Different contexts, common concerns: migration, social development and social protection in China and the US

Jennifer Holdaway^{1,2} · Zhenzhen Zheng³ · Zhanxin Zhang³

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This special issue of China Population and Development Studies includes a set of articles that consider the relationship between migration, social protection and social rights in China and the United States. They are the result of a multi-year collaboration between the Institute of Population and Labour Economics of the Chinese Academy of Social Sciences and the Social Science Research Council which sought to provide social scientists from China and the United States with the opportunity to deepen their understanding of each other's societies through the exploration of a policy issue of common concern.¹

This initiative might at first seem a surprising one, involving two countries, and two types of migration flow, that are rarely considered side by side. The international relations literature on China and the United States tends to emphasize the differences between the two nations and to present a schematic picture of political institutions and social processes. In comparative politics also, differences in level of economic development and political system mean that the US is typically clustered with the rich democracies and China either with developing nations or some bundle of “post-communist” or “transitional” states.

If we look only at average statistics and national level political organization, this separation seems reasonable. In 2015 the US had a per capita GDP of \$53,000,

¹ An additional article from the project on healthcare for migrants in China (Niu and Zheng 2017) was published in the December 2017 issue of China Population and Development Studies.

✉ Jennifer Holdaway
jennifer.holdaway@area.oxford.ac.uk

¹ School of Interdisciplinary Area Studies, University of Oxford, Oxford, UK

² Institute of Geographic Sciences and Natural Resources Research, Chinese Academy of Sciences, Beijing, China

³ Institute of Population and Labour Economics, Chinese Academy of Social Sciences, Beijing, China

while China's was only \$6800. Educational levels in the US are on average considerably higher, at 12.9 years compared with only 7.9 in China. The US is also fully urbanized (85%) while China only passed the 50% mark in its urbanization in 2011. The US is a post-industrial society, with only 2% of the population employed in agriculture, 17% in industry; and 81% in services. In China, by contrast, 35% of the population is still employed in agriculture, 30% in industry and only 36% in services (World Bank Open Data 2015; National Bureau of Statistics of China 2016). In terms of political organization, the US is a representative democracy with a federal system, and China is a one-party state with a unitary government.

There are also good reasons why, with a few exceptions (Roberts 1997; Pieke and Mallee 1999; Solinger 1999; DeWind and Holdaway 2008), internal and international migration have tended to be separate areas of research and policy. International migration generally involves longer distances and the crossing of linguistic, cultural and sometimes religious boundaries. More importantly, it entails crossing state borders, with the result that international migrants generally have different rights than citizens of the receiving nation to residence, employment, social protection and political participation, at least until they undergo formal naturalization processes.

However, as this collection shows, despite the different contexts migration is nonetheless a phenomenon that generates a common set of policy concerns in China and the United States. In both cases, the scale of migration is huge, and it has a profound effect on the economy and society of both the sending and the receiving places. Although both migration flows are diverse and include the movement of high skilled urbanites, they are dominated by labor migrants who are poorer and less-educated than the populations in the areas to which they move. In the United States, despite reduced numbers and a rising rate of return in recent years, migrants from Mexico and other central and South American countries (collectively referred to as Latinos), comprised 51% of the foreign-born population in 2015, with Mexicans alone accounting for 27% (Pew Research Center 2017). In China, in 2016, there were 245 million migrants out of a population of 1.382 billion people, more than 80% of them from rural areas (Department of Service and Management of Migrant Population 2017).²

Although some people migrate for other reasons, in both cases economic disparities between sending and receiving places are a strong incentive for movement. The average household disposable income in the United States in 2016 was \$44,049, compared with \$13,891 for Mexico (OECD Better Life Index 2018), while the average income of urban residents in Beijing, Shanghai and Guangzhou was between 7000 and 8000 RMB, compared with only 1200–1450 RMB for rural people in the major migrant sending regions of Sichuan, Jiangxi and Hunan (National Bureau of Statistics of China 2016). The educational level of migrants is also relatively low, and is one reason for their clustering in low-wage occupations, often in the informal economy: on average, in 2015, urban residents of major receiving cities in China

² Migrants are usually defined as people who have spent more than 6 months living away the place where their *Hukou* is registered.

had completed more than 9 years of education compared with only just over 7 years for residents (rural and urban) of sending provinces (National Bureau of Statistics of China 2016) and 90% of native born Americans had completed high school, compared with only 37% of Mexican migrants (OECD Better Life Index 2018).

The comparison is made more compelling by the fact that China is unusual in having had since the late 1950s a system of household registration, known as the *hukou*, which has operated very much like a form of internal border control in limiting population mobility across regions and between rural and urban areas. At birth, Chinese are given a registration booklet that designates them both as the resident of a particular place, and as either a rural or urban resident. The right to reside anywhere other than your place of origin, and to access services and participate in local social and political institutions, is dependent either upon a formal change in your *hukou* status (equivalent to acquiring citizenship and renouncing your former nationality and attendant rights) or on being granted a temporary residence permit of some kind, which, like a visa, may carry with it some, but not all of the social and political rights enjoyed by citizens and, in some cases, the opportunity to work towards permanent residence. The specific policies relating to the *hukou* have changed over time and, as we shall see, the current significance of the institution is contested by scholars (see Zhang Zhanxin's article in this special issue for a discussion). However, the way in which the *hukou* system continues to regulate and restrict rights to residency status and shapes the integration of migrants by regulating their rights to employment and social protection (Chan and Buckingham 2008; Wang 2018), makes for many interesting parallels between rural–urban migration in China and international labor migration in the United States, which have been noted by researchers including Kenneth Roberts (1997) and Dorothy Solinger (1999).

Another way in which China and the United States are similar that has important repercussions for patterns of migration and the governance of migration is that both are nations of continental scale with considerable internal diversity in their natural environments and in the structure and levels of development of their economies. This generates regionally distinctive migration flows and related needs for social protection. For example, as research from this project (Niu and Zheng 2018) shows, for many years, the economy of Guangzhou was dominated by manufacturing industries that employed mostly low-skilled, young, single female workers, while migrants to Beijing, most often employed in services, were older and more likely to be married and to have children with them. These two groups have rather different needs for healthcare, education and other forms of social protection. Similarly, Latinos who work as farmworkers in the western states of the United States and those who work in the New York service sector also have different demographic profiles and needs. Regional diversity also means that receiving communities have different constellations of economic interests and cultural orientations towards migration. For example, the economies of New York and Shanghai are both heavily dependent on migrant workers and these cities have historically been more welcoming towards migrants than some others.

Differences in the formal structure of the two nations' political systems also obscure similarities in institutional arrangements and political processes that are partly related to the phenomena of scale and internal diversity discussed above.

The US has a formal federal system, in which states and localities have significant control over many areas of social policy, as well as discretion in enforcing federal mandates. For example, education below the post-secondary level is almost entirely funded from local property tax revenues and block grants for federal welfare programs give states leeway in deciding the type and level of benefits. As the article by Fraga and Wilcox in this collection shows, there is also considerable variation in state-level legislation relating to both the status and integration of migrants. This variation is detailed in Tran and Donato's article on healthcare provision for migrants.

China's system of government is formally a unitary one, and there has been a trend towards recentralization in recent years. But differences in regional levels of development and economic structure mean that there is also significant diversity in policy implementation at the provincial and local level, to the extent that some observers (Zheng 2007) have claimed that China operates under a system of "de facto federalism" and other scholars talk of the development of "provincial social policy regimes" (Ratigan 2017). The article in this collection by Wang Chunguang shows that this diversity extends to policies towards migrants, and he offers a typology of the approaches adopted in different cities as a way of "interpreting" and "adapting" national policy in the context of different local conditions, interests and resources. These analyses show that in both the US and China, there are many similarities in the challenges of translating national policy into local action.

This collection of articles provides a window into the operation of institutions and policy processes in the two countries by analyzing the relationship between migration, social development and social protection. Critiques of purely economic measures of development in the 1990s led to the inclusion of life expectancy and educational attainment in the Human Development Index, as outcomes that are important in themselves, but also the foundation for future economic growth (Ul Haq 1995; Sen 1999). The concept of social development goes beyond these individual level indicators and emphasizes that development is also dependent on social institutions. The ability to create and maintain families and social networks, and to be both valued by and able to contribute to society are crucial to human wellbeing (United Nations 1995). Social protection of various kinds—including economic safety nets, public services, and mechanisms for public participation—is therefore also essential for economic development and social cohesion (Overseas Development Institute 2001).

Of course, many of the supports covered in the term "social protection" are far from new. Most societies have always had some form of provision for assisting those in need, through famine relief, charitable giving and patronage relations. The late 19th century saw the emergence of "welfare states" in Europe that deployed public investment to ensure various forms of social protection, including provision of education, healthcare and social insurance, and these were consolidated in the years following the Second World War (Castles et al. 2010; Kunhle and Sander 2010). Different social protection regimes, underpinned by different ideological rationales, have emerged and evolved in different contexts but it is interesting that analysis of these different models has taken place within two largely separate streams of research, one on the "welfare states" of the Western democracies, and the other on

“social protection” in developing countries [see Isakjee (2017) and Overseas Development Institute (2001) for summaries of the literature].

However, as this collection demonstrates, the key questions regarding social protection remain broadly similar in both contexts. How and to what extent should societies provide support to individuals and families that are not able to protect against risks or meet their needs through the market? Which needs should be seen as essential and guaranteed with public funds and which left to the private sector? Who should be given rights or entitlements to which supports and on what basis? How are these systems to be structured and financed? And what is the relationship between normative conceptions of risks and needs and actual provisions in different countries at different times? (Zutavern and Kohli 2010).

The articles in this collection consider these questions through the lens of migration. The swelling of populations in certain places, and their shrinking in others, along with associated changes in age and gender structure, necessarily generates new needs for social protection for both migrants and non-migrants, whether they are “left behind” in the place of origin or residents of the receiving place. What rights or entitlements migrants should have to social protection, and at what point in their settlement, are often contentious questions, particularly when resources are scarce, and/or migrants are seen to be in competition for employment opportunities and public services with other, long-resident disadvantaged groups.

The first three articles by Wang Chunguang, Zhang Zhanxin and Luis Fraga and Bryan Wilcox-Archuleta all speak from different perspectives to two issues: the relationship between migrants’ legal status or right to reside in the receiving place, and their social integration in the form of their rights to social protection of various kinds including healthcare, employment insurance and education for their children.

Wang Chunguang’s paper discusses the way in which the relationship between *hukou* policy, which determines migrants’ rights to residence in the city, and citizens’ rights, which determine their access to social protection, have changed over the years, and how they have varied across cities. He first notes that gradual relaxation of *hukou* policy at the national level and the requirement to end discrimination against migrants in terms of access to social protection have not been effectively implemented at the city level, and that there is therefore effectively a disconnect between rights to residence and rights to social protection that continues to leave migrants significantly disadvantaged in relation to urban residents. However, he also notes that this implementation gap is not the same across cities. Attributing this to the relative autonomy of local governments and the space they have to “interpret and adapt” national policy, Wang proceeds to develop a typology of the different approaches cities have taken in implementing modified versions of national policy that accord with their own interests and resource constraints. He suggests that there are four broad governance models that differ on two dimensions: (1) whether the focus of policy is on government provision of social protection or reliance on the market and (2) whether the emphasis is on control or openness towards migrants. The four examples of Beijing (extreme control-service; Shanghai (less intense but also control-service); Guangzhou (open-market) and Wuhan (the closest to open-service), flesh out his analysis with examples of the way in which residence status of different kinds, from temporary permits to full *hukou*, have brought varying rights

to social protection in the four cities, reflecting their different interests in attracting workers of different types or controlling population growth.

The second article, by Zhang Zhanxin, discusses some of the same issues but from a different angle. The analysis broadens the perspective within which *hukou* policy and its implications for migrants' social rights are considered by placing them within the broader framework of marketization of China's economy and the development of a social welfare regime. Zhang argues that while it is true that the *hukou* used to completely determine rights to social protection in the collective era, and progress in *hukou* reform has been slow, these two other transitions have significantly reduced its importance and are progressively decoupling residence status and social rights in a way that benefits rural–urban migrants. Initially, he argues, migrant workers were very disadvantaged in relation to urban workers, most of whom worked in state-owned enterprises with job-related benefits. But as the state sector shrank and more people were employed in the private sector, this advantage lessened; and the *hukou*-neutral Labor Contract Law and Social Insurance Law further reduced the gap between migrant workers and urbanites, which has now become more a matter of underlying differences in financial, human and social capital than one of differences related to status. While he acknowledges that incomplete *hukou* reform will still affect the realization of migrants' rights, this still constitutes a substantive change. He therefore argues that although scholars have tended to focus on the distinction in *hukou* status between rural and urban people, the other distinction relevant to social rights is that between local and outsider, and this question of “local citizenship rights” deserves greater attention.

Luis Fraga and Bryan Wilcox's article addresses similar themes in the context of the United States. They consider the position of immigrants in terms of their legal *status* (right to residence) and their level of *integration* in terms of their rights to engage in employment and benefit from social protection. They begin by reviewing the evolution of United States immigration law and policy, and the way in which its provisions have grouped migrants into different status categories with different rights to reside in the US and different rights to employment, as well as different potential pathways to citizenship, which have profound effects on both the immediate life circumstances and the long-term prospects of migrants and their children. This array of statuses, from citizenship, through permanent residence and long-term work visas to temporary visas and complete lack of authorization mirror in many ways the complex array of statuses into which internal migrants within China may fall and there tends to be a negative correlation between poverty and disadvantaged legal status. At the same time, there is a complex and dynamic interaction between status and social rights and this differs across jurisdictions. Regardless of what national policy may be, it is easier in some cities than in others for migrants to realize their legal rights to social protection; and in some locations they may have local citizenship rights that go beyond national provisions. Fraga and Wilcox's analysis of pro-status and pro-integration law across states shows that since the late 2000s there has been a rapid increase in the number of such state-level bills passed. Bills relating to status are fewer in number and more constrained in their scope, relating mostly to the expansive or strict implementation of federal law on voting rights or reporting of illegal migrants. Bills relating to integration, over which states have more

control due to their responsibility for funding healthcare, education and other key areas of local policy, are more numerous and there is a clear difference between pro-immigrant states like California and Florida and anti-immigrant states like Arizona, Georgia and Indiana.

The other two articles in this collection unpack two specific policy areas, health and education. Van Tran and Katharine Donato provide an analysis of healthcare access to unauthorized (Mexican) migrants in the US with some comparative reference to rural–urban migrants in China. They begin by reviewing the way in which the size and diversity of the US unauthorized population have also increased over time and the corresponding diversity in the range of local policy reactions, from welcoming and neutral tolerance to hostile apprehension and deportation. Healthcare is a particularly fiercely contested policy field due to the high costs involved and Tran and Donato show how access to federally supported provision for unauthorized migrants and those with temporary residence status has decreased over time. Despite this, there is not a neat correlation between unauthorized status and lack of access to health care. Tran and Donato document significant variation in state level policy: pro-immigrant states like California and New York, have attempted to maintain some kind of safety-net for immigrants through community clinics and health centers, as well as by not aggressively enforcing immigration law that would call for checking legal status at the point of access to care. In addition to providing the unauthorized with safe haven, “sanctuary cities” extend social and health benefits, either by decoupling eligibility from legal status or by establishing these benefits program directly through state funding.

The final article by Jennifer Holdaway considers education and by doing so shifts the focus of attention from migrants to their children, who, especially in light of the rapid ageing of native born/urban populations, will form the core of the labor force in both China and the United States in decades to come. She finds that the similar background characteristics of migrant families—including poverty, low levels of parental education, mobility and social exclusion—create common challenges for children of migrants in both contexts. The structure of both education systems serves to exacerbate underlying socio-economic inequalities. In both countries, residential segregation, unequal funding, and formal and informal tracking processes concentrate migrant children in poor quality schools, resulting in low average levels of attainment and high drop-out rates. There are some obvious steps that could be taken in China to expand opportunities for migrant children, especially with regard to the transition to post-compulsory education, which is still constrained by their parents’ *hukou*. However, the experience of the United States shows that expanding *access*, while necessary, is not sufficient to level the playing field. To do this, targeted investments must be made to meet the specific educational needs of migrant children.

Collectively, these articles, and our larger project, demonstrate that there are indeed many commonalities to the challenge of integrating labor migrants into social protection systems, regardless of whether they cross a national boundary. Migrants’ lower levels of education and income in relation to local residents place them at a disadvantage in accessing market-based services, and their legal status often excludes them from access to public provision. While it is clear that in both

China and the United States, success in this endeavor will be crucial for economic development and social cohesion, it is also clear that in both contexts a great deal remains to be done to include migrants in social protection regimes.

These analyses also show that there is a limit to the value of national level comparison, especially in the context of two countries in which there is such a high degree of sub-national variation in migration flows, political interests and resources. In both countries, national policy has been interpreted and implemented very differently in light of local interests and concerns, with some states in the United States and some cities in China emerging as much more open, or hostile, to migrants. Closer examination of the structure and financing of social protection also shows different mixes of state and market that belie the idea that one social protection or welfare regime exists in either country. This suggests that future comparative research might most usefully focus on this level of government, further unpacking these variations and exploring their implications for the effective provision of social protection for migrant families.

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References

- Castles, F. G., Leibfried, S., Lewis, J., Obinger, H., & Pierson, C. (Eds.). (2010). *The Oxford handbook of the welfare state*. Oxford: Oxford University Press.
- Chan, K. W., & Buckingham, W. (2008). Is China abolishing the Hukou system? *The China Quarterly*, 195, 582–606.
- Department of Service and Management of Migrant Population, & NPFPC. (2017). *Report on China's migrant population development 2016* (pp. 3–6). Beijing: China Population Publishing House.
- DeWind, J., & Holdaway, J. (Eds.). (2008). *Migration and development within and across borders*. Geneva: International Organization for Migration.
- Isakjee, A. (2017). Welfare state regimes, a literature review. IRIS working paper series, vol 18. <https://www.birmingham.ac.uk/Documents/college-social-sciences/social-policy/iris/2017/IRIS-WP-18-2017UPWEB18.pdf>. Accessed 1 Mar 2018.
- Kunhle, S., & Sander, A. (2010). The emergence of the Western welfare state. In Castles, et al. (Eds.), *The Oxford handbook of the welfare state* (pp. 62–80). Oxford: Oxford University Press.
- National Bureau of Statistics of China. (2016). *China statistical yearbook 2015*. Beijing: China Statistics Press.
- Niu, J., & Zheng, Z. (2017). Hukou restricted migration and migrants' health: evidence and policy implications. *China Population and Development Studies*, 1(2), 81–103.
- OECD Better Life Index. (2018). <http://www.oecdbetterlifeindex.org/countries/mexico/>. Accessed 1 Mar 2018.
- Overseas Development Institute. (2001). *Social protection concepts and approaches: implications for policy and practice in international development*. London: Overseas Development Institute.
- Pew Research Center (2017). Facts on immigration. (Tabulations of 1960–2000 decennial censuses and 2010, 2013–2015 American Community Surveys (IPUMS)). 3 May. <http://www.pewhispanic.org/2017/05/03/facts-on-u-s-immigrants/#fb-key-charts-origin>. Accessed 1 Mar 2018.
- Pieke, F., & Mallee, H. (1999). *Internal and international migration: Chinese perspectives*. London: Curzon Press.

- Ratigan, K. (2017). Disaggregating the developing welfare state: Provincial social policy regimes in China. *World Development*, 98, 467–484.
- Roberts, K. (1997). China's tidal wave of migrant labor: What can we learn from mexican undocumented migration to the United States? *International Migration Review*, 31(3), 249–293.
- Sen, A. (1999). *Development as freedom*. Oxford: Oxford University Press.
- Solinger, D. J. (1999). *Contesting citizenship in urban China: Peasant migrants, the state and the logic of the market*. California: University of California Press.
- Ul Haq, M. (1995). *Reflections on human development*. Oxford: Oxford University Press.
- United Nations (1995). Copenhagen declaration on social development. <http://www.un-documents.net/cope-dec.htm>. Accessed 1 Mar 2018.
- Wang, C. (2018). Local governance in China: realizing the citizens' rights of migrants. *China Population and Development Studies*. <https://doi.org/10.1007/s42379-018-0002-3>.
- World Bank Open Data. (2015). Household income, United States 2015. <https://data.worldbank.org/>. Accessed 1 Mar 2018.
- Zheng, Y. (2007). *De facto federalism in China: reform and dynamics of central–local relations*. Singapore: World Scientific Publishing.
- Zutavern, J., & Kohli, M. (2010). Needs and risks in the welfare state. In Castles, et al. (Eds.), *The Oxford handbook of the welfare state* (pp. 169–182). Oxford: Oxford University Press.

Dr. Jennifer Holdaway is a Senior Research Fellow at the School of Interdisciplinary Area Studies (SIAS) of the University of Oxford and a Foreign Expert at the Institute of Geographic Sciences and Natural Resources Research, Chinese Academy of Sciences. She is also Co-Director of the Forum on Health, Environment and Development. Prior to joining SIAS she was a Program Director at the Social Science Research Council (SSRC) where she developed interdisciplinary and internationally comparative programs in the field of migration studies and on environment and health. Holdaway has written and edited numerous publications on these topics. For more details see <http://www.ccspp.ox.ac.uk/dr-jennifer-holdaway>.

Zhenzhen Zheng is a Professor at the Institute of Population and Labor Economics, Chinese Academy of Social Sciences.

Zhanxin Zhang is a Professor at the Institute of Population and Labor Economics, Chinese Academy of Social Sciences.