**Sonia Di Vito**

# LINGUISTIC REFLECTIONS ON THE CONCEPTS OF *INCLUSION* AND *INTEGRATION* IN OHCHR OFFICIAL DOCUMENTS

ABSTRACT. This article traces the history of the words 'integration' and 'inclusion' in official documents of the Office of the United Nations High Commissioner for Human Rights, adopted and signed by member countries. The analysis shows that it is only recently, and only in some documents, that integration and inclusion are mentioned, but without ever providing a precise definition of what integration and/or inclusion are. We will find answers and propose a synthesis using related concepts developed in sociology.
KEYWORDS: OHCHR. Integration. Inclusion. Migrants. Hosting policies.

## *Preliminary reflections on the two concepts*

In order to begin our reflection on the similarities and differences between the terms integration and inclusion, we want to get support from dictionary definitions to see if they are treated as two synonyms or if they have differences.

Collins Dictionary[1] says:

| Integration | Inclusion |
|---|---|
| **noun** <br> **1.** the act of combining or adding parts to make a unified whole <br> **2.** the act of amalgamating an ethnic or religious group with an existing community <br> **3.** the combination of previously racially segregated social facilities into a nonsegregated system | **1. variable noun** […] <br> **2. uncountable noun** <br> **Inclusion** is the policy or practice of making sure that everyone in society has access to resources and opportunities. |

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[1] https://www.collinsdictionary.com/dictionary/english, last accessed November 2024.

The word *integration* has multiple meanings and the one that concerns us most closely is number 2; it is a process in which one or more things come together and become one bigger thing. The word *inclusion* also has two meanings, but the one we are interested in appears to be an uncountable noun and involves the concept of giving everyone in a social group, resources and opportunities.

The Cambridge Dictionary[2] says:

| Integration | Inclusion |
|---|---|
| the action or process of successfully joining or mixing with a different group of people […] | the act of including someone or something as part of a group, list, etc., or a person or thing that is included […] |

The Oxford Dictionary[3] proposes the following definitions:

| Integration | Inclusion |
|---|---|
| The making up or composition of a whole by adding together or combining the separate parts or elements; combination into an integral whole | The action or an act of including something or someone (in various senses of include, v.) |

Even for these two dictionaries, the two words do not seem to be synonymous. The two definitions also emphasise that the parts that make up the whole are different and separate.

What the three definitions have in common is that these two concepts are different and do not seem to be interchangeable. The question therefore arises as to the use of these two terms in international documents referring to migrants.

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[2] https://dictionary.cambridge.org/dictionary/english/, last accessed November 2024.
[3] https://www.oed.com/search/advanced/Entries, last accessed November 2024.

### *The terms* inclusion *and* integration *in the Conventions promoted and adopted by OHCHR*

After analysing the definitions of the terms *inclusion* and *integration* found in various dictionaries available online, we are going to focus in this section on the findings of the two terms in some official documents of the OHCHR. These documents can be found online at the official website of the United Nations[4]; we analysed the section *Human Rights Instruments*, in both their subsections *Core instruments* and *Universal Instrument*. First, we looked at the official texts of the conventions and protocols that concerned migrants directly, which therefore had the words 'migrant(s)' and/or 'refugee(s)' in their title. We found four documents, namely the *Convention Relating to the Status of Refugees*, the *Protocol Relating to the Status of Refugees*, the *International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families*, and the *Protocol against the Smuggling of Migrants by Land, Sea and Air, supplementing the United Nations Convention against Transnational Organised Crime*, published in 1950, 1966, 1990 and 2000 respectively. No occurrence of the two words was found in the 1950 *Convention* (OHCHR, 1950) nor in the 1966 *Protocol*

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[4] https://www.ohchr.org/en/instruments-listings, last accessed Novembre 2024.

(OHCHR, 1966), one occurrence in the 1990 document, with a specific reference to children in art. 45 para. 2: '[...] aimed at facilitating the integration of children of migrant workers in the local school system' (OHCHR, 1990: 14). In the document on the smuggling of migrants, we encountered no occurrences of the word *inclusion* and six occurrences of the word *integration*, which always appears associated with the noun *organisations*. In this last case, it is an attribute to qualify those organisations (international, non-governmental) that are judged adequate, due to the preparation of their staff, to operate and to protect the rights of migrants subjected to illegal smuggling.

When talking about *inclusion* and *integration*, it is impossible not to think of these two concepts that have long been used in school education policies aimed at children/young people with special educational needs. Assuming that, we decided to study the OHCHR documents that directly address this issue, namely the 1975 *Declaration on the Rights of Disabled Persons*, the 2006 *Convention on the Rights of Persons with Disabilities* and the 2016 *Committee on the Rights of Persons with Disabilities* document. In the first document, the word *inclusion* is not found, while we encounter the word *integration* that is to be 'promoted' in 'normal life' and in society; in the second document, the word *integration* is used to characterise the associations that deal with people with disabilities and the term

*inclusion* comes into play associated with the adjective *full* and with the noun *participation*, specifying that inclusion takes place in 'society', in the 'community'. Thus, although we cannot find any clear definition of inclusion, the fact that it is associated with the term *participation* makes us assume that inclusion is an active process for all individuals belonging to a community. The 2016 document brings a major new feature: we finally find a definition of the two terms, opposing not only each other, but also the terms *segregation* and *exclusion*:

> «The Committee highlights the importance of recognizing the differences between exclusion, segregation, integration and inclusion. Exclusion occurs when students are directly or indirectly prevented from or denied access to education in any form. Segregation occurs when the education of students with disabilities is provided in separate environments designed or used to respond to a particular impairment or to various impairments, in isolation from students without disabilities. Integration is the process of placing persons with disabilities in existing mainstream educational institutions with the understanding that they can adjust to the standardized requirements of such institutions. Inclusion involves a process of systemic reform embodying changes and modifications in content, teaching methods, approaches, structures and strategies in education to overcome barriers with a vision serving to provide all students of the relevant age range with an equitable and participatory learning experience and the environment that best corresponds to their requirements and preferences. Placing students with disabilities within mainstream classes without accompanying structural changes to, for example, organization, curriculum and teaching and learning strategies, does not constitute inclusion. Furthermore, integration does not automatically guarantee the transition from segregation to inclusion.» (OHCHR, 2016: p. 3)

Such a definition is represented in the same year through a highly striking graphic in which the difference between inclusion and integration is immediately visible: in inclusion processes, diversity is an intrinsic part of the host community, and "diverse people" do not constitute a separate group within the community (Hehir et alii, 2016: 3). Whereas, in integration processes, diversity is accepted within the community as long as it conforms to the community's standards.
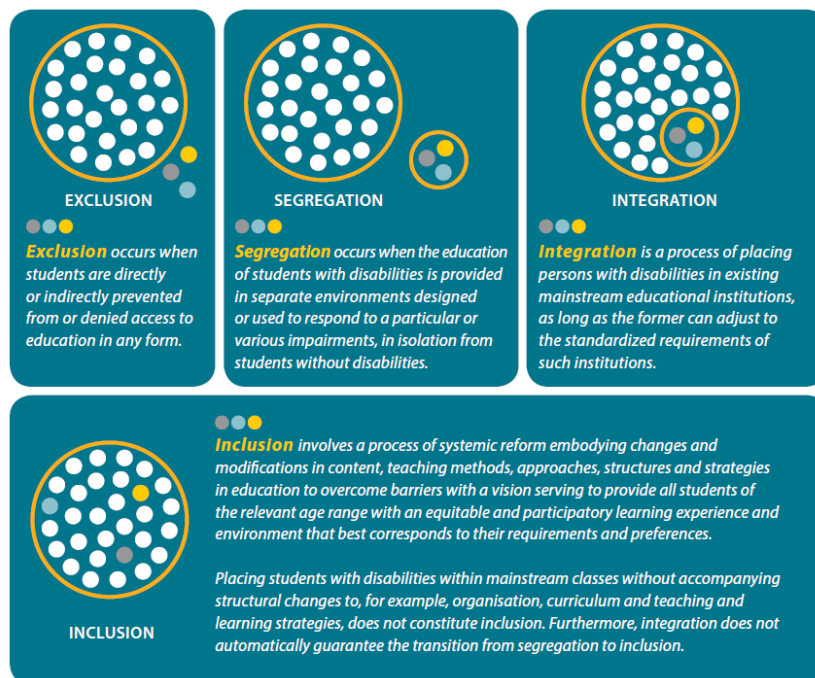


Fig.1- Representation of *segregation*, *inclusion*, *exclusion* and *integration* (Hehir et alii, 2016: 3)

However, as specified above, these definitions are given in official documents with respect to the situation of pupils and students with special educational needs in schools (of all levels). Can we also extend them to situations concerning the

condition of migrants in the host community? We will deal with this in more detail in the next section.

### *The integration process from different points of view*

The scientific literature on migrant integration processes unfolds on two different but highly related levels. In fact, on the one hand, research has focused on the strategies that the protagonists of the integration process put in place at the time of living together in the same territory; on the other hand, the policies implemented by governments to foster integration processes must also inevitably be taken into account. In the following sections we will try to explore these two spheres.

### *Attitudes and behaviours in the integration process*

Over the decades, increasing attention has been paid to processes concerning the attitudes and behaviours that migrants and host communities adopt toward each other and vice versa. In particular, in the last decades of the 20th century, Berry's (1980, 1990, 1997, 2005, 2006 among others) numerous works contributed to further reflection on the process of acculturation, namely on "what happens to individuals who have developed in one cultural context when they attempt to re-establish their lives in another one" (Berry, 1997: 5). In the process of acculturation, 4 types of strategies are evident, according to Berry (1997: 9), which depend on the attitudes that migrants and host community take toward each

other's culture. The first strategy is that of assimilation which is since migrants do not wish to maintain their cultural identity and seek interaction with the host community. The second strategy is opposite to assimilation because migrants do not want to lose their cultural identity and therefore avoid interaction with the host community; it is separation. Integration is the third type of acculturation and corresponds to the fact that there is, on the one hand, a desire to preserve their cultural identity and, on the other hand, a willingness to participate in life in the social context to which they belong. The last type is marginalization: migrants, due to discrimination or exclusion, have neither interest in maintaining their cultural identity nor in having relationships with others. However, in recent times, researchers need a more dynamic descriptive system that considers the complexity of integration processes. Therefore, Van der Zee and Oudenhoven (2022: 1) proposed a model that considers cultural empathy, open-mindedness, social initiative, emotional stability, and flexibility as skills that facilitate interactional dynamics and underlie intercultural competence. This model is based not only on the willingness of the migrant to be part of the community in which they live, but also on the willingness of the host community to be an active part of the integration process.

*Integration policies over the decades*

Alongside the behaviours adopted by those involved in the integration process, we have the policies, more or less effective, adopted by governments to foster integration processes. In 2010, Rodríguez-García reports on the dominant models of socio-cultural incorporation of migrants at the time: the assimilationist perspective and the multiculturalist perspective. The author summarizes them, highlighting their limitations and challenges and casts a glance at new directions. Until 2010, integration policies were generally classified into three models: assimilationist, multiculturalist and segregationist (Rodríguez-García, 2010: 253). The first perspective is based on the idea that the migrant community must fully adopt the rules and values of the host community. In this type of integration, migrants are the ones who have to adapt as much as possible, while the degree of acceptance by the host community is very low. An example is the case of France, which in 2004 banned the wearing of religious symbols, particularly the headscarf. The second, on the other hand, respects and protects cultural diversity within a framework of shared values. This policy was adopted, for example, in Australia in 1973, when Grassby, Minister of Immigration in the Whitlam government, delivered a speech on Australia's multicultural society of the future (Armillei and Mascitelli, 2017: 115). The segregationist or exclusionary model is

characterized by the separation or fragmentation of communities belonging to different ethnic groups (Rodríguez-García, 2010: 253). An example of this model was, until the first decade of the 2000s, the city of Stuggart, in which the population that did not have German passports lived in a specific part of the city that, by the way, was also inhabited by very poor segments of the population, both German and non-German (European Foundation for the Improvement of Living and Working Conditions, 2009: 13).

In the early years of the 21st century, policies based on multiculturalism were imposed, according to which the individual has the right to preserve their cultural heritage (Safdar et al., 2023: 3). Indeed, Safdar et al. (2023: 4) point out that in countries such as the US or UK, the younger generation of migrants could also be educated about their language, culture, history, religion, food, holidays. However, it was from these countries that the first speeches about the failure of multi-cultural policies came, since communities stayed separated from each other and also from the rest of the population. Moreover, as early as 2008, the Council of Europe stated that multiculturalism had proved inadequate and an approach based on intercultural dialogue was adopted, at the basis of which there are actions aimed at interactions between the various communities that make up a given society. It is also thanks to this paradigm shift that the European Commission

(2020: 12) stated in 2020 that the term *inclusion* or *empowerment* should now be used, as the term *integration* had started to coincide with *assimilation*. This concept is based on the fact that diversity is an advantage that can provoke mutual understanding and create a culture of diversity that enables the fight against discrimination and inequality; it presupposes an interaction based on the idea that cultures open up to each other and learn from each other in a dynamic interaction, in a kind of creative interchange, without losing their own identity (Nicola, 2012). In this perspective, the need for encounter and mutual change assumes great importance. It is necessary to take on diversity as a component of a community's identity through a profound knowledge of the 'different cultural universes' with the possibility of finding points of cohesion and harmonisation of these differences (Nicola, 2012), through interaction and dialogue for the resolution of possible conflicts, without any cultural group prevailing over the other. We can only accept the concept of integration if it is an expression of union that presupposes the fusion of many elements or subjects that complete each other often through the coordination of their means, resources and capacities[5]. And this meaning of the term *integration*/*inclusion* is in line with Kofi Annan's speech

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[5] Definition of the word *integration* taken from the Treccani online dictionary, https://www.treccani.it/vocabolario/integrazione/?search=integrazi%C3%B3ne%2F, last accessed November 2024.

delivered to the European Parliament in 2004, in which he stated that integration is a two-way street, because in order to integrate, i.e. to form a whole, reciprocity is needed.

### *Inclusion and education*

The Council of Europe promotes education for democratic citizenship, which presupposes the ability of each citizen to live in a society where different cultures exist, where diversity is a source of richness and where the Other should be approached with sensitivity and tolerance. Educating for democratic citizenship means educating for inclusion, participation and the promotion of culture and shared values.

And for the migrant to be integrated, society must be open to others and accept change; as Rocca (2020: 36-37) says, integration is a matter of collective commitment and must therefore be accompanied by educational measures for the benefit of all, capable of combating the ideologies that promote segregation and intolerance. To tackle discrimination arising from diversity, as early as 1966, UN *Covenant on Civil and Political Rights* strongly stated that individuals cannot be subjected to discrimination because of their language. In particular, Article 27 states that minorities must be able to preserve their culture, profess their religion and use their language. However, language is considered one of the most

important aspects of migrants' inclusion, both by the host society and the migrants themselves (OIM, 2019: 220). The language of the host country, and in particular the lack of knowledge of it, is one of the first obstacles that migrant must overcome and becomes a real barrier to integration. Language enables interactions, but it is also a means by which migrants evolve in the new community, as it gives them progressive access to health care, housing, education and work. For this reason, language training for migrants is a priority aspect of government policy: specific free language courses, which may be compulsory for migrants, will be set up and complemented by civic and social education courses (OIM, 2019: 221). However, while knowledge of the host community's language also constitutes a fundamental element from the migrants' point of view, having a too high requirement (a level of knowledge from B1 upwards) can be detrimental to their inclusion as language tests can dissuade migrants from applying for a particular status, and can also exacerbate the vulnerability of some of them who are unable to pass the language test for various reasons (age, level of education, family and economic background, state of health...). ALTE (Association of Language Testers in Europe, 2016: 32), for its part, states that language integration requires not only a general level of linguistic competence, but also awareness of the cultural norms of the host society and presupposes the

ability to relate these to the migrant's linguistic and cultural background. Beyond formal issues, if the migrant really wants to be and feel integrated in a community, an empathic dialogue with the new environment needs to be set up, learning contexts need to become 'emotionally warm', as Flora Sisti (in press) argues; the development of an empathic attitude both in the migrant and in the host community needs to be fostered.

This is why welcoming and training stakeholders have a duty to foster a plurilingual and intercultural educational perspective, according to which diversity is an asset, to be welcomed and valued. This perspective must characterise the education of migrants but also that of host communities; opportunities to meet and exchange, to get to know each other, to narrate the self that leads us to discover the other and to see them no longer as a threat but as a value, as a possibility for human and cultural growth.

### *Conclusions*

Promoting effective integration policies makes it possible to better manage the coexistence of migrants and host communities. Such policies require mutual accommodation between migrants and host societies and respect for shared values. In designing comprehensive policies, it is important to recognise that integration must address both long-term and short-term migrants. Promoting

integration helps migrants to participate fully in social, political and cultural life, while educating host communities to recognise the positive contributions of migrants, reducing misconceptions and promoting inclusion. Ultimately, it can be said that integration is a path that, if properly managed, leads to inclusion, i.e. the creation of a community based on mutual understanding and respect for each other's diversity.

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