❚ Article ❚

Immigration and the Boundaries of Social Citizenship in East Asia: Theoretical Considerations in a Comparative Perspective*

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Abstract

Welfare systems in South Korea, Japan, and Taiwan were traditionally geared towards economic growth and productivity, rather than focusing on social rights. However, with increasing social policy commitments and migratory inflows in recent years, questions of who is deserving what in redistributive terms are increasingly relevant for these welfare latecomers, as it has been the case for European welfare states. By connecting discourses on social citizenship in East Asia to broader theoretical debates, this study aims to provide some conceptual instruments for a deeper analysis of social rights in this region in the face of increasing immigration trends. It is suggested that the lack of a differentiation between the ideas of status, identity, and social rights may lead to an ethnocentric understanding of social citizenship, which ill fits with the human rights perspective.

❚ *Keywords* : social citizenship, immigration, East Asia, welfare state

Introduction

Immigration and ethnic diversity have been increasing in North America and in Western Europe for several decades now. Based on these countries' experiences, a bulky literature has developed on modes of migrants' integration, transnationalism and interactions with the mainstream society (for a review, see Schmitter Heisler, 2008). For several, often

ethnically homogeneous, European countries an initial phase of immigration was encouraged to fill labor shortages, under the assumption that migrant workers would only stay on a temporary basis; when, after the 1970s, it became apparent that migrants were going to stay on, earlier views on these guest workers needed to be adjusted for a more long-term situation (Castles, 1986). If guest worker programs after World War II were characterized by work permit systems and bilateral agreements, later these regulations were administratively relaxed, allowing family re-unifications, recognition of asylum seeking, and international law and anti-discrimination policy reinforced through court decisions (Emmenegger & Careja, 2012). All these developments have progressively led to a larger scope of social inclusiveness in several western European countries, especially for long-term resident migrants, who tend to enjoy a level of access to social rights akin to that of the citizens of the host country (Hampshire, 2013). Still, long-term migrants are often not completely at the same level as true citizens of their host country, somehow falling in between fully protected nationals and vulnerable (especially when undocumented) short-term migrants. This status of almost-citizens has been labelled "denizenship," to highlight the distinctiveness of this separate category (Hammar, 1990).

Yet, levels of social inclusion and exclusion for immigrants in European welfare states do vary depending on the contexts, giving rise to many diverse situations in terms of ethnic segmentation of labor markets and racialization of access to social citizenship (Castles & Schierup, 2010). Some countries adopt migration policies that strengthen regulation and control across national borders in the presence of generous welfare benefits, whereas others minimize the amount of social rights to all, allowing instead the entrance of large numbers of migrants (Myers, 2000). To the former type belong Scandinavian countries, which tend to adopt a combination of high social protection for permanent residents, with a strict surveillance of the national borders and stringent criteria for permanent residency; Anglo-Saxon countries with a liberal tradition (e.g., the United States) offer residual welfare provisions and a less rigid control

of migration inflows (Castles & Schierup, 2010). In general, migration inflows represent a challenge to social inclusion in that the inherent universalism behind the idea of citizenship – i.e., an equal status to all members of a given polity (Marshall, 1950) - has to be re-framed in a more dynamic scheme whereby citizenship ties are constantly realigned in response to more blurred states' boundaries (Bauboeck & Guiraudon, 2009). Although the so-called "postnational" era of citizenship (Soysal, 1994; Bauboeck & Guiraudon, 2009) called for a more inclusive, human-rights oriented welfare state, this ideal is difficult to attain in a climate of welfare austerity. Indeed, dilemmas of migrants' inclusion yield formidable challenges in research and policy-making alike (Hollifield, 2004), with fears of an erosion of social rights for all, which might result in an expanding denizenship to all (Turner, 2016).

Aside from the experience of countries from the Western world, how do other countries cope with these challenges? New destinations for immigration can be found in Asia in the cases of Japan, South Korea, and Taiwan, for which increased immigration flows started from the 1990s. Even though in terms of percentages of foreign residents, these countries do not compare with cases such as Switzerland or the United States, it is a fact that this region is now acknowledged as a destination of new immigration, especially for the low-skilled, cheaper labor force (Fields, 1994; Kaneko, 2009; Hollifield, 2000; Seol, 2012). Indeed, the fact that migration in East Asia is mostly driven by labor shortage (Kong et al., 2010; Kim, 2017), and the expectation that migrants are going to stay only on a temporary basis, have several elements in common with the previous experiences of continental European countries a few decades earlier. In fact, although several studies are being published on migration and discrimination, they tend to be descriptive and not to challenge the original policy assumption that economic immigrants are only going to stay over the short-term (Shin, 2017). The lack of a transnational human rights perspective in social citizenship models in Asia (Fields, 1994) makes these models particularly prone to discrimination and societal compartmentalization, which eventually increases obstacles to wel-

fare access to the immigrant populations. Turning a blind eye to social integration of foreigners on the long term might create fertile ground for increasing tensions and social problems for several Asian countries which are nowadays more and more a destination for labor migration. Several studies have pointed out that policies of integration and acceptance of multiculturalism are already in place, but ghettoization of foreigners and the risk for them to remain socially excluded from their host society are commonly described as endemic problems (Parrenas & Kim, 2011; Nakamatsu, 2014; Kim, J., 2011).

The assumption that guest workers are just going to stay in East Asia on a temporary basis is indeed already showing its limits, with some countries already relaxing their migration policies in order to meet the demands of companies through extension of the allowed visa period (Oh et al., 2013). In the light of this, and assuming that lessons can be learned from the migration experience in Western countries, it is important to frame a discussion on the limits of social citizenship for East Asian countries in a comparative perspective with other countries of immigration.

Academic debates on social citizenship build on a considerable amount of prior assumptions and discourses, such as citizenship in connection to capitalism and class structure in Britain, and slavery, immigration, and race in the United States (Isin & Turner, 2007). However, these discourses cannot be equally applied to East Asia with its history of developmental economic growth, authoritarianism, and a weak civil society (Chang, 2012). Nevertheless, in concomitance with rising commitments to welfare, social needs and equality have become common topics in East Asian policy debates over the past fifteen years, both in electoral competitions and public opinion's expectations. In the presence of institutionalized social policies, it certainly makes sense for members of a nation-state to expect a certain degree of social protection based on nationality, legal residence in a given territory, working status, need or desert (Lister & Dwyer, 2012), or taxation, parenthood, and military service (Isin & Turner, 2007). When financial resources for public welfare are limited, the regulations with which social provisions are made become

crucially important to determine who is in and who is out, especially when these discourses are just at their beginning stage, as is the case of social citizenship in East Asia and its boundaries.

The main gist of this research lies in a reflection on how increased migratory inflows in East Asian countries – with a focus on South Korea, Japan, and Taiwan – impact on social citizenship modes in these countries. Specifically, the research questions are:

- How can social citizenship in East Asia be understood in a comparative perspective? Is it affected by recent increases in migratory phenomena?

This article is divided in four parts. First, I provide a brief overview of the development of ideas of social citizenship in East Asia, attempting to provide some context for theoretical reflection. Second, I discuss the challenges that recent immigration inflows represent for social inclusion in East Asia, and, especially, in South Korea, Japan, and Taiwan. In order to better substantiate this point, an analysis of the regulatory frame that gives access to two non-contribution related welfare policies (i.e., health and public assistance) will be presented in comparative perspective. In the third part, drawing on theories of welfare and migration that might apply also to late welfare developers, I try to make use of some of these conceptual instruments, so as to be able to differentiate types of social citizenship. Finally, I provide some ideas for discussion on this important topic.

Social Citizenship in East Asia

"Social rights are constituted through the naming and claiming of needs."
(Dean, 2015, p.155)

Social citizenship and civic culture are inevitably embedded in the history and the culture of their own country (Brubaker, 1992; Isin & Turner, 2002; Dwyer, 2004; Dean, 2015; Marshall, 1950). Terms like

rights, democracy, and social membership/status acquire very different meanings when related to the individual state's key historical experience. While equality is a core defining trait of French democracy, weariness of government intervention along with reliance in civil society are recurrent themes in the U.S.; while civil rights are prevalent in Britain, where negative freedoms from the state's interference prevail, positive rights to social security are more importantly felt in Germany (Isin & Turner, 2007). In recent times, the challenges represented by globalization and neoliberal politics visibly eroded the extent and generosity of previous social rights commitments as a result of public finances in distress and a shrinking public welfare system (i.e., insufficient supply), but also due to the increasing complexity of a growing welfare demand, mainly driven by demographic changes and migratory influxes in the presence of already weakened labor markets and industrial relations (Taylor-Gooby, 2009; Joppke, 2007; Turner, 2016).

In East Asia, a long tradition of ancient states with a highly centralized bureaucratic system did indeed exist, first in China and Korea, later importing this system to Japan as well. This form of government was more akin to an empire, which, far from granting rights to its citizens, could, at best, result in compensations to the citizens/subjects as a form of benefice, rather than contract (Turner, 2012, p.22). The lack of an independent middle class and the absence of a democratic tradition fostered the creation of subservient elites following the central state, with a general weakness in civic culture (Turner, 2012), thus reinforcing the status of citizens as subjects rather than individuals with equal rights (Janoski, 2014; Kashiwazaki, 2009).

The formation of a nation-state and its citizenry in a modern sense, with the creation of rights as a consequence of the payment of taxes and contributions, was only imported from Western culture in 19th century Japan after the Meiji Restoration. Prior to the Sino-Japanese War (1894-1895), the Chinese tended to identify the world and its people as a whole without political boundaries, according to the view that all humankind lies under the sky (*tianxia*, 天下) (Qi & Shen, 2015; Bell,

2015). Following the military defeats, the Chinese faith in the *tianxia* order started to be replaced by a new awareness of the boundaries of their own political system. Still, Confucian values applied in that obligations to their own family were felt as more important than duties towards the state: a logic of "graded love," applying in a diminishing degree to the family first, followed by the close community, the nation, and the *tianxia* last (Bell, 2015). Korean activists in the 19th century also tried to conceptualize the new idea of a nation-state, following the end of the long reign of Chosun Korea (1392-1910), as an extended family, prompting the new citizens to accept the new reality with emotional familial affection ("*chung*") (Kim, S., 2007). The consequences of a prolonged hierarchical imperial style of governing, along with a lack of civil society engagement in these societies, are reflected in a citizenry that tends to remain passive, nonetheless showing, at times, a tight bond with the state in terms of obligations - as would be expected in family ties. Given the history of dictatorial rule in the past few decades, claims of civil and political rights have been put aside for the sake of economic development, what has been labeled "developmental" (Chang, 2012), or "consumer" (Dirlik, 2012) citizenship.

Immigration and Social Citizenship in East Asia

Immigration and welfare can be understood as being in a circular relationship: on the one hand, immigration influences welfare state commitments, eroding the boundaries of stateness and its territorial power of intervention (Halfmann, 2000). On the other hand, welfare regimes tend to react to migratory inflows by creating different systems of incorporation of the new entrants, each with different discursive interpretations of rights and specific policy frames (Soysal, 1994; Brubaker, 1992). Eventually, these mixes of social protection systems and strategies of incorporation for immigrants give rise to a specific blend of social citizenship, with consequences in terms of social stratification and inequality (Castles & Kosack, 1973; Morrissens & Sainsbury, 2005; Dean,

2015). The opening up of national borders in the form of increased trans-national trade, investment, and migration typical of open democratic capitalistic systems puts pressure on both closure and openness towards immigration – also called the liberal paradox problem (Hollifield, 2004).

As of now, the once developmental welfare systems in Japan, South Korea, and Taiwan have progressively increased their commitment to universalism in social policy coverage. At the same time, resulting from a combination of push (for example, the search for better economic opportunities) and pull factors (i.e., the availability of workplaces in labor markets abroad) (Kim, G., 2017), migratory inflows have dramatically increased in once Newly Industrializing Countries such as Korea and Taiwan, a phenomenon that has been described as a "migration transition" in this geographical area (Fields, 1994). In response to these events, Taiwan, South Korea, and Japan have adopted a system of temporary work permits akin to the *Gastarbeiter* system used in Germany during the 1960s, under the questionable assumption that these workers will only stay on a temporary basis. Based on the Western experience, this assumption has been largely challenged in literature: see Castles, 1986; Hammar, 1990; Soysal, 1994). Starting from the 1980s and on through the 1990s, the practice of importing cheap labor from abroad to supply the lack of workforce in their respective labor markets has continued (Fields, 1994; Piper, 2004).

Another important category of migrants in the region is represented by family migration, and, most notably, the phenomenon of the foreign spouses (Toyota, 2008; Jones & Shen, 2008), who, differently from the labor migrants, are considered to settle permanently. Thus ushering in an Asian-style understanding of multiculturalism and social integration, akin to assimilation in the host society (Kim, N. K., 2014; Kim, N.H., 2012; Kashiwazaki, 2013; Parrenas, & Kim, 2011) (an aspect that can be found also in the encouragement of entry for people who look ethnically homogeneous to citizens in the guest country).

Be it out of labor or family reasons, foreigners' presence in East Asia has increased consistently in the past few years, amounting to 3.1

percent in Korea, two percent in Taiwan, and 1.8 percent in Japan of the total population in 2014 (Korea, Ministry of Security and Administration; Japan, Statistical Office; Taiwan, Immigration Office). Also due to the still relatively small scale of migration, these countries have just begun to grapple with issues of human rights and multiculturalism (Seol, 2012; Kim, 2012).

Comparing these countries' experience to earlier migration and social policies in other Western countries, just how open can social citizenship in East Asia be deemed to be? Is it possible to also hypothesize that a transition from a model of national citizenship to one of post-national membership (where the rights of non-nationals within their host countries are re-shaped in respect for personhood) (Soysal, 1994) is also under progress? I shall address this aspect by having a look at the regulatory frame of welfare access in these countries from a comparative perspective.

Regulatory Frames to Welfare Access

Over the years, legal residency and payment of taxes has increasingly replaced citizenship as the new standard criterion in Europe for granting access to social rights (Lister & Dwyer, 2012). However, increased numbers of foreigners have not seemed to challenge nationalistic practices of welfare access in East Asia as yet. More than by their legal status and residency, migrants tend to be compartmentalized into specific categories by function (ex. temporary workers, foreign spouses, foreign students, and so forth). In this way, social integration policies only apply to those who are expected to stay on for the long term (ex. foreign spouses), in a strikingly assimilationist way. In the case of Japan, foreign spouses have been described as being "incorporated into the host society primarily as foreigners rather than as Japanese nationals with full citizenship rights" (Kashiwazaki, 2013). Barring foreign residents from welfare access, often irrespective of their length of permanence in the host country, has brought about concerns for their basic human rights. For example, the lack of access to childcare for foreign mothers has led to episodes

of child abandonment in Korea (*The Korea Times*, 2015) and the use of welfare facilities for housing and health issues from foreign residents have encountered resistance from community locals in Taiwan (*Taipei Times*, 2014). In this sense, it does not look as if increased immigration flows in the past decade have resulted in more inclusiveness of these welfare systems.

But just how inclusive/exclusive a stance do policymakers actually take for the provision of supposedly universal welfare systems? Here a distinction should be made on the level of analysis. According to Dean (2015), three possible levels can be considered (macro/meso/micro). The macro policy level responds to the question: which social rights are formally legislated and regulated by law?[1] On a meso level, procedural rights to welfare are taken into account, with implementation and service delivery considerably depending on local authorities' discretion (Lipsky, 1979; Foster, 1983; Lister and Dwyer, 2012). Finally, welfare access at the micro level represents the outcome perspective of social rights, measurable as inequalities in social protection across social categories (Morrissens and Sainsbury, 2005; Gran & Clifford, 2000). Relying on the first macro level of analysis, I shall here focus on healthcare systems and public assistance schemes, so to provide some comparative evidence against which to observe the cases of Taiwan, Korea, and Japan.

From a simple comparison of access to health systems, East Asian countries appear successful in attaining full coverage of the population, although in practice welfare access for foreigners is expected to depend on their working situation and visa type. Japan and Taiwan especially offer a legislative frame that attempts to include all long term residents in their respective countries, whereas limitations exist depending on the working contract (Germany), foreign students (Italy), and cross border migrants (Switzerland) (MISSOC, 2017).

Table 1

Access to health insurance from a comparative perspective

Country	Healthcare system's basic principles	Coverage
UK	Tax financed universal national health service for all residents.*	All persons "ordinarily resident" in the UK.
Sweden	Tax financed public health service for all inhabitants in regional responsibility. The system is universal and compulsory.	All residents
France	Compulsory social insurance scheme with affiliation based on professional criteria and on residency, and financed by social security contributions and special contributions.	All persons with gainfully employment or with a permanent regular residence in France of at least 3 months.
Germany	Compulsory social insurance scheme for employees and categories of persons assimilated thereto up to a certain income limit and with income-related contributions.(Statutory Health Insurance, GKV). Since 1 January 2009 there is a general obligation for the entire population to become affiliated with the statutory or private health insurance.	Persons in paid employment and those receiving vocational training, trainees, and other categories of recipients (pensioners, disabled, un-employed persons receiving benefits, students, farmers, etc.) Persons having no other right to healthcare services in case of sickness (under certain conditions). Exemptions: civil servants, magistrates and professional soldiers. Voluntary insurance: full-time self-employed, those with annual earnings exceeding the annual income limit, those with low-paid (less than € 450 a month) or short-term (less than three months) employment.

Country	Healthcare system's basic principles	Coverage
Italy	Tax-financed National Health Service for all inhabitants (based on residency).	All the Italian residents, all EU residents subject to Italian law, extra-EU citizens and their dependent family members, when holder of a residence permit;Extra-EU citizens without a residence permit (Temporarily Present Foreigner – STP) but only for urgent and essential clinical and hospital treatments. Voluntary insurance for: foreign citizens holding a residence permit valid more than 3 months; foreign citizens studying or working au pair in Italy
Switzerland	Contribution-based social insurance	All persons domiciled in Switzerland. The government may extend the obligation to take out insurance to persons with no domicile in Switzerland and may exclude certain categories of persons from the compulsory insurance. Voluntary insurance for cross-border employees who are not required to take out insurance.
Korea	Universal social insurance system	Workers, self-employed, family dependents. Voluntary insurance may apply for foreigners
Japan	National Health Insurance & company health insurance	NHI for self-employed and students; company health insurance for workers. Foreigners residing for more than 3 months required to enroll.
Taiwan	Social insurance system	Compulsory enrollment for all residents of 6+ months

Note. * Information for the UK relates to England only. Competence for health care is devolved to Scotland, Wales and Northern Ireland.
Source: MISSOC (2017), Korean National Health Service, Japanese Ministry of Health, Labour and Welfare, Taiwanese Ministry of Health and Welfare

A more substantively exclusionary stance is to be found in access criteria to the national public assistance schemes. As table two shows, while the majority of Western European countries under consideration (exception made for some restrictions to public assistance in Germany) focus on long-term residency as a main criterion for qualification, Korea, Taiwan, and Japan either deny living support for non-nationals, or leave the subject unspecified, leaving considerable margins of discretion to local welfare officials. A recent ruling from the Supreme Court in Japan explicitly denied public assistance to an elderly, long-time resident Chinese woman residing in Oita, on the grounds that only Japanese nationals qualify for such a benefit (*The Japan Times,* 2014). Assuming that the woman must have worked and paid taxes during her life in Japan, barring access to poverty benefits when in need could be interpreted as a discriminatory practice. In the Korean case, eligibility for public assistance only applies to those foreigners who: (1) are married to Koreans; (2) have children of Korean descent with their Korean spouse; (3) live under the same roof with their Korean spouses and children. This set of restrictions is especially questionable in that the foreign spouse is not provided with an individual social right. Instead, his/her entitlement to social citizenship depends on the existence of a blood line with a Korean family, a typically ethnocentric way of interpreting citizenship, in neglect of considerations of human rights. Finally, for what concerns Taiwan, available regulatory frames do not look specific enough, once again leaving street-level bureaucrats with considerable room for discretion.

Table 2

Access to public assistance from a comparative perspective

Country	Basic principles	Entitlement	Nationality requirement	Residence requirement
Sweden	Last resort policy organized locally. Entitlement changes based on need	Individual right, housing situation considered as a whole	No	All persons with the right to stay in the country. No permanent residence required.
France	Solidarity income support with activation requirements (separate schemes for the disabled and the elderly)	Individual right, different conditions depending on ability to work	No	Stable and effective residence in France. Temporary waiting period allowance (allocation temporaire d'attente, ATA): foreigners granted subsidiary protection, stateless persons, persons returning from abroad and awaiting reintegration.
Germany	Security for jobseekers, subsistence support, security for the elderly and people with reduced earning ability	Individual right, different conditions for non-able bodied and able-bodied. Family members must live together	Germans, EU nationals, employed foreigners are eligible. Restrictions for foreigners without a work permit and to asylum seekers	Actual/habitual residence in Germany. Excluded are foreigners with no right of residency and foreigners whose stay is solely for the purpose of finding employment or because their children are attending school and their family members and persons entitled to benefits under §1 of the Asylum Seekers' Benefits Act."
Italy	Social allowance and social card (an income support measure).	Individuals and/or families in need	No	10+ years of residence in the specific municipality of competence

Country	Basic principles	Entitlement	Nationality requirement	Residence requirement
Switzerland*	Specific minima per need, with differential amounts	Elderly, invalidity pensioners	No	Domicile and permanent residence in Switzerland. Foreigners must have resided continuously 10+ years (refugees and stateless persons: 5 years)
United Kingdom	Income support for the non-able bodied, jobseekers' allowance, pension credits, housing benefits.	Individual entitlement, with possibility of supplements for dependents.	No	Must be present in the country. Claimants who have lived outside the UK during the period of 2 years before the date of claim, must satisfy the habitual residence test.
Korea	National basic livelihood scheme and medical support	Family entitlement based on income threshold	Yes	Marriage and cohabitation with a Korean national, with either a pregnancy with the Korean spouse or the presence of an underage child conceived with a Korean (the child condition applies also to the widowed)
Japan	Livelihood, housing, education, medical, occupational, funeral assistance	Family and individual needs	Yes	Yes
Taiwan	Income support, medical support, targeted programs for the needy	Family entitlement based on income threshold	Yes	Yes

Note. Other sources reveal stricter eligibility criteria for the case of Switzerland. Cfr. Roemer (2017).
Source: MISSOC 2017, Japanese Ministry of Health, Labour and Welfare, Korea's Minimum Income Guarantee Law, Taiwanese Public Assistance

A Theoretical Perspective

In comparison with the earlier migrant countries in the Western world, what are then the criteria for social citizenship adopted in East Asia from a theoretical point of view? Perhaps some ideas borrowed from the theoretical literature on citizenship and migration can be of help in gaining a better perspective on the topic. Specifically, I would like, first, to point out the importance of historical legacies in determining discourses on social citizenship, and, second, to better specify where is it that social citizenship starts to become blurred in East Asia by borrowing Joppke (2007)'s ideas on the theme.

First, history mattered in helping countries in East Asia to shape their own discourses on citizenship. A traditionally strong and centralized state and bureaucracy, a strong cultural bond under the influence of Confucian China, and a weak self-determination for the citizens all contributed to a transition from imperial rule to a liberal nationalism, which did not, however, acknowledge the existence of equality among its citizens-subjects in a liberal sense. A degree of equality was historically granted through the right of occupying important positions in government as a result of passing competitive examinations with own individual effort, rather than claiming inalienable, equal rights for all (Bell, 2015). In a similar vein, the state's tendency of focusing most on national concerns and in disregarding more general issues of human rights could also be seen as a persistent trait, since a public understanding of citizenship in a globalized world is still under construction (Schattle, 2015). The very creation of the United Nations (UN) as an institution, and of a body of legislation on human rights transcending the territorial boundaries of nationality, can be interpreted as the urge to rebuild nations and human dignity after the shocks of the Holocaust and the Second World War (Hollifield, 2004). These concerns were far less perceived in Japan, Taiwan, and South Korea (Baik, 2012), struggling at the time with state-building and the development of a capitalistic economy in the lack of a full-fledged democracy.

Conceptually, some clarifications are needed concerning the definitional idea of citizenship. Joppke (2007) provides a more nuanced interpretation of citizenship if compared to Marshall's (1950) analysis, which mostly focuses on the "rights" dimension. Specifically, Joppke postulated that citizenship can be articulated in three dimensions: status, identity, and rights. While citizenship status consists in a definition of formal state membership and the rules of access, identity corresponds to the semantics of nation/nationalism where a proper behavior that identifies the citizen of a nation can be expected. Finally, citizenship rights are to be understood as formal liberties and benefits granted to the citizenship status (Joppke, 2007).

In East Asian welfare states, aside from the fact that a weak civil society does not fully embrace civil, political, and social rights, the dimensions of status and identity tend to be quite blurry and intermeshed with one another due to the lack of a public understanding of the nature of the relationship between the state and its citizens over history. As earlier stated, ideas of democracy and the liberal state needed to be borrowed from the Western world in the absence of the same cultural roots of political thinking. Although the Chinese empire originally understood the rule to govern in the Confucian terms of "mandate from heaven," according to which people's collective conscience was supposed to control the doings of the government (Janoski, 2014), nationalism in practice has often been enforced through closed-minded strategies of self-affirmation, with little contribution from the civil society (Pekkanen, 2006; Bell, 2015; Chang, 2012). Ethnicity, in particular, is still considered a strong element that permeates the identity of citizens in Japan, China, and Korea, with a strong emphasis on descent and race – what Brubaker (1998) labeled "ethnic nationalism," Although ethnicity and nationality are distinct terms in East Asia, they are not as distant semantically as is the case in Western countries (Dirlik, 2012). In order to stress this ethnocentric aspect (Walker & Wong, 2013), citizenship in East Asia has been variously labeled "ethnizenship" (Lee, 2012), "citizenship of kinsmen" (Turner, 2012), and "ethno-national" (Kashiwazaki, 2009).

Welfare latecomers in East Asia present a series of features that renders a proper understanding of social citizenship problematic to interpret. Although China, Korea, and Japan all share a long history of a centralized state and bureaucracy, they have never been clear-cut over the state's responsibilities for its citizens-subjects. While the level of stateness in regulating welfare provisions has always been relevant, public commitment from a financial point of view started to take off only in much more recent years. Direct welfare provision is still largely delegated to the private sector, especially when it comes to care services (An & Peng, 2015). In general, even if the generosity and coverage of welfare policies have considerably increased during the last two decades, a commonly agreed upon understanding of social citizenship among public opinion, policymakers, and researchers in East Asia still needs deeper elaboration.

Discussing the boundaries of social citizenship in East Asia

In Europe the problem of migration is now hotly debated in that social rights are perceived as a problem of scarce resources; in this context, nationals, it is argued, should be prioritized when it comes to welfare coverage. In this way, citizenship is an equalizer of opportunities indeed, but someone looks more equal than some other in a process of "hierarchical citizenship" (Hampshire, 2013).

As for our examples from East Asia, human rights concerns for foreign residents tend to be dismissed as a non-problem, at times rising concerns from the international community (Amnesty International, 2014). It goes without saying that without a modicum of basic social rights to all residents, countries of new immigration are facing the risk of increasing overall levels of social vulnerability in terms of poverty, child abandonment, sexual exploitation, unsafe working conditions, discrimination and social cleavages, conflict, and social unrest. However, more crucially, the fact that regulations on welfare access in the countries under analysis are still left at an "ethno-centric" level of interpretation

of citizenship status and ethnicity is very questionable. Borrowing on Joppke's (2007) ideas of citizenship divided into the components of status, identity, and rights, I suggest that a more fruitful discussion in the matter could be started when it comes to redefining identities, rights, and obligations in countries of new immigration.

Table 3

Ideal-typical Models of Social Citizenship when Confronted with Immigration

	Liberal	Civic Republican	Ethno-national
Rights	Thin	Thick	Thick
Status	Thick	Thick	Thick
Identity	Thin	Dualized	Thick
Openness to human rights	Broad	With limits (denizenship)	Limited

Source: Own elaboration from Joppke (2007), Isin & Turner (2002), Lee (2012), Hammar (1990), Brubaker (1998), Bauboeck and Guiraudon (2009), Tilly (1996)

Citizenship rights and obligations can be defined at various degrees, from "thick" to "thin" (Tilly, 1996). For example, low levels of taxation and high mobility are to be found in "thin" Anglo-Saxon countries. Citizenship can also present different degrees of inclusiveness of its members. When defined narrowly, a clear-cut distinction will separate nationals from outsiders; however, progressively enlarging the degree of inclusion will expand the scope of inclusion to denizens (i.e., long-term foreign residents who work and pay taxes) (Hammar, 1990), undocumented migrants, and refugees, getting closer to a human rights-oriented model. It is also very possible that rights, status, and identity overlap in a thick and indistinguishable mix of ethno-centric we-ness. As sketched in Table 3, the idea is that this is exactly what is happening in East Asian countries, where rights of citizenship are inextricably related to issues of historical belonging. The three types[2)] of social citizenship are better explained as follows.

The first type represents an ideal liberal democratic nation in its modern sense, with a specific attention to civil liberties guaranteed to many people, also outside of the political territory. Here, a cosmopolitan society and a more residual provision of welfare services, combined with a policy of citizenship by birthplace (*ius soli*), would result in a smaller level of overlap between rights, status, and identity. A typical example could be given by the US: a Chinese-American yuppie and a Mexican American elderly will probably not share much in terms of identity, but they will still share the same status of American citizenship. While civil and political rights apply to a vast majority of citizens and migrants, a thinner provision of social rights with an eye to human rights will be possibly and legitimately expected.

The second social citizenship type, akin to nation-states with a civic republican tradition in continental Europe, has a stronger communitarian stance and higher levels of social inclusion given by an increased overlap between the three dimensions of citizenship. This is also due to a citizen-ship policy that mixes principles of *ius soli* with family relationships (*ius sanguinis*). Here, the most socially included citizen would be the male working professional with a life-long employment, but for those who do not perfectly fit this social inclusion model, a certain freedom to choose the identity they prefer (for example, coming out as a homo-sexual), a basic universal protection following considerations of long-term residency (denizenship), and human rights could represent a modicum of citizenship rights. For example, in Italy basic rights of urgent medical treatment and child schooling tend to be guaranteed to all the persons physically present in the territory, irrespective of their citizenship or visa status (Saraceno et al., 2013).

Finally, I tentatively collocated models of social citizenship in East Asia within the "ethno-national" category, whereby a much higher degree of overlap between the three dimensions is shown, to the point that na-tional pride and identity, ethnicity, and citizenship status can represent crucial conditions of access to basic welfare policies, such as public assis-tance against poverty. This is typically happening in countries that used

to be mono-ethnic in the past, as is the case in Korea. In this light, citizenship tends to follow an ethnocentric policy based on *ius sanguinis*, with little provisions for long-term residents who are left in the blind spot of welfare coverage for all the duration of their residence, no matter how long they stay. Due to the sense of belonging to the nation-state likened to an extended family (Kim, S., 2007), the degree of "thickness" when belonging to these states results in a web of relational expectations within tightly knit societies, where it is difficult for outsiders to fit the general picture, unless some separate categorization is purposefully made for them (e.g., foreign students, migrant workers, and the like). In this sense, it can be said that ethnocentrically oriented models of social citizenship still focus on a national perspective, are not much open to post-national discourses of citizenship stimulated by migratory processes, and tend to link the concession of social rights to strong expectations in terms of identity and status to their citizens, resulting in a strongly exclusionary stance towards outsiders (Tierney, 2011). This is not intrinsically a cultural feature of the countries under the influence of Chinese Confucianism, which, as I mentioned, used to be able to transcend the national boundaries in its understanding of humankind in terms of *tinxia* (Bell, 2015).

Conclusion

Opening up the boundaries of the nation-states to migration influxes has several repercussions on our understanding of citizenship, and many academic contributions have been dedicated to the topic, although there is no definite answer on how to move beyond a "statist" debate to a post-national citizenship (Bauboeck & Giraudon, 2009). Yet, analyzing these complexities in a theoretically informed way, and from a comparative perspective, may help in disentangling the dimensions of the problem, and in locating problematic aspects more specifically. Citizenship studies about countries in East Asia tend to view them as exceptional cases with an ethnocentric stance and a focus on devel-

opmental priorities, with a low civil society culture that treats citizens as subjects. However, I would like to argue that such a static picture is not necessarily a given; instead, it needs to be further clarified in order to understand why this is the case and what directions of change could possibly emerge.

In the present article, a potential for blind spots in welfare coverage for immigrants in Japan, South Korea, and Taiwan has been highlighted, and a theoretically informed interpretation has been applied in order to understand these apparently anomalous cases. According to this frame, it looks as if restrictive categorizations of beneficiaries of social rights might derive not really from intrinsically ethnocentric ideas of citizenship, but from a poor conceptualization of state-citizens relationships in East Asia during the course of history. Accordingly, while a family-like state provides a strong identity and status to the citizen, who becomes entitled to some specific rights, a poor understanding of the citizens' obligations bind them to a thick, otherwise not well defined commitment to the state, so that citizens and people are enmeshed into one single entity of eth-no-citizens. Although, in Confucian thought, the level of commitment to the community for the citizen tends to decrease as the social circle gets larger (the idea of "graded love"), nevertheless a degree of universal commitment for mankind at large (*tianxia*) is not ruled out. When the level of "thickness" is clarified, there might be compatibility with the tenets of a liberal democracy (Bell, 2015). In this light, there might be grounds to question the close interrelation between social rights and na-tionality in East Asia, when long-term foreign residents are also obliged to their fiscal duties to the state of residence, itself a qualifying criterion for granting access to public assistance measures in most Western European countries.

In conclusion, it looks as if social citizenship at the legislative level in East Asia tends to be more ethnocentric and exclusionary when com-pared to Western European countries, and, in this sense, little effort has been made to expand these welfare systems, notwithstanding incremental volumes of entrants into these countries of new immigration. In truth,

the delivery of welfare services in practice is facilitated by helpful local officials in Japan and non-profit organizations in South Korea (Hong & Atteraya, 2013), and it would be interesting to integrate these analyses at the meso level with the macro and micro perspectives (Dean, 2015).

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1) It is probably the most common approach in comparative studies on welfare states (Korpi, 1989; Korpi & Palme, 2007).

2) These types are elaborated more as ideal-typical frames, where actual nation states might not find a perfect fit.

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