	2.26%	Moldova	2.23%	Moldova	3.00%	Belarus	5.6%	Nepal	2.9%
Uzbekistan	2.18%	India	1.39%	Nepal	1.67%	India	2.5%	India	2.0%
India	2.17%	Nepal	0.95%	India	1.61%	Bangladesh	2.0%	Bangladesh	1.9%
China	1.96%	China	0.95%	Bangladesh	1.02%	Moldova	1.8%	Moldova	1.7%
Vietnam	1.11%	Russia	0.79%	Russia	0.61%	Azerbaijan	1.0%	Georgia	1.5%
Serbia	0.99%	Uzbekistan	0.66%	China	0.60%	Uzbekistan	0.6%	Philippines	1.3%
Nepal	0.91%	Serbia	0.63%	Turkey	0.57%	Georgia	0.6%	Uzbekistan	1.2%
Russia	0.88%	Bangladesh	0.57%	Uzbekistan	0.52%	Philippines	0.6%	Azerbaijan	0.8%
Together	92.26%	Together	95.37%	Together	95.78%	Together	95.3%	Together	94.1%

Source: author's elaboration based on MRPiPS, 2024

The homogeneity of the foreign population, which is made predominantly of Ukrainians, represent a peculiar feature of Polish immigration (Duszczek & Matuszczek, 2018; Górný & Kaczmarczyk, 2018). The increase in the number of Ukrainian workers in the Polish labour market did not lead to tensions with the local population, which maintains an overall positive view on Ukrainian immigrants; the segmentation of the labour market and decreasing unemployment levels contribute to the complementarity of foreign and national labour force (Duszczek & Kaczmarczyk, 2022).

In general, policymakers continued to liberalize entry for work of non-EU citizens while intensifying border controls, improving repatriation, and emphasizing the rhetoric of state's

¹¹ Source: author's elaboration based on MRPiPS, 2024

control against unwanted movements. However, migration continued to represent a technocratic, non-politicized topic. In 2009, the centrist liberal government led by Donald Tusk established a working group to create a strategic document for a comprehensive and coherent regulation of migration to Poland (Duszczek & Matuszczyk, 2018). In 2012, the government approved the strategic document: *“Polish Migration Policy—the Current State of Play and Proposed Actions”*, a set of guidelines for both immigration and integration policies. However, although the policymaking process leading to the formulation of the strategic document involved the social partners, the approved document was criticized as largely descriptive, lacking specific solutions, and financial references for the implementation of the different policies (SIP, 2014).

A peculiarity of the Polish case is the prolonged lack of any coherent or comprehensive immigration discourse in the political and public spheres (Krzyżanowski, 2020).

The situation changed starting from 2015 following the EU debates on the relocation mechanisms for the increasing arrivals of refugees and asylum-seekers from the Mediterranean routes. This coincided with parliamentary elections, resulting in the instrumentalization of immigration for electoral purposes. As Klepański and colleagues write, in 2015 “There has been a dramatic shift from practically no immigration-related debates to the proliferation of anti-immigrant rhetoric” (Klepański et al., 2023, p. 489). The conservative Law and Justice party (PiS) took advantage of the crisis situation in Europe to transform itself from a conservative-Catholic party to an anti-EU, ethnonationalist, xenophobic party. The PiS party obtained 37 percent of the votes against the 24 percent obtained by the incumbent centrist Civic Platform (PO), which enabled them to create, for the first time in post-1989 Poland, a single-party majority government (Markowski, 2016), in power until the 2023 elections.

Having campaigned on an anti-immigrant stance, the government adopted a tough approach and moral panic rhetoric on immigrants and asylum-seekers, who have been since then framed as a threat to Polish culture and nationhood (Krzyżanowski, 2018). From a policymaking perspective, the government combined ‘tough’ policies and discourses on border controls, irregular crossings and refugees resettlement, while maintaining a liberal approach to economic migration. In 2016, the government annulled the 2012 strategic

document and its implementation plan on Polish migration policy, by claiming that the changing migration context required a new policy approach. However, it failed to present a comprehensive strategy. Instead, the government established the “Inter-ministerial group on socio-economic aspects of migration policy”, led by the Ministry of Investment and Economic Development, to identify the socio-economic priorities of migration policy. The relevance given to economic agents in shaping migration policy is novel when compared to the traditionally involved state’ agencies, and it hints at the utilitarian view on immigration (Mikulska-Jolles, 2019).

In 2018, the Council of Ministers approved the “Socio-economic priorities of migration policy”, which has been acting as the mainframe of the state immigration policy. The document underlines that migration policy must be adapted to the needs of the labour market, focusing on supplementing the needed labour in areas where there are shortages, attracting the arrival of high social capital individuals and of Polish returnees, as well as preventing further emigration (Moleda-Zdziech et al., 2020). Furthermore, in 2019 a draft of a migration policy strategy was circulated, and heavily criticized by external commentators and political opposition, so that the government never approved it. The Helsinki Foundation for Human Rights stated: “In the document, migration of foreigners is presented as a ‘necessary evil’ which Poland must allow due to negative demographic trends and the needs of the labour market, unless it is possible to overcome them with other proposed measures (such as, for example, fertility promotion, activation of people currently unemployed, the use of robotization and automatization in the economy, internal migration or re-emigration of Poles from abroad). Migrants are treated, on the one hand, in an instrumental manner, as a necessary workforce, and on the other hand, as a threat to the security and social cohesion of the state” (HFPC, 2019). Polish immigration policy continued to neglect the integration aspects, leaving it to local level administrations and to grassroots initiatives led by NGOs with limited financial resources (Moleda-Zdziech et al., 2020; Ślęzak & Bielewska, 2022).

8.2 Post 2020 developments

Recent developments have drastically shaped migration to Poland, forcing policymakers to revise and adapt policy. Since 2020, Poland faced distinct crises which impacted the nature of immigration flows.

Starting from March 2020, the Covid19 pandemic crisis led to sudden restrictions on internal and cross-border mobility, with restrictions on the right of claiming asylum (Jaroszewicz et al., 2024). Due to pandemic-related restrictions, the hiring of foreign workers was temporarily disrupted, and many already residing in Poland decided to return to their home countries. The decrease in the immigrant population, however, quickly rebounded in 2021.

The closure of borders and implementation of safety measures such as social distancing and quarantine highlighted the strong dependence of certain sectors of the economy on migrant workers. In this context, the hierarchization of European labour markets, and Poland's position as a source and destination of foreign labour is quite evident. Faced with the sudden halt to mobility, all European economies had to find solutions for sectors which have traditionally been heavily relying on migrant labour. Especially the agricultural sector needed labour as the harvest time approached. In this context, Polish workers were sought by Western European countries, with countries like Germany exempting Polish agricultural workers from entry restrictions, or organizing Covid-free charters to import Eastern European workers to the agri-food sector (Fiałkowska & Matuszczyk, 2020). At the same time, Polish farmers were also facing labour shortages, thereby pressuring the government to settle fast-track solutions for the inflow of non-EU farmworkers.

To mitigate the impact of mobility restrictions on economic activities, Polish authorities enacted two sets of provisions.

The first concerned extending the residence permits of foreign workers whose visas were due to expire during the state of emergency, and allowing them to switch employers and sectors (Fiałkowska et al., 2022; Jaroszewicz et al., 2024). This provision facilitated legal residence and mobility towards sectors with labour shortages. In November 2021, the Polish Parliament passed a bill aimed at further simplifying and accelerating the process of obtaining temporary residence and work permit for foreign residents intending to work in sectors of strategic importance for the Polish economy (Sejm, 2021 cited in Jaroszewics et al., 2024:9).

The second set of provisions concerned rules on border crossing during the pandemic. As soon as restrictions were enacted in March, the government issued a series of ordinances to exempt certain groups of foreign workers from the closure. In particular, migrants who

obtained seasonal or other type of work permits were entitled to enter Poland for work purposes. With time, other categories were added to the eligible list, such as migrants who did not have yet a seasonal work permit, but whose applications for such a permit were already registered by Polish offices (Fiałkowska et al., 2022). In September 2020, following the political upheaval and repressions in Belarus, the government added to the list the general category of citizens of Belarus, and in 2021, also Ukrainians were added to the migrants eligible to enter despite restrictions.

In general, the further liberalization of entry rules for work during the pandemic was driven by organized employers' interests, so that, as pointed out by Kaczmarczyk (2023), the presence of foreign workers in Poland continued to grow.

Poland was directly confronted with the Belarusian border' crisis of 2021 and the Ukrainian war started in 2022. The attitudes of Polish political parties towards both crises were drastically different.

Since mid-2021, Poland has been experiencing a humanitarian crisis on its border with Belarus, as Belarusian authorities exploited asylum-seekers from Middle Eastern countries as a manufactured crisis at EU borders. The EU and Polish response has been of securitizing the borders, recurring to unlawful pushbacks and refusal of accepting claims for asylum (Human Rights Watch, 2022). In September 2021, the PiS government proclaimed a state of emergency in the areas surrounding the Belarusian border, thereby forbidding activists, human rights organizations and journalists to enter the restricted zone. As elections approached in 2023, the crisis has been opportunistically used by both political sides, further dehumanising immigrants and treating them exclusively as a threat to Polish safety and nationhood (Grupa Granica, 2021).

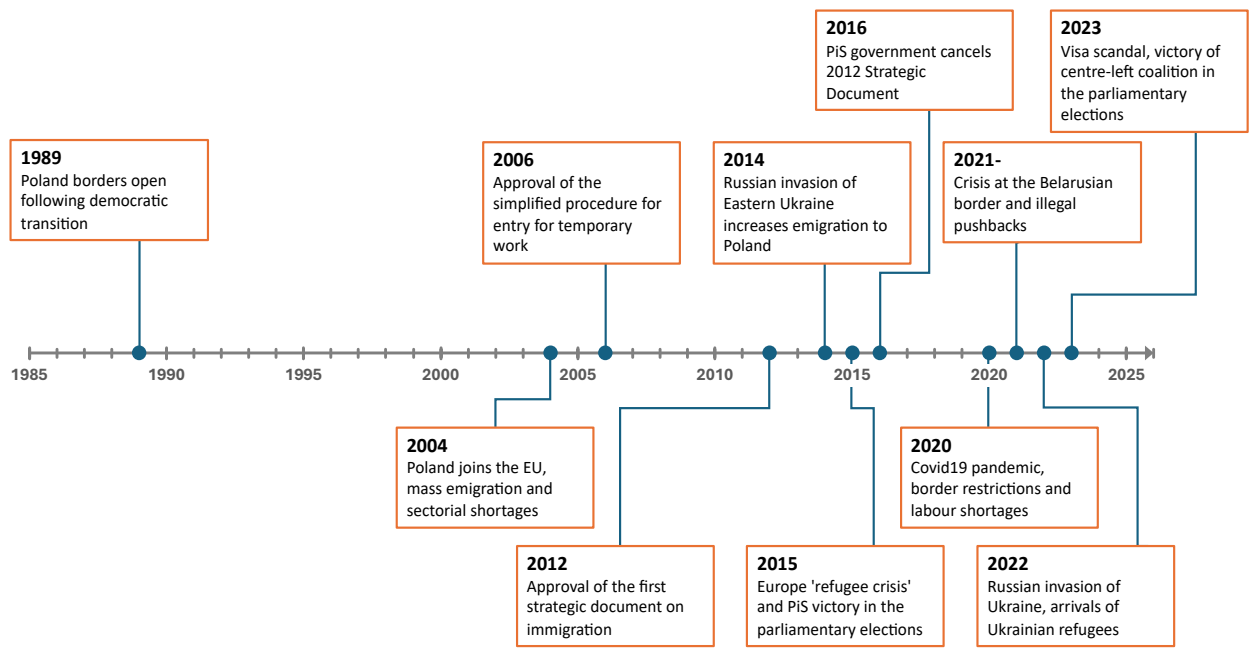
At the same time, the EU and Poland responded differently to the Ukrainian refugees' inflows after the Russian aggression against Ukraine. Immediately after Russia's invasion of Ukraine, Polish authorities decided to open the borders to Ukrainians fleeing the country and to activate the EU directive on temporary protection. The directive provides the right to residence and work for 18 months, access to social security benefits on the same basis as Polish citizens, and assistance for accommodation, healthcare and transport.

The war in Ukraine impacted the nature of migration flows to Poland as Ukrainian immigrants were the larger group of immigrant workers, mostly men taking up temporary positions. With the war, inflows shifted to mostly refugee women, elderly, and children – therefore bringing different integration needs, such as schooling, language classes, psycho-social support. This context led to challenges both to the labour market system, as immigrant workers have to be recruited from different countries, as well as to migration governance, as the humanitarian crisis requires the establishment of an integration strategy.

As of 2024, almost 1 million Ukrainian refugees live in Poland, around 65% of them found employment (Zyzik et al., 2023). The continuing positive economic situation facilitated the rapid integration of Ukrainian refugees in the labour market, although data shows that refugees are often overqualified for the jobs available for them (ibid.).

Finally, the contradiction between the political anti-immigrant stand, and the economic demand for migrant workers is increasingly worsened by ageing population and declining fertility rates. The Polish economy has been recording one of the most GDP robust growth rates in Europe at 2.9%, with low unemployment rate at 2.9% (EC, 2025). Therefore, the demand for migrant labour remains high, while migration increasingly became a topic of electoral battleground. The persistent demand for cheap migrant labour, coupled with PiS anti-immigrant position, led to the increase in opaque practices for the recruitment of workers – mostly from South-East Asia. According to the investigations, between 2018 and 2023 a cash-for-visa scheme was developed, where Polish consuls were pressured to issue visas to applicants who paid considerable sums to private agencies acting as visa intermediaries (NIK, 2024). The scandal erupted during the 2023 electoral campaign, significantly affecting PiS credibility. Eventually, the centrist coalition led by Donald Tusk was able to win the elections on the promise of bringing back order into a de-regulated, chaotic immigration system.

Figure 14: Migration timeline Poland



9 The factors explaining immigration policymaking in Poland

In the following sections, I analyse the interplay of different drivers of labour migration policymaking in the 2004 – 2024 period. Combining data from interviews, conferences and document analysis, the chapter investigates how factors related to interests, ideas and institutions shaped policymaking development. The structure of the analysis follows the chronological order of immigration policy evolution in Poland, taking as ‘symbolical’ start date Poland membership to the EU, and examining policy changes and continuities up to 2024.

By looking at policy and political debates over time, and by situating policy decisions within the context in which they took place, the Chapter traces policy shifts to reveal the complex interplay of domestic economic and political pressures, institutional constraints, and ideological changes that have determined a neo-liberal approach to labour migration and a changing political attention to immigration to Poland.

9.1 Interests: utilitarian approach to foreign workers

In this section, I look at the role that economic, political and societal interests played in the evolution of labour migration policy.

Starting from post-accession, the economic perspective has been central in shaping policies, with a neo-liberal approach of providing cheap and flexible workforce while at the same time limiting workers' rights and assistance provisions.

As stressed in all the interviews, the relative openness to foreign labour has been a constant in the policymaking approach since the introduction in 2006 of the employers' declaration of intent. The process has been mostly driven by the economic interests of employers for labour force, and it is tightly connected with EU accession. Rather than introducing the 'European Social Model', EU accession inaugurated a period of de-regulations and neoliberal measures to increase the attractiveness of the Polish economy for foreign investments (Meardi, 2007). The EU structural funds and foreign investments in the Polish economy contributed to a progressively improving situation in Poland's economic growth, with consequently growing demand for labour. Furthermore, the possibility to move freely within the EU encouraged many Polish workers to seek for higher wages and better working conditions in Western European countries. Hence, starting from around 2007, the labour intensive, poorly paid sectors of the Polish economy such as construction, started to experience shortages. The exit of Polish workers created a self-reinforcing cycle where labour shortages were systematically addressed through importing non-EU workers rather than improving domestic wage and working conditions, institutionalizing Poland's dependency on foreign labour as a cornerstone of its competitive economic model. Up to today, the issue of labour shortages has been dealt with by opening to foreign workers, so that the need for importing foreign labour is not contested, but there is a widespread consensus. With very few exceptions, the dominant view is that Poland has a structural need for foreign workers, while there has not been much debate on alternatives (like rising wages and improving working conditions). As outlined in several documents and interviews, immigration policies have mostly responded to labour market needs, and therefore they have been aimed at establishing quick entry channels for foreign workforce. As expressed by one respondent representing employers:

The government was rather responding to pressure from the business. Because they understood very clearly that no migrants, there may be no problems in the future, but no growth in the economy. The Polish economy is still very much a manual one. And we need those hands to assemble the washers, dryers, and the seats for VW and wheels for Mercedes. The government understood that without opening to immigration, the growth would be cut. [...]I would say business was the driver for immigration policy, and the government was smart enough to not be an obstacle. So, to put aside the eventual political gain. (IPL4 – Lewiathan - largest employer organisation, president)

The lack of a counterpart to employers' position, together with the continuing emigration of Polish workers who had better opportunities within the EU, pushed utilitarian measures aimed at providing a workforce willing to substitute the native in the low-paid jobs. The measures implemented until today are characterized by a focus on providing labour supply, neglecting the integration aspects of immigration. This is translated in a relatively easiness to obtain a temporary work permit, which does not imply access to social rights.

The 2006 Act introducing a simplified procedure for the six Eastern neighbouring countries is paradigmatic of the business-driven logic behind immigration policymaking in Poland. As outlined in the previous chapter, the simplified procedure responded to pressures from the agricultural sector, and it was subsequently expanded to cover all sectors. The success of the simplified procedure led to its subsequent expansion to more countries, sectors of the economy, and longer periods of validity. However, workers' protection and social assistance remained practically inexistent with this type of permit.

The analysis of parliamentary committees' debates and interpellations preceding the approval of the simplified procedure highlights how turning to immigrants from poorer economies was presented by the right-wing, conservative ruling coalition as the only viable solution to maintain the competitiveness of Polish companies, as expressed in the following excerpt:

We decided to change the law in order to help our farmers. The salaries for fruit picking are so low that Polish workers refuse to work (...) unemployed Poles refuse to take such jobs as the salaries are indeed very low. (Doc PL10 – Bogdan Socha, Undersecretary of Labour and Social Policy, 12.07.2006)

Furthermore, the policy drafting process leading to its approval was extremely fast, as it was approved within few weeks from its proposal without much political or public debates on its impact and consequences for the Polish labour market and society (IPL6, expert).

The competitiveness through low wages responds to the immediate and short-term interests of employers, as investing in technology or upgrading the economy yields results in the long-term. Hence, the chosen solution was to recur to cheap workforce, which in the Polish case was available from the neighbouring countries.

From a political perspective, until 2015 immigration policy was not politicized and mostly a matter of national administrations. The largest parties across the political spectrum responded to employers' demands and, similarly to the Danish and Italian case at the beginning of immigration inflows, did not see immigration as a central topic for gaining electorate support.

Until 2015 migration was not a subject in political and public debate. It was a subject of discussion only between specialists, NGOs, policymakers. When I was the counsellor for the Prime Minister, I was into the project for drafting a migration policy which was published in 2012, but I would say it was mostly a technocratic process, there was no serious debate around it with the general public. (IPL6 – Migration expert, academia)

Rather, between 2007 and 2015, the political activity focused on favouring the return of Polish emigrants, mostly through information campaigns and fiscal incentives without discussing the conditions of the mobile workforce. The more silent but persisting political line on immigration has been to continue favouring the entry for work of third-country nationals. Behind this vision there is the widespread conviction of immigration as needed by the economy, as outlined by politician and former Minister of Administration and Digitization Michal Boni:

When we are talking about economic immigration, it is very important to understand that there are two dimensions of this. Firstly, this is a real current situation of the labour market, and some shortages in the labour market. We need people in many sectors. On the other hand, labour migration is required because of the future social systems. A much more demographically balanced situation in Poland is important for the labour market, but it is also important for the real capability of social and pension systems in the future. (IPL5 - Michal Boni, former Minister of Administration and Digitization)

The grim demographic projections have led many experts and policymakers to see labour immigration as necessary also for the future sustainability of the pension and welfare systems. From a temporal perspective, whereas economic and societal policies favouring return migration, economic upgrading, welfare provisions for families, are perceived as eventually successful only in the long-term, inflow of immigrant workers is viewed as an immediate response.

Departing from 2015, the political position to labour immigration became more ambiguous. The EU 'refugee crisis' and subsequent calls for relocation programs were politicized by the right-wing populist PiS and Confederation parties, whereas the incumbent Civic Platform maintained a more balanced pro-EU stand. The politicization of the refugee crisis to obtain electoral consensus opened up a new political approach to immigration policy in general. The xenophobic propaganda promoted by right-wing actors was successful in pushing the public opinion towards anti-immigration positions. At the same time, the underlying approach of liberalization of entry channels for work was not challenged. In the same period, immigration inflows increased exponentially. Thus, the political interest of obtaining an electoral gain through a tough stand on immigration hindered the formation of a comprehensive national strategy of migration governance, while the economic interest for foreign labour supply continued to favour temporary entry of needed hands.

A paradigmatic case of the ambivalent approach to the migration topic is provided by the reactions of the PiS government after Paweł Choraży, the PiS Deputy Minister of Investment and Development, stated in a public interview in 2018 that "the influx of immigrants to Poland must increase in order to maintain economic growth" and that "it is thanks to immigration that the prosperity of successful countries is built" (quote reported in *Gazeta Wyborcza*, 27.04.2023, my translation). The government reacted to these statements by dismissing him from the post, arguing that his expressed position was in contrast with the party line on immigration. Hence, as outlined in the following quote, there is a tension between silent policy direction and public stand of political actors:

The issue was always that we need labour migration. (...) But again, this is a very conservative government and whenever it goes public, they stop. In 2018, one of the ministers said that we need to validate this document because we need foreign workers. And he got dismissed immediately and nobody talked about it! The government knows that we need it. But they cannot admit it nor validate it, because they know it would make them lose their credibility, of their 'Poland to Poles' propaganda. (I4 PL – Lewiathan President)

On the other hand, the politicization of the immigration debate also led the opponent coalition led by Donald Tusk to take an opportunistic stand during the elections as an immediate way to challenge the ruling party:

It is very clear that all parties when is needed, they play the populist game. So, even the liberal side of Mr. Tusk, which is supposed to be the European way, when it comes to migration, they are in the very

comfortable political spot to say: “yeah, the current government brought us 150,000 Muslim migrants to Poland, deteriorating our security!” (IPL2 – Civil Servant, Ministry of Labour).

Finally, the political ambiguity towards immigration since 2015, and the employer-driven character of immigration policymaking implied a lack of interest in integration measures. This is coupled with ideas of Polish society as fundamentally homogeneous, as it will be analysed in detail in the next section. It follows that there have not been neither pressures for investing in integration strategies, nor political interest in getting involved. Here, the temporal perception of gains is a decisive factor in the lack of agency by both political and economic actors. Politically, the effects of a well-integrated foreign population are visible in the long-term and the costs are contingent. Economically, the labour-intensive character of the Polish economy yields low interests in retaining and integrating the workforce, so that the employers’ approach to immigration favours the temporary stay of the foreign workforce.

The centrist government elected in 2023 ran the elections on the promise of fixing the broken immigration system created by PiS, by prioritizing the interests of citizens for orderly migration over business demands. The stated objectives of the Tusk government reveal a fundamental temporality dilemma between short-term economic interests and long-term societal development:

Maybe we should resign from this 0.2 percent of GDP increase, to avoid what I said, avoid different issues, different challenges, which would make it necessary to pay more tomorrow. More money for different integration instruments. You know, in the discussion it is very difficult to combine the situation on one hand the short period of time, short interest of the employers with a long perspective of development of our country. (IPL 1 - Expert, civil servant Ministry of Interior)

As outlined in the reflection above, decision-makers are faced with a trade-off between short-term economic gains from migrant labour, and longer-term societal wellbeing, dependent on immigration governance. Economic interests operate on short temporal horizons, while sustainable integration requires long-term planning and resources. During the interview, the respondent referred to addressing the long-term societal interests for cohesion and integration as an attempt to avoid the mistakes made by European countries with longer immigration histories. At the same time, the stable policy direction adopted in the past twenty years does not hint at a change towards investments in a long-term oriented migration governance.

9.2 Ideas: not a country of immigration?

In this chapter, I analyse how values and beliefs attached to ideas of national identity shaped labour migration policymaking. The discursive reference to different moments of Polish history is used to build a Polish identity, which in turn legitimizes contemporary positions on immigration. From the documents and interviews, two ideas on Polish identity are often mentioned in the relationship towards immigration. Firstly, the large wave of Polish emigration impacted the national imaginaries about Poland as not a country prepared to immigration. Secondly, although less present in the data, there is a competing interpretation of Polish identity¹², which in turn impacts policymakers' narratives towards diverse immigrants.

The dominant narrative of Polish identity is an ethnic-nationalistic one. From the analysed parliamentary debates and politicians' statements, the self-perception of Poland as a homogeneous, Catholic nation is used to depict immigration as a threat, and therefore to justify immigration restrictions. With the politicization of immigration departing from 2015, this ideational frame of Polish nation has been widely adopted by the conservatives and the populist far-right, and it became the dominant approach in debates about the impact of immigration on Polish society. However, there is another tradition that emphasises Polish identity as a multi-ethnic and tolerant. This ideational frame draws from the history of Poland under the Jagellonian dynasty, as a time where diverse ethnic and religious groups composed the Polish Commonwealth, to underline Polish identity as European, multi-ethnic and tolerant. Especially during the early phases of politicization, left-wing and pro-EU parties drew from this imaginary to counter the nationalist narrative of the right:

Remember that this is also our tradition, that we have always been open, we have always been tolerant. Let's not destroy it, let's not undermine it. By talking about the destruction of civilization in Europe, let's not undermine our great Jagiellonian tradition, which has always characterized and distinguished Poland

¹² On this, see Polish philosopher Bocheński essay on "What does it mean to be Polish" (1995), where he theorised two main forms of Polish identity: an ethnically inclusive one – from the Jagellonian period, and an ethnically exclusive one – from the Saxon period.

against the rest of Europe. The former Republic of Poland was the first European Union, it was the first true union of nations beyond divisions, beyond differences. We were the ones who set an example for Europe and we were the first union of states, nations and religions for several hundred years, because that is what it looked like in the Republic of Poland. (Doc. PL115 – Rafal Grupinski, parliamentary of Civic Coalition speech in Sejm Session 16.9.2015)

Although few reference to the Jagellonian Polish identity emerged, these have been not recurring, hinting at the fact that the left did not develop a countering narrative to the nationalism used by the political right to justify closure to immigration. The absence of a sustained counter-narrative allowed the conservative interpretation of Polish identity to become increasingly entrenched as the default lens through which immigration policy debates were conducted.

The fact that Poland witnessed strong emigration since the early 2000, influenced how policymakers and public opinion viewed immigration.

The post-accession emigration contributed to create an identity of Poland as a country of emigration, so that – similarly to the Italian case – policymakers and media did not see immigration policy as a priority. As mentioned by several respondents, at the beginning of the 2000s, Poland had one of the highest unemployment rates in Europe, which hit especially the younger cohorts of workers:

At the time we treated ourselves as a typical emigration country. That is why we did not focus on immigration. We had very conservative immigration policies, especially for labour migrants, we had very complicated procedures, because at that time we had a 20% unemployment rate, and it would not have been very wise for us to encourage immigrants to come to Poland. Because there was also not acceptance by the trade unions. (IPL 1, Expert, civil servant Ministry of Interior)

The self-perception of Poland as an origin rather than a destination of migration flows had many repercussions in the public and political discourse, as well as in the policies adopted.

From a public discourse perspective, the definition of Poland as not a country of immigration contributed to the consolidation of an identity of Poland as a homogeneous society, which does not have the experience, and it is not ready for hosting culturally different people. In the analysis, it emerged how respondents often compared Poland to the traditional countries of immigration, claiming that not having experience with a diverse population makes Polish citizens conservative rather than open to different cultures, traditions and religions, as exemplified in the following anecdote:

We are not a country of immigration: when we prepared the recommendations in the report Poland 2030, we argued that Poland needs to have an immigration policy open for different kind of countries, with integration policies (...). We discussed some pictures and illustrations for the report. And someone had the idea of putting a photo as it was in a street of London, with some white people, black people, different colours, different races. But in our group some people said: it is too dangerous in 2009 for Poland, politically, to show that we think about migration policy, which means that people with different cultures, religious and so on, will come Poland. So, it was a real challenge at that time. (I5PL – Michal Boni, former Minister of Administration and Digitization)

Starting from the 2015 elections, these traditionalist cultural patterns have been manipulated for political gain, leading to further anxieties towards the ‘otherness’ of immigrants. Within this context, Western European countries with longer immigration histories like France, Sweden and Germany are often brought up as examples of societal tensions caused by immigration. Hence, they are used discursively to justify a restrictive approach as wise for the future of Poland. However, societal closure to immigration represents a challenge for a debate on integration and long-term settlement of the immigrant population.

Furthermore, the emigration of Polish workers contributes to the national victimhood narrative, as Polish emigrants faced marginalization and racism in Western Europe. This trait has favoured a narrative of competition with other ethnic groups. As one activist and legal expert explained, the experience of discrimination abroad created a complex dynamic where Polish emigrants developed racist attitudes as a misguided strategy for social acceptance in host societies:

Emigration brought racist attitudes. It comes from guys working abroad, working in the lower positions along people of colour. And they did not like that (...). It fuelled a lot of the attitudes of regular people in small cities, because Polish abroad talked about how immigration is bad, how many migrants there are. Poles lived in the areas populated by people of colour, because they were cheap, and they did not like it. There is a term for that, coined by a British academic, pathologic integration, it shows that Polish integration in UK was done through racist attitudes. They tried to present themselves as part of the host society, underlining their racism towards other immigrants. Because they thought it would be the way to be accepted, to be treated as equal by the host society. Because also Eastern Europeans face a lot of racist attitudes. (...) To feel better, they found a scapegoat. (I8 – CSO, legal expert)

The concept of “pathological integration” (Fox & Mogilnicka, 2019) reveals how racialization practices can create a perverse cycle where marginalized groups adopt the prejudices of their oppressors to insert themselves more favourably in the racialised hierarchy of immigrants’ desirability. Polish emigrants, facing their own racialization as “different shades of white”, attempted to climb the hierarchy by positioning themselves above other minority groups. According to the insights of the respondent, the racist attitudes internalised by Poles abroad

got transmitted back to Poland as a form of negative social remittances. Hence, Polish emigrants became carriers of racialized worldviews that then influenced domestic attitudes toward immigration.

From a policymaking perspective, the identification of Poland as an emigration country contributed to a political delay in envisioning policies for the settlement and integration of immigrants. Firstly, during the first years after Poland accessed the EU, policymakers focused on maximising the positive impact of emigration and limiting the negative externalities. This involved for instance the focus on facilitating the return of Polish emigrants, the engagement with Polish diasporas, and the design of policies targeting descendants of Poles abroad. In this context, the inflow of foreign workers filling labour shortages was viewed as a necessary short-term strategy to sustain economic growth, without a long-term vision on the societal aspects of increasing immigration. Throughout the past twenty years, the declining demographic trends also led to a widespread belief of the necessity to attract immigrants as a solution to sustaining the welfare system in the future.

There is an implicit tension between the belief of economic immigration as necessary, and societal fears of an increasingly diverse Poland. Politically, this tension has been balanced in different ways.

Initially, when considering loosening the regulations to respond to employers' demands, policymakers introduced the simplified procedures for eastern neighbouring countries, which shared similar historical and cultural ties. Apart from pragmatic reasons of pre-existing mobility and geographical proximity, the opening to – especially Ukrainians – has been justified by emphasizing the cultural, linguistic and historical ties that Ukraine shares with Poland. This proximity has then been translated in a preference for Ukrainian workers in terms of values, work ethic and ability to assimilate to the native population:

The government should now work on solutions that will encourage residents of our neighbouring countries: Ukraine, Belarus and Russia to settle in Poland. (...) Otherwise, in a few years we will have to import Chinese, Pakistanis, Africans and Arabs. It may be too much of a shock for society. (Doc. PL109, Interview with Professors Iglicka and Bieniecki on Gazeta Wyborcza, 11.09.2014. quote 109:76)

As outlined in the excerpts above from a newspaper interview with two leading migration experts, the narrative of societal homogeneity leads to a hierarchization of immigrants

depending on nationality and religion, with white, Christian neighbours being considered as the attractive migrants. The availability of a vast pool of workers from the neighbouring Ukraine has been defined by some respondents as “a gift to Poland”, precisely because it provided “workers that are similar in terms of language. And also, in terms of culture, in terms of their hardworking ethos, their behaviour in the labour market” (IPL7 – Expert, academia).

Since 2015, the politicization of immigration shaped public opinion position vis-à-vis racialized immigrants. Both opposition and governing parties boosted on anti-immigrant narratives addressed mostly at Muslims, Africans and Middle East immigrants, with a strong impact on citizens’ opinions (Hargrave et al., 2023). At the same time, economic interest for cheap labour push for the continuation of recruitment from Southeast Asia. The combination between the economic interest for increasing availability of cheap labour and the public discourse of rejection of racialized immigrants has contributed to the invisibilization of this workforce:

Because one thing is that we are very close, culturally and linguistically. The other ones are coming and leaving. You do not see them. They do not come with their families. So, it is not solving the birth-rate, the demographic problems, we are just importing labour. And maybe that is why we do not have tensions. Because out of the few cricket players in the parks of Warsaw, you do not have their families staying in the country. (IPL4 – Lewiathan president)

On one hand, workers from Nepal, Bangladesh or Pakistan, are recruited through working agencies and placed in isolated working sites. The temporary character of their permits, together with the working and living conditions hinder any form of socialization. On the other hand, the largely symbolical narrative of closure to racialized immigrants hinders any type of measures in support of immigrants’ rights and conditions. The lack of political will, leaves the market to shape the organization of migrant work, ultimately leading to the degradation of those workers to commodified labour force.

9.3 Institutions: building Polish immigration policy between change and continuity

The establishment of a governance framework for immigration is tied to the accession to the EU and to the Schengen area. The enlargement process had a direct impact, as Poland had to

adapt its immigration regulations to EU requirements, as well as an indirect impact, as the entry in the EU brought changes in the demographic and economic outlook of the country.

Concerning the direct impact, Polish emigration grew significantly with EU accession, and the economic growth led to a progressive improvement in labour market indicators, with shortages in various sectors. Although concerns about the impact of mass emigration on the Polish welfare and demographic projections were raised since its accession to the EU, successive governments tried to limit the negative externalities by focusing on informative campaigns to attract Poles abroad, without addressing the job conditions at home. Instead, pushed by employers' lobbying, policymakers turned to immigration as a solution to maintain low wages in labour intensive sectors. As explained by several respondents, the Polish economy leans on its comparative wage competitiveness, which faced with mass emigration, has been preserved by the recruitment of foreign workforce accepting poor conditions. Hence, the policies implemented until today reflect a continuity in dealing with immigration through a purely market logic of cheap labour supply.

Initially and up until around 2010, the low politicization of immigration contributed to fewer actors being involved in policymaking; as described by a civil servant of the Ministry of Labour, migration has been treated as a technical area of policy, with relatively little attention from political actors, and employers demanding quick and easy entry procedures. The first strategic document published in 2012 reflected the technocratic nature of immigration policymaking, as it involved few experts from the ministries and academia and was quickly approved without public or political debates.

In overall, the continuity in Polish immigration policymaking lies in the combination of closure in terms of rights and opening in terms of access to the labour market. This is translated into increasingly liberal entry policy for temporary work, and a lack of agreement on a national strategy on integration, with few resources allocated to it:

Poland was focused mainly on labour immigration. (...) So, for example, in our department, I think around 20 people are dealing with labour migration. In the Department of Social Policy, it is only - I think it is tragic - between 1 and 0.5 people working on integration. We can admit foreigners, but we still do not think about integration. (IPL2 - civil servant, Ministry of Labour and Social Affairs)

Even with the growth of anti-immigrant populist parties, the high politicization of immigration, and its instrumentalization for electoral purposes changed little in the neo-liberal policy direction on labour immigration. Although the far-right nationalist PiS openly suspended the 2011 Strategic Document with the claim of not wanting Poland to become a country of immigration, it did neither dismiss nor reduce the recurrence to migrant workers. On the contrary, during the PiS government, there was an increase in work permits for countries such as Bangladesh, Nepal, Pakistan and India.

The increasing political weight of immigration led to tensions between the openly restrictive and silently liberal policy approach for categories of migrants that have been constructed as unwanted. In the Polish case, it is not the low-paid immigrant worker as such to be unwanted, but it is the racialized other. This dual approach creates a complex policy landscape where economic pragmatism operates alongside political rhetoric. While anti-immigrant propaganda dominates public debate, the underlying policy infrastructure continues to facilitate immigration through established legal channels and administrative procedures.

The war in Ukraine represents an exogenous crisis which determined a change in immigration flows. The Polish economy is heavily reliant on Ukrainian labour. However, since 2022, the prohibition of border crossing for all men aged 18-60 years, and the arrivals of refugees – predominantly women with children and elderly – drastically changed the type of migrants' inflows. The changed character of Ukrainian immigration had important repercussions for the Polish labour market. The halt of male workforce from Ukraine caused acute shortages in many economic sectors such as transport and construction. Furthermore, employers and experts expect a continued reduction in workforce as future reconstruction in Ukraine will create a demand for workers:

There is no way that we will have more Ukrainians, because if you speak with the EU officials about Ukraine, one of the major issues they have about the reconstruction, is the lack of labour force in Ukraine. So, there will be a strong pressure that they go back. When you will have Italian, German, American companies spending public money to the reconstruction, they will not care about salaries nor costs. So, there will probably be more attractive conditions for the workers in Kiev than in Warsaw. Today is not the case, but when the reconstruction will come, I am sure that the salaries will be higher in Kiev or Kharkiv than they are today in Warsaw. (I4PL – Lewiathan President)

Additionally, other respondents underlined that departing from 2018, there has been a growing competition to attract Ukrainian workers, as other countries such as the Czech

Republic and Slovakia are witnessing economic growth and sectorial labour shortages. Current and projected labour shortages in the type of manual work covered prevalently by Ukrainians pressures policymakers and economic actors to provide alternative solutions. The short-term, immediate response has been that employers and temporary employment agencies began to recruit from Asian countries such as Nepal, India and Bangladesh. The recruitment from Asian countries introduces a fundamental tension between economic and political imperatives. While employers and policymakers continue to pursue the same neoliberal logic of importing cheap labour, the newly recruited foreign workers are precisely the ‘racialized others’ constructed as unwanted in Polish public discourse. This creates an intensifying divergence between economic interests— demanding labour recruitment regardless of origin—and political rhetoric that has consistently targeted non-European, non-white immigrants as threats to Polish identity and security.

Finally, I reflect on the impact of the change in government after the 2023 elections for the Polish policy direction on labour migration. The moderate coalition led by former president Donald Tusk campaigned to bring order in the migration governance system. Although the political dynamics will be delved in chapter 9.4, here I focus on the implications of the new comprehensive migration strategy for 2025-2030 presented by the government in October 2024. As part of maintaining electoral promises of bringing order and systematicity to the Polish migration legislation, the government presented a strategic document, tellingly titled: “Regain Control, Ensure Security”. The document is paradigmatic to analyse the new approach to immigration, which presents unexpected ruptures and continuities.

On the continuities with the PiS line, the document is not successful in presenting an encompassing strategy, but it overfocuses on the security aspect. Throughout the document, there is a recurrent use of terms linked to security and control, thereby supporting the view that immigration is a negative phenomenon:

The main direction of Poland's migration policy assumes, **above all, ensuring security, which is treated as an existential challenge** in the conditions of current geopolitical challenges. The presence of foreigners **cannot introduce uncertainty into the everyday life of Polish residents**, so the immigration process must be limited, subject to monitoring and control by public institutions and respond to the expectations of Polish society. This applies to both social and cultural issues related to the influx and presence of foreigners, as well as economic issues, resulting primarily from the situation on the labour market and the competitiveness of the Polish economy. (Doc. 149 – Migration Strategy, bold in text)

As outlined by critics, this vision perpetuates the image of migration as an unfavourable, negative phenomenon that undermines the familiar, safe, idyllic 'us' world. In so doing, it perpetuates the dualizing narrative of Poland, Polish people versus immigrants. In overall, although the Civic Coalition presented itself as an alternative to the populist far right, its approach to immigration policy became tuned for political gains in the right-wing electorate, as denounced by an activist:

The long-awaited document has turned out to be a political tool. It tries to calm the anxieties of a society where governments have been talking about migration almost exclusively as a threat for nine years, and have been stocking anti-immigrant sentiments, then exploiting our fears in election campaigns. (...) the strategy is deeply rooted in the narrative of fear – it focuses on premises of control and regulations, stokes the image of migrants as those who abuse the system, and sees the state's task in strengthening control. (Doc. PL155 – Agnieszka Kosowikz, president of the Polish Forum on Migration initiative).

In overall, the migration strategy document has been criticised from several fronts for several reasons, including the way in which the document has been introduced:

There was also no public debate on it. It was announced by the Prime Minister and accepted by the Government three days later. Previously none saw the draft, including other Ministries. It was presented at the government less than a day before the government had a meeting, it was discussed in the meeting of the Cabinet, and there was a vote later that day. And some Ministries from left parties decided not to support it. It was the first time for this government to face a strong opposition. (IPL8 – NGO, legal expert)

The lack of consultations with social and economic partners, political actors of the governing coalition, and administration of relevant ministries hints at continuity with the PiS line of decision-making without consultation. It also reflects a rupture with the moderate centrist tradition of including experts and public officials in policymaking on immigration during the de-politicised period.

A restrictive approach to labour migration is an element of rupture in Polish migration policymaking, which is justified in the 2025-2030 strategic document by the need to upskill and not rely on cheap foreign labour for economic growth. However, it remains to be seen whether the stated objectives of the strategy will find implementation:

Let's see how this strategy translates into legislation. Because it might happen, but it also may not. Because it jeopardizes a lot of interests of different groups. The title is: Regaining Control, Improving Security. This is the approach: security, limiting migration, also labour migration. They call for limiting it. The explanation behind it is that Poland should not be stuck into this middle growth country, being focused only on the lower end of the market, so we should have the ambition to upskill. And it is fair. But the strategy is for five years only: we cannot do it in five years, we can do it in twenty, maybe. (...) So, you see the contradictions there. (IPL8 – NGO, legal expert)

As outlined in the quote, it is difficult to assess whether the stated intentions in the strategy will find their way in legislation or whether they served political goals.

All in all, recent developments show how the politicisation of immigration issues had the effect of ending the technocratic period of labour migration policymaking, as also labour migration has been increasingly scrutinised after the 2023 visa scandal. Until recently, Poland maintained a dual approach characterized by a largely invisible but liberal policy framework in line with the established management of labour migration, while simultaneously employing visible tough rhetoric and restrictive policies regarding other aspects of immigration. The shift from technocratic to politicized policymaking represents a fundamental transformation in how Polish institutions approach migration governance, as immigration decision-making are increasingly politically driven. This change is visible in how migration policy has increasingly been subject to electoral cycles and partisan considerations. Consequently, the capacity of Polish institutions to develop and implement comprehensive migration strategies may be significantly constrained by the need to respond to immediate political pressures rather than to structural economic and demographic challenges.

9.4 Inter-actor dynamics

This chapter analyses the role of different actors in influencing migration policy development, focusing on the power relations between state and non-state actors.

9.4.1 Dynamics within and between political parties

In this section, I outline the evolution of political parties' position on migration policy between 2004 and 2024. In this period, there has been a generalised consensus on the necessity of attracting migrant workers for the Polish economy. Respondents referred to the economization of migration, where the utilitarian logic of providing the demanded hands to the economy has been adopted by all ruling parties. This also implies that for very long time, labour migration policy was not object of political contestation. The previous sections highlighted the role of economic interests, labour shortages, and cultural proximity with Ukraine in favouring an overall unanimity of political positions towards labour migration.

Here, I explore the position and alliance-building of political parties over time, and how these shaped the liberal direction of labour migration policies.

Polish party politics between 2004 – 2024 is characterized by the competition between Civic Platform (PO) and Law and Justice (PiS) (Drewski & Gerhards, 2024). PO was founded in 2001 as a centre-right, pro-European party. Initially, it had an economically liberal and culturally conservative profile, which however evolved into a more centrist approach to socio-cultural issues. Under the leadership of Donald Tusk, it won the elections in 2007 and remained in power until the 2015 elections.

PiS was founded in 2001 as a right-wing, conservative and nationalist party. It progressively defined itself as a populist party that emphasizes the fight for maintaining national sovereignty vis-à-vis the EU, cultural conservatism and close relations to the Polish Church (Drewski & Gerhards, 2024). Under the leadership of twin brothers Lech and Jaroslaw Kaczyński, it won the 2005 parliamentary and presidential elections.

Smaller left and right-wing parties are mostly incorporated into government alliances with these two major parties. With regards to labour migration policies, conservative parties representing rural and farming interests, like the Polish People Party (PSL) or former Samoobrona have been influential in supporting a liberal approach to managed immigration to fill labour shortages.

There is a notable absence of a left-wing force in Polish politics. Throughout the '90s and early 2000s, the dominant party was the centre-left Democratic Left Alliance (SLD), which however declined after corruption scandals and electoral losses to the more modern PO and PiS. In 2019, together with other small left-wing parties, it founded the Lewica alliance. Hence, after years of absence of a left party in Parliament, became the third political force after PO and PiS in the 2019 parliamentary elections. Lewica maintains a positive views on immigration, and it emphasizes the importance of establishing an integration framework.

Until 2015, immigration did not enter the sphere of interest of party competition. The analysis of parliamentary debates and parties' political programs within the 2004 – 2014 period hints at the marginalization of the topic from the political and public debate, with the national

administration, circles of experts, employers, and EU legislations playing a central role in shaping immigration policy direction. It follows that until 2015 elections, political parties had not yet developed a comprehensive immigration discourse.

The 2015 national elections represent a key turn in the politicization of migration and migration policies. PiS exploited the EU crisis on refugees' arrival to build an anti-EU, anti-immigration narrative (Krzyżanowski, 2020). In the context of ongoing debates for the establishment of a relocation system across the EU member states, the party positioned itself as a hardliner against immigration and EU-mandated relocation. Although the effective number of refugees and asylum-seekers arriving to Poland was very minimal, PiS was successful in spreading xenophobic, racist discourses targeting Muslim and Middle East immigrants (Krzyżanowski, 2020). To justify and strengthen support to their position in a country with very few numbers of asylum-seekers and migrants from the Middle East, PiS narratives often referred to the experiences of EU countries with a larger immigrant population. By employing distorted and *ad-hoc* fabricated imagines of violence and threats against the national identity of other EU countries, the party was successful in both normalizing racist discourses in the public space, and in spreading a sense of panic related to immigration. The following excerpt from a parliamentary debate on the EU refugee crisis, is paradigmatic to show how distorted events in countries with higher immigration levels are used to express the urgency of defending the Polish nation:

There are concerns about hanging the Swedish flag in schools, because there is a cross on the flag. It turns out that Swedish schoolgirls are not really allowed to wear short dresses today, because that is also not liked. What is happening in Italy? Churches occupied, sometimes treated as toilets. What is happening in France? Sharia law being introduced, patrols to ensure Sharia is observed. The same in London, and in Germany, phenomena of this kind are also taking place. Do you want this to appear in Poland, so that we stop being hosts in our own country? Well, I want to say it clearly: Poles do not want this. Law and Justice does not want that. (Doc. PL115, Jaroslaw Kaczynski).

As the excerpt above suggest, PiS adopted anti-immigration discourses typical of the populist radical right – in a context where immigration was extremely low – to fabricate a feeling of threat to the Polish identity and customs. By painting an imaginary where cultural norms have been overthrown by the 'Muslim other', the party portrayed itself at the safeguard of Polish identity and traditions while accusing the governing PO to neglect this aspect.

The 2015 presidential and parliamentary elections were won by PiS, which became the first party since the end of communism to win the parliamentary elections with an absolute majority and was later confirmed in power after the 2019 elections (Meardi & Guardiancich, 2022).

PiS governance of immigration has been characterized by securitarian discourses and symbolic policies towards not wanted immigrant groups, and silent liberal policies towards needed foreign hands. The combination of a securitarian stance and utilitarian praxis led to an uncoordinated mix of policies. On one hand, the pressures of economic actors for foreign workforce ensured a continuity in the liberal approach to entry for work. On the other hand, PiS nationalist conservative vision of a homogeneous Poland did not give space to integration measures and long-term settlement:

You cannot be good for the electorate and bad for entrepreneurs at the same time. Therefore, PiS's only option is exactly what it does - speak loudly about social policy and quietly open the door to migration. (Doc. PL107 – Gazeta Interview with Prof. Pawel Kubicki on 21.06.2023)

And:

The government does not boast about it, but it does not pose any obstacles, realizing that the Polish economy cannot cope without foreign workers. However, it does little to speed up this process and stabilize the situation of immigrants. (Doc. PL107 – Witold Gadomski in Gazeta 27.04.2023)

As outlined in the excerpts above, the contradiction between the needed foreign hands and the unwanted foreigner, unfolded in a tacit tolerance of continued arrivals of foreign workers, while rejecting investments into a coherent immigration governance structure.

By suspending the 2012 comprehensive migration policy document without replacing it with new guidelines, the party symbolically rejected a vision of Poland as a country of immigration. The drastic cuts in integration funds, together with the lack of investments in the immigration governance system hints at the party's assumption that labour migration is tolerated as a temporary solution to labour shortages, without however intending to facilitate the long-term settlement of the foreign population.

In overall, the PiS government approached immigration along two distinct temporalities. Tolerating the liberal approach to economic immigration represented the contingent tactic

for the current shortages of important sectors of the labour market. However, the party refused to view immigration as a long-term phenomenon. Instead, it promoted long-term strategies to improve the demographic situation in Poland for the future, therefore seeing immigration as a short-term fix rather than a permanent phenomenon. For the long-run, PiS approved an ambitious package of welfarist and familialist policies to incentivize higher fertility rates and address demographic decline - without explicitly relying on immigration as part of the solution. In the words of former Prime Minister Morawiecki:

Demographic problems are problems of the whole of Europe. We want to solve them by supporting Polish families, supporting Polish children, Polish youth. (Prime Minister Morawiecki, Sejm Meeting nr. 80 on 25/04/2019).

Although familialistic policies are unlikely to solve the demographic crisis (Meardi & Guardiancich, 2022), they signal PiS' strategic preference for supporting Polish families as the primary solution to demographic decline, rather than embracing immigration as a long-term demographic strategy.

The lack of a compromise between the restrictive securitarian and the liberal economic approach to immigration, led to an increasingly schizophrenic situation, while the numbers of immigrants began to steadily increase. This tension became very visible during the 2023 election campaign, when investigations uncovered systematic corruption in issuing of visas in a number of Asian and African countries. However, as pointed out in the quote below, the scandal is the outcome of steadily increasing immigration and a political negligence in updating the administrative system to the changing migratory context of Poland:

When we speak about the visa scandal, there is one thing that should be said: between 2010 and 2020 migration increased 20 times. This happened without substantial increase in people working on migration in the offices and administration. (...) Then, there were also lobbying actions from employers (...). But it was mostly due to limited capacities. (IPL6 – Migration expert, academia)

In the report presented by the Supreme Audit Office (NIK), they identify the problem in the lack of a systematic legal framework to process visa applications as well as in the understaffing of overburdened consulates. This led to an increase in waiting time (in some countries exceeding the year) and in an increase in the involvement of for-profit visa intermediaries, "often dishonest or functioning at the border of the law, appropriating the functionality of the e-consulate system" (NIK, 2024). The Audit Office outlined how the

Ministry neglected the inadequacy of the migration governance system in respect to the increasing migratory pressures, leading to non-transparent and chaotic mechanisms:

Although the Ministry of Foreign Affairs was aware of the changing conditions – the needs of the labour market and the geopolitical environment, as well as the accompanying phenomena related to, among others, the increase in migratory pressure and the growing, negative role of visa brokers – it did not take comprehensive supervisory or legislative measures adequate to the scale of the problem. Instead, it used ad hoc and non-transparent mechanisms bearing the hallmarks of arbitrariness and discretion. (...) In the absence of any migration policy of our country, they caused its blurring and privatization in favour of entities with appropriate contacts, able to take advantage of existing gaps. (Doc. PL 145 – Supreme Audit Office press conference 10.10.2024)

The restrictive securitarian approach to immigration championed by PiS hindered any type of investment into a comprehensive migration policy and governance system, including the development of efficient administrative structures, as confirmed in interviews and documents analysed. In the words of the 2019 PiS government spokesman Müller: “any ideas that would liberalize migration policy are rejected by us, as the government” (DOC. PL 142 pg. 6). However, this political resistance applied mostly to improvements in governance frameworks and administrative efficiency. For instance, civil servants working on issuing work visas were since long aware of systemic problems and operational deficiencies within the immigration system. Despite these frontline insights, political representatives in the relevant Ministries ignored their warnings. Rather than addressing these complex and politically sensitive administrative challenges, the government chose political inertia, prioritizing ideological positioning.

At the same time, anti-immigrant discourses and symbolically restrictive policies have little impact on the migratory pressures and economic demand for foreign workforce. Therefore, private agencies have been benefiting from the increasing pressures from businesses and from the political unwillingness to invest in an overburdened public administration. On one hand, the outsourcing of public duties to private agencies allowed the PiS government to maintain its restrictive stance while silently allowing liberal entry. On the other hand, the involvement of intermediary agencies led to pressures to make the visa application system profitable rather than just, thereby often bending the stiff regulations coming from the securitarian paradigm.

The opposition instrumentalized the scandal for electoral purposes, but in a revealing way. Rather than challenging the fundamental contradiction between PiS's securitarian rhetoric and Poland's growing economic dependence on immigration, the Civic Coalition chose to adopt the same securitarian framework. In other words, the opposition exploited the scandal to present itself as the safeguard of Poland, accusing Law and Justice of silently allowing the uncontrolled immigration they openly opposed. This strategic choice demonstrates how deeply the securitarian discourse penetrated Polish politics, with moderate parties feeling compelled to compete on security grounds rather than offering an alternative vision of migration governance.

The PO leader Donald Tusk adopted a very similar narrative strategy, using social media to accuse the governing PiS to have facilitated entry to Poland to Muslim and African countries:

Figure 15: Donald Tusk on the Visa Scandal – post on X from the 7th Sept. 2023



The tweet above is exemplary of the populist tone in which the visa scandal was instrumentalised. In an electoral competition logic, the winning strategy of both political spheres has been to adopt anti-immigrant, securitarian discourses, thereby renouncing on the possibility of countering populist tendencies on the issue.

As outlined in the following quote, political dynamics of governing/opposition are dominant when approaching migration, so that parties' position is not anchored on distinct ideologies, but rather on calculations of winning electoral support:

This is a very complicated game and migration is top issue. But if you have such a difficult puzzle, you will use migration only to keep the power or to take the power. (IPL1 – civil servant, expert)

This quote reveals how migration policy in Poland has become instrumentalized, with political parties treating it as a strategic tool rather than as a substantive policy area. The dominance of power calculations explains why even opposition parties adopted securitarian frames

during the visa scandal, demonstrating that migration discourse has been reduced to a competitive arena for showing political toughness rather than addressing the challenges of managing migration flows.

The 2023 elections brought a change in government, with the coalition led by Donald Tusk forming a government with the Lewica and the moderate conservative Third Way. Looking at the new government approach to immigration policy, few reflections can be made.

Once in power, the government adopted a blend of securitarian and pragmatic approaches to immigration policy. This strategy allowed it to both distance itself from its predecessor and maintain a tough stance on immigration. By pledging to bring order and coherence to migration governance, the ruling coalition sought to differentiate itself from PiS, which had been criticized for creating an inefficient and disorganized regulatory framework. At the same time, the new government did not distance itself from the PiS-introduced populist approach to immigration; on the contrary, it continued along a similar restrictive position. As outlined by few respondents, the centrist coalition adopted an anti-immigration stance as a strategy to counter the populist far right. For instance, during the presidential elections of 2025, immigration was used as a political battleground, with PO exploiting the typical restrictive rhetorics of PiS to win support of right-wing voters. This convergence around restrictive immigration policies across the political spectrum suggests that anti-immigration sentiment has become deeply entrenched in political strategies. The adoption of such rhetoric by centrist parties ultimately legitimizes and normalizes restrictive approaches to migration, limiting future policy alternatives.

9.4.2 Dynamics within and between administration

The early phase of development of Polish immigration policies was characterized by a 'managerial-administrative' approach (Łodziński & Szonert, 2023). The lack of a clearly set political direction resulted in the administration developing specific, *ad hoc* solutions at the expense of a broader discussion on the long-term needs and goals of the State migration policy. From the beginning, migration issues were placed under the jurisdiction of the Ministry of the Interior and were treated mostly within the framework of maintaining the security of the state and responding to EU and Schengen requirements.

As the importance of foreign workers for the Polish economy began to grow, so did the role of the Ministry of Labour in managing the simplified procedure, collecting data, and mediating with the social partners. However, the lack of a political debate on what should the objectives and priority of migration policy be, also led to a lack of compromise between the economic interests for foreign labour and the imperative of controlling the borders of the state. Hence, since very early, there has been a dualization of ministerial objectives and internal competition between different administrative bodies. In particular, the overall vision on immigration has been delineated by the security imperatives of the Ministry of the Interior, with the notable exception of the simplified procedure for entry for work which has been managed by the Ministry of Labour and follows utilitarian economic imperatives.

The dualization of ministerial objectives on immigration has been pointed out by several respondents, who reflected on how the dominance of the Ministry of the Interior also affected the development of immigration policy:

The first point is related to the institutional setting, because if we were to shift the Department of Migration Policy from Ministry of Internal Policies to the Ministry of Labor, I think that it would have given us the new possibility to look at immigration from the labour market perspective and cultural perspectives. Not only about some restrictions related to crossing the borders and so on. (IPL5 – Michal Boni, former Minister of Administration and Digitization)

Although the policy direction on labour immigration remained largely consistent until recently, the competences and authority of different administrative bodies changed throughout the years, as different duties and offices were established under the responsibility of the Ministry of the Interior, of Labour, of Economic and of Foreign Affairs. The tendency of different ministries to operate as “silos” (IPL3), without effective inter-ministerial coordination, posed significant challenges to policy coherence and integration.

Through the simplified procedure, entry for work of citizens from the six eastern neighbouring countries was encapsulated within the Ministry of Labour, and for long it represented the main instrument for inflows of foreign workers. However, this has not been accompanied by an encompassing view on the integration needs of the working immigrant population, which would have required both a political will and guidelines for inter-ministerial coordination. Instead, immigration matters have often been treated in a fragmentary way, with different Ministries overseeing specific aspects. This institutional fragmentation, combined with the

absence of a clear political direction, created space for extensive bureaucratic discretion and arbitrary decision-making in the approval of work permits. Consequently, similar applications could receive vastly different outcomes depending on which official processed them and their interpretation of regulations, undermining both predictability and fairness in the system.

Departing from the politicization of immigration in 2015, the institutional set-up began to be symbolically changed to highlight parties' position on immigration:

An interesting trend is that in Poland we have an Office for Refugees, and it was for many years responsible for refugees-related procedures and data collection, etc. Then, the institution has been completely marginalized. When the war in Ukraine started, the Office for Refugees has been completely deprived from its function and role. Despite the very fact that before that, it was the main institution with capacity to work actively in the field. If you just look for signs of politicization in Poland, you just look at this, at the changes in the public administration, and at who used to be responsible for migration. Then you will see the securitization turn, and that is super clear. (IPL6 – Migration expert, academia).

The lack of coordination and consultation across the ministries, with the dominance of the securitarian approach of the Ministry of the Interior reflects the political intention to treat immigration as a matter of national security for political interests, while rejecting all other aspects of immigration. However, economic pressures have until now enabled silent openings, at times also bringing open disagreements between different ministries, as explained by a respondent:

At some point there was the Ministry of Economy who started to promote the idea that Polish economy needs foreigners to develop. And there was one vice-minister who openly said that Polish economy would need workers not only from Ukraine but also from other countries. And this guy was dismissed, and the department was also dismissed very soon. There was a shift from the Ministry of Labour to Ministry of Interior. In 2018-2019 most of migration issues have been subordinated to the Ministry of the Interior. (IPL6 – Migration expert, academia)

The tension between economic and political drives are reflected in ministerial dynamics. Similarly, the following excerpt from an economic commentary outlined the discrepancy between the immigration policy brought up by the Ministry of Interior and the interests of economic partners:

It is worth noting that immigration policy in Poland is handled by the Ministry of the Interior, which is focused on the country's security. From the point of view of the Ministry of Internal Affairs' tasks, it would be best if there were no immigrants at all. Polish business has a completely different point of view and economic ministries should have it too. (Doc. PL107 – Witold Gadomski in Gazeta 27.04.2023)

The quote above highlights the discrepancies in objectives between public officials in the Ministries and businesses. Generally, civil servants tend to be more cautious about labour migration inflows, emphasizing the need for setting clear control mechanisms and limitations, whereas employers lobby for quick access. As emerged throughout the interviews with civil servants (IPL3; IPL13; IPL14) the combination of growing labour demand and employers' pressures to facilitate the recruitment of foreign workers led to politicians favouring employers' demands:

Politicians were not aware of the loopholes in the legislation because they were influenced mostly by employers. When we as experts tried to fix somethings, we knew that there were abuses happening, but politicians did not realise it. (...) Even in 2022 politicians were listening to employers and making more employers' friendly procedures. (IPL13 – Civil servant, Minister of Labour).

The political responsiveness to employers' pressures rather than to ministerial warnings, created the institutional conditions that would eventually contribute to systematic policy failures and scandals.

The 2023 visa scandal drew attention to the poor coordination between the authorities involved, as evidenced by the findings of the investigation carried by the Supreme Audit Office:

NIK also drew attention to the lack of systemic solutions and established, effective mechanisms regarding the flow of information between the Ministry of Foreign Affairs and consular institutions, and other institutions and entities (Ministry of the Interior and Administration, Border Guard, MRPIPS, Ministry of Science and Higher Education, UdsC, provincial offices, starosts, district employment offices and universities). (...) The lack of information flow effectively disrupted the monitoring of foreigners' stay on the territory of Poland and promoted the emergence of negative phenomena related to irregular migration, the growth of the grey economy, illegal visa mediation, and could even promote risks in the field of human trafficking. (Doc. PL 145 – Supreme Audit Office press conference 10.10.2024)

Similarly in 2024, the migration strategy presented by the moderate government was criticized for a lack of inter-ministerial consultation. The draft was prepared within the Ministry of the Interior without involving the Ministry of Labour, as confirmed in interviews with CSOs representatives and civil servants. Ultimately, these recurring patterns of institutional fragmentation reveal how the politicization of immigration has weakened rather than strengthened state capacity to manage migration flows effectively. The emphasis on political signalling and lack of investments in ministerial capacity building has systematically undermined a coordinated, long-term oriented approach that complex migration governance

requires, creating a self-reinforcing cycle where poor inter-actors' coordination generates crises that further justify securitized, unilateral decision-making.

9.4.3 Employers

In this section, I analyse the role of employers in influencing migration policy looking at changes and continuities in their relationship with policymakers over the years. As it emerged in previous sections, the 2015 and 2023 elections can be considered turning points in the approach to immigration policy, which is also reflected in the position taken by representative of employers' interests. The overall business perspective on immigration is that smooth access to foreign labour is a precondition for economic growth, as it enables to maintain low production costs, and therefore a competitive edge:

The Polish economy is doing currently well; we are a kind of brilliant example in the European countries. But one of the necessary conditions for this, is to keep migration going up. (IPL4 – Lewiathan president)

Shortages of Ukrainian workers are urging employers to pressure governments to further liberalise policies towards countries not included in the simplified procedure. This creates a tension between political and economic interests; economic actors are concerned with obtaining the cheapest possible workforce in order to maintain competitiveness, whereas political actors openly adopt restrictive and negative narratives towards immigration from “culturally diverse” countries. Ultimately, the lack of a political project and will to view immigration as a permanent phenomenon in Poland, leads to a short-term pro-business logic without a long-term perspective on migrant workers' position, role, and needs in the Polish society.

Few elements are important to understand the role and interactions of employers; namely, the relevance of sectoral actors in shaping sectorial regulations, the evolving interaction between political and economic drivers, and ultimately the temporality of economic goals' attainments.

The first element refers to the unequal involvement of employers' organizations in migration issues. The analysis of documents and interviews showed that different associations got involved in advocacy and lobbying to different extents. This is dependent on the different

degrees of power of the various employers' associations, as well as to the different political and economic relevance of different productive sectors.

The Lewiathan Confederation is the institution representing big enterprises. As such, it is the organization with the highest capacity in bringing forward businesses' interests. Its involvement in migration policy started very early on and throughout the years it maintained a position of openness to immigration. The Lewiathan has been able to exert its influence both through official lobbying activities and through a strong presence in the public debate. By conducting and publishing research on various aspects of labour migration policy and labour market dynamics, it has been successful in presenting to policymakers' circles and the wider public its point of view on labour migration. As highlighted by several respondents, the organization has a pro-active role in highlighting businesses' struggles with pieces of legislations, and in proposing policy alternatives beneficial to businesses.

Other business associations began to be involved in pro-migration activities only recently, and with lower degrees of power and capacity. However, more than general employers' organisations, sectorial actors have been relevant in shaping policy liberalization in Poland. Specifically, employers' representatives of strategic sectors of the Polish economy contributed to influence sectoral policies:

In Polish migration policy I observe much more some sectoral actors that can be more influent in terms of migration policy, especially agriculture and construction. Because which sectors, which labour niche is strategic for the polish economy and important for the politicians, so that is why we observe sectoral regulatory regimes. (IPL7 – Migration expert, academia)

Since very early, the agri-food sector began to demand smooth and quick entry possibilities for seasonal workers. The temporal dimension of work in agriculture, the intense competition and the low margins of profit in the sector all contribute to the reliance on cheap labour. Additionally, the agri-food sector is of central relevance for the Polish economy and politics, making parties such as former Samoobrona, PLS – and to a certain extent also PiS – highly receptive to the preferences of farmers. The simplified procedure approved in 2006 for the agricultural sector, and subsequently expanded to other sectors, is a clear process of policy circles promptly reacting to pressures of farmers' associations.

Another feature of the employers' interactions with policymakers refers to the fact that labour immigration has been mostly dealt with by a restricted circle of policymakers within the national administration rather than by national politicians. This implied that most lobbying activities have been done at the administrative level rather than at the national political level. This tendency was confirmed in an interview:

Of course there is the official lobbying activity in Poland, but I also conducted some research on the official lobbying activities in the Polish Parliament, and the migration issue was not relevant for them...That is why I can imagine that some direct lobbying activities are observed for specific actors, experts, in particular central administration, not politicians. (IPL7 – Migration expert, academia)

Additionally, interviewed experts underlined how lobbying activities of employers are tendentially hidden, as they mostly do not happen through the official channels, leading to a lack of transparency and involvement of other relevant social, political and economic actors.

The politicization of migration from 2015 brought changes in the interactions between economic and political actors, with political factors gaining relevance in the way in which policies were made. During the 2015 – 2023 PiS governments, its anti-immigrant rhetoric led to the fact that pro-business immigration policies were silently approved, and whenever they went public, they were dismissed. The following commentary to the PiS government revoking a draft for simplified visa procedures for a set of countries reflects the tension between economic and political drives:

The visa facilitation regulation was a positive exception to the government' non-existent migration policy. The draft introduced simplifications in visa procedures for citizens of 20 countries¹³. The draft appeared on the Government Legislation website in mid-June, but after criticism from the opposition, the government withdrew its plan to introduce it. We have been calling for the optimization of this system for a long time. We endorsed the regulation with the hope that the bottlenecks in Polish consulates will no longer block employers from hiring foreigners. (Doc PL 152 pg. 17, Oko.press interview with Nadia Kurtieva, migration specialist Lewiathan 21.10.2023)

The heightened political sensitivity surrounding immigration has therefore impacted employers' capacity to influence policymaking, introducing uncertainty as pro-immigration measures could be withdrawn whenever they became subject to public scrutiny. This episode

¹³ These countries were: Saudi Arabia, Armenia, Azerbaijan, the Philippines, Georgia, India, Indonesia, Iran, Qatar, Kazakhstan, Kuwait, Moldova, Nigeria, Pakistan, Thailand, Turkey, Ukraine, Uzbekistan, Vietnam and the United Arab Emirates.

reveals how the politicization of migration altered the established inter-actors' dynamics surrounding the policy-making process. That is; by transforming previously technocratic decisions into politically contested terrain, economic demands can be overridden by electoral considerations.

The politicisation of immigration altered the dynamics between employers and political actors as it introduces political strategic calculations that might counter employers' demands. However, as pointed out during an interview with a representative of the Lewiathan, the overall policy course remains substantially sensible to economic factors:

Even this government (PiS), in the last two years, effectively brought 150,000 Bangladeshi and Indian immigrants to Poland, because we need them! So now, only because Mr. Tusk suddenly brought it into the debate, they stopped it, but they just stop it for some time. We need it. So, there is no fundamental change. (IPL4 Lewiathan president)

The episode mentioned in the excerpt further highlights the impact of the politicization of immigration on policymaking. The fact that the government paused the influx of migrants following public discussion by a political opponent suggests that immigration is often used as a political tool rather than a consistent policy area. At the same time, the respondent's remark that 'there is no fundamental change' further suggests that, despite public debates and shifting rhetoric, immigration policy in Poland remains reactive to economic pressures. Hence, a politicised environment led to a dual-track system, where public discourse and practical implementation operate parallelly. However, whenever these silent liberal policies become publicly visible, there is an immediate distancing and pro-immigration measures are suspended to preserve political credibility.

Exogenous factors such as the crisis with Belarus and the war in Ukraine increased employers' pressures to attract migrant from countries depicted by politics as problematic. The difficulty to reconcile these opposing tendencies added up to the opacity of the system, which ultimately culminated with the 2023 visa scandal.

Employers' role is more hidden, and it used to be hidden. (...) Polish employers desperately needed migrant workers. And that is why they pushed heavily on Polish officials. We do not have much information on that, but apparently there was a lot of lobbying. We have few big players in terms of migration, and employers' associations and recruiters play a huge role. I would be happy to see more transparency here, unfortunately this is not the case. I guess because of the crisis, and because of the visa scandal, right now we are learning more stories. But still, is not that you can say that there was a series of

meetings, and during those meetings there were discussions...nothing. There is nothing on that. (IPL6– Migration expert, academia)

The combination between political unwillingness to govern immigration and employers' influential role in pushing for increasing the availability of cheap labour created an unsustainable dualization of goals. The only viable path to reconcile the political backlash against immigration with economic pressures for opening to immigration has been to recur to short-term solutions that address businesses' concerns but are shielded from the public eye. Hence, the coexistence of opposing goals is maintained at the expense of transparency and consultation with other key stakeholders.

Currently, the path that the new government seems to have adopted is more restrictive also to labour migration. The 2024 Strategic Document has been criticized for embracing populist slogans, and therefore for being unpragmatically restrictive on immigration. However, its underlying logic as expressed by a respondent involved in the document' ideation goes back to the role of politics in governing the economy-society binomial. Firstly, the reliance on cheap labour for competitiveness is not sustainable in the long-term, so that politics should aim at stirring the economy towards upscaling:

Employers are in favour of opening the Polish labour market for workers because they try to convince us that without foreigner workers it would not be possible to keep Polish economic growth. But my answer is, if our competitiveness is based only on the cheap labour force, our economy is very weak. That is why, in the next years, our economy will be dependent on cheap labour force. But we have to shift. We have to change our economy. Because it will not be possible to be competitive only on cheap labour force in the long period. (IPL1 – Expert, civil servant).

Secondly, the short-term interests of economic actors might have a negative long-term impact on societal cohesion if there is not an adequate institutional structure in place to govern increasing immigration. However, the actual strategy and statements by the government make it difficult to believe that a compromise can be found, so that it is possible that the dualization between economic and politics interests will continue, thereby maintaining the backdoor to labour migration open.

9.4.4 Private intermediaries

One aspect concerned with the employers' driven character of labour immigration in Poland is the peculiar role of private employment agencies. The literature on the role of employment

agencies in immigration to Poland is scarce, and the scope of this dissertation did not allow for an in-depth analysis of the characteristics of these agencies. Nevertheless, combining findings from existing literature with data from interviews and documents, few elements emerged.

Temporary work agencies are an important mean to access the Polish labour market. Therefore, they play a central role in shaping entry and stay possibilities of migrant workers. They act as a broker between the employer and employees; employers outsource the recruitment process to specialised temporary work agencies, which deal with the recruitment of candidate, and bureaucratic procedures. Their work is regulated by the Act on Employment Promotion and Labour Market Instruments of 20 April 2004, but many irregularities have been documented (Pawlak & Lashchuk, 2020), especially after the visa scandal brought their role to the spotlight.

The outsourcing of the recruitment process is an effective tool for private businesses, and hints at two specificities of the Polish labour migration governance system.

Firstly, the privatisation of the sector is partly given by the complex legal entry system and long bureaucratic waiting times exceeding a year. Thus, the business-driven character of immigration to Poland, combined however with a complicated, uncoherent legal framework favours the outsourcing of the recruitment process to private agencies. As outlined in the quote below, companies prefer to pay a specialized agency to deal with the complex hiring process rather than getting personally involved:

It is easier for our clients (companies) when someone is taking care of all the paperwork, taxes, contracts, salaries. It is better for them to get a bill at the end and pay us for everything. (temporary work agency in Pawlak & Lashchuk, 2020:16)

A second connected aspect refers to the fact that the privatisation of foreign workers' recruitment introduces a profit-driven actor in the governance of migration flows. This means that a lot of pressures in labour migration policymaking will be exerted by intermediaries following the logic of profit maximisation, as emerging in the quote below:

The majority of immigrants are coming here to work. I think the interesting actors are temporary staffing agencies. I used to run one of them. The labour agencies have been fighting for their clients; they were very successful. I have been working there, and we have been capable to modify a lot of procedures, bring

the authorization down from the central level to local offices, simplifying the documents, accelerating the procedures and prolonging the duration of the stay. So, agencies have been the important actors. First with Ukraine, but later also fighting for the next generation of inflows from Pakistan, Nepal, India. (IPL4 – Lewiathan president)

Liberalisation of entry policies is largely shaped by profit interests. Additionally, for-profit logics do not necessarily coincide with society's interests and preferences, creating an unbalanced system of gains and costs, with little accountability. As pointed out by few respondents, the privatization of the recruitment process, with little control mechanisms from state institutions, leads to the establishment of an influential group of actors interested in expanding liberal entry procedures, with no accountability for the negative externalities on society.

Finally, it is worth noting that recurring to temporary agencies increases employers' costs with an impact on the real wages of recruited workers, as explained in the quote below:

When you look at the costs from the perspective of employer and the real incomes of workers, you can find some situations in which the value of the real income, is just about 10 -15% of the whole costs for the employer using temporary agencies. I've talked with my colleagues who are leading some businesses, and they are using those temporary agencies. Because of shortages in the labour market, they have created a dominant position. And it is very dangerous because it is relatively expensive. So, the final solution is that of reducing the income addressed to the workers. (IPL5 - Michael Boni)

The lack of clear regulations and enforcement mechanisms contributes to the overall opacity of the recruitment process and conditions, at the expense of workers.

9.4.5 Trade Unions

Although formally there is an institutionalised social dialogue between representatives of the government, trade unions and employers, its power and authority in policymaking is limited (Czarzasty & Mrozowski, 2023). In Poland, there are three main trade unions charged with representation of employees' interests in the Social Dialogue Council. The national conservative Solidarity (NSZZ), the social democratic All-Poland Alliance of Trade Unions (OPZZ), and the more neutral Forum of Trade Unions (FZZ). Poland has a unionization rate of around 12 percent, one of the lowest in the EU. Additionally, higher unionisation is registered in education, public administration, national defence and manufacturing, leaving important sectors with even lower unionization rates (OECD, 2021), with migrant workers being mostly employed in poorly unionised sectors.

Throughout the interviews, all respondents pointed at the absence of trade unions' voice on immigration issues:

What is very interesting is that trade unions don't play any role in this discussion. Because on the one hand, Solidarity is very politicized on the side of PiS. On the other hand, the other trade unions are concentrating now on very basic issues, like the minimum wage and how to negotiate with the government to get special allowances for teachers, for doctors and so on. They are not active in discussion on immigration (IPL8 – CSO, legal expert)

The proximity of Solidarity to the Law and Justice party excludes any action towards representing immigrant workers' rights and interests. The other trade unions did not have for long any plan on immigration. In 2017, OPZZ adopted an official stance on migration policy, which emphasised equal treatment between foreign and national workers and the need to invest in integration measures. Around the same time, it helped establishing a trade union targeting Ukrainian workers in Poland (Trade Union of Ukrainian Workers). The union has been active in information campaigns, but its actual effectiveness in reaching out foreign workers is unclear. In overall, all respondents agreed on the fact that they did not see any actual impact of trade unions' activity towards immigration. That is, trade unions have formally established plans and collaborations with relevant stakeholders, but they struggle to translate this formal involvement into meaningful action.

Apart from the overall asymmetrical power relationship between trade unions and employers which weakens any action towards immigrant workers' rights, there is another aspect worth mentioning. The Polish regulations, incentivising short-term migration, make it extremely difficult for trade unions to organise migrant workers. The quote below brings the example of a case where four Ukrainian workers turned to the trade union for support, with scarce success:

These were the situation in Poznan, Gdansk, Bydgoszcz, concerning both unpaid wages and changes in working conditions that were not in line with the contract. Unfortunately, only in one case we were successful. In other cases, the length of the foreigners' stay was too short to win the case. (Ignacy Józwiak, immigration responsible for Workers' Initiative, in: Babakova, 4/07/2018)

As the quote suggests, even in cases where unions were involved, they struggle to be incisive, because of the high labour market fluctuation and short residence time of migrant workers. Furthermore, the analysis of statements released by trade unions' officials suggested that there is a discrepancy of objectives between migrant workers and trade unions. Because of

the temporality of migrants' stay, migrant workers are concerned with earning as much as possible, which typically involves working longer hours, taking extra shifts, and ultimately signing hyper-flexible contracts. Trade unions focus on improving workers' social security and working conditions, which does not appeal to a highly mobile workforce.

Although the largest trade unions do not have a strong role in influencing labour immigration policies, there are more recent grassroots trade unions being founded at the sectorial level, which are more successful in obtaining small improvements in conditions at the workplace.

9.4.6 Civil Society Organisations

The role and influence of CSOs changed throughout the years, following changes in political saliency of immigration issues. Three phases can be distinguished.

During the first phase, few CSOs focusing on immigration were established that supplied to the lack of public involvement in providing support to migrant workers and asylum-seekers. Contrary to the Italian case, the involvement of Catholic organisations was limited. This can be partially explained by the ambiguous position of the Polish Church towards immigration. Traditionally, it did not get involved advocacy or service provision for immigrants. Its proximity to the Law and Justice party led to maintaining a silent position vis-à-vis immigrants and refugees' rights in Poland. Few Catholic organisations have been active in the field, such as S. Egidio Community and Catholic Inteligentia Club. Nevertheless, the official position of the Polish Church can be better described as not interfering with the line of PiS.

The first organisations dealing with immigration were NGOs working on human rights and newly established NGOs providing legal services to immigrants. CSOs began to provide a range of services which would not have existed otherwise, such as legal aid, language courses, job counselling, housing assistance and advocacy (Follis, 2019). In the experience of a respondent involved in immigrants' support since the early stage, during the 2008 – 2015 period, the expertise developed by CSOs was acknowledged by national level policymakers. During that time, funding for their work was increased, enabling many NGOs to strengthen their position and services offered. Furthermore, the political climate around immigration allowed for public consultations, so that CSOs played a consultative role in the policymaking process:

It was a moment when the government started to listen, at least a bit. Through the official channel, that is public consultations, when NGOs are entitled and encouraged to add comments to draft laws. At that particular time, this instrument worked, meaning that we were heard (...). We had a dialogue, we did not manage to change the system, but we were quite effective in correcting things. Our voice was heard, and I would say it was also valued. Policymakers thought that especially these legal advice organizations working on the ground had a lot of knowledge and could help them to correct provisions that were maybe wrong. (IPL 8 –CSO, legal expert)

A positive cooperation between public authorities and NGOs was also established at the local and regional level, contributing to growing capacities of these organisations.

However, the politicisation of immigration and the rise of the Law and Justice party opened a negative phase for civil society. In particular, NGOs and activists working on immigration have been criminalised in public debates, and former partnerships were put to an end. From a financial perspective, subsequent governments cut all national funds to CSOs, so that many struggled with maintaining their every-day activities, as they had access only to EU funds.

Because of the campaign of criminalisation of CSOs, the collaborations established with national administrations in the different Ministries were also interrupted:

In 2015 with the PiS government, everything stopped immediately. (...) All our comments went in vain, and there was very little acknowledgment of our voice. No contact whatsoever with any public officials, because they did not want to meet with us. The heads of departments, the ministers themselves. And we also stopped our contacts with officials at lower levels, not to threaten them, exposing them to their superiors. This was followed by the leaving of the most experienced public officials in the ministries. They moved elsewhere. (IPL8 – CSO, legal expert)

The situation of hostility from national policymakers led to strengthened cooperation between the existing NGOs involved in immigration. Furthermore, following the refugee crisis, a number of Polish cities, headed by the Gdansk Municipality, inaugurated a season of local level disobedience, establishing strong partnerships with local CSOs to provide integration services to asylum-seekers and migrants living in the municipality. Finally, the war in Ukraine triggered an increase in national and EU fundings for the reception and support of Ukrainian refugees, and to a limited extent, a re-evaluation of the role of civil society. However, their ability to advice the policymaking process at the national level remains subordinated to political calculations.

9.5 Summary

Chapter 9 analysed the labour migration policy trajectory in Poland based on three analytical frames: temporal, 3 I's, and inter-actor dynamics.

Also in the case of Polish immigration policy, two main phases can be identified. While both phases have been shaped by the interplay of interests, ideas, institutions and inter-actor dynamics, the balance among these drivers shifted significantly over time.

In the first phase, which extended from EU accession until 2015, labour migration policy was driven by economic interests of employers and by neo-liberal ideas of economic growth and competitiveness through deregulation. The large-scale emigration of Polish workers after 2004, combined with rapid economic growth, created acute shortages in low-wage, labour-intensive sectors. Rather than improving domestic wages, policymakers responded by introducing liberal procedures, most notably the 2006 employers' declaration system, which facilitated the recruitment of seasonal workers from neighbouring countries, above all Ukraine. In this context, the idea of low-wage foreign labour as a cornerstone of Poland competitive economic model became institutionalised.

At the ideational level, immigration continued to be framed as temporary and exceptional. Poland's self-image as an emigration country reinforced this perception, delaying recognition of immigration as a structural phenomenon. When discussed publicly, immigration was presented as an economic necessity but rarely as a societal transformation. This perception allowed policy continuity, but also entrenched the absence of integration measures and reinforced institutional inertia.

Concerning inter-actor dynamics, immigration was treated as a technical matter, with low political salience and limited public debate. Employers at the sectorial level and employer associations played a central role in shaping labour migration policy, whereas trade unions remained marginal actors. Additionally, CSOs working on the ground gradually gained expertise on challenges and criticisms in the regulations at the implementation phase. Their expertise allowed them to play a consultative role in the drafting and evaluation of migration policies.

External pressures deriving from EU and Schengen membership, together with ministerial pressures and awareness of the migration trajectory of older countries of immigration, played a central role in pushing for the establishment of a comprehensive legislation on immigration. The 2012 strategic document confirmed the technocratic character: expert-driven, and lacking a public debate.

The second phase was triggered by the 2015 refugee crisis, which marked a politicisation from the top of immigration. Right-wing parties, particularly PiS and Confederation, mobilised anxieties around EU relocation quotas, reframing immigration as a cultural and security issue. Christian identity was instrumentally used to frame immigration as a threat rather than to advocate for charity and solidarity. After the 2015 elections won by PiS, the securitarian paradigm consolidated, narrowing the space for policy options and marginalising civil society organisations. Yet, despite the hostile rhetoric, labour migration channels remained open and were even expanded, as employers' demand continued to be a central driver of migration policy decisions. The dismissal of Deputy Minister Paweł Chorąży, who openly acknowledged the economic necessity of foreign workers, symbolised the limits of policy debate under conditions of politicisation (see section 9.1).

The war in Ukraine further exposed these tensions, as it both disrupted the labour supply of culturally close migrant workers and forced policymakers to design measures for refugees integration. Regardless of PiS nationalist narratives, the recruitment from officially unwanted countries silently intensified. The result was a deepened decoupling between political rhetoric and labour market dynamics, which culminated in the 2023 visa scandal.

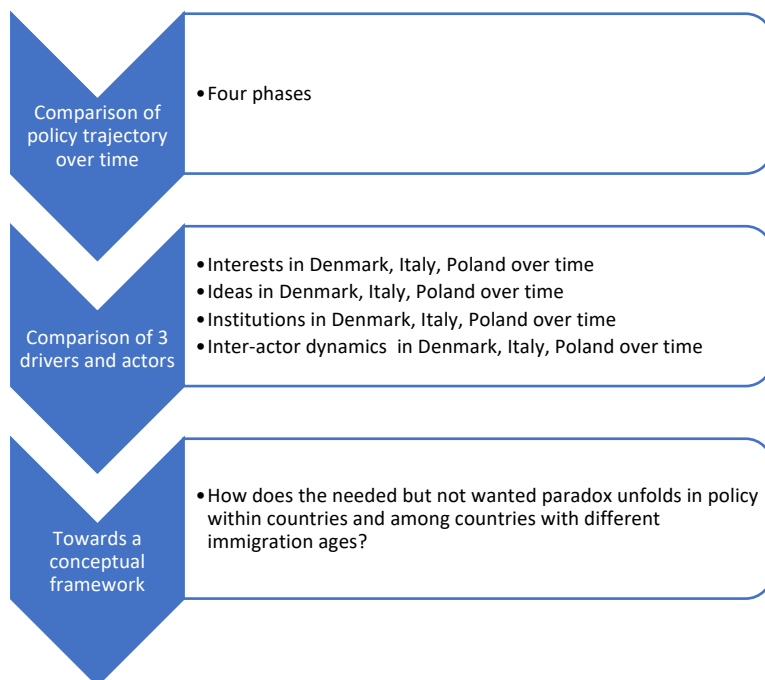
The 2023 elections and the subsequent adoption of the 2024 migration strategy, *Regain Control, Ensure Security*, illustrate both continuity and change. The securitarian framing persists, with migration portrayed as a potential threat and with policy priorities centred on control. At the same time, the new strategy rhetorically acknowledges the need to reduce dependence on cheap migrant labour and to invest in domestic upskilling. However, critics note the lack of consultation, the short-term horizon, and the primarily symbolic function of the strategy as a tool to capture right-wing voters.

The interplay of economic imperatives and political calculations generated a migration policy framework marked by tensions that have become increasingly irreconcilable. Employers' structural demand for cheap labour continues to sustain liberal entry regimes, while securitarian narratives dominate political discourse and limit the scope for integration or long-term planning. The instrumentalisation of immigration for electoral gain since 2015 has further constrained the space for alternative paradigms, reinforcing a governance model based on temporary, low-rights migration. This combination of unchallenged economic necessity of foreign labour and immigration politicisation leaves Poland with a fragmented migration regime, unable to reconcile competing interests.

PART III

THE NEEDED BUT NOT WANTED PARADOX IN TIME AND ACROSS CASES. COMPARATIVE INSIGHTS

The analysis of policy development in three most diverse cases in the European context highlighted differences, as expected, but also some intriguing similarities. The discussion is structured around two pillars. The first section discusses how the analysis of policy developments hinted at unexpectedly similar trajectories of migration policymaking in the three countries. The second part discusses similarities and differences in the policy impact of different drivers and actors in the three countries. Finally, combining these two pillars, I develop a conceptual framework to explain changes and continuities in how the paradox of a needed but unwanted workforce unfolds in policymaking.

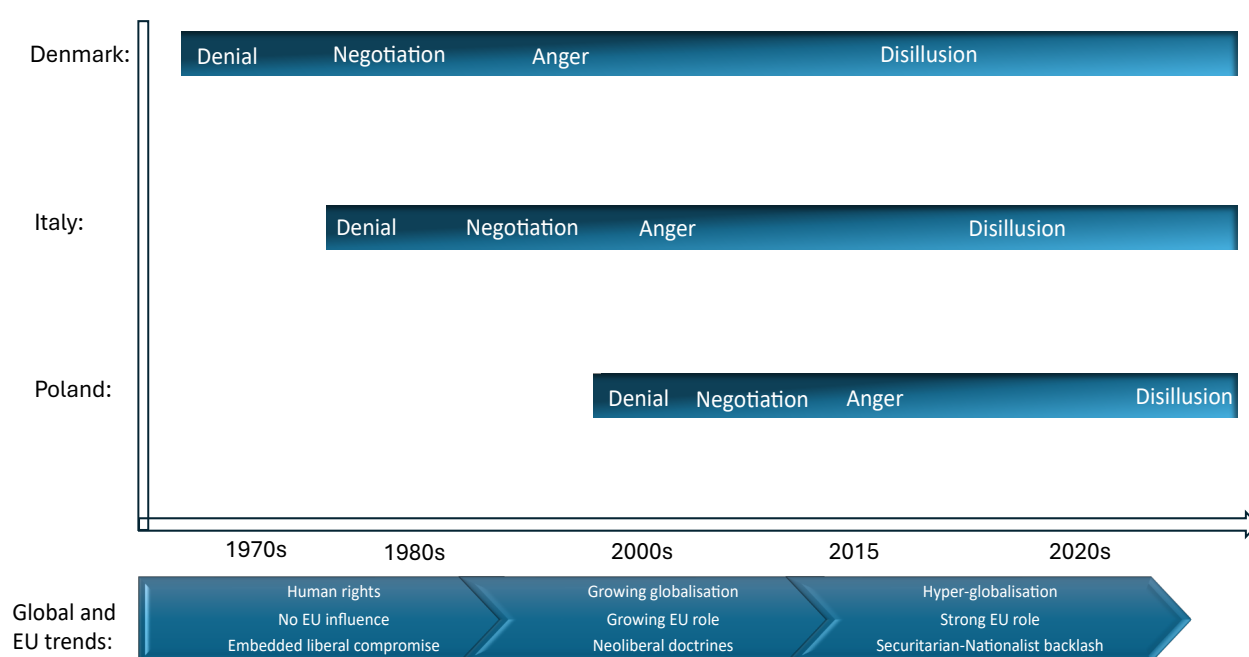


10 Discussion

10.1 Policymaking along time

The regulation of labour migration went through different phases since Denmark, Italy and Poland officially became countries of immigration. Interestingly, although immigration started at different times in the three cases, they followed similar migration policy trajectories, as illustrated in the figure below.

Figure 16: Migration policy phases along time in Denmark, Italy and Poland



Across all three cases, labour migration policy unfolded through a similar four-stages sequence. Despite changing global, EU, and national contexts, each country's immigration policymaking follows a comparable trajectory.

Initially, labour migration began in a context of *denial* of the country's transformation into an immigration destination. As immigration continued to grow, *denial* gave way to the *negotiation* phase, where comprehensive policy reforms attempted to balance competing demands from employers, unions, ministries, and civil society. Popular fears and anxieties, amplified by far-right 'protest parties,' signalled the transition to an *anger* phase, featuring symbolic attempts to reclaim control through demonstratively tough measures. Finally, the *disillusion* phase – which remains unevenly developed across the three countries –

emerges as public trust in anti-immigrant populist parties' capacity to deliver on their promises of limiting immigration progressively erodes.

These stages are characterised by varying degrees of politicisation, institutionalisation of immigration governance, and actors involvement in the policymaking process. During an interview with a former Head of Cabinet of the Italian Ministry of Labour, the respondent compared immigration to new blood: "*it changes the blood of a nation. It is a positive thing, but if it changes the blood, it can also kill*" (IITA3). This metaphor highlights how immigration is part of broader developments that reshapes societies while generating anxiety about the implications of these changes, in particular with regard to the idea of 'not being a country of immigration'. Drawing from the parallel with the grieving process about the identity of not being a country of immigration, I adapt the stages of grief terminology to describe the trajectory of policymaking on immigration. While the naming of the stages after a different theoretical context does not have the ambition of offering a heuristic frame, it serves as a descriptive device to capture the different phases of policy development. The emotional terminology should not obscure that each phase corresponds to distinctive governance patterns that emerged during the analysis; I retain the emotional terminology alongside the broader pre-politicisation and politicisation framework because it captures an essential dimension of immigration politics that governance language would miss: the symbolic, affective, and identity-based aspects that contribute to make immigration a contentious political issue.

Before moving to examine each stage in detail, I outline three general points over the model. First, the four stages identified are not always clearly demarcated, transitions between stages can be gradual, with elements from different phases coexisting during periods of policy evolution. Second, given that each country has a different *immigration age*, they are positioned at different points within this trajectory, with some stages more fully developed than others. Third, the model describes observed patterns rather than predicting outcomes: countries can oscillate between phases, elements can coexist, and historical context matters enormously for how each stage manifests. The framework's value lies not in deterministic prediction but in identifying recurring patterns in how polities respond to the wicked problem of needed but not wanted migration across different institutional and temporal contexts.

10.1.1 Pre-politicisation: from denial to negotiation

Across all three countries, initial immigration inflows occurred without political acknowledgment of their wide-ranging implications for societal transformations. In Denmark, the temporary nature of guest-worker schemes contributed to policymakers' underinvestment in supporting these new groups and low interest in establishing a comprehensive governance framework. In Italy and Poland, their semi-peripheral position within Europe as immigration flows began, combined with their self-perception as countries of emigration, led to similar outcomes: avoidance of establishing governance structures and denial of their transformation into countries of immigration.

The common element of the *denial* phase is the absence of political guidance, which left the limited number of involved actors with considerable autonomy to pursue their short-term interests without a long-term vision of the implications of a growing marginalised and disadvantaged immigrant population. The limited attention from national politicians provided a relatively large room of manoeuvre for the groups involved in shaping the early policy phase. The composition of the interest groups varied across countries. In Denmark, it was largely negotiations between trade unions and employers' associations on the scope and scale of guest workers' schemes, which then turned into demands to policymakers. In Italy, civil society organisations were the first ones noticing a growing number of immigrants, with a strong role of the Church and of Catholic groups in both supporting inflows and in spreading awareness of the need to govern the phenomenon. In Poland, it was largely employers lobbying for increasing the supply of workforce following the country's EU accession and emigration of Polish workers. Additionally, in Italy and Poland, EU and Schengen membership created external pressure to approach immigration as an issue of safety and border controls.

As it became increasingly clear that growing immigration required a governance system, the pressures to establish comprehensive and modern legislative frameworks increased, urging Parliaments to include the issue in the agenda. During the *negotiation* stage, the fact that immigration was not considered as an electoral battleground, favoured a season of consultative work with interest groups and experts to establish encompassing frameworks. During this stage, policymakers attempted to control immigration dynamics and their societal impacts by providing legislations that aimed at addressing the multi-faceted aspects of

immigration. This led to the approval of the 1983 Aliens Act in Denmark, the 1998 Turco-Napolitano Bill in Italy, and the 2012 Strategic Document on immigration in Poland. These frameworks are characterised by being approved after a long consultative process which involved experts, civil society organisations and economic partners. Although with varying degrees, they all include a combination of security, migrant rights, and economic considerations.

In all three cases, the institutionalisation of a comprehensive regulatory system coincided with the emergence of opportunist tendencies in political parties, growing anxieties in the population, and an overall increased attention on immigration, which signalled the shift to the next phase of policymaking.

This disconnect between elite policy discourse and popular concerns must be understood within the broader context of a global turn to neoliberal restructuring, which impacted the societal, economic and political spheres (Joppke, 2025).

According to Ruggie (1982), the embedded liberal compromise of the post-war era had balanced market liberalization with social protection, allowing states to pursue free trade while maintaining robust welfare systems and full employment policies that cushioned workers from market volatility. The neoliberal turn that began in the late 1970s gradually dismantled this compromise. The adoption of neoliberal policies across Europe systematically weakened the economic position of working-class populations through deregulation, privatization, and the erosion of collective bargaining power. These transformations coincided with increasing immigration flows, creating a volatile combination where economically insecure populations encountered growing diversity in their communities and workplaces (Castles, 2010; Schierup et al., 2006). Hence, Schierup and colleagues (2006) talked about a dual crisis of the welfare state's declining ability to maintain societal equity, and of nation states' inability to govern increasingly diverse societies. The neoliberal emphasis on market solutions and individual responsibility undermined the social solidarities that had previously cushioned working-class communities against economic disruption. Traditional left-wing parties, having largely embraced the 'Third Way' accommodation with market capitalism, found themselves unable to offer credible alternatives to neoliberal orthodoxy (Joppke, 2025). Hence, while left-wing actors framed immigration within their progressive

socio-cultural ideals, they ignored how these changes interacted with declining wages, job insecurity, and weakened social protection systems (see for instance sections 5.3.1 and 7.2.2). The failure to engage meaningfully with these anxieties left a political vacuum that would later be exploited by populist and far-right movements, fundamentally altering the terrain of migration politics.

Although Poland followed a different historical trajectory, there is a parallelism with the nexus between social costs of neoliberal economic policies and the rise in populist parties. Studies on Polish populist parties highlight the causal connection between increasing socio-economic inequalities following the economic transition and populist votes amongst the places lagging behind (Olejnik & Wroński, 2025). This pattern emerged as early as in the 2000s, with populist parties like Samoobrona, which combined anti-neoliberal economic positions with anti-EU sentiment, achieving significant electoral success by mobilising voters disadvantaged by the post-communist era shock therapy. Peculiar to Poland is the politicisation of immigration in 2015, which emerged as a predominantly top-down process (Tworzecki, 2019), occurring in a context of low immigration numbers, and prevalently from Ukraine. Here, the role of convergence becomes apparent, as the radical right in Poland instrumentalised anti-EU and anti-immigrant discourses despite the de facto absence of any genuine threat perception among the population.

10.1.2 Politicisation: from anger to disillusion

The politicization of immigration opens a third phase in migration policymaking, as it shifted from a matter of few specialists and interest groups into a political battleground. The move from *negotiation* to *anger* stage coincides with the growing support of populist far-right parties that's agenda quickly moved to the securitization of immigration.

In Denmark and in Italy, this shift can be allocated to the early 2000s, when declaredly anti-immigrant populist parties like the Danish People's Party and the Lega Nord entered government alliances, intervening on the immigration legislative framework. In 2002, the Fogh-Rasmussen government approved a new immigration legislation, which has been considered the most restrictive in the EU. At the same time in Italy, the Berlusconi government approved the Bossi-Fini Bill, which shifted the balance on the approach to

immigration to a predominantly securitarian one. In overall, the two Bills radically changed the existing regulations, marking the shift towards a securitization approach to immigration.

In Poland, the shift to the *anger* stage coincided with the 2015 refugee crisis in Europe. Although Poland was marginally touched by the increased Mediterranean arrivals, the Law and Justice party exploited an external crisis to spread an anti-immigrant narrative for electoral gains. The PiS governments suspended the 2012 strategic document but did not replace it. This implied a reliance on loudly shouted anti-immigrant statements and measures against integration and asylum, in coexistence with silent openness – often at the edge of legality – to temporary entry for work.

Whereas in the *denial* and *negotiation* phases, country-specific factors led to variations in the groups of actors being involved and in the interaction of different drivers, with politicization, migration policymaking in the three countries became increasingly more syntonised. In all three cases, low-paid labour immigration began to be framed as an issue of public safety and of competition with disadvantaged citizens. In this context, the saliency of the securitization paradigm led to the narrowing of the political space with the consequent silencing of other aspects of migration governance. Further, it has reduced the space available for civil society and social partners in influencing policy direction.

In the *anger* stage, tough policies towards unwanted immigrants provided the appearance of right-wing governments' ability to control and restrict immigration. At the same time, they have been coupled with less visible measures enabling the continuous provision of needed workers. The silencing of this demand contributed to the generally low awareness of the role of low-paid foreign workers, as well as to an underestimation of their overrepresentation in essential jobs.

In Denmark, low-paid immigration has been viewed as a marginal phenomenon in the modern, knowledge-based economy, and framed more as a problem than a necessity. Most of the demand for low-paid workers in important segments of the economy was filled through intra-EU migration, which for its nature is less visible and less controversial. In this framework, the 2004 and 2007 EU's enlargements allowed for a silent influx of low-paid workers.

In Italy, the same government promoting the Bossi-Fini law approved Europe's largest regularization campaign. After the 2008 and 2011 crises, Italy *de facto* closed legal entry routes for migrant workers. In this context, the lack of a political will to reform the entry channels for work led to a no policy approach on labour migration. The sectorial demand for migrant workers has been filled through tacit tolerance of forms of irregular entry and/or work.

Poland relied on the simplified procedure to fill labour demands with 'culturally close' workers, while maintaining restrictive regulations and tough rhetoric for 'undesirable', racialised migrants in a context of a growing economy with large emigration flows. The paradox of needed foreign hands and unwanted foreigners unfolded as tolerance of temporary migrant workers to deal with labour shortages, while neglecting the need to establish a long-term strategy on immigration.

Departing from around 2020, the three cases are progressively moving to a *disillusion* phase, as it becomes increasingly evident that anti-immigrant populist parties lack the claimed ability to stop needed but not wanted immigration. This phase is marked by pessimistic acceptance of the paradox's insolvability, corresponding to a lack of radical reform in favour of incremental, election-driven adjustments within the prevailing securitarian policy framework.

The *disillusion* phase represents an ongoing shift in how the needed but not wanted paradox is managed, though this phase remains unevenly developed across the three cases. Rather than resolving the fundamental contradiction between economic demand for migrant labour and political resistance to immigration, political actors across the spectrum increasingly adopt a resigned approach: maintaining restrictive rhetoric while allowing continued labour migration through incremental policy changes rather than radical reform of the overall legislative framework.

In Denmark, the Danish People's Party's trajectory from electoral success in 2015 to debacle in 2019 exemplifies this transition. The anti-immigrant agenda remains central to Danish politics, but its ownership has shifted. The Social Democrats' appropriation of the far-right populist agenda on immigration demonstrates how mainstream parties have absorbed the populist positions and abandoned their traditional ideologies. This mainstream adoption

eliminates the competitive advantage that far-right parties enjoyed during the *anger* phase. Instead, political competition now occurs within a shared securitarian framework where all parties propose similar restrictive agendas with only marginal adjustments – precisely the kind of incremental tweaking that characterizes policy stagnation rather than substantive reform.

In Italy, the Lega's decline from dominant force in the right-wing alliance to minor player after the 2022 elections illustrates how successful populist parties can lose relevance once their agenda becomes mainstream political currency. Although the Italian centre-left did not explicitly embrace right-wing immigration agendas, it fails to articulate a compelling alternative vision or propose comprehensive reforms. Even when confronted with the Covid-19 crisis, which exposed the structural dependence on migrant workers in essential sectors, the centre-left government limited itself to a regularization rather than addressing the underlying inadequacies of the legislative framework (see section 7.2.3). Other parties, including Giorgia Meloni's Fratelli d'Italia, have capitalized on anti-immigrant positioning while demonstrating similar limitations in reducing immigration flows. Hence, whereas populist parties during the anger stage attempted to offer policy alternatives through major, radical reforms of the immigration legislation (exemplified by the 2002 Bossi-Fini Decree), progression to the disillusion stage is characterised by the reduction of ambitions for comprehensive reforms. In this stage, the discrepancy between rhetoric and policies is not solved, hinting at the fact that it can cause future tensions and backlash. In the meantime, the immigration governance structure remains static, with incremental, ad-hoc adjustments being implemented as a reaction to external pressures. Examples of this type of gradual adjustments through existing policy tools include the 2020 regularisation approved by the centre-left government as a response to the Covid19 crisis, and the expansion of entry quotas by the Meloni government, while refusing to address the structural inadequacies of outdated regulations.

In Poland, the 2023 visa scandal marked an early sign of growing disillusion with anti-immigrant parties ability to deliver on their promises. The scandal exposed the gap between anti-immigrant rhetoric and the practical reality of labour market demands, and it contributed to the PiS electoral defeat. The incoming Tusk government's alignment with similar political

claims in order to secure votes demonstrates how little the terms of the debate have shifted. Nevertheless, the government's stated objective of improving controls also on labour migration in favour of Polish people's interests might suggest that – although the direction is the same – the younger 'immigration age' of Poland positions its policymaking in an earlier stage, as political parties still attempt to provide new frameworks to control immigration.

The government's stated aim of tightening controls on labour migration in favour of Polish workers suggests that Poland, as a younger immigration country, may still be experimenting with frameworks that in Denmark and Italy have already settled into stagnation.

The disillusion phase thus represents a form of exhaustion of credible political alternatives to the existing management of the paradox. The securitarian-utilitarian framework persists because it serves the dual function of satisfying public demands for control while accommodating economic imperatives for low paid migrant labour. The result is a politics of managed contradictions rather than resolved tensions, where incremental adjustments substitute for the radical reforms that characterised the negotiation and the anger stages.

10.2 Interests, Ideas, and Institutions in policymaking

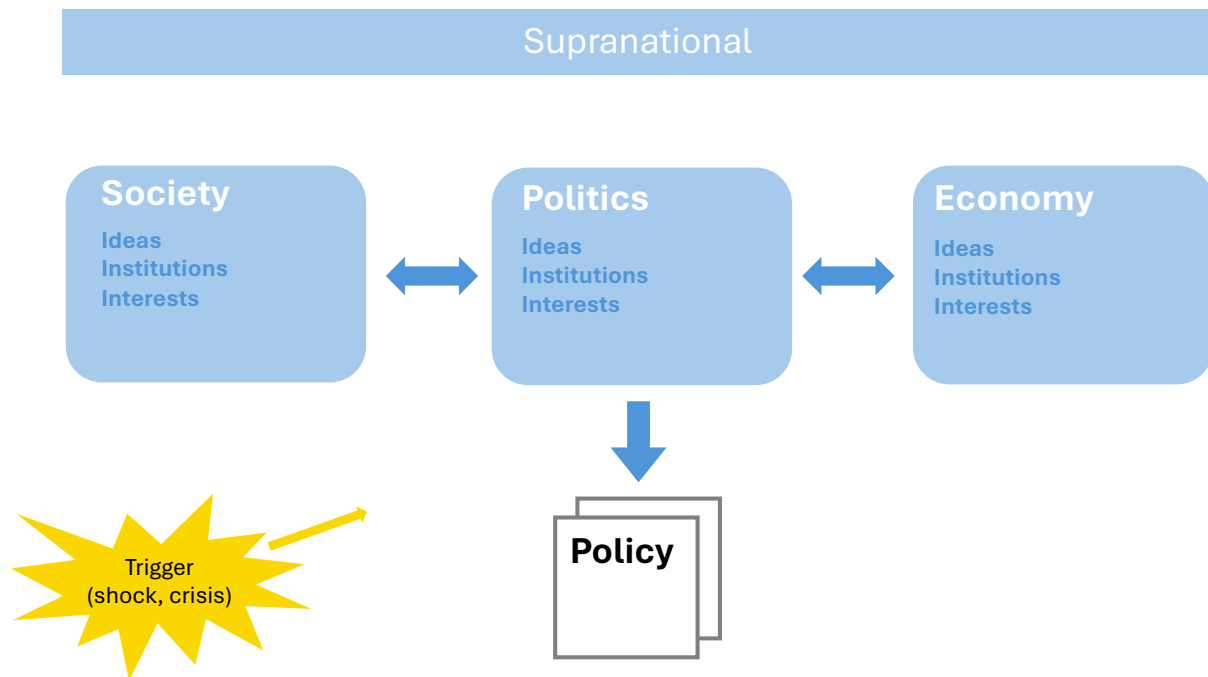
After having discussed differences and similarities in policymaking patterns across cases over time, this section turns to delving into how the paradox can be investigated using the 3 I's analytical framework.

Grasping the complexity involved in migration policymaking requires analysing the interests of different actors, including their relative influence and power to push for their preferred policy direction. Furthermore, institutional settings in place in different contexts and times can either facilitate or constrain a particular policy outcome. Finally, ideas, norms and values within society or within a specific policy circle impact which policy options are considered feasible, and which are deemed unacceptable in a given country and point in time.

In the following sections, I compare the three cases to outline similarities and differences in how different drivers impacted labour migration policy development.

Conceptually, I reflect on the role of interests, ideas, and institutions by discussing how each of them shaped the dynamics between political, economic and societal actors and contributed to policy evolution across the four identified stages. The figure below sketches the conceptual framework linking the policymaking process to 3 I's drivers and to economic, political, and civil society actors' dynamics.

Figure 17: Conceptual overview of the interactions leading to the policy outcome



As it will be discussed in detail, interests, ideas, and institutional drivers of policy played different functions and carried different weight in the four stages identified in the previous section.

10.2.1 Interests: Denmark, Italy and Poland over time

The analysis of interests comprises the preferences of economic, political and civil society actors regarding policy options, and the dynamics that the involved actors put in place to pursue their preferences. The three cases present similarities and differences.

Regarding interests, economic interests played a major role as they established an ongoing demand for migrant labour in specific sectors.

In the *denial* phase, economic interests played a major role in shaping initial immigration policies in Denmark, Italy and Poland, despite substantial differences in their economies' structure – concertation with trade unions in Denmark, unorganised economic actors in Italy, strong employers' lobbying in Poland.

Generally, economic interests of obtaining cheap labour for specific sectors played an influential role in shaping labour migration policies. This pattern aligns with theoretical expectations about the role of business interests in migration policymaking, although country-specific and sector-specific contexts highlight different dynamics through which economic interests were met.

Similarities across the three cases emerge also looking at the role of interests in shaping dynamics within the political sphere.

The low political attention on the phenomenon of labour migration implied that politicians dealt with immigration policy without a clear electoral objective as no direct political gain was involved in engaging with immigration policy. The *negotiation* phase was somehow urged by civil society, experts and economic partners growing awareness of the necessity of establishing clear regulations. In this stage of low political interests, parties' ideational frames played a more relevant role, as it will be argued in section 10.2.2. Additionally, in the Italian and Polish case, politicians reacted to EU pressures for a restrictive approach and improved border controls, as both countries had a strong interest in joining the Schengen area.

The *anger* phase corresponds to the politicization of immigration where the main feature is the different interaction between economic and political interests across the three cases. As emerging populist anti-immigrant parties began to exploit immigration for electoral purposes, the space available for economic and civil society actors became constrained. The instrumentalization of immigration as electoral battleground by heightening public attention and inflating discontent with immigration policies, hindered the continuation of technocratic, low-visibility policymaking processes. Therefore, the centrality of the electoral interest for all political parties has fundamentally transformed the process of labour migration policymaking.

This dynamic reflects the evolution of interests over time: whereas economic actors once operated in relatively depoliticized environments where technical solutions could be negotiated, starting from the *anger* stage, they found themselves sharing the space with political interests of prioritizing symbolic closure. What began as (more or less) technocratic responses to regulating labour migration has evolved into a complex choreography of visible public restriction and invisible accommodation of economic demands.

In the *disillusion* phase, economic interests for recruiting low-paid migrants reached an all-time high, also considering the changing demographic context and mobility dynamics across the EU. However, economic calculations have to also accommodate electoral-driven political calculations. Hence, the tensions between these two contribute to the continuation of gradual changes of labour migration policies, within a securitarian framework.

The following section, by discussing the role of ideas and institutions in shaping actors' agency, will return to how interest-driven factors combine with other elements to produce the precarious balance inherent in the needed but not wanted paradox.

10.2.2 Ideas: Denmark, Italy and Poland over time

Ideas played a central role in how labour immigration has been governed across the different stages, as they contributed to shape policymakers' approach to what labour migration policy should achieve.

The idea of not being a country of immigration during the early immigration inflows contributed to the initial *denial* phase, as political leaders made sense of growing immigrant workers as a temporary phenomenon destined to disappear (see section 5.1.1 for Denmark, 7.1.2 for Italy, and 9.2 for Poland). This identity and self-perception contributed to the delay in establishing a comprehensive immigration legislation, as immigration was for long perceived as a transitory phenomenon rather than a long-lasting feature of society.

During the *negotiation* phase, centre-left parties played a predominant role. Hence, migration policymaking was influenced by left-wing ideational frames.

Denmark exemplifies how left-wing universalist principles regarding human and workers' rights most significantly shaped migration policymaking during this period. The establishment of Denmark's 1983 legislative framework occurred within the broader context of “the age of human rights” —a period when human rights ideals constituted a dominant global paradigm (Moyn, 2010). This international normative environment fundamentally conditioned how immigration was framed in the Danish *negotiation* stage, embedding migration policymaking within a discourse of universal rights and humanitarian obligations. In particular, left-wing politicians emphasised the contribution of foreign workers during the phase of economic growth, and therefore state's duty to support them as equal to Danish citizens.

In Italy, the influential role of the Church and civil society organisations contributed to the inclusion of solidarity and charity values, coexisting together with ideas of safety and control driven by ministerial logics, EU pressures for border management, and the gradual decline of the human rights paradigm that had influenced immigration policymaking in North-Western Europe during the 1970s-1980s.

Across both Denmark and Italy, left-wing actors involved in advocacy, consulting and policy drafting failed to acknowledge the growing anxieties of the working-class population. These actors neglected to address popular concerns about the impact of immigration on working conditions, socio-cultural cohesion, and on welfare state (Betz, 1994). Left-wing normative commitment to solidarity and multiculturalism created a values gap with their working-class constituencies (Mudde, 2007). Rather than engaging with these concerns, left-wing actors frequently dismissed them as racist or regressive attitudes, further alienating working-class voters. This moral framing of economic and cultural anxieties as illegitimate contributed to the progressive detachment between left-wing parties and segments of their electoral base, ultimately creating political space for populist, anti-immigrant parties (Norris, 2005).

Poland's early stages of immigration policymaking occurred in the post-Soviet era and EU accession, in a context dominated by neoliberal doctrines. This influenced the political approach towards favouring an employer-friendly system of foreign labour recruitment. Hence, Poland represents the case where neoliberal ideas have been more dominant in driving migration policy from the outset. The prevalence of utilitarian logic in the making of migration policies implies that other aspects related to the settlement, integration, and

working conditions of migrant workers received significantly less attention compared to labour market flexibility and employers' demands. However, even within this utilitarian-dominated context, the *negotiation* stage witnessed the involvement of civil society organizations and policy experts who acted as a mitigating factor of the purely market-driven approach to labour migration management, also in light of Western-Europe's experiences.

The *anger* phase is characterized by right-wing actors that mobilized securitization and nationalist framings to politicize immigration. The broader ideational landscape became increasingly convergent across the three countries, reflecting a turn towards a securitarian-nationalist paradigm within the ongoing economic neoliberal framework. This shift occurred within the context of accelerated globalization and growing socio-economic polarization between its beneficiaries and those left behind (Kriesi et al., 2006).

The rise of far-right populist parties making anti-immigration their central agenda item reflects popular anger and protest toward established parties' perceived inability to reassert national control over immigration flows. This securitarian-nationalist paradigm combines multiple ideational elements: cultural protectionism emphasizing national identity preservation, economic nationalism linking immigration to labour market competition and welfare state strain, and security discourse framing immigration as an existential threat to social cohesion and public order (Rydgren, 2007).

In Denmark, left-wing solidaristic visions towards low-paid migrant workers became marginalised. The right-wing voiced popular concerns over migration as a threat to the salary, working conditions, and welfare of the lower classes. Hence, the populist far-right challenged the incumbent's ideas of solidarity and universality of rights, by proposing an alternative narrative of unwanted migrants being a threat to the Danish workers. This narrative was reinforced with right-wing socio-cultural ideas of superiority of Danish values, while it framed integration as a process requiring foreigners to conform to the majority group's cultural norms (Hervik, 2004b).

In Italy, political ideas became crucial in shaping migration policymaking. The transition to the second republic, alongside the emergence of new parties, saw the rise of political marketing, where ideological coherence became secondary to the instrumental positioning of parties

according to public sentiment (Calise, 2010). Regarding immigration, this progressively meant giving voice to and amplifying popular fears and anxieties. The emphasis on nationalistic and protectionist socio-cultural framing promoted by the Lega Nord gradually led to anti-immigrant, securitarian approaches to become the dominant framework for immigration policymaking. Consequently, measures addressing labour migration no longer aimed at balancing societal and economic needs; instead, they were driven by securitarian imperatives designed to gain electoral support. On the opposite side of the political spectrum, the crisis of traditional left-wing ideologies also undermined the centre-left's capacity to articulate a coherent position on immigration, balancing working-class fears with inclusive immigration policies.

In Poland, the rise of PiS and immigration instrumentalization for political purposes marked the beginning of the dominance of securitarian ideas in the public sphere. The outcome has been the parallel development of economic utilitarian views over the management of labour immigration, and political securitarian logics of migrants' exclusion. Contrary to the Danish and Italian cases – where political ideas of migrants as threat were both linked to the cultural, societal and economic spheres – the role of migrant workers has never been challenged in the Polish context. Instead, the threat of immigration has been identified only on societal and cultural structures. In this framework, religious values have been used not to support a solidaristic approach to immigrants, but rather to enhance divisions between the national Catholic identity and non-Catholic migrants. Therefore, political interests have exploited ideas of national identity to portray unwanted Muslim migrants as a threat to Polish values and beliefs. Poland's case demonstrates how neoliberal economic ideas combined with nationalist cultural politics, produce a dual system that facilitates labour migration while maintaining exclusionary boundaries.

Finally, in the *disillusion* stage, the failure of far-right populist parties to control unwanted immigration, combined with Europe-specific factors such as the increasingly tangible impact of declining demographic trends are leading to an adjusting of ideational layers. Hence, there does not seem to be a change in dominant paradigms, but rather a re-adjusting of the hierarchy of desirability of different migrant groups. As a result, the idea of the contributing migrant worker, who deserves conditional inclusion because of economic utility, is being used

to justify opening measures. This does not dismantle the securitarian-nationalist framework, but it tempers it with utilitarian justifications that frame certain categories of migrants as contributing to national prosperity and welfare.

10.2.3 Institutions: Denmark, Italy and Poland over time

The three cases present differences in socio-economic and political institutions, considered as independent variables, from labour market organisation to welfare institutions. However, they present similarities in the institutionalisation path of migration policies.

Here, I discuss the institutionalisation of the migration regime and its impact on how the paradox has been dealt with over time in the three countries. As outlined in section 10.1, the process of migration regime formation and consolidation shows similarities across cases.

When migration inflows started, the legislations in the three countries were outdated, and therefore not fitting. In Denmark, the pre-existing regulations on foreigners stemmed from the post-Second World War, with a focus on refugees and intra-Scandinavian migration. Italy's migration laws dated back to the fascist period, and they were primarily concerned with banning anti-fascist militants. Poland's legislations were heritage of the Soviet time, with a focus on regional migration and on preventing emigration. The different institutional responses contributed to shape distinct migration regimes in each country.

In Denmark, the growing demand for guest workers was dealt with through the tripartite system. Therefore, decisions on what approach to adopt vis-à-vis labour migration were centralised and involved thorough consultations with the social partners. In Italy, immigration was initially absorbed in informal sectors and small enterprises, so that there were limited pressures for concertation and planning unlike the case of guest workers in North-Western Europe. This resulted in an unintentional *laissez-faire* governance of migration, as the demand for migrant workers met the supply without governments' intervention. In Poland, the approach to labour migration can be described as a planned *laissez-faire*, where labour immigration has been driven by business actors, while state actors primarily played a facilitating role.

The gradual consolidation of these *modi operandi* into a migration policy, determined subsequent developments. At the same time, while this is the general background, both external and internal pressures have shaped the following policy evolution.

During the *negotiation* phase, faced with rising immigration and obsolete legislative frameworks, policymakers aimed at establishing a modern and comprehensive legislation to regulate both economic and humanitarian immigration. Though differing in historical context, emphasis, and specific strategies, major reforms – Denmark's 1982 Aliens' Act, Italy's 1998 Turco-Napolitano Law, and Poland's 2012 Strategic Document – shared the goal of creating pragmatic legal frameworks incorporating both economic-driven, rights-driven, and security-driven provisions.

The Danish case presented a stronger attention to humanitarian aspects. Idealistic motives, driven mostly by a minority group involved in the drafting, were central in the Danish framework, whereas the other two aspects were secondary. Furthermore, the EU did not play a role in influencing migration policymaking; instead, horizontal policy learning from neighbouring North-Western European countries emerged in the analysis as a contributing factor.

The Italian case presents a combination of securitarian aspects driven by the simultaneous application to Schengen membership with pragmatic and solidaristic considerations introduced by the involvement of civil society associations (for a more detailed analysis, see sections 7.1.3 and 7.3.5).

Similarly, the Polish 2012 strategic document is characterised by the coexistence of securitarian and utilitarian approaches, with integration measures. The utilitarian and securitarian provisions were determined on one hand by the structural labour shortages following Polish emigration, on the other hand by the EU and Schengen requirements. The integration measures were the outcome of consultations with civil society organisations working on the ground and with experts that emphasised the necessity to foresee integration measures. Also in this case, policy learning from older European countries of immigration emerged as a driver behind policy choices.

During the *anger* stage, the progressive instrumentalization of an anti-immigrant agenda favoured visible political interventionism and a securitarian approach on immigration, with labour migration being silently allowed. In all three countries, the progressive securitisation of migration led to right-wing protagonism in migration policymaking, with radical changes in the Danish 1983 Aliens' Act, in the Italian 1998 Turco-Napolitano Bill, and the suspension of the 2012 Strategic Document in Poland. These changes marked a symbolic turn away from comprehensive legislations to punitive, security-oriented measures.

With the transition to the *disillusion* stage, there has been a progressive abandonment of political ambitions to design regulatory systems aimed at dealing with the various facets of labour migration. Instead, low-paid labour migration is being managed through silent utilitarian approaches.

Ultimately, it can be argued that shocks such as the COVID-19 pandemic, the Ukraine war, and long-term trends like ageing population and growing shortages in essential sectors might have represented critical junctures, in line with policy theories viewing crises as potentially enabling radical policy change (Kingdon, 2003). However, the policy solutions adopted in Denmark, Italy, and Poland do not hint at a radical rupture with the established narrative and policy framework, but rather at gradual adjustments within the institutionalised dysfunctional regimes. This suggests a decreasing political viability for comprehensive policy renovation as the persistent dominance of securitization frames limits possibilities for more balanced approaches incorporating broader economic, societal and political aspects.

The case of Poland illustrates how *immigration age* shapes the pace of policy evolution. The Tusk government's recent strategy to limit labour migration and to establish a frame for orderly recruitments signals that Poland did not yet fully enter the disillusion phase, as such initiatives still carry the imprint of "grand policy design" ambitions, framed in securitarian terms. At the same time, latecomer countries are less insulated from external pressures and dominant paradigms, meaning they traverse the same stages more rapidly. Poland's trajectory therefore reflects an accelerated version of the path taken earlier by Denmark: the stages are the same, but the temporal distance between them is compressed.

10.3 Inter-actor dynamics: between cooperation and fragmentation

The analysis outlined how across the three cases, labour migration policy emerges from complex interactions among multiple actors with divergent and at times contradictory goals. These dynamics challenge traditional models of policymaking that assume coherent state action or linear decision-making processes (Parsons, 1995; Sabatier, 1999). Instead, the evidence from Denmark, Italy, and Poland reveals how different groups of actors—employers, trade unions, civil society organizations, political parties, and bureaucratic agencies—form shifting alliances and engage throughout the policymaking process in ways that fundamentally shape policy outcomes for low-paid migrant workers.

Concerning the connection between actors and the analytical frame of interests, ideas and institutions, the following can be pointed out.

The analysis revealed how the space available for interest advancement varies significantly across different immigration policy phases. When immigration remains outside the realm of party competition, alliances of interest groups can more easily pursue policies aligned with their goals (Wright, 2017). The early phases of labour migration policymaking in all three cases demonstrated this dynamic, with case-specific groups participating in policy consultation and advocacy (see section 5.1.3 for Denmark, section 7.1.3 for Italy, and section 9.1 for Poland).

The role of economic lobbies in immigration politics proved less straightforward than traditional accounts suggest, as businesses often displayed heterogeneous rather than unidirectional interests, as well as varying capacity to shape immigration policy (Caviedes, 2010; Menz, 2010a). Different sectors, firm sizes, and national contexts generated varying preferences for labour migration policies, complicating simple narratives about business influence (see for instance section 7.3.3). Moreover, employers' capacity to shape policymaking is constrained by country-specific institutional features such as strong concertation in Denmark, or fragmentation and small businesses' size in Italy.

The politicization of immigration fundamentally altered interest-groups dynamics by constraining the traditional channels through which advocacy operated. As immigration became electorally salient, the space for quiet lobbying and technocratic accommodation

diminished considerably. This transformation forced economic and civil society actors to adopt new strategies, including coalition formation with other stakeholders.

Bureaucratic interests followed distinct logics shaped by institutional mandates rather than broader political structures (Alesina & Tabellini, 2004). Ministries of Interior in Italy and Poland consistently pursued security-driven agendas that prioritized control over human mobility, regardless of economic pressures. This pattern reflects the inherent tendency of bureaucracies to protect and expand their fields of power while pursuing sectoral interests (Paquet, 2020). Labour ministries, conversely, demonstrated greater receptivity to employer concerns about workforce needs, creating inter-institutional tensions that shaped policy outcomes. These bureaucratic dynamics highlight how institutional fragmentation can create multiple access points for different types of interests, with policy outcomes depending on which institutional actors gain predominance during specific phases of the policy process.

Moving to the relation between ideas and actors, the analysis highlighted how different groups draw their diagnostic and prognostic frames from their interpretative frameworks. This clearly emerged in the case of Italy maintaining dedicated entry quotas for South American countries despite no immigration inflows from this region, which demonstrates how ideational framework can override both economic interests and empirical evidence. This policy persistence, driven by the belief that Italian emigrants might want to return, exemplifies how deeply held ideas can shape policy outcomes.

Furthermore, ideational frames are used by actors to build coalitions, gain support and legitimacy to pursue their goals (Schmidt, 2011). Changing migration policy phases witnessed changing narratives to justify the changes in policy direction. For instance, far-right populist parties successfully mobilized ethno-nationalist frames about cultural threat to build broader coalitions beyond their traditional base, transforming security concerns into a political resource for promoting restrictive immigration policies. Starting from 2020, shortages in low-paid jobs led to a reframing of ideas of deserving and contributing migrant (Triandafyllidou, 2022). In Denmark, the centre-left government emphasized the essential role of hard-working migrants for Danish economic growth and ultimately societal wellbeing to legitimise a change in policy direction. This shift reflects broader post-pandemic narratives about essential workers that emerged across Western democracies, demonstrating how crisis moments can

create opportunities for ideational entrepreneurs to reshape policy discourse and build new coalitions around previously contentious issue.

The analysis highlighted how different institutional contexts empower or constrain the participation of policy actors (P. A. Hall & Taylor, 1996), so that the three cases showcased variations in both the groups involved and their relative power to influence policy. Varying degrees of regulations of the labour market influenced which groups gained voice in policymaking processes. The tripartite structure in Denmark positioned trade unions as the legitimate partners to represent local workers' interests. In Italy, the embeddedness of labour recruitment in informal societal networks provided space for the Church and civil society actors to function as intermediaries between migrant workers and employers, particularly in sectors like domestic care where formal arrangements were absent or inadequate. The neoliberal restructuring in Poland contributed to the marginality of trade unions in consultations.

From a perspective of national administrations, the jurisdiction over labour migration falls largely within the Ministry of Labour and of the Interior in both Italy and Poland. In Denmark, an ad-hoc Ministry of Migration and Integration has been established in 2002. These two settings impacted policymaking on labour migration in different ways. In Italy and Poland, although with different nuances, the sharing of competences between several ministries with different objectives had the potential to lead to mal-integration of competing objectives. Furthermore, the progressive securitization approach to immigration shifted the authority over the Ministry of the Interior, with a consequent lowered attention to aspects connected to the integration of migrant workers in the labour market. In Denmark, the establishment of a Ministry focused on Migration and Integration represented a visible political act of the right-wing government showing that integration policy was considered an urgent aspect for regulating the deviant customs of the 'other' population – mostly the Muslim minority (Rytter, 2018). The inherent political nature behind the establishment of this ministry, contributed to establish a restrictive approach within the Ministry, which ultimately impacts what can be undertaken and what cannot (see section 5.3.2.). Hence, whereas in Denmark the dominant administrative approach is restrictive, Italy and Poland exhibit tensions between their ministries. The Ministry of Labour typically advocates for more open and

inclusive migration policies to meet economic needs and fight irregularities at the workplace, while the Ministry of Interior pushes for stricter controls based on security concerns.

Within national administration, the role of individual agency varies significantly across the three cases, reflecting different institutional cultures and political traditions. Denmark's highly institutionalized, consensus-oriented system constrains individual discretion through mechanized procedures and strong norms of administrative neutrality. This institutional framework limits the scope for policy entrepreneurs —individuals who invest their time, energy, and resources in promoting particular policy solutions (Kingdon, 2003).

In contrast, Italy and Poland exhibit greater space for policy discretion and personal influence, creating opportunities for individual actors to shape policy directions significantly, but also leaving space to arbitrary decisions. These individual-level dynamics interact with broader institutional structures to produce distinct national patterns of policy development. In Denmark, the fear of administrative overreach and the emphasis on collective responsibility constrain individual initiative, leading to policy outcomes that reflect institutional consensus. Conversely, in Italy and Poland, the administrative structure creates opportunities for individual actors to bypass institutional constraints, sometimes enabling more pragmatic interpretation of the law, but also increasing unpredictability and inconsistency.

The rise of populist parties highlighted how institutional changes can reshape actor configurations and power relations (Thelen, 2004). The transition from the *negotiation* to the *anger* phase altered the established inter-actors' power relations, as the Ministry of the Interior increasingly assumed control over immigration policymaking in Italy and Poland, while a new Ministry of Migration was established in Denmark. Civil society organisations in Italy and Poland moved from holding a consultative role during the early phase, to being marginalised from policymaking processes during the politicisation phase.

Theoretical section 2.4 discussed the analytical fitness of multi-level governance (MLG) as a framework to analyse immigration policymaking dynamics. In the context of labour migration policymaking over time, MLG captures the involvement of diverse actors in policy networks

and the dispersion of authority across multiple levels. This framework helps explain how non-governmental actors, national governments, and supranational institutions interact to produce policy outcomes that no single actor could achieve independently.

However, the emphasis of MLG approaches to cooperation across levels is often far from the actual governance of immigration, which is also the outcome of conflicting processes between different groups of actors (Dabrowski et al., 2014). In particular, the politicization of immigration has transformed labour migration policymaking from a collaborative, technocratic processes that MLG theory describes, into contested battlegrounds where political competition increasingly dominates. The battleground concept introduced by Campomori and Ambrosini (2020) captures broader changes in how policies are legitimized, and how different levels interact to support their preferred policy solution. Where once technical expertise and stakeholder consultation provided the primary basis for policy validity, public opinion polling and electoral calculations began to play a central role in decision-making processes. This shift has particularly affected labour migration policy, where the symbolic politics of immigration control often override the practical considerations that technical experts and affected communities bring to policy discussions.

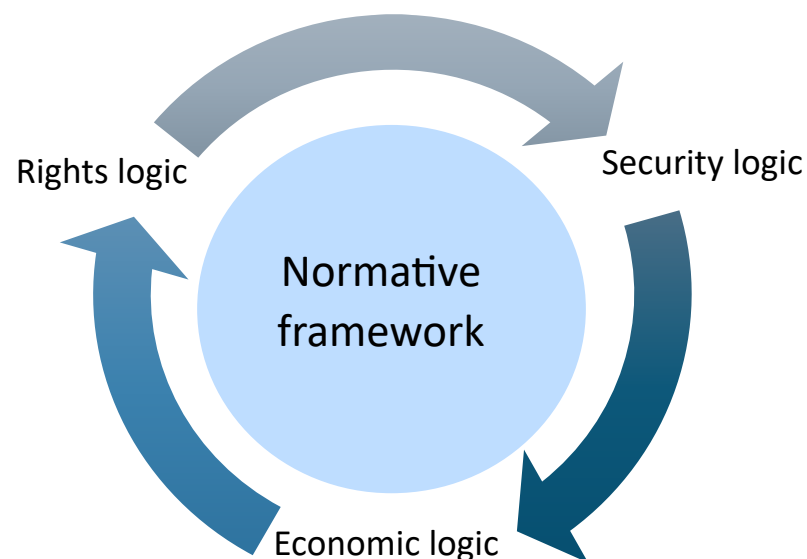
Understanding these evolving inter-actor dynamics requires moving beyond static institutional analyses toward more dynamic approaches that capture how politicization reshaped the relationships between different types of actors. The evidence suggests that successful policy entrepreneurship in contemporary labour migration policy requires not only technical expertise and institutional access, but also the ability to navigate increasingly narrow spaces for alternative policy solutions.

10.4 Towards a conceptual framework for the needed but unwanted paradox

The analysis of Denmark, Italy, and Poland reveals a systematic tension between the demand for migrant workers alongside increasingly restrictive political rhetoric and formal policies. This needed but unwanted paradox requires a conceptual framework that can explain how migration policies evolve under contradictory pressures.

The analysis of policymaking dynamics over time highlighted a striking parallelism across different cases in the development of migration policies. Immigration policymaking featured a *negotiation* phase where political willingness to establish a comprehensive immigration legislation encouraged consultative processes with experts and ‘actors on the ground’. Although with context-dependent nuances, the *negotiation* phase produced in all three cases a normative framework balancing a mix of economic-, security-, and migrant rights- focused logics. In all three cases, the final regulative outcome did not reach a perfect balance between logics, reflecting inter-actors’ power relations and strategic alliance-making. Nevertheless, it can be argued that the 1983 Aliens’ Act in Denmark, the 1998 Turco-Napolitano Bill in Italy, and the 2012 Strategic Document in Poland included provisions responding not exclusively to one or two logics, but to the three logics showed below:

Figure 18: Intertwining logics in the institutionalization of policy



This equilibrium was disrupted by broader structural transformations in the political sphere, where populist parties included immigration issues in their narrative pitting elites versus left-behind people (Gidron & Hall, 2017).

The shift to the *anger* phase of migration policymaking is characterized by the interaction between two logics driving labour migration policies, namely economic- and security-focused. The political instrumentalization of immigration transformed policy discourse by framing

migration as a threat to the insider group. During this process, the early security-focused logic progressively turned into a securitarian one, which leveraged anti-immigrant rhetoric to mobilize constituencies and gain competitive advantage. The dominance that the securitarian logic took in the approach to immigration policy marginalized rights-focused perspectives by excluding civil society organizations and advocacy groups from policy consultations. Simultaneously, the politicized environment reduced economic logics to a narrow utilitarian calculus of addressing shortages in low-paid occupations, neglecting broader considerations of policy impact on working and residency conditions, integration, and long-term socio-economic development.

In short, the dominance of the securitarian stance in migration policy hindered pragmatic regulation in the field of labour migration, as any non-restrictive policy measures had to be justified within or against securitarian discourses.

Policy feasibility in the field of labour migration has been reduced to silent options responding to sectorial labour needs. The short-term reactive nature of policymaking in a politically charged domain contributed to the neglect of durable solutions to the needed but not wanted paradox, as long as it could be provisionally solved through invisibility strategies. That is, the dominant restrictive approach to immigration was reconciled with economic demands for migrant workers through 'invisibility strategies': EU enlargement, opening to less visible migrants, tolerance for forms of irregularity and legal opacity. These invisibility strategies represented sophisticated political solutions to irreconcilable policy demands: the economic necessity of low-paid migrant labour versus political pressures to restrict immigration.

In overall, the adopted invisibility strategies represented an interplay between utilitarian and securitarian logics on migration, whereas migrant rights' logics disappeared.

During the *disillusion* stage, changes in low-paid labour migration policy have been minimal, and always represented by policy-level interventions within the utilitarian-securitarian axis, rather than radical innovation of the framework.

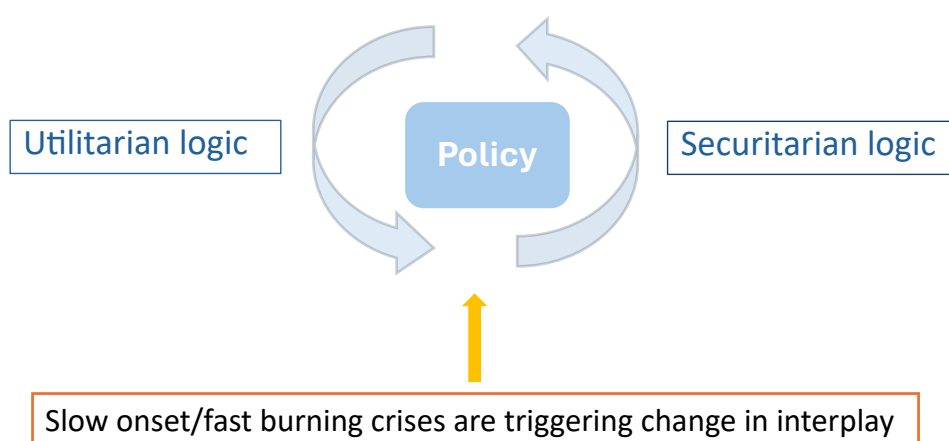
The relationship between utilitarian and securitarian approach to labour migration policy is not per se competing. However, it can become incongruent. Recently, the interaction

between the dominant securitarian paradigm and utilitarian considerations seems to be changing.

Socio-economic developments like the intensifying negative demographic trends across the EU, and sudden shocks such as the Covid19 pandemic and the Ukraine war, contribute to the worsening of labour shortages in important sectors of national economies. Furthermore, previously available pools of more accepted migrants – Ukrainians in Poland and Eastern Europeans in Denmark – are shrinking. As a result, policymakers face increasing pressure to revise entry selection filters, while the political backlash against immigration remains high. Low-paid, racialised migrant workers have been categorised as undesirable. This has been justified by the commonly shared view of their inability to assimilate culturally, and to contribute economically. However, the increased visibility of labour shortages in essential sectors, in which they are overrepresented, is challenging this assumption.

Changing contexts generate new interactions between the policy approach to economic needs and the overall securitarian frame. These adaptations suggest that the needed but unwanted paradox is not static but evolves in response to changing circumstances, creating windows of opportunities – however limited – to adjust the balance between utilitarian and securitarian logics.

Figure 19: *Logics in the politicization of migration policy*



The balancing of securitization and utilitarian pressures operates through context-specific filters to select who deserves to enter (and under which conditions), while maintaining an overall securitisation approach.

This conceptual framework suggests that the needed but unwanted paradox is not merely a policy failure but a systemic feature of migration governance that reflects deeply rooted contradictions between socio-political structures and economic neoliberal globalization. Understanding these dynamics is essential for developing more coherent and sustainable approaches to labour migration policy that can reconcile economic efficiency, democratic accountability, and rights-based governance.

10.4.1 Filters as temporary solutions

In the three analysed cases, similar pressures have led to different ways out from the needed but unwanted dilemma.

Countries' specific solutions can be conceptualised as a revisiting of the selection filters, as hierarchies of (un)desirability are being re-evaluated. In this, I follow De Haas et al. (2016) argument that modern migration policies act as filters to either encourage or discourage entry of various migrants' groups. In the analysis, I classified three main filters which determined the shifting position of migrant categories in the hierarchy of desirability. The revision of the legislation for low-paid immigrant workers happens through a reordering of which categories are deemed as deserving, according to economic, cultural, and moral filters.

With economic filters, I refer to the entry criteria based on whether categories of migrants are viewed as contributing to the economy and society. Until recently, low-paid migrant workers have been framed as an undesirable category also from an economic perspective. The low status jobs that they filled put them at risk of poverty; therefore, in the public and political debate they have been framed as a cost to the national welfare, especially in the case of long-term migration with family members. Additionally, the low visibility and social recognition of the occupations where migrant workers are overrepresented, contributed to a lack of acknowledgment of the structural demand for these jobs. Therefore, economic filters have been adopted to close legal entry channels for low-paid foreign labour, with the legitimising discourse of having to restrict entry possibilities for low-paid third country nationals as undeserving because of their low economic contribution.

With cultural filters, I refer to asymmetrical entry possibilities according to whether categories of migrants are perceived as more or less able to assimilate culturally. Therefore, ideas of different migrant groups as being culturally close or distant from what is understood as national identity contribute to create a hierarchy of migrants' desirability. Within this framework, the racialisation of certain ethnic groups is a discursive strategy to deal with the dilemma of the needed but not wanted, as it contributes to determine which migrants are deemed deserving, based on the belief that some nationalities are less likely to upset societal norms. This legitimises opening to the needed migrant while maintaining tough rhetoric towards the not wanted. Similarly to economic filters, ideas of cultural proximity are socially constructed and time dependent. For instance, while nowadays Italian immigrants are largely considered as culturally close and thereby more desirable than other nationalities, until fifty years ago, they were subjects of exclusionary policies and racist discourses in North-Western Europe. As this example shows, throughout time, different groups have been framed as problematic because of their perceived 'otherness', addressed as culturally inferior to the dominant *Leitkultur*.

On one hand, racist discourses serve the purpose of identifying an easy scapegoat and thereby gaining electoral support. On the other hand, the normalisation of racist discourses contributes to the sorting of different foreigners along a hierarchy of desirability, which is used as a device for increasing public acceptance of nationalities perceived as culturally close. The case of Denmark, with the shift from the "non-Western" categorisation to the "MENATP" highlights how racialised narratives serve to reframe perceptions of undesirability along nationalities. Similarly, in Poland liberal labour migration policies are justified by the notion that they are restricted to migrants from culturally similar countries, perceived as less likely to challenge societal norms and religious values. Conversely, the recruitment of migrant workers from East Asia happens silently, and it has been instrumentalised to accuse the PiS government of allowing entry of an unwanted category.

Finally, with moral filters I refer to criteria selecting certain categories of migrants as more deserving because of values connected to specific characteristics they possess. For instance, gender is an important factor in the perception of migrants' desirability. A widespread paternalistic perspective often portrays migrant women as vulnerable and at the same time

unproblematic due to their perceived docility. In several of the analysed texts, justifications of opening measures towards working sectors where women are overrepresented outlined that migrant women are not the ones causing unsafety. The positive portrayal of migrant women leads to a relatively uncontested acceptance of opening policies towards this category. Connected to the gendered factor, the sectors having strong demands for migrant workers are placed in a varying degree of perceived deservingness based on values and societal norms. For instance, reproductive and care labour have long been sectors shielded from the overall restrictive stance on immigration, whereas migrants working in sectors such as construction or logistics are perceived as less deserving.

Another moral criterion that emerged in the analysis relates to the different categorisations of migrants. The moral perception of deservingness related to categories – and therefore placement in the hierarchy of desirability, shifted throughout time in Denmark and Italy to a lesser extent, whereas it remained stable in Poland. For instance, being categorised as a refugee and asylum-seeker in Denmark shifted from being perceived as a deserving category throughout the 1980s to being often depicted as bogus and taking advantage of the generous Danish welfare from the 2000s. Contrarily, being a migrant worker shifted from being viewed as a competitor to the local vocational workers and unemployed during the economic downturn of the 1980s, to being increasingly depicted as contributing and needed for dealing with current and future socio-economic challenges. In Italy this distinction is not as clear cut as in the Danish case. In the early immigration phase the two categories were not clearly separated, as policy provisions on refugees were still underdeveloped. In the second phase and up to today the moral element connected to different categories is not dominant in the selection criteria adopted. In Poland, the utilitarian approach to labour immigration adopted since the early 2000s, led to liberal policies towards labour migration, whereas the politicization of immigration led to closure towards refugees and asylum-seekers from North-Africa and the Middle East. However, the moral filter related to categories has not been used. Instead, economic and cultural criteria are more helpful to explain Polish policymakers' approach to the needed but not wanted dilemma.

11 Conclusion

Since the post-War immigration to North-Western Europe, there has been a lively debate on whether states had lost the capacity to control immigration inflows. A flourishing literature engaged with the puzzle of the liberal paradox: why liberal democracies accept migrants they claim not to want. Despite decades of policy development, expanded state control capacities, and the growing embeddedness of immigration in European societies, this paradox has proven remarkably persistent.

This thesis has taken the case of low-paid labour migration to investigate how the paradox unfolds through time and across national contexts. It argued for the importance of incorporating *temporal positioning* and *country's immigration age* into comparative migration policy research. These variables help explain differences and similarities in how the paradox unfolds in policy. While much of the existing scholarship tends to focus either on single-country analyses or comparisons among countries with similar immigration histories, this thesis addressed an understudied area by comparing countries with different immigration ages – Denmark, Italy, and Poland – through a comparative-historical framework

By tracing long-term policy trajectories, the study moved beyond contingent and crisis-driven explanations and identified a common four-stage pattern in policy development.

The initial *denial* phase featured growing immigration and economic demand for migrant workers, but political actors failed to acknowledge the ongoing transformation. In the *negotiation* stage, governments sought to formalize immigration policy through comprehensive reforms. The resulting policies reflected attempts to strike a balance between economic imperatives, security concerns, and migrant rights considerations. All three countries experienced a shift to the *anger* phase, where far-right populist political entrepreneurs capitalised on anti-immigration agendas for electoral interests. Immigration became a symbolic issue around which cultural and economic insecurities were projected. Politicization reduced the policy space, thereby systematically marginalizing both pragmatic regulations and rights-based approaches. In an attempt to maintain electoral promises, once in power the far-right populist radically changed or withdrew the comprehensive regulations approved in the *negotiation* stage. Despite populist promises to 'regain control', restrictive

measures failed to eliminate the demand for low-paid migrant labour. Finally, the ongoing *disillusion* stage follows the growing delusion about populist parties' ability to effectively restrict unwanted immigration. This stage features the progressive political alignment towards the securitarian framework and policymaking only through gradual adjustments within the overall securitarian framework to respond to the pressing socio-economic demands for migrant labour.

While this trajectory emerged across all cases, its timing and expression diverged in line with each country's immigration age and the changing broader global and European contexts. For instance, although all three countries experienced a *negotiation* phase, this occurred at different times. In Denmark, it occurred in the 1980s, during a period shaped by human rights discourses and limited EU influence. In Italy, it occurred in the 1990s, amid growing EU pressures and early signs of nationalist backlash against expanding globalisation processes. Finally, Poland experienced its *negotiation* stage in the early 2000s, during neoliberal economic dominance and securitarian nationalism. These differences illustrate how time-dependent ideational and institutional contexts condition country-specific manifestations of the common policy trajectory. These variations illustrate a central argument of this thesis: while countries tend to converge as they follow the same structural sequence, they do so asynchronously and with time-dependent inflections.

The analysis further showed how the paradox persisted across the different policy stages as it was functional in managing irreconcilable tensions. Restrictive policies reassure electorates but cannot address the root causes of the paradox, as this would require addressing broader dynamics related to the structural economic demand for low-paid labour, and to broader societal transformations – which remains unrealistic. Instead, restrictive immigration policies, while creating perceptions of control, do not reduce the demand for cheap labour, thereby leading to irregularities, temporary schemes, and ultimately marginalization of the migrant workforce – reinforcing rather than resolving tensions. As the analysis of the three cases showed, this outcome is not a deliberate strategy of political and economic elites, but rather the result of competing, and often uncoordinated, drivers.

The thesis makes three key contributions to migration studies.

First, it introduces *temporal positioning* and a country's *immigration age* as critical variables in comparative migration policy analysis. This conceptual innovation enables a more dynamic understanding of how migration policy evolves, and how countries may be positioned at different points along the same underlying process.

Second, the thesis develops a multi-actor, multi-driver framework that integrates the 3 I's with governance approaches, attentive to both structure and agency. By applying this analytical framework, the thesis argued that the paradox should not be understood as the outcome of structural, ideational, or interest-based forces alone, but as the product of ongoing struggles and alliances among actors in contested political arenas. This framework enables the tracing of how different drivers and actor coalitions interact over time and across country settings to produce the often contradictory policy outcomes observed. The four-stage trajectory that emerged from this framework might offer a generalisable tool for understanding policy trajectories.

Third, by demonstrating the structural nature of the needed but not wanted paradox, the findings corroborate arguments that contemporary labour migration policies are structured around inherent contradictions and conflicting demands (Boswell & Geddes, 2010; Castles, 2004; Czaika & De Haas, 2013; Geddes & Scholten, 2016; Schultz et al., 2021). Rather than interpreting incoherence or inconsistency in migration policy as evidence of failure, the thesis positions these features as outcomes of structurally conflicting demands, and investigates under what conditions contradictions stabilize or destabilize policy. This reframing calls for theoretical approaches that are better equipped to understand policy as the management of irreconcilable tensions, rather than the resolution of clearly defined problems. In line with recent literature (Scholten, 2020), this research argues for more realistic governance approaches that embrace, rather than attempt to resolve, this fundamental tension. Recognizing contradiction not as failure but as constitutive of migration governance offers a more realistic framework for understanding how EU governments navigate the pressures of neo-liberal globalization, welfare sustainability, and identity politics in the twenty-first century.

Naturally, the study has limitations. First, while the thesis aimed at providing a comprehensive framework that captures the interactions between multiple actors and different drivers in

policymaking, it necessarily sacrificed some degree of empirical precision and analytical depth. The ambition to synthesise broad patterns across time and space sometimes came at the expense of more granular, actor-specific accounts, or deeper institutional analysis. This trade-off reflects a conscious methodological choice, but it remains a relevant limitation when assessing the explanatory reach of the proposed model. Second, the application of the 3 I's framework prioritized analysing interactions between interests, ideas, and institutions rather than adopting an in-depth commitment to any single theoretical tradition. This approach enabled a broad and flexible analysis across cases but may have limited the analytical depth that could be achieved through more focused theoretical engagement with one tradition. Furthermore, focusing on low-paid labour migration, while serving a functional purpose in unpacking the needed but not wanted paradox, may not capture the nuances of contradictory dynamics affecting other migration categories, where different logics and actor configurations might produce alternative trajectory patterns. Finally, while the four-stage model offers analytical clarity, it risks oversimplifying complex national processes or imposing an overly linear narrative where there may be overlaps or reversals.

Looking forward, this thesis findings suggest two critical research directions. First, further research could investigate whether this four-phase trajectory holds across other world regions beyond Europe, where different historical experiences with migration, distinct economic structures, and alternative political systems may generate different patterns of paradox management. Second, further research could investigate whether—and under which conditions—there might be a fifth stage of the policy trajectory identified in this thesis. Can countries reach an *acceptance and adaptation* stage, and thereby a solution to the paradox? This thesis's findings hint that acceptance might be selective, involving the transitioning of specific migrant groups from 'unwanted' to 'accepted' based on changing hierarchies of perceived desirability.

In sum, this thesis demonstrates the value of a historical-comparative approach for making sense of paradoxes in migration policy dynamics. By considering three countries with different immigration trajectories, the thesis traced not only how policies change but why they do so in distinctive ways. This approach allowed the analysis to move beyond static

institutional or synchronic comparisons, highlighting how the paradox is reproduced, transformed, and managed over time.

12 References

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13 APPENDIX

INTERVIEW NR	ROLE	DATE
IDK1	Expert at Vive, think tank	2023
IDK2	3F Political advisor	2023
IDK3	Expert at Rockefeller Foundation, think tank	2023
IDK4	3F Trade Unionist, central level	2023
IDK5	Expert on migration, 3F trade union	2023
IDK6	Expert on migration, 3F trade union	2023
IDK7	Representative of The Confederation of Danish Employers (DA)	2023
IDK8	Expert on migration of The Confederation of Danish Employers (DA)	2023
IDK9	Civil Servant, research unit, Ministry of Migration and Integration	2023
IDK10	Civil Servant, Ministry of Migration and Integration	2023
IDK11	Civil Servant, Ministry of Migration and Integration	2023
IDK12	Expert on migration, Confederation of Danish Industry (DI)	2023
IDK13	Expert on labour market policy, Danish Trade Union Confederation (FH)	2023
IDK14	Civil Servant, Ministry of Labour	2023
IDK15	Elected parliamentary, member of the Green Left	2023
IDK16	Expert on Danish labour market, University	2023
IDK17	Expert, Danish centre against human trafficking	2023
IDK18	Expert, Danish centre against human trafficking	2023
IDK19	Expert, Danish Institute for Human Rights	2023
IDK20	Elected parliamentary, member of the Liberal Party (Venstre)	2024
IDK21	Non-elected politician, the Danish People Party	2024
IDK22	Representative of The Confederation of Danish Employers (DA)	2024
IDK23	Representative of the Association of Danish Municipalities (KL)	2024
IDK24	Representative of FOA, trade union of Public Employees	2024
IDK25	Written interview with centre-left (Enhedslisten) parliamentary, migration spokesperson	2025

INTERVIEW NR	ROLE	DATE
I1	Expert, academia	2022
I2	Former Head of Cabinet, Ministry of Labour	2022
I3	Former Head of Cabinet, Ministry of Labour	2022
I4	Expert, civil society advocacy and research IDOS	2022
I5	Civil Servant, current, Ministry of Labour	2022
I6	Expert, civil society advocacy and research Lunaria	2022

I7	Employers' association small-medium enterprise (CNA)	2022
I8	Civil Servant, current, Ministry of Foreign Affairs	2022
I9	Trade Union, UIL, responsible immigration	2022
I10	National Association of Municipalities (ANCI), civil servant on migration affairs	2023
I11	Advocacy and political advisor in Parliament, Ero Straniero campaign	2023
I12	Legal expert on migration, Protestant Church (Chiesa Valdese)	2023
I13	Former centre-left parliamentary (PD), focus on migration	2023
I14	Former Head of Cabinet, Ministry of Interior	2023
I15	Trade Union of agricultural workers (Flai – CGIL) Migration expert	2023
I16	Former centre-right politician (Forza Italia), undersecretary Minister of Foreign Affairs	2023
I17	Legal expert, anti-racism movement	2023
I18	CSO Association of Christian Workers (ACLI), expert on migration	2023
I19	Employers' association, domestic work (DOMINA)	2023
I20	Researcher, Leone Moressa research institute on migration	2023
I21	Former politician, Forza Italia, focus on migration	2023
I22	Trade Union of construction workers (Filca-Cisl), migration expert	2023
I23	Catholic CSO, migration expert (Sermig)	2023
I24	Trade Union of migrant workers (ANOLF)	2024
I25	Migration expert, CGIL	2023
I26	Former judicial officer, migration focus	2023
I27	Livia Turco, former Minister of Social Affairs – centre-left	2023
I28	Susanna Camusso – former leader of CGIL, centre-left (PD) parliamentary	2024
I29	Sergio Briguglio – former migration consultant for Caritas	2024

INTERVIEW NR	ROLE	DATE
IPL1	Civil Servant, Ministry of Interior, migration expert	2023
IPL2	Civil Servant, Ministry of Labour	2023
IPL3	Migration expert at Lewiathan - largest employer organization	2023
IPL4	President, Lewiathan	2023
IPL5	Michal Boni, former Minister of Administration and Digitization	2023
IPL6	Migration expert, academia	2023
IPL7	Migration expert, academia	2024
IPL8	Legal Expert, CSO	2024
IPL9	Civil Servant, Ministry of Labour	2024

IPL10	Migration expert and trade unionist at Inicjatywa Pracownicza (Workers' Initiative)	2025
IPL11	Legal Expert, CSO	2025
IPL12	Trade Unionist at Inicjatywa Pracownicza (Workers' Initiative)	2025
IPL13	Labour migration policy expert at Ministry of Labour	2025
IPL14	Labour migration policy expert at Ministry of Labour	2025