

Study No. 13

**From Asylum Seeker to Refugee
to Family Reunification**

**Welfare Payments
in These Situations
in Various Western Countries**

Hans Hansen

The Rockwool Foundation Research Unit

Copenhagen 2006

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Preface

For nearly ten years now the Rockwool Foundation Research Unit has been looking at the life circumstances of non-Western immigrants, with a particular focus on their integration into the labour market. As a complement to this research, there has been an interest from the outset in the rights of this group of people under social security systems. Non-Western immigrants and their descendants in Denmark currently have an employment rate which does not exceed 50%, and consequently it is necessary to consider transfer incomes in order to obtain a comprehensive overview of their life circumstances.

In connection with the expansion of the studies of immigrants' life circumstances to include Germany, we have, with the help of Hans Hansen PhD, a consultant from the Danish National Institute of Social Research, studied the rights of non-Western immigrants in the two countries from a comparative point of view (see *Social Security Benefits in Denmark and Germany – with a Focus on Access Conditions for Refugees and Immigrants* (Hans Hansen et al., 2002)).

When the Board of the Rockwool Foundation requested the Unit to produce a book about immigration to several Western European countries with different welfare structures, it seemed appropriate to ask Hans Hansen to help us once again with another comparative overview, since he had already written several well received international comparisons of social security benefit schemes.

This report provides a comparative overview of the welfare payments to which asylum seekers, refugees and reunified families are entitled in various industrialised countries, as well as of the regulations governing access to these benefits. Geographically, Hans Hansen's study includes Denmark, Germany, Sweden, Great Britain, the Netherlands, Italy, and Canada, all of which are highly developed Western welfare states, but which have differently structured welfare models.

Hans Hansen's calculations of the absolute levels of payments have also been used in *A Comparison of Welfare Payments to Asylum Seekers, Refugees, and Reunified Families. In Selected European Countries and in Canada* (by Torben Tranæs, Bent Jensen, and Mark Gervasini Nielsen), which is being published at the same time as this study. In that publication, the Research Unit has used Hans Hansen's data in various ways: for example, to compare the purchasing power of the benefits in the countries mentioned with incomes in Turkey, a source of many immigrants to Western Europe.

I would like to thank Hans Hansen once again for letting us make use of his extensive work and comprehensive knowledge of the area. Thanks also to the Research Unit Secretary, Mai-britt Sejberg, who proof-read the manuscript and made the layout for printing. Finally, I would like to express my gratitude to the

Rockwool Foundation and especially to Tom Kähler, Chairman of the Board, and Poul Erik Pedersen, Director, for their continued great interest in the work of the Unit – including the preparation of this volume.

Copenhagen, September 2006

Torben Tranæs

1. Introduction

The purpose of this study is to compare the social benefits to which asylum seekers, refugees, and members of reunified immigrant families are entitled in selected welfare-state countries. The Rockwool Foundation Research Unit has for a number of years been concerned with the life circumstances of non-Western immigrants and with their integration into the labour market, and this study forms a part of this general project.

The basic principle of this study is to follow the progress of an asylum seeker through the system with respect to access to basic public support, i.e. to social assistance and like payments, in Denmark, Germany, Sweden, Great Britain, the Netherlands, Italy, and Canada. The following situations are assumed to occur:

1. The asylum seeker arrives in the country and is found accommodation. In some countries this will be a centre for asylum seekers, in other countries a different type of accommodation will be provided. The amounts received by the asylum seeker in the form of public transfer payments are listed.
2. The asylum seeker is recognised as being a refugee and is granted a residence permit. The amounts received by the refugee in the form of public transfer payments are listed.
3. The refugee is reunited with his or her family, which is assumed to consist of a spouse and a child. The amounts received by the family in the form of public transfer payments are listed.
4. The process is followed until the point where the family becomes entitled to benefits in line with those received by citizens of the country, and the amounts received by the family in public transfer payments are listed. This phase is not relevant for all countries.

A succession of events is thus assumed, but they are regarded as taking place within the same year, in that the benefits are calculated according to the rates for 2003. The findings can also be interpreted as concerning different people in the situations of being asylum seekers, refugees and reunified families in 2003. Only personal transfer payments are counted; housing benefits are with a few exceptions not included. Nevertheless, an account is given as far as possible of access to benefits related to housing. As has already been indicated, such an accounting can be made by several different methods, and these are discussed in the following section.

2. Methods

The calculations presented below are based on the methodology used by the OECD in this field. The results are initially based on the OECD's 'Take Home Pay' concept, which is defined as follows:

$$\begin{aligned}
 & \text{Gross income} \\
 & - \text{Taxes and social security contributions} \\
 & + \text{Any child benefits} \\
 & = \text{Take Home Pay}
 \end{aligned}$$

Clearly this is a very simple method of calculating income which only includes a few items. The calculation of taxes is also greatly simplified; only standard allowances and credits are included, and social security contributions include only compulsory payments to public schemes. Even here, however, there is room for various interpretations. For a Danish citizen in employment, the OECD includes, for example, contributions to unemployment insurance among the social security contributions, even though such payments are not obligatory in Denmark. However, the type of people that concern us in this study, asylum seekers and refugees, are not attached to the labour market when in the situations that we examine here, and thus do not make contributions to unemployment insurance, etc.

The simple Take Home Pay concept of income is very well suited for studying the situation of asylum seekers and refugees when they receive basic income transfers. It is assumed that they do not have any other income or savings – an assumption which is very likely to accord with reality.

It has been noted that Take Home Pay does not take account of housing costs or transfer payments to cover such costs, for example in the form of housing benefit paid to individuals. This is not a great problem in relation to asylum seekers, who live 'free of charge' in asylum centres or the like in most countries. This is not the case in Canada; but here a special allowance is paid which it is assumed covers the cost of housing.

As far as refugees and members of reunified families are concerned, the calculation problem is somewhat greater, in that these groups generally find and pay for their own housing. In most countries, however, when refugees and the members of their reunified families receive welfare benefits (social assistance), as is the situation in this study, costs of housing within reasonable limits (which means the full cost in most cases) are paid through a special housing supplement or housing grant. This is not the case in Denmark and the Netherlands, where the basic social assistance payments are intended to cover a part of the costs of housing. For these two countries, therefore, a correction is made; see the section on the situations in Denmark and the Netherlands. A figure for the outlay for

housing is deducted from the basic social assistance payments after taxes and social security contributions, so that these basic social assistance payments are comparable with the payments in other countries. These corrections cannot be applied in a general manner, but are based on specific preconditions. Despite this weakness, it is believed to give a more accurate picture if these corrections are made than if they are not, even though this does give rise to certain problems of consistency, as described later. In the case of Canada there are fixed upper limits to the housing supplement, depending on the size of the family. It is assumed here that the actual costs of housing can be held within these limits. In Italy there is regional variation in the proportion of housing costs that can be covered by the housing supplement. This means that the uncertainty of the results for Italy is significantly greater than for other countries.

The alternative to the methods used here is to include in the calculations the actual costs of housing for refugees and members of reunified families in all the countries covered. However, the lack of both data and resources makes such a procedure impossible in connection with this study. The calculations made can be interpreted in two ways. One interpretation is to regard the calculations for five of the countries as reflecting Take Home Pay, while corrections are made for the two other countries, Denmark and the Netherlands, in order to bring the bases of the results for these countries as close as possible to those for the others. This is a rather strained interpretation of Take Home Pay, in that the corrections are made with respect to housing costs, which are not taken into account in the standard Take Home Pay concept. The other possible interpretation is to regard the calculated amounts as reflecting what each individual or family has as disposable income after deduction of tax and social security contributions, with the addition of any child support, and after housing has been paid for, whether fully through housing supplement or partly through housing supplement and partly through payments out of income (this last being the case in Denmark and the Netherlands).

The results of the calculations of payments to asylum seekers, refugees and members of reunified families are measured against the Take Home Pay for each country's Average Production Worker (APW) and for a 2/3 APW, i.e. a person with two thirds of the gross income of the APW. If we use the first interpretation of the calculations for asylum seekers and refugees, there are no consistency problems: Take Home Pay is being used in both cases. If, however, we use the second interpretation, the disposable income, then there is a problem, in that it is in principle inconsistent to use two different concepts of income in the same measurement: disposable income for asylum seekers and refugees, and Take Home Pay for the APW. Ideally, a similar correction should be made for housing costs covered out of income for the APW and the 2/3 APW. It is implicitly assumed in the concept of Take Home Pay that the person's own contributions to the cost of housing are zero. If we assume that the individual's payment towards housing costs affects Take Home Pay in the same manner in all countries, there

is no longer any consistency problem. This would be the case if, for example, contributions to the cost of housing made up the same percentage of Take Home Pay in each country. This is a rather awkward assumption to have to make, but nevertheless this is what is required if it is to be meaningful to use two different concepts of income in the same measurement. In the calculations made, it is assumed that the individual's own contribution to housing costs is zero percent. This is obviously a rather extreme assumption, but using any other percentage (provided it was the same for all countries) would not alter the relationships between the measurements, but only their levels. The assumption used here results in the lowest possible levels for the calculated relationships between the two income situations.

The APW mentioned above is a statistical construct, used by the OECD and others as an international reference point. The construct is documented in the OECD's annual publication *Taxing Wages*.

The APW income is the average salary received by a worker in full time employment in the manufacturing sector in a given country. The wage is calculated as a weighted average of the wage for male and female, skilled and unskilled workers. Holiday pay and overtime payments are included. This average income is identified with a person, the APW, who is neither ill nor unemployed in the year for which the calculation is made.

The APW's average income varies from country to country, for example because of differences in national levels of productivity and differences in the effects of the taxation system. Countries with high social security contributions by employers normally have a relatively low gross income.

The strength of the APW construct is that it gives a gross income, and after deduction of taxes and social security contributions also a net income, here described as Take Home Pay, for people with broadly the same work functions, namely employees in the manufacturing sector. The APW thus provides an income of a person in employment which can be used as a reference point to which to relate, for example, public transfer payments – in this case the benefits paid to asylum seekers and refugees. Such a comparison gives an impression of the size of the income transfers (after tax and social security contributions) in relation to a well-documented measure of employment income in the country, also measured after tax and social security contributions. This can be taken as an indication of the net replacement rate for employment income provided by the income transfers. This is the method chosen for this study, because it would appear to be the most relevant to measure the standard of public transfer payments as a rate of replacement compared to a relevant employment income, here represented by the APW income and the 2/3 APW income. This is the case despite the interpretation problem described above with respect to bringing housing costs into the calculations. As already stated, this may mean that the actual

net replacement rate is not correctly indicated, but the relationships between the rates in the various countries are indicated correctly if individuals' payments towards housing costs affect Take Home Pay equally, i.e. by the same percentage.

Relative measures, as described above, are not the only possibility. Absolute measures are also possible. The net amounts of Take Home Pay calculated for the various situations are calculated in the currency of the country concerned in each case. These figures can be converted to a single currency, usually the US Dollar. This is done not by taking the official exchange rates, but by making a calculation of purchasing power expressed in USD. This is called a correction for purchasing power parity. Italy, the Netherlands, and Germany, which all use the euro as the national currency, each have different exchange rates against the dollar measured in purchasing power. The OECD calculates such 'purchasing power parities', and their figures can be used in the recalculation. After such a recalculation has been carried out, the amounts can be ranked, and it is possible then to see which country provides the largest payments.

There is no completely problem-free method of making such comparisons – not even the 'purchasing power parity' method. The calculation according to this method assumes an average or other pre-stated pattern of consumption, and it is certain that asylum seekers and probably also refugees in receipt of welfare payments deviate to a greater or lesser extent from such a norm. For example, an asylum seeker will not derive much immediate advantage from the fact that cars are relatively cheap in Canada and Sweden, nor yet have a great problem because they are relatively expensive in Denmark. Despite the problems, net replacement rate calculations have been chosen for this study. When comparing social security systems, in this study primarily social assistance schemes, for different countries, it is important to be able to refer across countries to a comparable wage for roughly the same type of work. This method can also help to reveal any possible incentive problems in relation to taking paid employment in preference to receiving social security payments, or to demonstrating the generosity of the social security payments, if one prefers to look at things that way. It should however be borne in mind that the assumption of zero percent costs for housing in the situation of the APW leads to the lowest possible net replacement rate being calculated. If the net replacement rate based on an assumption of zero percent housing cost is 50%, the rate will be 62.5% if an assumption is used that Take Home Pay is reduced by 20% through payments of housing costs.

3. The Situations in Denmark

3.1. The Asylum Seeker

An asylum seeker arriving in Denmark in 2003 and accommodated in a standard asylum centre would receive after registration (which it is assumed would take place very quickly) a daily allowance of DKK 40.71, plus a supplement of DKK 23.75 for work done at the centre, thus DKK 64.46 per day in total.

On an annual basis, this amounts to a payment of $365 \times 64.46 = \text{DKK } 23,528$. This is lower than the standard personal income tax allowance in Denmark, so no income tax would be payable. It is assumed that no social security contributions are levied on the payment.

The asylum seeker is housed at the centre, but must meet all other costs, including costs for food, out of the allowance received.

In 2003 a Danish APW, the OECD's average Danish industrial worker, had an income after tax and social security contributions of DKK 182,589, while a person with an income of 2/3 that of the APW had a 'Take Home Pay' of DKK 128,090. This means that the asylum seeker received 13% of the APW income after tax and social security contributions, or 18.5% of the income of a person with 2/3 of the income of an APW after tax and social security contributions.

3.2. The Refugee

When an asylum seeker is granted asylum, he or she receives a residence permit and is accorded the status of a refugee. The individual is now dealt with under the law on integration, and the designated home municipality takes over responsibility for the refugee with reference to the introduction programme. The person now has the right to a special introductory allowance, if there are no grounds for other forms of support. However, the municipality first takes over responsibility for the refugee from the end of the first complete month after the granting of a residence permit. Until then, the refugee continues to live at the asylum centre and receive the daily allowance and supplement.

Once the municipality has taken over responsibility, the refugee can upon application receive the introductory allowance, though first for the month from which the municipality takes over responsibility. Since the introductory allowance is paid in arrears, there can be as much as a month when there is no support provided. For that month the refugee may receive a special introductory allowance, which was DKK 4,366 in 2003; otherwise he or she receives the standard introductory allowance.

For 2003 the refugee would thus receive DKK 4,366 in special introductory allowance plus $12 \times 4,366 = \text{DKK } 52,392$ in ordinary introductory allowance, i.e. DKK 56,758 in total. This amount is taxable, and after tax and social security contributions there remains a disposable income of DKK 48,118. The refugee must meet all expenses out of this amount. Housing benefits can be granted in accordance with the relevant rules, and a housing allowance may also be granted in some cases and within specified limits. In the calculations above, the rates used are for a married person, even though the spouse does not live in the country. It is also assumed that the couple's children are not living within the EU, and therefore no provider allowance for children can be included. The Ministry of Integration has confirmed that this is the correct way to proceed in the calculations.

The introductory allowance then represents an income after tax and social security contributions which is 26.5% of that of the APW, and 37.5% of the 2/3 APW income.

However, the social security appeals tribunal has just made a ruling in a case concerning social pensions in which weight was placed on the fact that the claimant's spouse was not actually living in the country with the claimant, and consequently the claimant was given the full pension of a single person. In the light of this ruling, the figures for the introductory allowance have been recalculated as follows.

A single person's allowance was DKK 4,366 plus $12 \times 5,266 = \text{DKK } 63,192$, i.e. a total of DKK 67,558 DKK in 2003. After tax and social security contributions, the amount was DKK 54,694. The introductory allowance then represents an income after tax and social security contributions which is 30% of that of the APW, and 42.5% of the 2/3 APW income.

Before the introduction of the special starting-out support system (in July 2002) and thus a change in the introductory allowance, refugees received the equivalent of normal social assistance payments. Social assistance payments in 2003 after tax and social security would have provided 40% of APW income, calculated in the same way, and 57% of the 2/3 APW income.

3.3. The Reunified Family

When families are reunified, there is a requirement that the person living in Denmark should be in a position to support the other family members. This means that the refugee's spouse and children coming in to the country are not immediately able to receive an introductory allowance in their own right. The municipal board may however make a support allowance based on the introductory allowance that the spouse would have received had he or she been entitled to it. It is therefore assumed here that the married couple receives an allowance

equivalent to the introductory allowance. The Ministry for Integration has confirmed that this is indeed the situation that pertains when one of the couple has refugee status.

The resident alien with refugee status would receive at 2003 rates an allowance of DKK 4,366 x 12 = DKK 52,392. After tax and social security contributions, the amount would be DKK 45,014.

The spouse coming from abroad, here assumed to be the mother, would receive $12 \times (4,366 + 1,092) = \text{DKK } 65,496$, of which DKK 1,092 is the monthly provider allowance for the child. After tax and social security contributions, the amount would be DKK 53,425.

The couple would thus have DKK 117,888 in annual gross income, DKK 98,439 after tax and social security contributions. In addition there would be child benefits of DKK 11,700 for a four-year-old child, thus a disposable income of DKK 110,139 in total. Housing benefits can be granted in accordance with the relevant rules, and a housing allowance may also be granted in some cases and within specified limits.

This amount of disposable income, exclusive of child benefits, represents 54% of the income of the APW, or 77% of the income of the 2/3 APW. When child benefits are payable (both for the reunified family and for the APW and 2/3 APW) then the percentages are 56.5% and 79% respectively.

After receiving an introductory allowance for three years (from the time in which the municipality takes over responsibility), the payment changes to starting-out assistance, which is identical to the introductory allowance, so there is no change in the level of income.

3.4. The Transition to Social Assistance

After receiving the introductory allowance and starting-out assistance for a total of seven years, the recipient becomes entitled to transfer from the normal social assistance system, which provides for higher payments. Since the spouses will not both have been in the country for seven years at the same time point, then first one, then the other will transfer to social assistance. In the following, the income of the couple is calculated first for the period where the husband is in receipt of social assistance while the wife continues to receive starting-out assistance. Then the payments are calculated for the period when both spouses are receiving social assistance payments.

Social assistance for one spouse, starting-out assistance for the other. There are two cases to consider:

1. If social assistance payments are greater than the sum of what the two spouses would be entitled to under starting-out assistance, no starting-out assistance will be payable to the spouse who would otherwise have received it. Social assistance payments are made just to the one spouse, and nothing to the other.
2. If the social assistance payment is less than the sum of what the two spouses would have received in starting-out assistance, social assistance is paid to the one spouse, and the difference between the social assistance payment made and twice the starting-out allowance for one person (+ provider allowance for the child) is paid to the other.

In our case, $2 \times 4,366 + 1,092$ is less than DKK 10,859, the social assistance benefit paid to the main wage-earner in a family. The family thus receives $12 \times 10,859 - 6 \times 516 = 130,308 - 3,096 =$ DKK 127,212 in gross social assistance benefit at 2003 rates. After taxes and social security contributions, the amount is DKK 104,159. This is approximately DKK 14,000 more than for a single person supporting a family, since the unused tax allowances for the spouse, which can be used by the person with income, have a value of approximately DKK 14,000 in this situation. In addition, child benefits of DKK 11,700 is payable, so that total disposable income comes to DKK 115,859. Housing benefits can be claimed in accordance with the relevant rules, plus housing allowance when applicable and within defined limits. This amount of disposable income, exclusive of child benefits, represents 57% of the income of the APW, or 81.5% of the income of the 2/3 APW. When child benefits are payable (both for the reunified family and for the APW and 2/3 APW) then the percentages are 59.5% and 83% respectively.

3.5. Social Assistance for Both Spouses

The benefit payable for each spouse is DKK 127,212. After taxes and social security contributions the amount is 90,346 per person, DKK 180,692 in total. In addition, child benefits of DKK 11,700 is payable, so that total disposable income comes to DKK 192,392. Housing benefits can be claimed in accordance with the relevant rules, plus housing allowance when applicable and within defined limits.

This amount of disposable income, exclusive of child benefit, represents 99% of the income of the APW, or 141% of the income of the 2/3 APW. When child benefits are payable (both for the reunified family and for the APW and 2/3 APW) then the percentages are 99% and 137.5% respectively.

Net Replacement Rates for Situations in Denmark, Percent

	APW	2/3 APW
Asylum seeker	13	18.5
Refugee, introductory allowance, rate for a spouse	26.5	37.5
Refugee, introductory allowance, rate for a single person	30	42.5
Family, introductory allowance (excluding child benefit)	54	77
Family, introductory allowance (including child benefit)	56.5	79
Family, social assistance benefit/starting-out allowance (excluding child benefit)	57	81.5
Family, social assistance benefit/starting-out allowance (including child benefit)	59.5	83
Family, social assistance benefit (excluding child benefit)	99	141
Family, social assistance benefit (including child benefit)	99	137.5

The net replacement rate is measured in all cases in relation to the income of a single APW and 2/3 APW. In situations where there is a child, standard child benefits are included in the calculations where indicated.

Since the allowances in Denmark are also intended to cover a larger or smaller proportion of housing costs, in contrast to the situation in Germany, Sweden, Great Britain, Canada and in some cases Italy (where housing costs are covered in specific cases), a simple correction has been made: the Danish income levels after tax and social security contributions are corrected for the payments made by the individuals concerned, after deduction of housing benefit and housing allowance payments, for accommodation costing DKK 3,000 per month in the case of a single person and DKK 5,000 per month for a couple with a child. The 'alternative' table is as follows:

	APW	2/3 APW
Asylum seeker	13	18.5
Refugee, introductory allowance, rate for a spouse	12	17.5
Refugee, introductory allowance, rate for a single person	16	22.5
Family, introductory allowance (excluding child benefit)	39	56
Family, introductory allowance (including child benefit)	43	59.5
Family, social assistance benefit/starting-out allowance (excluding child benefit)	42.5	60.5
Family, social assistance benefit/starting-out allowance (including child benefit)	46	63.5
Family, social assistance benefit (excluding child benefit)	72.5	103
Family, social assistance benefit (including child benefit)	74	103

It is not claimed that the adjustment made will be universally correct, since it is based on an assumed cost of housing, but it gives a better picture than the unmodified figures when comparisons are made with other countries where housing costs are covered separately and for the most part in full.

4. The Situations in Germany

4.1. The Asylum Seeker

An asylum seeker who arrives in Germany is accommodated at an asylum centre, and is obliged to live there for the first three months. During this period, the asylum seeker typically receives benefits in kind.

After the initial three months the asylum seeker typically moves to live in a cooperative community or in private accommodation, where he or she receives cash benefit payments and also remuneration for work done in the cooperative. The amounts payable in 2003 were EUR 184 plus EUR 41 in pocket-money, a total of EUR 225 per month. The hourly wage for work in the cooperative (or on public projects) was EUR 1. The typical amount of such work done is not known, but if it is assumed to be 30 hours per month, this means that total monthly receipts would be EUR 255. This is as indicated only an estimate of the amount of work done, but 'real' work is always reserved for those on the official labour market, so that asylum seekers can only provide a supplementary contribution in connection with cleaning, kitchen work, minor repairs and the like. In 2003 an asylum seeker thus received $12 \times 255 = \text{EUR } 3,060$, which amount is below the lower limit for taxation in Germany. Social benefits are not subject to deduction of social security contributions in Germany.

In 2003 a German APW had an income after tax and social security contributions of EUR 19,658, the figure for a 2/3 APW being EUR 14,547.

An asylum seeker thus receives an income after tax and social security contributions which is 15.5% of that of the APW, and 21% of the 2/3 APW income. During this stage, costs of accommodation are met from the public purse.

The benefits described are in accordance with the German 'Asylwerberleistungsgesetz', but they are payable to other groups besides asylum seekers. The recipients are generally people who are expected to reside only temporarily in Germany. These include, for example, refugees who have come to Germany because of civil war in their homeland, asylum seekers who have been refused asylum and are awaiting travel home, and a larger group who cannot be returned home for one reason or other, and are thus a type of *de facto* refugees who have a residence permit in the form of a 'Duldung', which is in reality a kind of suspended deportation order. Transfer payments under the 'Asylwerberleistungsgesetz' are limited to a maximum period of three years; after this, payments are made under the 'Sozialhilfegesetz'.

4.2. The Refugee

When the asylum seeker has been granted asylum and thus achieved refugee status, he or she acquires the right to receive benefit payments in accordance with the 'Sozialhilfegesetz', which are at a higher level than under the 'Asylwerberleistungsgesetz'. It is assumed that the refugee status awarded is accompanied by a residence permit geared towards acquisition of permanent resident status in Germany. It is assumed here that we are dealing with an Article 16A refugee, who in 2003 would receive a permanent residence permit. 'Sozialhilfe' payments are calculated in accordance with the rules for 2003.

Payments to a single person according to the 'Sozialhilfegesetz' were EUR 295 per month in 2003 (based on the actual situation for the first half of 2003 and an estimate for the second half of the year), called the 'Eckregelsatz'. This gives a total payment of $12 \times 295 = \text{EUR } 3,540$.

A refugee thus receives an income after tax and social security contributions (there are none), which is 18% of that of the APW, and 24.5% of the 2/3 APW income.

Comparison with the equivalent Danish allowances (introductory allowance, starting-out allowance, social assistance benefits) is somewhat problematic, as the German benefits are intended to cover fewer outgoings than the Danish. The German payments are only intended to cover everyday expenses, while housing costs are paid for separately and in full. This is not the case with the Danish payments, which are intended to cover at least a part of the costs of housing. This disparity means that the calculations presented here show too low a net replacement rate for the German situations in comparison with the Danish. A correction has therefore been made to the Danish benefit payments, as described at the end of the section on the Danish situations and in the section on methods.

4.3. The Reunified Family

A foreigner with refugee status living in Germany has the right for his or her spouse and children to live in the country too. If refugee status is granted under Article 16A of the 'Grundgesetz' there is no requirement that the refugee be able to support the reunified family. From January 1, 2005 this also applies in the case of convention refugees, under the terms of the 2004 Aliens Act in Germany ('Zuwanderungsgesetz'). This means that in 2003, the whole family was entitled to social assistance benefits under the 'Sozialhilfegesetz'.

The rates of payment are equivalence weighted under the German system. The first spouse receives 100% of the 'Eckregelsatz', the other receives 80% (provided that spouse is aged at least 18 years), and a child of four years receives 50%. This gives a monthly allowance of $295 + 236 + 148 = \text{EUR } 679$, and thus

an annual amount of $12 \times 679 = \text{EUR } 8,148$ in 2003. In addition, there is a child benefit – ‘kindergeld’ – of EUR 1,848, making EUR 9,996 in all.

A reunified family thus receives an income after tax and social security contributions (there are none) which is 41.5% of that of the APW, and 56% of the 2/3 APW income. If ‘kindergeld’ is included in both this income and that of the APW and 2/3 APW, the replacement rates are 46.5% and 61% respectively.

For the reunified family there is again a disparity in relation to the Danish benefit payments, and the ‘alternative’ Danish benefits table should be used for making comparisons.

4.4. The Transition to Social Assistance

Under German law there are certain limitations on the rights of aliens to social assistance benefit as compared with the rights of German nationals, but these limitations do not apply to basic payments or to housing benefits. The calculations presented here on the basis of benefits under the ‘Sozialhilfegesetz’ would therefore be the same for equivalent individuals and families with German citizenship.

Net Replacement Rates for Situations in Germany, Percent

	APW	2/3 APW
Asylum seeker	15.5	21
Refugee, social assistance benefit	18	24.5
Family, social assistance benefit (excluding child benefit)	41.5	56
Family, social assistance benefit (including child benefit)	46.5	61

5. The Situations in Sweden

5.1. The Asylum Seeker

Asylum seekers in Sweden have the right to a place at an asylum centre (camp), and must be offered one. They are not actually required to live at an asylum centre, but they must be registered under the name and address of a centre while their application for asylum is dealt with. Asylum seekers can live independently wherever they wish, in practice mainly with friends or acquaintances. If they live with a Swedish family, there can be advantages with respect to integration into Swedish society. However, 'living independently' generally means living with other foreigners (refugees and immigrants), in which case some aspects of integration are less pronounced. Support subsidies for living independently are at the rate of SEK 350 per month for single persons and up to SEK 850 per month for families. These levels of payment make it possible to live truly independently in only the rarest of cases; typically, such payments are used for lodging with others. Around half of all asylum seekers in Sweden live independently. In the situation described here it is assumed that the asylum seeker lives at an asylum centre, but this makes no difference to the calculations if we assume that the whole of the allowance for independent accommodation would be used in payment for that accommodation.

In 2003 asylum seekers received a daily subsistence allowance of SEK 71, which was intended to cover all expenses other than accommodation, including the cost of food. If meals were taken at the centre, the daily allowance was reduced. The annual amount was thus $365 \times 71 = \text{SEK } 25,915$ in 2003. This total is below the ordinary personal tax allowance in Sweden, so no tax is payable, and it is assumed that no social security contributions are deducted. There is no special payment for work done at the asylum centre in Sweden, but the daily subsistence allowance may be reduced in the case of systematic refusal to participate in ordinary activities, which can include work related to the centre itself, participation in Swedish classes, or cooperation in assembling information for use in the processing of the application for asylum. In 2003 a Swedish APW had an income after tax and social security contributions of SEK 171,493, the figure for a 2/3 APW being SEK 118,254.

An asylum seeker thus receives an income after tax and social security contributions which is 15% of that of the APW, and 22% of the 2/3 APW income.

5.2. The Refugee

When the asylum seeker is granted asylum, and thus achieves refugee status, he or she is registered ('folkbokförd') in the municipality in which he or she has chosen to live and to participate in the Swedish introduction programme. At the

same time the refugee acquires entitlement to receive social assistance benefit, 'socialbidrag', on an equal footing with Swedish citizens and other legally resident foreigners in Sweden. This is not the only possible means of financial support, however. Swedish municipalities may choose to pay an 'introduction wage' (introduktionslön) to refugees and immigrants who participate in the introduction programme.

This introduction wage is typically higher than the social assistance benefit. However, not all municipalities offer an introduction wage, and consequently the calculations in the following are based on social assistance benefits. This is in line with the calculations for other countries, where the lowest levels of payments made are used as the basis for the figures given. The Swedish social assistance scheme is based on a 'national norm' which is made up of components for individuals, for example food and clothes, which are covered for every member of the family separately, and components for common expenses, such as TV licence, newspapers and telephone, which are covered for the whole household jointly. In addition, costs for housing are normally covered in full. It is also possible to have large one-off expenses covered according to need, for example for furniture and other household items. This possibility also exists in the social assistance benefit systems for most countries, but no figures for this are included in the calculations, since payments are always based on need and are of a one-off nature. It is also possible to have expenses covered for transportation in connection with job search, and the cost of membership of a trade union. These possible payments have again not been included in the calculations. Finally, it should be noted that a municipality may adjust the national norm either upward or downward if special circumstances indicate that this should be done. The following uses only the national norm components for individual and common expenses.

For a single person, social assistance payments in accordance with the national norm were SEK 3,255 per month in 2003, i.e. $12 \times 3,255 = \text{SEK } 39,060$ annually. The payments are free of tax, since they are calculated to cover the basic needs of a single person.

A single person thus receives an income after tax and social security contributions which is 23% of that of the APW, and 33% of the 2/3 APW income.

5.3. The Reunified Family

A refugee has the legal right for his or her spouse and children to live in Sweden. There is no requirement that a refugee living in Sweden should demonstrate an ability to support his or her dependents. The family is entitled to social assistance benefits in accordance with the rules described above.

A family consisting of two adults and a child of four years would in 2003 have received SEK 4,685 per month in allowances for individual costs for the two

adults and SEK 1,305 for the child. In addition, there would be an allowance to cover joint expenses for a family of three persons amounting to SEK 890 per month. The total benefit received would thus be SEK 6,880 per month. The family would be entitled to child allowance ('barnbidrag'), but as the social assistance benefit payments would be reduced by an equivalent amount, this entitlement has no effect on income. In 2003 the family would receive total benefit payments of $12 \times 6,880 = \text{SEK } 82,560$, with payments made in accordance with the national norm. A reunified family thus receives an income after tax and social security contributions which is 48% of that of the APW, and 70% of the 2/3 APW income.

Net Replacement Rates for Situations in Sweden, Percent

	APW	2/3 APW
Asylum seeker	15	22
Refugee, social assistance benefit	23	33
Family, social assistance benefit (excluding child benefit)	48	70
Family, social assistance benefit (including child benefit)	45	63.5

In the last calculation above, the APW and 2/3 APW incomes have been increased by the inclusion of an amount for child benefit of SEK 11,400 for 2003.

6. The Situations in Great Britain

6.1. The Asylum Seeker

The British support system for asylum seekers was amended under the Immigration and Asylum Act of 1999. Since 2000, the task of providing for asylum seekers has been undertaken by the National Asylum Support Service (NASS), which is a department of the Home Office, and support for asylum seekers has been separated from the normal social benefit system.

A short time after arrival, an asylum seeker in Great Britain will be quartered in an Induction Centre, where he or she will apply for support from the NASS. If the necessary conditions are met, including the condition that the asylum seeker has no funds for his or her own support, he or she will very quickly – within around a week – be provided with NASS support, which consists of a place to live ('Dispersal Accommodation') paid for by NASS, and cash benefits equivalent to 70% of the normal British social assistance benefit ('Income Support'), except in the case of children, where the benefit paid is 100% of the normal payment. In 2003, a single asylum seeker aged 25 or over would receive $0.7 \times 54.65 = \text{GBP } 38.26$ per week, i.e. a total of GBP 1,989 annually in 2003. No tax is payable on the benefit. The allowance is intended to cover all outgoings except housing costs.

In 2003 a British APW had an income after tax and social security contributions of GBP 15,345, the figure for a 2/3 APW being GBP 10,816. This means that the asylum seeker receives 13% of the APW income after tax and social security contributions, or 18.5% of the income of a person with 2/3 of the income of an APW after tax and social security contributions.

6.2. The Refugee

When the asylum seeker has been granted asylum and thus achieved refugee status, he or she acquires the right to receive benefit payments in accordance with the normal social security system, i.e. standard income support. It is assumed that the refugee has been granted a permanent residence permit, since this is a criterion for being considered a 'habitual resident' – which is normally a prerequisite for receipt of income support. A permanent residence permit is granted at the same time as refugee status. After being granted status as a refugee, the person is no longer required to live in 'dispersal accommodation' but is free to reside wherever he or she wishes in Great Britain. If the refugee is entitled to income support, housing support will normally cover all housing costs. Income support for a single person amounted to $52 \times 54.65 = \text{GBP } 2,842$ in 2003. No tax is payable on the benefit. A refugee thus receives an income after

tax and social security contributions which is 18.5% of that of the APW, and 26.5% of the 2/3 APW income.

6.3. The Reunified Family

A refugee in Great Britain with a permanent residence permit has a right to family reunification with his or her spouse and children provided that he or she can support his or her dependents without recourse to public funding. In processing an application for family reunification, a 'maintenance test' is carried out, i.e. a test of the family's ability to provide for itself without recourse to state aid. The test includes consideration of income from employment for one or both spouses, or the prospects for employment, and in the situation where the person is not currently employed, their concrete plans for obtaining a job. Level of education and previous work experience are also taken into account. There are no specific minimum requirements in the form of a set level of income or duration of income. It is simply necessary that the conclusion based on the test is that the couple has a reasonable chance of being able to support themselves and any children they have without recourse to state benefits. This means that receipt of social security benefit over a long period or poor job prospects will lead to a refusal of the application for family reunification. There are also certain minimum requirements regarding housing.

Even if the application is approved, however, there is no guarantee that the couple will not subsequently be unemployed, and in such a case they will be entitled to income support or job seeker's allowance (both at the same rates). There are differences in how long it will be before the newly-arrived spouse will become entitled to social security benefits in his or her own right. This will normally be after two years. However, if the newly-arrived spouse has been living outside the country for at least four years, the spouse and any children will be granted a permanent residence permit on arrival in Great Britain, and will thus have immediate rights to social security benefits under the normal system, their status being categorised as 'settlement'. Family reunification will not normally be granted on the basis of social assistance benefit (Income Support) as the sole source of income, as explained above, but short-term receipt of income support will not lead to rejection of the application.

In isolation, British social security benefits appear to be low, but recipients are often entitled to other benefits at the same time. It is also typically the case that in addition to payments to each person, e.g. income support, the family will also receive a special 'premium' on account of their family status. This is taken as being the case for the reunified family in the example below.

Payments to a married couple with one child are made up of a basic benefit of GBP 85.75 per week, child benefit of GBP 38.50 per week and a family premium of GBP 15.75 per week, in total GBP 140 per week. In addition there is

the normal family allowance for children (Child Benefits) of GBP 16.05 per week. In 2003, income support would have provided $52 \times 140 = \text{GBP } 7,280$ per year, and family allowance for a child $52 \times 16.05 = \text{GBP } 835$. Income support alone is 47.5% of the income of an APW and 67.5% of the income of a 2/3 APW. If family allowance for the child is taken into account (both for the reunified family and for the APW and 2/3 APW) then the percentages are 50% and 69.5% respectively. It should be noted that this addition of child allowance to the incomes of the APW and 2/3 APW does not mean that they are being considered as single parents.

Net Replacement Rates for Situations in Great Britain, Percent

	APW	2/3 APW
Asylum seeker	13	18.5
Refugee, social assistance benefit	18.5	26.5
Family, social assistance benefit (excluding child benefit)	47.5	67.5
Family, social assistance benefit (including child benefit)	50	69.5

7. The Situations in the Netherlands

7.1. The Asylum Seeker

An asylum seeker who arrived in the Netherlands in 2003 would be referred first to a 'registration centre', where after he or she would normally be quickly transferred to an asylum centre. There he or she would reside until processing of the application was completed. Asylum seekers have the right in the Netherlands to work for twelve weeks per year if they first obtain a special work permit.

During the stay at the asylum centre, an adult asylum seeker who has no financial means receives EUR 39.04 per week if he or she is to cover the costs of all their own meals. The amount is reduced if the asylum centre provides some meals. The benefit rate of EUR 39.04 per week is comparable with the equivalent benefits in other countries. In principle, it is supposed to cover all expenses except those of accommodation. It is however possible to apply for special allowances to buy items such as clothing.

On an annual basis, the allowance totals $52 \times 39.04 = \text{EUR } 2,030$. No tax is paid on the allowance, and it is assumed that there is no deduction for social security contributions.

In 2003 a Dutch APW, the OECD's average Dutch worker, had an income after tax and social security contributions of EUR 20,989, while a person with an income of 2/3 that of the APW had a disposable income of EUR 15,338 after tax and social security contributions. This means that the asylum seeker received 9.5% of the APW income after tax and social security contributions, or 13% of the income of a person with 2/3 of the income of an APW after deductions of tax and social security.

7.2. The Refugee

When the asylum seeker is granted asylum, he or she receives a temporary residence permit for three years and is accorded the status of a refugee. This also means that the refugee acquires right of access to the Dutch social security system in the normal way, including social assistance benefits. Social assistance benefit in the Netherlands is related to the legal minimum wage after deduction of tax and social security contributions. For a single person, the rate is 50% of the minimum wage after deduction of tax and social security contributions. In 2003 a single person received EUR 567.79 per month, including holiday pay (there is a special payment for holidays in the Dutch benefit system). It is also possible to receive a supplement of EUR 227.11 per month as a type of rent support if it is not possible to share accommodation with others. In the follow-

ing, calculations are presented both with and without this housing supplement in relation to the two levels of employee income (APW and 2/3 APW), but the level of benefit without the supplement is the more comparable with other countries, where the cost of housing is normally paid separately and in full, except in the case of Denmark. For Denmark an alternative set of calculations has been made in which the part of the rent paid by the individual has been 'taken out' of the benefit.

In 2003, annual social assistance benefits in the Netherlands for a single person were $12 \times 567.79 = \text{EUR } 6,813$ after tax and social security contributions. With the supplement, the amount was $12 \times (567.79 + 227.11) = \text{EUR } 9,539$. In relation to the APW income after tax and social security contributions, the level of benefit represents 32.5% without the housing supplement and 45.5% with it. In relation to the 2/3 APW income after tax and social security contributions, the proportions are 44.5% without the housing supplement and 62% with it.

7.3. The Reunified Family

A refugee in the Netherlands has the right to family reunification with a spouse and children when the requirement of ability to support the dependents can be met. This depends on the type of residence permit that the spouse in the Netherlands has. A temporary residence permit (which is what will be issued initially) requires a net income equivalent to social assistance benefit for a couple and evidence of employment of at least a year's duration at the time that application is made. If the resident spouse has a permanent residence permit (which can be obtained after three years), the requirement is for a net income of 70% of the social assistance benefit for a couple. In other words, it is not possible to immediately go on receiving social assistance benefit as a reunified family, but at a certain point in time the family will become entitled to such benefit. For a married couple, this benefit is 100% of the legal minimum wage after deduction of tax and social security contributions, and in 2003 this amounted to EUR 1,135.57 per month. For a child aged 0-6 years, an allowance (Child Benefits) was paid in 2003 at the rate of EUR 174.35 per quarter.

Social assistance payments of $12 \times 1,135.57 = \text{EUR } 13,627$ was 65% of the APW income after tax and social security contributions, and 89% of the 2/3 APW income similarly calculated. If family allowance for the child is taken into account (both for the reunified family and for the APW and 2/3 APW) then the percentages are 66% and 89.5% respectively. Married couples do not have the same possibility of receiving housing supplement as single people, so for the married couple, but only for them, it is most correct to adjust for own payments in the Dutch housing benefit system. Own payments towards housing costs are estimated at EUR 2,000 annually, and with this correction, which is equivalent in principle to that for Denmark, the four percentages would be 55.5, 76, 57 and 77 respectively.

Net Replacement Rates for Situations in the Netherlands, Percent

	APW	2/3 APW
Asylum seeker	9.5	13
Refugee, social assistance benefit without supplement	32.5	44.5
Refugee, social assistance benefit with supplement	45.5	62
Family, social assistance benefit (excluding child benefit)	65	89
As above, with correction for housing	55.5	76
Family, social assistance benefit (including child benefit)	66	89.5
As above, with correction for housing	57	77

8. The Situations in Italy

8.1. The Asylum Seeker

An asylum seeker in Italy applies to the police for a 'permit to seek asylum', which forms the basis of the next stage of the procedure. Asylum seekers may reside at a 'reception centre', but they are not obliged to do so, provided their place of abode is registered with the police.

Until 2002 it was possible for them to choose between a cash allowance (EUR 18 per day) or residence at a reception centre. The cash allowance was payable for 45 days only. From 2003 onwards, this choice has been abolished. If they have no funds of their own, asylum seekers now have the right to live and eat at the reception centre in return doing for a small amount of work there. They do not have the right to seek work on the open labour market during the processing of their cases. Thus, asylum seekers in Italy are paid no cash benefit at all from public funds during the asylum seeking phase. They may receive help from private aid organisations and from the UNHCR. However, as any such payments vary from case to case, and, more importantly, as the payments do not fall within the concept of 'basic public transfer payments', they are not taken into account in this overview.

In 2003 an Italian APW had an income after tax and social security contributions of EUR 16,100, the figure for a 2/3 APW being EUR 11,522. As already explained, an asylum seeker receives 0% of these amounts in basic public transfer payments.

8.2. The Refugee

An asylum seeker whose application is accepted and who acquires the status of a convention refugee is granted a permanent residence permit. This places him or her on virtually an equal footing with Italian citizens, except with respect to voting rights. It is assumed that a convention refugee is entitled to Italian social assistance benefit, the 'minimo vitale' (European Commission: Missoc, 2003).

Italy has no state system of social assistance benefits; the system is organised on a local basis, and there are significant variations in the levels of benefit from region to region. There has been an attempt at creating a national pattern of benefits, but no regulations have ever been put into force. There is also significant variation in the associated payments of housing allowances. In some regions the cost of accommodation is covered in full, in others in part, and in some places not at all. There is thus much more uncertainty about the levels of Italian benefits than about payments in the other countries. This should be borne in mind when making comparisons.

The minimum levels of benefit are used here in order to give as great a degree of comparability as possible, and although it may be expected that the lowest rates of benefit are coupled with partial or full payment of housing costs, this is nevertheless only a supposition. On this basis, a refugee in Italy would have received EUR 232 per month in social assistance benefits in 2003. Payments thus amounted to $12 \times 232 = \text{EUR } 2,784$ annually. No tax or social security contributions are deducted from the benefit. The amount is 17.5% of the APW's income after tax and social security contributions, and 24% of that of the 2/3 APW income.

8.3. The Reunified Family

A foreigner with a permanent residence permit (or a residence permit for a period of longer than five years) has the right to begin the procedure for family reunification. The family members who are brought to the country will acquire the same residence status as the member of the family already resident in Italy. There is normally a requirement for ability to support the family and for accommodation of an adequate standard, but these requirements are not applicable in the case of convention refugees. In 2003 a family consisting of two adults and a child would have received EUR 440 per month in social assistance payments, this figure being given with the same degree of uncertainty as the other figures for Italy. An equivalence scale taken from Missoc 2003 has been used to obtain this figure. In addition, EUR 516 in child allowance (Child Benefits) would be payable. On an annual basis, the amount received would be $12 \times 440 = \text{EUR } 5,280$ in social assistance benefit and EUR 516 in child allowance, a total of EUR 5,796.

The social assistance benefit alone amounts to 33% of the APW's income after tax and social security contributions, and 46% of the 2/3 APW income after the same deductions. If child allowance is taken into account (both for the reunified family and for the APW and 2/3 APW) then the percentages are 35% and 48% respectively.

Net Replacement Rates for Situations in Italy, Percent

	APW	2/3 APW
Asylum seeker	-	-
Refugee, social assistance benefit	17.5	24
Family, social assistance benefit (excluding child benefit)	33	46
Family, social assistance benefit (including child benefit)	35	48

9. The Situations in Canada

9.1. The Asylum Seeker

Here again we assume that we are considering an asylum seeker, in this case one who seeks asylum in Canada. The reason for emphasising this is that Canada also has a programme for 'sponsored' refugees, and such people have different rights to social assistance benefits than an asylum seeker of our 'standard' type. For example, federally sponsored refugees receive an allowance from the federal government for a certain period of time, and do not have access to social assistance benefit during the same period. On arrival in Canada the person will seek protection as a refugee (asylum) either at the port of entry or at the Canada Immigration Office. If the person's application to seek asylum is approved (fast-track processing), the application is passed on to the Immigration and Refugee Board, who will give an opinion on the case.

Canada has no asylum centres of the type found in Europe. Asylum seekers normally find and pay for their own accommodation, possibly with the help of grants from special aid organisations. Asylum seekers are entitled to Canadian social assistance benefits, and these vary from province to province. In Ontario, which is the most densely populated province and where Toronto (a typical choice of city for immigrants) is situated, the monthly benefit for a single person is CAD 195. In addition there is a housing allowance of maximum CAD 325 per month, and it is assumed in this study that this amount covers the full cost of accommodation. Unlike the majority of European countries, Canada has no general system of housing benefit. If social assistance benefit is the only form of income which the asylum seeker has, he or she is given a temporary work permit, and thus has the possibility of finding a job. The annual amount of social assistance benefit in Ontario is $12 \times 195 = \text{CAD } 2,340$.

In 2003 a Canadian APW, the OECD's average Canadian worker, had an income after tax and social security contributions of CAD 30,218, while a person with an income of 2/3 that of the APW had a disposable income of CAD 21,559 after deduction of tax and social security contributions. This means that the asylum seeker receives 7.5% of the APW income after tax and social security contributions, or 11% of the income of a person with 2/3 of the income of an APW after deductions of tax and social security contributions.

9.2. The Refugee

If the Immigration and Refugee Board decides to grant asylum, the asylum seeker is accorded the status of a refugee, either as a convention refugee or as a 'person in need of protection'. When granted this status, the person can immediately apply to become a 'Permanent Resident'. This will normally be granted

after a short time. With Permanent Resident status the refugee has legal rights similar to those of Canadian citizens, though not with respect to voting rights. Temporary residence permits do not form part of the system for people who wish to remain in Canada as immigrants; they are only used for people who apply for temporary residence in Canada in order to work for a limited period or to study. A person with permanent resident status has the same access to the social security system, including the right to social assistance benefit payments, as Canadian citizens.

The amounts of social assistance benefit to which refugees are entitled are precisely the same as those for asylum seekers, and thus for single persons represent 7.5% of the APW income after tax and social security contributions, and 11% of the 2/3 APW income after the same deductions.

9.3. The Reunified Family

Every Canadian citizen (a refugee with permanent resident status can become a citizen after three years) or person with permanent resident status has the right to family reunification with spouse and children provided that the people involved are also able to become permanent residents, which is normally the case. The right to family reunification extends to other family members and relations, but that is not a relevant factor here. The condition for family reunification, however, is that the person living in Canada acts as 'sponsor' for those family members who wish to come to the country. Being a sponsor means undertaking to provide financial support for the family members concerned. The spouse living in Canada must be approved as a sponsor. This requires that the sponsor is resident in Canada, and that he or she signs a sponsorship undertaking and also signs an agreement with the person being sponsored. It is also a requirement that the sponsor has a certain minimum level of income, and that he or she is not receiving social assistance benefit payments.

The sponsorship undertaking is for three years in the case of a spouse and ten years for a child, or until the child reaches the age of 25. The sponsorship undertaking does not mean that the family is forbidden to claim social assistance benefit during the sponsorship period, but any benefit paid is regarded as a loan, which the sponsor is obliged to repay at a later date.

In 2003, a couple with one child received a monthly benefit payment of CAD 476 plus a maximum monthly housing subsidy of CAD 554 (assumed here to cover the entire cost of accommodation). Child benefit in Canada consists of payments from the Canada Child Tax Benefit (CCTB) plus allowances from the province concerned. The basic amount in CCTB in 2003 was $97.17 + 19.17 =$ CAD 116.34 per month (estimated). Benefits are means-tested, but there is no reduction in the case of incomes on the level of social assistance benefit. In addition there is a supplement, but this is offset against an equivalent reduction in

social assistance payments, and so does not enter into the calculations. The Province of Ontario also provides a supplement, but this is only given to families in employment, and not to recipients of social assistance benefit. The annual social assistance benefit is $12 \times 476 = \text{CAD } 5,712$, and the annual child benefit is $12 \times 116.34 = \text{CAD } 1,396$.

The social assistance benefit for a couple with one child amounts to 19% of the APW's income after tax and social security contributions, and 26.5% of the 2/3 APW income after the same deductions. If child benefit is taken into account (both for the reunified family and for the APW and 2/3 APW) then the percentages are 22.5% and 31% respectively.

Net Replacement Rates for Situations in Canada, Percent

	APW	2/3 APW
Asylum seeker, social assistance benefit	7.5	11
Refugee, social assistance benefit	7.5	11
Family, social assistance benefit (excluding child benefit)	19	26.5
Family, social assistance benefit (including child benefit)	22.5	31

10. A Note on Family Reunification

This study is intended to cover the basic public transfer payments that will be available through the stages from asylum seeker through refugee to reunified family consisting of parents and one child. The process is followed until the point where there is entitlement to the normal social security benefit in each country.

In some countries, the entire progression can take place with support from welfare benefits. This is the case in those countries where there is no requirement that the immigrant should be able to support his or her family in the case of family reunification, or where there is some exception or special regulation that means that the entire family can be supported on social assistance benefits from shortly after their arrival, so that the complete progression here described can take place with unbroken support from state benefits. This is the way things work in Denmark, Sweden, Italy and Germany. It is assumed in the analyses that the spouse resident in the country concerned is a convention refugee, or in the case of Germany an Article 16A refugee – though after January 1, 2005 a convention refugee will be treated in the same way as an Article 16A refugee in Germany. The results given do not necessarily apply in the case of residence granted on other grounds.

In other countries, namely Great Britain, the Netherlands, and Canada, there is a requirement that the spouse in the country must be able to support his or her family before permission can be granted for family reunification. This requirement for ability to support the family cannot be fulfilled if the resident spouse's income is solely from social assistance benefits. Another source of income is required, such as earned wages, or good prospects of such income being obtainable (GB). The transition from being a single refugee to being a member of a reunified family can thus not take place without a break in being supported by social assistance benefit. At some time or other, however, the family will again become entitled to receive public transfers, in this case social assistance benefit, and this is the situation that is reflected in the calculations.

It must again be stressed that in the regulations and calculations presented here, which were those applicable for the year 2003, the refugee is assumed to have the status of a convention refugee, or in the case of Germany an Article 16A refugee. It is also assumed that both spouses are available for work on the labour market in those cases where this is a condition for the receipt of social assistance benefits. No calculations have been made to cover the case of married couples where only one spouse is available for work.

11. A Comparison of Relative Levels of Benefit

11.1. Asylum Seekers

In the earlier sections of this paper, calculations are presented for each of the seven countries showing what an asylum seeker would receive in cash in basic public transfers. In the European countries, apart from Italy, the amounts received are in the nature of 'pocket money', in some cases with the addition of a supplement paid in return for obligatory work done at the asylum centre. Such wages for work are very modest in all cases. The asylum seeker has permission to reside in the country temporarily while awaiting the outcome of the application for asylum. The European nations have thus chosen not to include asylum seekers under their normal social benefit systems, but have set up special regulations for this group. In one country, Germany, the special regulations are also used for certain other groups, such as *de facto* refugees and refugees from civil wars in their home countries. The special regulations have not existed from the start in all cases, but have sometimes been separated out from the normal welfare system, for example in Great Britain and Germany. Canada has no special system for asylum seekers. They are entitled to receive normal Canadian social assistance benefits if they have no other means of support. In the case of Canada, the asylum seeker is given a temporary work permit in order to allow job search. Generally speaking, asylum seekers in Europe are not allowed to seek work on the labour market, though permission is given in the Netherlands for a relatively short period.

Table 11.1. presents the results for each country measured in relation to the Take Home Pay for an APW and the 2/3 APW.

Table 11.1. Net Replacement Rates in Percent for Basic Public Transfers to Asylum Seekers in Seven Countries, 2003.

	APW	2/3 APW
Denmark	13	18.5
Germany	15.5	21
Sweden	15	22
Great Britain	13	18.5
The Netherlands	9.5	13
Italy	-	-
Canada	7.5	11

Source: Own calculations

Italy stands out in that it provides no cash benefits in this situation. The other European countries provide net replacement rates measured in comparison to the APW Take Home Pay in the range of 9.5% to 15.5%, with the Netherlands being at the bottom of the range, Germany and Sweden at the top and Great Britain and Denmark in the middle. In percentage terms, the difference between the highest and the lowest replacement rates is large, namely 63%, but in relation to the APW income all the levels of payment are modest. Even though the benefits provided are special payments of the ‘pocket-money’ type, they are relatively higher than the benefits provided under the Canadian social assistance system, giving an early indication that Canadian social assistance benefits, in this case those provided in Ontario, are at a low level.

11.2. Refugees

When an asylum seeker acquires refugee status, he or she becomes entitled to social assistance benefit in accordance with the normal rules for the country, in all cases except Denmark. In Canada social assistance benefit was already provided at the asylum seeker stage. In Denmark, a refugee is entitled to an introductory allowance, which is at a lower level than social assistance benefit.

In all countries, refugees are entitled to seek work on the labour market, and are thus in a far better position to become financially self-supporting than was the case when they were asylum seekers. In this study, however, it is the situation in which the refugee is without work and in receipt of basic public social assistance payments that is of interest. For refugees in Denmark, as explained previously, a correction is made for the proportion of housing costs that are to be met by the refugee. This correction is based on specific assumptions about the level of rent for accommodation, as explained in the section on Danish situations. If other assumptions are made about the cost of housing, there will be variations in the results for Denmark. Table 11.2. shows the figures for refugees in each country.

Table 11.2. Net Replacement Rates in Percent for Basic Public Transfers to Refugees in Seven Countries, 2003.

	APW	2/3 APW
Denmark	12 (26.5)	17.5 (37.5)
Germany	18.5	24.5
Sweden	23	33
Great Britain	18.5	26.5
The Netherlands	32.5 (45.5)	44.5 (62)
Italy	17.5	24
Canada	7.5	11

Source: Own calculations

The table presents the net replacement rates that are the most comparable. It is clear that Canada offers the lowest level of benefit. Among European countries, Denmark has the lowest level of benefit, and the Netherlands the highest. Germany, Great Britain and Italy, though with significant reservations about the accuracy of the figures for the last named, are more or less on a par with one another, with Sweden being somewhat higher. For Denmark, uncorrected figures are given in parentheses, and in the case of the Netherlands additional figures are given for benefit plus the supplement for housing. Using these figures, Denmark moves up above Sweden, but is still significantly lower than the Netherlands. The Danish net replacement rate stated without correction is misleadingly high. If accommodation rental is below DKK 3,000 per month (the figure used for the correction) then the net replacement rate will increase, but realistically it will hardly ever be higher than around the level for Germany, Great Britain and Italy. Thus, the Danish introduction allowance is at best on a par with social assistance benefit in these three countries.

11.3. Reunified Families

Family reunification takes place in accordance with widely differing regulations in different countries, including the seven nations in this study. One of the differences is in the requirements which are made of the spouse applying for family reunification to be able to support the family, which in this study is taken as consisting of a spouse and one child currently living in another country.

Great Britain, Canada and the Netherlands have requirements for an ability to support the family as a condition for family reunification. This means that recipients of social assistance benefits do not fulfil the support ability requirements. Other sources of income, for example wage income, are required. The situation of the family after reunification may change, however, and in this study a situation is examined in which there is no alternative income other than social assistance payments or the like with which to support the family.

In other countries there is no requirement for an ability to support the family, or there is provision for exceptions, so that family reunification can take place on the basis of social assistance benefit or the like as the source of the family income. In addition to social assistance benefit, families are also entitled to child benefits. In a reunified refugee family, both spouses will normally be allowed full access to the labour market in the country in which they are now legally resident, and the calculations below are made on the assumption that both spouses are available for work. The situation examined here is the one in which it is assumed that the family receive social assistance benefits or the like. In all countries except Denmark, the refugee family will receive social assistance benefits in accordance with the normal regulations. In Denmark, the family initially receives an introduction allowance/starting-out assistance. Later the first spouse to arrive will become entitled to normal social assistance benefit, and

finally the other spouse will also become entitled to such a benefit. There are thus three different sets of circumstances for Denmark, with only the last involving social assistance benefit according to the normal rules. In the case of Denmark, a correction is made for own contributions towards the cost of housing, as was done for single persons. This is also the case for families in the Netherlands. In the table below, only the corrected figures are shown for each of these countries. The uncorrected figures are given in the sections on the two countries.

Refugee families also receive the normal child benefits in all countries. These are included in the calculations, but since the purpose of the study is not to examine the effect of these benefits in relation to those who do not have children, the reference incomes, i.e. the Take Home Pay of the APW and the 2/3 APW, have been increased by the same amount. The results of the calculations for each country are collected together in Table 11.3.

Table 11.3. Net Replacement Rates in Percent for Basic Public Transfers to Reunified Refugee Families with One Child, 2003.

	APW	2/3 APW
Denmark I	43	59.5
Denmark II	46	63.5
Denmark III	74	103
Germany	46.5	61
Sweden	45	63.5
Great Britain	50	69.5
The Netherlands	57	77
Italy	35	48
Canada	22.5	31

Source: Own calculations

Canada again stands out as the country with the lowest levels of benefit. For Denmark there are, as explained above, three situations. The first is the case where the family is entitled to introductory allowance or starting-out assistance (the same levels of payment). This level of benefit (Denmark I) is on a par with social assistance payments in Germany and Sweden, but lower than the levels for the Netherlands and Great Britain. The next situation for Denmark is that where the first spouse to arrive has been in the country for seven years and thus is entitled to social assistance benefit, whereas the other spouse is entitled only to starting-out assistance (Denmark II). One might expect that this means that the first spouse receives social assistance benefit and the other starting-out assistance, but in fact this is not the case. If the social assistance benefit payable to the first spouse to arrive in the country is greater than the combined starting-out allowances for a couple, then social assistance benefit is paid to the first spouse,

while the second receives nothing: his or her starting-out allowance is offset by the first spouse's social assistance benefit. If the combined starting-out allowance is greater than the social assistance benefit payable, then the first spouse receives the social assistance benefit and the second receives the difference between this amount and the combined starting-out allowance. This is in principle equivalent to situation I for Denmark, but the income is distributed differently between the spouses.

It is only when both spouses become entitled to social assistance benefit, i.e. when both have been at least seven years in the country, that they receive benefit according to the normal regulations for social assistance (Denmark III). In this case, Denmark has by far the highest level of benefit of all the countries discussed.

Appendix: Economic Migrants, and Basic Public Transfers Made to Them

This appendix gives a brief overview of the access which economic migrants have to basic public transfer payments in the countries described above in relation to the situations for asylum seekers and refugees. The initial situation for economic migrants will in the majority of cases be an advance agreement concerning a job. This means that the first benefit system these migrants encounter in the case of ceasing to be employed will be the unemployment insurance system rather than the social assistance benefit system. There are very few nations which permit economic migrants to enter the country independently in order to seek work. This is however possible in Canada, and to a limited extent in Great Britain. No separate calculations for this are presented in this overview.

Denmark

Denmark has only very limited economic immigration from non-Western countries, but a fairly significant level of such immigration from EU/EEA countries, though principally of a temporary nature.

The starting situation for economic migrants is normally a job in Denmark, but this situation can of course alter. If the employment has been for a sufficiently long period (one year or more), and if the immigrant is a member of an unemployment insurance fund (Denmark is one of the few countries where unemployment insurance is completely voluntary), the person will be entitled to unemployment benefit, or otherwise to social assistance.

In order to receive continued support under the law on 'active social policy' (social assistance benefit for 6 months or more) the person concerned must be a Danish citizen, be a citizen of an EU/EEA member state, be related to such a person, or be covered by a special agreement between Denmark and the relevant home country. The right to social assistance benefit, however, will not apply to citizens of Eastern or Central European EU member states until after a transition period.

Foreigners who do not fall into one of the categories mentioned above and who are in need of prolonged financial support risk being repatriated against their will. A decision on such a case is made by the National Social Security Agency, giving due consideration to the person's marital status, length of residence in Denmark, state of health, connection with Denmark through relatives or of other types, and country of origin, and also whether a person who has entered into a support undertaking in relation to the person has defaulted on this. Persons who have been legally resident in Denmark for seven years or more cannot be involuntarily repatriated in this way. Entitlement to social assistance benefit is de-

pendent on residence in Denmark during seven out of the eight preceding years, otherwise the person is only entitled to the lower starting-out allowance. This rule does not apply to EU/EEA citizens. The amount of this benefit is described in the section on situations in Denmark.

Germany

Like the other European countries, Germany tightly regulates economic immigration from countries outside the EU/EEA. However, under the new ‘Zuwanderungsgesetz’, which came into force on January 1, 2005, entry for people with a high level of work-related training or skill has been made easier, and the general administrative procedures have been simplified. The 1973 ban on immigration still applies for other workers, though with a number of exceptions related to skilled labour. The situation for an economic migrant to Germany will therefore be that he or she has a job in the first instance. If the duration of employment has been sufficient (one year), the immigrant will in the event of unemployment be entitled to unemployment benefit (‘Arbeitslosengeld’), and when this entitlement runs out then to ‘Arbeitslosenhilfe’, replaced from 2005 onwards by ‘Arbeitslosengeld II’. If the duration of unemployment has not been sufficient, the person would have been entitled to ‘Sozialhilfe’ in 2003, replaced after January 1, 2005 by ‘Arbeitslosengeld II’. The rates for ‘Sozialhilfe’ in 2003 are given in the section on situations in Germany.

Sweden

Sweden, like Denmark, has only limited economic immigration from non-Western countries, but a fairly significant level of such immigration from EU/EEA countries, though principally of a temporary nature.

Economic migration by people from non-Western countries requires that they have a job before arrival, and that the wage paid is over a certain minimum. Economic migrants from non-Western countries thus begin in a situation where they have a job. This situation can change, and if the now unemployed person was previously in work for long enough (six months) then he or she is entitled to receive unemployment benefit from the Swedish ‘grundförsäkring’ scheme, which covers everyone who fulfils the work requirements (a minimum period in employment before unemployment). If the person is also a member of the income-related insurance scheme (which is voluntary), he or she will also receive benefit from there.

If the conditions for receiving unemployment benefit are not fulfilled, then all who are legally resident in Sweden (this excludes asylum seekers) are entitled to ‘socialbidrag’, social assistance payments. The amount of this benefit is described in the section on situations in Sweden.

Great Britain

Most economic immigration from non-Western countries is regulated in the same way as in other European countries, i.e. a job must be agreed beforehand, and the employer takes responsibility for obtaining a work permit and possibly accommodation. A small part of the economic migration from non-EU/EEA countries, falling under the 'Highly Skilled Migrant Programme', takes place in the same way as in Canada. If a person can acquire sufficient points under a points system, they are allowed to enter Great Britain in order to seek work. Permission to enter the country is nevertheless conditional upon documentation that the applicant can support him or herself and any accompanying dependents.

The starting situation for economic migrants will thus normally be a situation in work. If the employment ceases, and if the person has been in work long enough and has thus paid in a minimum amount in social security contributions over the previous two years, he or she will be entitled to receive Job Seeker's Allowance, contribution based (JSA (c)), in the same way as GB nationals. If the person has not been in employment for long enough to qualify for JSA (c), he or she will receive Job Seeker's Allowance, income based (JSA (ib)). The benefit levels for JSA are the same as for income support (IS), which is described in the section on situations in Great Britain.

The Netherlands

As in most other European countries, economic migration to the Netherlands from non-EU/EEA countries is strictly regulated. For a stay longer than three months, the employer must apply for a work permit and must document that the immigrant will have sufficient income and a reasonable place to live. Work permits are only issued for workers in employment sectors where there is a shortage of labour. Anyone who wishes to set up a business in the Netherlands must document a certain minimum level of income, and the establishment of the business must be in the interests of the country.

The economic migrant thus begins in a situation with a job, and if he or she becomes unemployed it will be possible for him or her to receive benefit payments from the Dutch unemployment insurance system, which is obligatory, provided the length of employment has been sufficient. After 26 weeks of employment, an unemployed person becomes entitled to a set minimum level of benefit; if the period of employment has been longer (at least four out of five years) then the person qualifies for earnings-related benefit. If the unemployed person has not been in work for long enough, or if entitlement to unemployment insurance payments is used up, he or she will receive social assistance benefit, as described in the section on situations in the Netherlands.

Italy

Italy is the only one of the European states in this study that has significant economic immigration from non-EU/EEA countries. Each year a decision is made as to how many immigrants may enter Italy, and this total is divided between countries of origin in the form of immigration quotas. The annual total is fixed in the light of the employment situation in each of the regions of Italy.

An employer who wishes to employ a non-EU/EEA national must apply for a work permit at the local employment office, and document that the employee's salary and conditions of employment will be equivalent to those of Italian nationals, and must also ensure that the employee has adequate living accommodation. If the economic migrant loses his or her job, he or she may only remain in Italy for a maximum of six months in order to find a new job. During this period, if contributions have been paid in 52 weeks out of the previous two years, the immigrant is entitled to receive benefit from the Italian unemployment insurance fund. After five years, the economic migrant can obtain a permanent residence permit and is entitled to social assistance benefits in the same way as Italian citizens. The rate for social assistance benefits is given in the section on situations in Italy.

Canada

Canada has a very high level of economic immigration every year, including immigration from non-Western countries, in particular China and India. Entry to Canada as an economic migrant is regulated through a points system wherein age, education, language proficiency (English, French), work experience, etc. are included. There are special rules for entrepreneurs and investors. If the applicant has points at or above the minimum limit, he or she can apply for permanent resident status. Normally this is granted, and thereafter the economic migrant has the same access to the Canadian labour market and the Canadian social safety net as Canadian citizens.

Family reunification follows the same rules as in the case of refugees (and also Canadian citizens), i.e. with sponsorship obligations. There are thus the same limitations to social assistance benefits as for other reunified families, as described in the section on situations in Canada.

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