Racial Discrimination: Similar or Different?

Methodical Questions to Compare U.K. and Germany

Discussion Paper

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1. Introduction[*].

After World War II most of the Western Europe societies became countries of immigration. Since the 1990s also traditional emigration countries like Italy and Spain are beginning to change step by step into countries of immigration. Thus Western Europe has developed to an important region of destination at the end of the last century. Now these societies are multicultural or are growing up to that.

In the social sciences we have a controversial debate on the characteristics of multicultural societies. Three of the most important points in this debate (for this paper) can be summarised as follows: (1) The mainly critical aspect is that terms like multicultural society or multiculturality are needing definitions of different and distinctive ethnic-cultural groups or races. The objection is in case of Max Weber that a differentiation like that constructs groups who are not relevant in analysis of social structures and differences, because an ethnic-cultural or a racial group is not a social group, thus these constructions could not be social categories in research. As result these constructions would exist outside the society and aren't an integral part of social development. The stance is to deconstruct and integrate ethnicity into social relations. (2) The second point covers the reproach that the term of multiculturality means a normative concept of society, in which the different groups and races should live together in harmony. Therefore this concept looks like a pedagogical programme. In this programme you find two contrary directions: One bases on distinguished ethnic-cultural groups and races, and on the acknowledgement of the right of equality in difference. The other direction means that the differences are mainly cultural constructions and the differences are overinterpreted. Thus these differences have to be respected but on the same time similarities have to be perceived. (3) Independent of distinguished positions and meanings in the debate all voices have the same starting point: multiculturality in western societies is combined with ethnic conflicts, racism, and xenophobia[1].

The last point is our starting point, too, because we can observe that in all immigration countries are existing conflicts between ethnic-cultural groups or blacks and whites. We can observe racism and xenophobia in attitudes of stable parts of the inhabitants all over the time of immigration, and we can observe daily discriminations, and time by time, in different periods violence against minorities. But we do not know exactly, what are the reasons for these phenomena: if the process of immigration and the development to a multicultural society

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[1] To that debate see for example Mintzel (1997, pp. 21-43), Bade/Bommes (1996), Hoffmann-Nowotny (1996), Radtke (1993), Schulte (1990).

really are responsible for discrimination, racism, and violence. Out of our researches we know that immigration, and the heterogeneous cultural structure of societies are not the reason, but they could be the primer for these phenomena in context of social conflicts and social change (s. Birsl/Ottens/Sturhan, 1999). It is not controversial in social sciences, that there exists a relation between social conditions and ethnic-cultural or racial conflicts but there are no empirical explanations how this relation is characterised.

Now we want to know more about this relation. Comparing U.K. and Germany we are looking for similar or special aspects of that relation, or in other way: Are there comparable structures and patterns in context of social and ethnic-cultural conflicts in both countries; do there exist stances of explanations of xenophobia and racism, which include general aspects of that relation? Or do we have to search for very different explanations for U.K. and Germany resp. for each western country? Both variations are important to investigate possibilities to reduce or probably to prevent ethnic-cultural or racial conflicts. We are focussing these questions on the situation in the world of labour in industrial plants where we find employees from different ethnic-cultural and racial groups, and different social classes. We are interested in the life situations, social and political attitudes of employees, and how the trade unions in both countries try to fight against racial and ethnic-cultural discrimination. Our main question is, if the antidiscrimination policy of trade unions covers instruments of reducing or preventing ethnic and racial conflicts in case of the shop floor.

But before we are able to find answers to this question we have to specify the different or similar conditions of racial or ethnic-cultural conflicts, and of trade-union policies in both societies. The central conditions are the migration histories and systems, and the industrial-relation systems, especially the positions of trade unions to execute a policy based on interests, and to represent employees on the level of the shop floor and the level of society in U.K. and Germany.

In this paper we are referring to the conditions of migration systems and industrial relations, and of antidiscrimination policy of trade unions. Our main thesis is that on one side we will find very different structures in the systems, politics and policies of the government . But on the other side there exist comparable patterns of social, ethnic-cultural, and racial conflicts as well as comparable reactions of the trade unions. In the following chapter we will specify our research interest and the main thesis in context of methodological questions.

2. Similar or Different? Methodological Questions to Compare U.K. and Germany.

In case of the migration systems and histories after the World War II U.K. and Germany represent two of three dominant types of immigration countries in Western Europe. The first two types are old immigration countries: former extensively colonial countries (U.K., France or the Netherlands) and countries which recruited foreign workers - "Gastarbeiter" - in a certain period (Germany, France, the Netherlands or Belgium). The third type is represented by the new immigration countries Spain and Italy. Its characteristic is the immigration of new groups of migrants from Africa, Asia, or Latin America, and actually from Eastern Europe. The majority in these groups are seasonal workers in the agrarian sector, or they are working in the informal sector as domestic servants in private households. Especially in the informal sector there are many female immigrants, who have not any legal status, and who dispose only of low wages. Beyond that these two countries (Italy and Spain) show a strongly marked regional disparity in economic and social development. Because of this there exists a high rate of internal migration from southern regions to the industrial centres of the north for a long time. These internal migrants are working in the industrial sector and cover the demand of unskilled workers. Their function in industry is very similar to that of the Turkish, Spanish, Italian or

Yugoslavian immigrants in countries of recruiting in the 1950s - 1970s, and meanwhile their social position within the working class is similar to that of foreign workers, too.

In case of our focus we are interested in U.K. and Germany as two types of old immigration societies in Western Europe. To compare these societies we have two typical methods of social sciences (s. J. Hartmann, 1995, pp.30f.[2]):

1. Most similar systems design: This is the most common method to compare democratic western countries in social sciences. The base is to classify similar aspects of institutional systems like the political system, government system, party system or the industrial-relation system. Out of the research interest meanwhile other according categories are possible: policies, political processes or processes of social structuring. This method works with a high number of rough categories and renounces to details. The destination of that is to look for differences between comparable societies, nations or in context of the globalisation debate between transnational regions.

2. Most different systems design: This method covers a statistic organisational comparison of particular systems and structures. The starting point of classification are different aspects and categories; destination is to examine similarities between societies, nations or regions. In opposite to the most similar systems design this method compares a low number of categories and considers details.

Both methods include advantages and disadvantages. The most similar systems design is able to find out differences of countries which seem to be similar in the first view. But the rough categories could cover the risk to overlook differences which could be very important. For example: Both U.K. and Germany are parliamentary democracies or representative democracies with a long history of immigration. But in case of policies and decision processes including the migration policies it is important to consider that U.K. is a central state changing actually in direction to more federal structures. Till today the central state regulates and executes the immigration policy, acts, and laws. Federal structures will be changing and distributing responsibilities **(Steve! Is it right?)**. Since 50 years Germany is a federal state with some tendencies to more centralisation in the last 10 to 20 years. Actually there is a discussion to stable again the role and the political responsibility of the Bundesländer. Thus in Germany the alien law is a federal law, and the asylum right is part of the bill of rights in the Constitution (Grundgesetz). But parts of the executive orders are the task of the Bundesländer.

The most different systems design do not know risks like these, and you are able to examine comparable conditions and structures between apparently different societies. For example: the migration situation of new immigration countries and old immigration countries. In the first view they are very different in their migration development concerning migrants from foreign countries. But if you consider regional disparities, the structure of internal migration, and new immigration and meanwhile the demand of the labour market within the countries like Spain and Italy you find similar conditions between old immigration countries and the richer regions of the north in the new ones. On the other hand the most different systems design with its low number of categories runs risk to lose sight of superior structures and conditions like influences of different democratic histories and developments or political systems.

In consideration of the advantages and disadvantages we want to combine both methods. We are starting with the most similar systems design and with rough classifications of similar structures and developments in U.K. and Germany: democratic systems, long tradition of immigration, dependencies between immigration and demand on the labour market etc. Comparing these classifications we want to examine the differences: influences of different political systems, of different historical reasons of immigration, different laws and political reactions to

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[2] see also B. Agozino, 2000.

migration. Last but not least we are focussing to the different industrial relations in both societies, and the integration and antidiscrimination policy of trade unions. In this part of the research we are disposing of some most important differences in detail. This is the point to continue with the most different systems design and to verify our thesis in view of the trade-unions policy and chances to prevent xenophobia and racism on the shop floor and in the society in general. Our first thesis says that we will find on one side very different conditions, developments and national reactions of immigration in the both countries. On the other side there are similarities in case of the life situations and labour positions of ethnic-cultural minorities in the different periods of immigration. Our second thesis means that the trade unions as well in U.K. as in Germany reacted late to the situation and really opened their organisations for the ethnic-cultural minorities just in the 1970s, well then twenty years after the beginning of immigration. One result is that there is a backlog till today to integrate the minorities and that the conflicts between minorities and majorities are defined as ethnic. After the backlog trade unions are concentrating on the "old migration groups" of the 1960s and 1970s and mainly on male immigrants as blue collar workers in industry. They neglected new groups and the special situation of female immigrants in the service and informal sector.

We do not want to blame the trade unions to be responsible for the situation but immigration is regulated and orientated on the labour market. Antidiscrimination policy in this segment of society is a central aspect of integration and reducing conflicts. This segment is the base of trade-unions representation of interests.

The combination of most similar systems design and most different systems design methodical looks like a "funnel design" because we are beginning with rough and superior categories and political levels, selecting some important and more nicer differences, and receiving as result a mix of influences and conditions of the trade-unions policy in U.K. and Germany.

Independent of this methodical decision we have to consider two further problems:

1. *Galton's problem of comparative studies*: This problem is named on a British social anthropologist, who formulated that fundamental dilemma more than hundred years ago (1889, p. 272). It means: If there are similar phenomena in different societies, can they be explained functionally; are they necessary results of special structures or not? A very good example in this case is the question, if liberal or restrictive migration policy is depending on the development of the demand on the labour-market. Maybe the phenomena also could be results of political decisions of social élites to adapt structures or of taking over polities and structures from foreign countries and from other frames of reference, because the effects look like advantageous. In present the European integration demonstrates this dilemma of comparative researches excellently: In context of the "harmonisation" in the European Union the member countries will be following a tuning and partly a common immigration policy (pacts of Schengen and Amsterdam). Such a thing within the European Trade-Union Congress there are existing discussions about common strategies of trade unions to prevent racism in the context of collective bargaining. In researches you can not control in each case, if there will be shown parts of the Galton's problem. In our comparative study about migration systems and trade-unions policy in U.K. and Germany this dilemma is omnipresent. Thus we generally have to consider it, especially quite recently (EU). Consequently we have to ask for the reasons why trade unions seem to react similar and what are their central points of orientation: the situations of immigrants, of whites, of plants, the structures of the labour markets and/or the experiences of foreign trade unions.

2. *Problem to define ethnic-cultural or racial groups*: By differentiating ethnic-cultural and racial groups, maybe we will construct phenomena out of social processes in sense of the critical voices in the debate on multiculturality (s. Chapter 1). But actually there are no alternatives because in attitudes we are finding differentiations like "whites and blacks", "British / Germans and aliens/ foreigners". On the shop floor or in the neighbourhood peo-

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ple identify distinctive races and ethnies. In policy, acts, and laws we observe combined and complicate systems of classifications of dualism and of definitions of distinctive groups. Attitudes and policies are our focus, thus we have to consider these categories as social constructions. But, nevertheless, we need the definitions of majorities and minorities to investigate, if there exist special life and professional positions. This is only one side of the problem. The other side is that in our opinion the critical voices are justified. Therefore to operate with the social constructions can be only the first step. The second step has to be to deconstruct the constructed groups: by analysing, we have to check if their situation could also be explained by others than ethnically structured reasons and perhaps (in hole or partly) could be integrated into categories of social structure of both societies. This method of two steps offers the opportunity to examine not only different but similar life conditions of special social groups and classes of majorities and minorities. Than we are able to look for the effects of trade-union policies to reduce or to prevent racism and xenophobia.

3. Immigration to U.K. and Germany - Similarities and Differences.

Included France U.K. and Germany are the most important destinations of migration in Western Europe[3]. In Germany the immigration era was beginning directly after the World War II, and in U.K. a short time later. That period was characterised by economic crisis with big structural problems, problems of public assistance, and high unemployment figures because of effects of the war. The political strategies of the post-war governments were very different: The British Labour Government (since 1945) prefered a policy of nationalisation of banks, airlines, and parts of the metal industry, and more public welfare. The following Conservative Governments could attach to these fundaments of the Labour policy. The Western German Conservative Government (since 1949) started in that phase a more stronger policy of restoration the capitalist system combined with elements of public welfare. That policy was influenced by the "Marshall-Plan" of the Western allies, and the reconstruction of a democratic political system and national state after the fascism. Because of these reasons the post-war development of both societies was temporally different. The British inhabitants perceived the early 1950s and the following years as a golden period, as "affluent society" because of growing private consume and of full employment. That was independent of the situation of the whole economy, the stop-and-go policy, and the Suez crises. But 1963 the situation on the labour market began to be get worse: there existed around 800,000 unemployees, and a structural economic crises became obviously. That was comparable with the situation exactly ten years later in Germany when the unemployment figure received the number of 1 Mio. because of structural economic problems, too. Germany had its "golden era" of social and economic prosperity between the end of the 1950s/ the beginning of the 1960s and the beginning of the 1970s. That was also independent of economic-market fluctuations in the first part of the 1960s.

In result the social and economic development in U.K. and Germany in the post-war era was temporally different but structural similar. It is interesting is that in both countries still are dependencies between immigration and demands on the labour market, and similar aspects in the migration policy: liberal migration policy in time of economic prosperity, full employment and a high demand of male workers in industry; a restrictive policy in time of economic crises and growing unemployment figures. In that period immigration functions mainly through family reunification. Quite recently in U.K. we observe a discussion on refugees and the right of

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[3] Countries like Switzerland, Belgium, Monaco, Luxembourg, or Liechtenstein have higher rates of immigrants. But they are historical escpecial cases of immigration countries, and they are not comparable with the other countries in Western Europe.

asylum which looks like the debate in Germany in 1992 and 1993. The actual law from April 2000 has the same orders than in Germany. That debate in both countries are emotional and not dependent on the real immigration situation[4]. In both societies it evoks racism and negative attitudes against foreigners especially in social groups which normally have no contact to refugees, or in regions where no refugees are living. Perhaps Germany will have a new debate on asylum in the nearly future. Starting point would can be the discussion on an immigration law - the first one in Germany. This law shall regulate what kind of groups, more exactly: what kind of unskilled or skilled employees needs the labour market, and in which quota. The danger is, that with an immigration law the individual right of asylum in the Grundgesetz could be fallen.

Thus in a rough perspective immigration and migration policy in U.K. and Germany are orientated mainly on the economic development and the labour market; in this case are similarities between both. But if we are looking to the courses and the structure of immigration, we will find some important differences.

Table 1. Types of most important groups of immigrants since World War II in U.K. and Germany

Types	U.K.	Germany
1. Colonial or post-colonial migrants,	**X**	
2. ethnic migrants (migrants of same ethnic affiliation),		**X**
3. migrant/foreign workers and their families,		**X**
4. refugees (with asylum, de-facto refugees, refugees of civil wars)	**(X)***	**X**
5. other migrants		
6. continental migrants from Europe,		**X**
7. transcontinental migrants from Africa, Asian or America.	**X**	**(X)***

Categories partly from H. Fassmann/R. Münz, p. 18 and own completions.
* These are actual tendencies.

The first immigration period in Germany after the Word War II started very early at the end of the 1940s, when "Aussiedler" or "Vertriebene" from Oriental Europe, and a little bit later "Übersiedler" from German Democratic Republic (GDR) came to the occidental Federal Republic (s. type 2 in the table 1). Out of the Grundgesetz from 1949 these groups are Germans, but in the German migration research it is undisputed that the first two groups are immigration groups and that they have especial problems of integration. These problems have three perspectives which are quite recently important: (1) In the German majority was existing only a low acceptance because there dominated the opinion that "Aussiedler" got to much (financial) helps and had more advantages than ordinary Germans to find their living standards in time of post war, and of bad public assistance. The first generations of "Aussiedler" and "Vertriebene" directly after the World War II were building their houses in separated residential districts or were living in separated blocks of flats. Till today - more than 50 years later - they are not really accepted and integrated, especially in village communities. (2) The living situation and cultural background of "Aussiedler" from Russian or Kasachstan are very different to the situation in Germany. Especially young people have problems to establish themselves. (3) This perspective is strongly connected with point 2: The German society sets very high de-

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[4] Since the end of the 1990s U.K. has the highest figure of refugees in the EU after Germay but related to the numbers of inhabitants U.K. is standing only on the 9th point in Western Europe.

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mands on the integration power of the "Aussiedler" because they have to be "Germans" - thus the argumentation.

The immigration of these groups interrupted in 1962 when the "Iron Curtain" was fallen between the occidental and oriental part of Europe. At the same time the German Government had started to recruit foreign workers, called "Gastarbeiter" (s. type 3 in the table 1), firstly from Italy, Spain, Portugal, and Yugoslavia, later from Turkey. That was the starting point of the second period of immigration. And it was the time of economic prosperity, and full employment. In that period mass production was developed and the Taylorism in industry had become the dominated production concept. Thus there existed a high demand of unskilled workers in industry. The German workers were taking place in skilled jobs. The immigration of "Gastarbeiter" for unskilled jobs meant social mobility for German blue-collar workers. Thus the labour market was characterised by strong segmentations.

During that time most of the immigrants were men. The earliest groups were workers with high education and vocational qualification; the later groups were mainly without any vocational training. That was regulated from the emigration countries to avoid brain drain. In 1973 when the economic crises and the unemployment figure was growing rapidly the government stopped the recruiting of foreign workers.

At that point the immigrants had to decide if they wanted to stay in Germany and fetched their families, or to remigrate to their origin countries. Because after the recruiting stop only family members of "Gastarbeiter" were allowed to immigrate to Germany, and in case of remigration they lost the right to come back to Germany again. That was temporally the point of no return: Germany became definitively an immigration country with ethnic-cultural minorities who stay permanently. The joke of the story is that Germany never wanted to be an immigration country but the restrictive policy effected exactly that opposite development.

In the 1980s many Spanish and Italian people migrated back to Spain and Italy because the economic situation was coming apparently better there, and these countries became members of European Union; since then their inhabitants have unrestricted opportunities of mobility.

The second period of immigration finished at the end of 1980s when the third one was beginning. Till that time around 15 Mio. "Vertriebene", and "Aussiedler" were immigrated to Germany. Additional to that, 4,8 Mio. members of other ethnic-cultural minorities like the foreign workers and their families were still staying in the old Federal Republic. All together around 30% of the inhabitants in Occidental Germany were immigrants (s. K.J. Bade, 1992, p 16).

In the third period, after the unification of the two German states and when the "Iron Curtain" was opened, "Aussiedler" came again from Eastern Europe. They are till today the biggest group: In the 1990s between 20% and more than 30% of all immigrants were "Aussiedler" (in comparison 1980: less than 8%; s. U. Birsl/S. Ottens/K. Sturhan, 1999, p 55). In this period which is during till the present, the figures of refugees are increasing, too (s. type 4 in the table 1). Some of them are asylum seekers (Article 16 of the Grundgesetz), others are de-facto refugees, or victims of the civil war from former Yugoslavia. At the beginning of the 1990s there were around 200,000 refugees per year who applicated asylum, actually the immigration figure of refugees is decreasing to 70,000 per year. Since the end of the 1980s till today less than 10% are receiving right of asylum. The rates of acknowledgement supple between 3,2% and 9,4% per year (s. Beauftragte der Bundesregierung für Ausländerfragen, 1997, p 282).

In the 1970s more than 90% of all refugees were coming from other European countries. Since the beginning of the 1980s the part of transcontinental immigrants is growing. Meanwhile nearly 25% of all refugees are immigrating from other continents. Thus the migration system in Germany is changing.

Meanwhile 7,3 Mio. members of ethnic-cultural minorities (without "Aussiedler") are living in Germany. The biggest group are the Turkish people. Nearly 97% of all foreigners are staying in the Western Bundesländern, this is a little bit more than 10% of the inhabitants (s. U. Birsl/S. Ottens/K. Sturhan, 1999, p 48).

Till today the majority of immigrants to U.K. are coming from states of Commonwealth; they are transcontinental migrants (s. types 1 and 7 in the table 1). Just during the 1990s the figures of refugees of civil-war countries like former Yugoslavia or Sri Lanka are growing more perceptible (s. type 4 in the table 1). These figures are similar to Germany now.

Actually there are living more than 3 Mio. members of ethnic-cultural minorities in U.K. (without Irish people). That is according to 5,5% of British inhabitants. The biggest groups are African-Carribeans, African Asians, Indians, Pakistani, and Bangladeshi of (post)colonial states. The majority of them were firstly men. Later in the course of family reunification more women immigrated. In the present the family reunification is the dominated way of immigration: Between July 1998 and June 1999 70% of all rights of settlement were given in case of that (s. K. Jackson/T. Chilton, 1999, p 9). The minorities immigrated temporally shifted:

Table 2. Dominate periods of Immigration (biggest minorities)

Minorities	Periods	Percentages of all members of a minority group
African-Carribeans	1950-1970	84%
African Asians	1960-1980	85%
Indians	1960-1980	74%
Pakistani	1960-1980	70%
Bangladeshi	1970-1990	80%

Source: T. Jones, 1996

It means that the majority of British immigrants were coming in periods of economic crises and unemployment. Only the African-Carribeans were coming in the post-war time of economic prosperity. Means it, that in U.K. the immigration proceeded against the labour-market development? It is right, that the majorities of the most important migration groups were coming in time of bad situation on the labour-market, but when we are looking to the balance of inward and outward migration the statistic shows us that in time of economic crises at the beginning of the 1960s the balance was mainly negative till 1988 included. Just during the 1990s more people immigrated again to U.K. than emigrated (s. Office for National Statistics, 11 November 1999).

In opposite of Germany Britain's ethnic-cultural minorities do not find only bad or unskilled jobs, but their opportunities on the labour market are different. There exists an interesting development starting in 1980s:

> "There has been important developments in the distribution of ethnic minorities between job levels. The LFS data suggest that by the end of the 1980s, the proportion of Chinese, African Asian, and Indian male employees having jobs in the top category (...) was as similar or higher than for white men. As shown by the earlier surveys, the job levels of Indian men are more polarised than those of white men (...). African Carribean men, as before, tend to be concentrated in skilled manual jobs, while Pakistani and Bangladeshi still tend to be much lower job levels than white men" (T. Jones, 1996, p 84).

The reason for the better labour-market position for male immigrants in comparison with Germany is that British immigrants came from former colonies, where many of them, especially the first immigration generations, were English speaking people, and they got British education in their countries, being used to British culture and habits[5].

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[5] The position of female immigrants in comparison of both countries have to be analyse in detail, too.

Naturalisation for the first immigrants to U.K. was without problems, because they had been citizens of the Commonwealth and therefore they had all political rights. With the Commonwealth Immigration Act 1962 there was made a difference between citizens of the U.K. and its colonies on the one side and citizens of the independent Commonwealth-states on the other side. Only people born in U.K. or people with passports, issued by the British government had the right to enter the country. With this law the British government set up an ethnic legislation (s. N. Räthzel, 1994, pp. 226f.). But on the other hand, migrants settling in U.K. became British citizens automatically after five years. This is the reason why most migrants are British citizens. But in the last years the rules for naturalisation had become more restrictive (British Nationality Act 1981, Immigration Act 1988 (?)).

Whereas in U.K. the understanding of citizenship was impressed by the colonisation and ius soli, in Germany the understanding of citizenship was orientated on origin (ius sanguinis). Till now in Germany naturalisation is considered as the last step of integration into the native community. Therefore naturalisation had always many hurdles. Till the beginning of the 1990s there was no claim to naturalisation, it was a willing act of the state. That was changing in 1993. People got the opportunity of naturalisation after 15 years and young foreigners after 8 years. Since January 2000 all foreigners - independent of their age - can applicate the German citizenship after 8 years, and children, who were born in Germany get this citizenship automatically in addition to the citizenship of their parents. When they will be 22 years old, they have to decide, which passport they want to have further on.

All these analysed aspect of the migration courses and systems in U.K. and Germany show especially the differences. But in the result there are some important similarities respective tendencies of adaptions between both countries. If we are on the way of Galton's problem now, we will not be able to decide in each case if we observe endogenous aspects or kinds of policy which are assumed. The most important tendencies of adaptions are:

- Actually similarities referring to the rights of asylum seekers. The German way to reduce the figure of asylum application could be the model of the British policy now.
- General tendencies to stop migration. This is the result of the labour market orientation in migration policy in both countries. But in Germany there is actually a discussion about "Green Cards" for high educated specialists from Indian in the industry of information technology and there are consequently first voices which require an immigration law. In present this and the first point is still influenced by the "harmonisation" of the general migration policy in the European Union.
- Tendencies to adapt the fundamental consideration of citizenship. It means that U.K. loosens the principle of ius soli and German that of ius sanguinis.
- In U.K. the rates of European immigrants (refugees) is increasing, and in Germany the rates of transcontinental immigrants. Both migration systems are in a phase in which the structure of immigrant groups is changing. Maybe the statistic relation between continental, or better: European immigrants and transcontinental immigrants would be similar in both countries in the future.

The last point could be very interesting because of the ethnic or racial classification in context of conflicts, xenophobia, and racism. Actually in Germany we have in this case the dualism "Deutsche-Ausländer" respective "Germans-Aliens", an aliens are mainly whites. Thus racism on basis of colour of skin is not the dominate problem. If the transcontinental immigration will be growing further, and more black people will move inward Germany, a new classification could become important: "Whites against Blacks" like still in U.K. Over again in U.K. the discussion about right of asylum shows first steps in direction of a classification like in Germany, because the majority of asylum seekers are not blacks, but whites. Racism because

of the colour of skin could be than only one issue of xenophobia. The phenomena would be more differentiated in both societies.

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