

From Divergent Paths to Convergent Policies: A Comparative insight into the Dutch and UK Asylum Policies

A qualitative case study research

Hasna el Morabit
613494
Erasmus University
MSc International Public Management and Public Policy
First reader: Sandra van Thiel
Second reader: Markus Haverland
2024/2025
Date of Completion: June 16th, 2025
Wordcount: 11998

Summary

This thesis investigates the domestic and transnational factors that drive restrictive asylum policy in the Netherlands and United Kingdom in 2024. In spite of the divergent institutional frameworks, the Netherlands' membership and alignment with EU asylum norms and the Brexit-driven unilateralism of the UK, both countries have opted for restrictive asylum policies by framing asylum seekers as national security, welfare and cultural risks. Whereas previous studies have looked at populist rhetoric and transnational policy diffusion separately, this research brings these variables together under a comparative framework to explain the convergence of asylum policy restrictiveness. By using Kingdon's Multiple Streams Framework (MSF), this qualitative case study determines how populist political strategy, crisis frames, and transnational policy diffusion all came together to create 'policy windows' for restrictive policy reform. This thesis analyses legislative texts, party manifestos, media reports, and interviews with specialists and shows that restrictive policies are the outcome of convergence of three streams: (1) problem framing (e.g. crisis narratives), (2) policy emulation (i.e. copying transnational policy designs), and (3) populist electoral rhetoric (e.g. Netherlands' PVV and UK Conservatives' and Reform party). The research findings show that asylum policy restrictiveness is not an inevitable outcome of structural problems, but is instead a politically constructed choice, driven by political agency and transnational interdependence. This thesis adds to the Multiple Streams Framework and refines the framework by linking transnational policy diffusion to the policy stream as a solution for domestic crises. The findings contribute to further debates on migration governance and shed light on a new era of rising populism and securitization in governance.

Keywords: asylum policies, securitization, populism, restrictive, policy diffusion, United Kingdom, Netherlands

Acknowledgement

This project would not have been made possible and successful if it wasn't for my thesis supervisor prof.dr. Sandra van Thiel. Thank you for the encouraging words, feedback and support during this exciting end of my studies. Furthermore, I would like to thank the two experts, prof.dr. Peter Scholten and prof.dr. Daphne Halikiopoulou, for participating in my thesis research and providing me with incredibly valuable knowledge on this topic. I would also like to thank prof.dr. Markus Haverland for taking the time to read and assess my thesis.

Lastly, I would like to thank my thesis circle and fellow students, Yoosung, Sean, Dwayne and Steve, that have given me feedback, support, and kind words during our research process. Your help has been invaluable, and I could not ask for a better group.

I would like to dedicate this thesis to my parents who, even though they did not have the privilege to have an education, have always supported me and given me motivation to continue and succeed in mine.

List of Content

Summary	2
Acknowledgement	3
Chapter 1. Introduction	6
1.1 Problem statement	6
1.2 Academic and societal relevance	7
1.3 Thesis outline	8
Chapter 2. Theoretical framework	9
2.1 Introduction	9
2.2 Domestic Influences	9
2.3 Transnational Influences	11
2.4 Kingdon's MSF	13
2.4.1 The Problem Stream	13
2.4.2 The Policy Stream	14
2.4.3 The Political Stream	14
2.4.4 Policy Windows and Entrepreneurs	15
Theoretical Discussion	15
2.5 Conceptual model	16
Chapter 3. Research design and Methodology	18
3.1 Research design	18
3.2 Justification case selection	19
3.3 Operationalization	20
3.4 Method of data collection	22
3.5 Selection of Documents	24
3.6 Validity and reliability	25
Chapter 4 Results	28
4.1 Introduction	28
4.2 The interplay of Forces: Domestic and Transnational Factors	28
4.3 Problems and Crises	29
4.3.1 Securitization in the Netherlands	29
4.3.2 The 'Disorganized' UK	30
4.4 The Power of Politics	31
4.4.1 The Dutch Directness	31
4.4.2 UK's Polarized Climate	32
4.5 Policies Beyond Borders	34
4.5.1 The Dutch Steering the Union	34
4.5.2 Creating New Paths In and Beyond Brussels	35
4.6 Expert Interviews and Conclusion	36
Chapter 5 Conclusions	38

<i>5.1 Answers to the questions</i>	38
<i>5.2 Discussion</i>	40
<i>5.3 Limitations and Recommendations</i>	41
5.3.1 Implications of Validity	41
5.3.2 Academic Recommendation	42
5.3.3 Recommendation for Practice	43
Bibliography	44
Appendices	51
<i>A. Information sheet and Consent form</i>	51
<i>B. Coding list</i>	54
<i>C. Interview Guides</i>	56
<i>D. Tables of selected documents</i>	59

Chapter 1. Introduction

1.1 Problem statement

Over the last few years, Europe has seen a shift in migration governance. This shift, highlighted by stricter border security and the prioritization of deterrence, has paved its way through many European governments (Geddes, 2018). The ‘migration crisis’ in 2015, which included over one million asylum applications in the EU, can be seen as a turning point in many EU countries (Castles et al., 2020). EU member states started questioning their sovereignty and EU’s security measures. These debates were exacerbated after 2020 due to global instability. The return of the Taliban in Afghanistan, the war in Ukraine and migration due to climate change are examples of these global instabilities that occurred (UNHCR, 2023). EU member states, and countries bordering the EU, have in response adopted more restrictive policies reframing migration as a security problem rather than a humanitarian issue (Stefan & Cortinovis, 2021).

The Netherlands and the United Kingdom (UK), despite their different geopolitical position, are examples of the asylum policy shift. The Netherlands has historically been a supporter of the EU solidarity sentiment and liberal asylum norms. However, in 2024 the Dutch government introduced the so-called ‘strictest asylum policy ever’, an asylum policy package that includes stricter eligibility criteria, an opt-out of future EU asylum treaties and more (Ministerie van Asiel en Migratie, 2024). Simultaneously, the UK, post-Brexit, has adopted unilateral measures in ‘The Border Security, Asylum and Immigration Bill’. This bill includes the strengthening of border security, enhance the power of law enforcement and more (The Home office, 2025). These measures highlight a broader EU shift to ‘govern migration’ with the use of restrictive policy (Geddes, 2018).

In this thesis, I will study how different factors such as domestic politics, transnational pressures and policy reform theories explain the increased restrictiveness of the asylum policies in the Netherlands and the United Kingdom. Through a comparative case study, this thesis asks:

How do domestic and transnational factors explain the increased restrictiveness of asylum policies in the Netherlands and the UK in 2024?

This research question is backed by three sub-questions:

1. How do the Netherlands and the UK define (and implement) their latest asylum policies?
2. Which factors are theorized in Kingdon's Multiple Streams Framework that drive restrictive asylum policies?
3. Which domestic and transnational factors do the Dutch and UK governments allude to for adopting restrictive asylum measures?

The aim of this research is to explain why there was a change within the two governments and what has caused these changes.

1.2 Academic and societal relevance

Scholars have extensively researched the trends and rise of restrictive asylum policies in western Europe (Consterdine & Hampshire, 2020). However, there are still critical gaps that remain in the field. Firstly, there are not many comparative studies of the Netherlands and the UK. Despite the two countries have differing institutional frameworks; the Netherlands being tied to EU asylum cooperation (e.g. Dublin regulation) while the UK has gained more unilateral power post-Brexit, both countries are on the same path in policy reform. This makes for an interesting perspective to research both cases on the causes of their policy reform. I will explain the justification of the two countries further in Chapter 3. Furthermore, existing research often overlook the link between domestic political narratives and policy reforms. Especially how the popularization of far-right parties in both countries has led to a rise in anti-migration rhetoric as an attempt to influence the policy agenda has not been studied that often yet (Mudde, 2019). Lastly, while policy reform theories such as the Multiple Streams Framework (Kingdon, 1984) have been applied to migration governance, their explanation for present day restrictions are yet to be analyzed.

This research is relevant for society as restrictive asylum policies have serious human rights implications. The UK's Rwanda 'plan' was criticized for violating the non-refoulement principle by the UNHCR (Limb, 2023). The Netherlands on the other hand, faced critique due to the reduced protection for unaccompanied minors by organization like Amnesty International (Galloway et al., 2015). These situations highlight the ethical dilemmas in asylum governance. This research informs policy makers, politicians and international organizations about the

causes and consequences of the highly restrictive approaches used in the shaping of asylum policy (FitzGerald, 2019).

1.3 Thesis outline

The outline of the thesis is as followed: Chapter 2 is the theoretical framework. This will include policy reform concepts and theories. The main policy theory that will be used is the Multiple Streams Framework by John Kingdon (1984). This theory is used to analyze policy reforms according to different streams coming together and creating a policy window (Kingdon, 1984). Chapter 3 gives an overview of the methodological course of this research. This chapter explains the operationalization, reliability and validity of the research methods. In Chapter 4 the results of the gathered data will be analyzed and explained. Lastly, the research question will be answered in Chapter 5.

Chapter 2. Theoretical framework

2.1 Introduction

This chapter combines three theoretical lenses: domestic populist political strategies, transnational factors (post-Brexit sovereignty and policy diffusion), and Kingdon's Multiple Streams Framework (MSF), to explain the increased restrictiveness of asylum policies in the Netherlands and the UK in 2024. The chapter develops a theoretical explanation by first examining more broad and general drivers of policy change, including transnational policy diffusion and shifts in political ideology (e.g., populism). It then narrows to Kingdon's Multiple Streams Framework (MSF), which integrates these concepts into a cohesive model.

The theory of domestic populism explains how right-wing parties use anti-migration narratives and rhetoric to frame asylum seekers as threats to national identity, national security or welfare systems. This is an attempt to leverage public distress to legitimize restrictive measures (Mudde, 2022). Transnational dynamics show us how structural changes, such as the UK's post-Brexit sovereignty agenda and the Netherlands' uncertainty toward EU asylum regulation, expand or constrict policy alternatives.

Finally, Kingdon's Multiple Streams Framework connects these dimensions by explaining how crises, such as sudden and substantial migration flows, open "policy windows," allowing for restrictive measures to align with political agendas. The framework assumes that restrictive policies develop when populist narratives and rhetoric boost public demand for control (political stream), transnational factors redefine and allow for new feasible solutions (policy stream) and focusing/chance events like the asylum crises (problem stream) converge to create the pathway for policy reform.

2.2 Domestic Influences

Mudde (2004) describes populism as a "thin ideology," that positions a virtuous "people" opposite a corrupt elite. This ideology, with the use of framing of groups that seek asylum, has become a significant driver in shaping debates on asylum. Particularly, right-wing populism intertwines rhetorical 'anti-establishment' messages with nativist and authoritarian appeals, depicting migrants as cultural and economic threats (Mudde, 2007). Populist parties like

Netherlands' Party for Freedom (PVV) or the UK Independence Party (UKIP) use crises, actual or manufactured, to present themselves as the guards of national identity against the evildoer of uncontrolled migration (Vossen, 2011; Bale, 2013). They commonly depict '*welfare chauvinism*', associating the problems of housing, healthcare, or jobs with asylum seekers (Andersen & Bjørklund, 2021; Hedegaard & Larsen, 2024).

States are aware of their differing international obligations regarding asylum policies, but domestic politics often play a decisive role. Governments have to find the right balance between competing interests, electoral incentives, and public sentiment. Asylum governance is ideological in nature, this is clear when looking at the different ideologies of political parties. There is conflicting attention to the social costs and benefits of migration (Hedegaard & Larsen, 2024). Although international norms and transnational pressures shape how policies are designed, it is domestic actors such as political parties, media, and civil society that drive how asylum policy is created, enforced, and justified (Mudde, 2004). The call for either reinforcement or mitigation of restrictiveness derives from the framing of migration at the level of national discourse that is triggered by the earlier mentioned domestic actors.

Central to this process is the concept of securitization. This is evident when political elites present migration as an existential threat to support the implementation of emergency measures (Buzan et al., 1998). Through representing asylum seekers as a threat to national security, social cohesion or economic stability, governments justify policies which prioritize detention over safety (Van der Brug, 2024). This ongoing process is not just a matter of rhetoric, it transforms institutional priorities by concentrating resources to border enforcement, detention and deterrence policies (Goodwin-Gill, 2023). That said, securitization does not happen on its own. Populism is frequently used as a political tactic, exploiting public fears to promote power while invalidating those with a different viewpoint (Mudde & Rovira Kaltwasser, 2013).

Populist parties force mainstream actors to adapt their strategies. Center-right and center-left parties, fearing electoral losses, often pursue accommodative strategies, including populist themes in an effort to neutralize challengers (Bale et al., 2010; Albertazzi et al., 2021). This "populist contagion" makes exclusionary rhetoric acceptable, even among traditionally progressive parties (Mudde, 2013). For example, center-right governments may tighten asylum eligibility criteria or create more policies for detention to get ahead of populist critiques (Geddes, 2023), while center-left parties reframe humanitarian commitments as "balanced"

approaches that “prioritize territorial integrity and national interests” (Hedegaard & Larsen, 2024). Such cooperation further establishes restrictive norms that translate populist ambitions into institutionalized, as opposed to merely electoral, policy outcomes (Van Spanje, 2010).

Importantly, the populist influence is not limited to legislative changes. It reframes how society views asylum seekers, relegating them to the level of “illegal invaders” or “system exploiters” (Cap, 2019; UK Government, 2024). Such a discursive shift undermines public empathy and creates an accepting space that allows for punitive solutions (Esses et al., 2017). Media narratives exacerbate this effect by overemphasizing criminality or cultural differences while under-reporting stories of displacement or trauma (Hellwig & Sinno, 2017). The combined effect of these narratives overtime shifts the bounds of what is seen as acceptable and unacceptable policy (FitzGerald, 2023).

2.3 Transnational Influences

Ultimately, it is clear that restrictive asylum policies are the result of a process shaped by transnational learning, normative contestation, and strategic repositioning (Börzel & Risse, 2009). Transnational dynamics such as policy diffusion, Europeanization, and the matter of sovereignty in a post-Brexit Europe, can be seen as drivers of (asylum) policy reform in Europe.

Policy diffusion, referring to the interdependent adoption of policies between states (Gilardi, 2013), offers an interesting perspective through which to conceptualize the role of external pressures in shaping national asylum governance. This process can function through mechanisms like learning, where states adopt policies in to solve common problems. Another reason would be emulation, where states align based on concerns about their legitimacy or have regulatory aspirations (Guérin, 2016). For example, neighboring non-EU states may adopt EU asylum standards to regulate their own migratory problems by combining their powers with the EU. This shows a highly functional response to global problems (Börzel & Risse, 2009). On the other hand, it is possible that other democracies may copy EU policies to signal compliance of humanitarian values to other countries and/or international organizations or as an effort to diminish their own (democratic) deficits (Gilardi, 2005). These types of policy learning mechanisms show how global pressures transcend national borders. This can lead to the conditioning of restrictive and/or humanitarian policies that go into broader global regions than solely the country they have been created in.

Europeanization, meaning the internalization of EU norms and institutional practices has shaped the governance of asylum historically in member states like the Netherlands. Because of this, EU frameworks, such as the Common European Asylum System (CEAS), generate two forms of compliance pressure: compulsory legal requirements (e.g. the Dublin Regulation) and collectively held humanitarian standards (Wallace, 2000). Yet the spread of populism has encouraged contestation of these norms, compelling states to interpret EU imperatives in narrow terms. The Netherlands' 2024 Asylum Acceleration Act, for example, shows that the Netherlands more or less keep the formal compliance mechanisms of CEAS, but will limit the set procedural safeguards (Van der Brug, 2024). This highlights the strategic balance of the Dutch between the compulsory EU obligations and the current anti-migration sentiment that is present domestically. Tension that this balance creates, points out how Europeanization allows for both alignment and adaptation in the way that states are able to navigate the supranational regulation while simultaneously calming and/or quieting domestic audiences.

In contrast, the UK's post-Brexit trajectory is an argument in favor of de-Europeanization, i.e. rejection of EU norms, and de-EU-ization, i.e. disengagement from EU structures (Müller et al., 2021). Through these unilateral moves, by detaching itself from the Dublin Regulation and negotiating bilateral deals such as the Rwanda deportation agreement, the UK will scale sovereignty back down to the national level and emphasize bilateralism over multilateral cooperation (Wolff et al., 2024). This change is not necessarily isolationist motivated but rather represents a strategic rebuilding motivation of the UK. Instead of copying from the EU, their policies replicate non-EU practices, such as Australia's offshore processing, to signal independence while also responding to migration in a sober way (Wolff et al., 2024). The rhetoric that is used by the Conservative Party, framing asylum seekers as 'invaders' (Yahoo! News, 2025), is obtained from existing populist discourse that has been used in the Europe. This is interesting as this usage of narratives still distances the UK from the EU and their humanitarian norms.

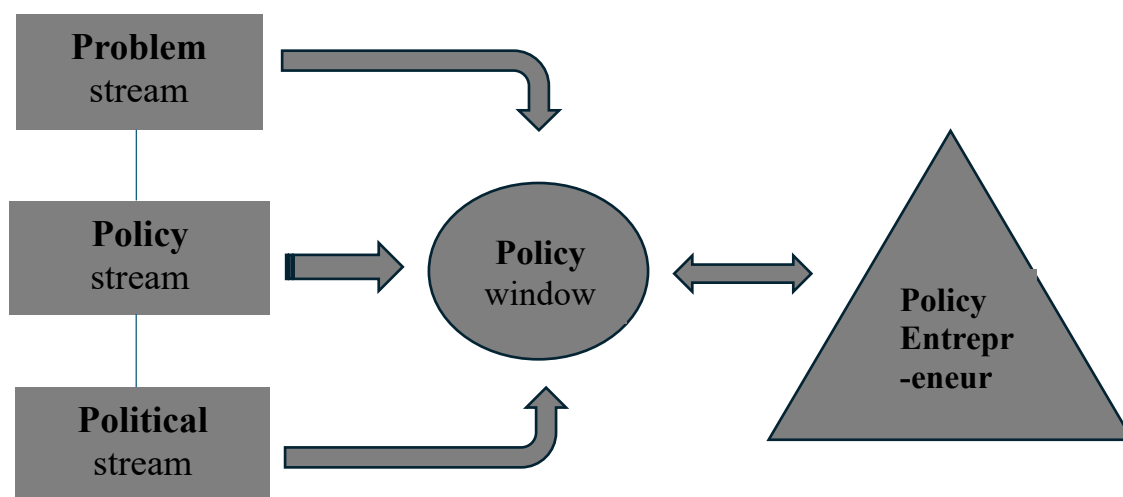
Bilateral efforts that have become more favored post-Brexit, further show how the UK uses a combination of policy diffusion mechanisms. While on the one hand the UK rejects the EU asylum frameworks, such as the CEAS, it does participate in policy learning mechanisms from policy models of EU countries that prioritize deterrence (e.g. Italy's collaboration with Libya) (Blatter et al., 2021). The Rwanda plan, that was depicted as a humanitarian solution to help

with channel crossings, emulates externalization practices of the EU but, in their case, operates outside of the EU's accountability area. This reiterates the theory of policy diffusion where, in this case, there is a combination of signaling sovereignty while mimicking the same pragmatic policies. This shows how there are still transnational influences within states that are set on disengaging from multilateral/regional systems. This becomes more clear with issues that transcend borders such as climate change but also migration.

2.4 Kingdon's MSF

The Multiple Streams Framework by John Kingdon (1984) brings a unique perspective to understanding the development of asylum policies as the result of the convergence over time of three separate and yet complementary streams as seen in Figure 1. The problem, policy, and politics stream, that for the most part operate independently from each other, come together and eventually align as a policy window opens (Kingdon, 1995). This conceptual framework is especially valuable for analyzing the recent, more punitive turn of asylum policies, considering how the combination and accumulation of crises, previously known solutions and political opportunities provide the justification for those exclusionary policies.

Figure 1. *Kingdon's Multiple Streams Framework*



2.4.1 The Problem Stream

The problem stream includes conditions that are recognized by policy makers as needing policy attention, which are often created through a crisis, focus event or change in public and political attention (Kingdon, 1984). In the area of asylum policymaking, specifying the problem is of

high importance: after all, migration spikes, fears for national security and/or domestic backlash against multiculturalism can elevate asylum to the top of the political agenda. Take, for example, the 2023 asylum reception crisis in the Netherlands when there were overflowing lines outside facilities and the addition of protests at the same time, which redefined migration as a logistical and social emergency that could not be ignored (Van der Brug, 2024). In a similar way parallels can be observed in the case of the Channel crossings in 2022 and how the media and political narratives framed irregular migration as a national security issue targeting the UK national borders (Goodwin-Gill, 2023). These situations can be classed as focusing events which are events that inform and reshape political agendas, mobilizing, earlier inactive, public concerns into bigger problems with policy solutions (Kingdon, 1984). Importantly, problem interpretation is not neutral but the result of strategical attempts by policymakers and political actors to overemphasize certain stories by, for example, linking asylum seekers to lack of housing or welfare pressure (Andersen & Bjørklund, 2021).

2.4.2 The Policy Stream

The policy stream is developed with solutions that already exist in public policy areas and now need to match up with the right problem. Solutions are considered based on their feasibility, cost-benefit effectiveness, and acceptability to stakeholders (Kingdon, 1984/2014). In Europe, policy options like externalization plans, accelerated procedures, and detention expansion have been thoroughly debated over decades regarding asylum restrictiveness and crisis management (Jeannet, et al., 2010). For instance, the UK's Rwanda deportation plan drew inspiration from models such as Australia's offshore processing model, this time bundled as a 'new' deterrence strategy (Blatter et al., 2021). On the other hand, the Netherlands' 2024 Asylum Acceleration Act was a copy of previous EU proposals to score high on the processing of asylum applications, redesigned to fit domestic political needs (Spieker, 2024). Such solutions are not adopted unless they seem both technically feasible and politically acceptable, a process that is usually helped through transnational diffusion of policy ideas (Gilardi, 2013).

2.4.3 The Political Stream

In the political stream we find changes in public opinion, electoral cycles, and institutional (in)balances of power (Kingdon, 1984). Populist parties like Netherlands PVV and UK Conservative party have turned the political current by posing migration as a cultural and economic threat, changing the national mood as Mudde (2007) explains this. Populist parties

and their rhetoric have more influence and impact than merely electoral successes; mainstream parties assimilate populist narratives as a measure to prevent electoral challenges in the future. This leads to populist-motivated restrictive policies that are getting positioned in the policy agendas (Bale et al., 2010). For instance, a UK post-Brexit narrative focused on regaining sovereignty in border control established an accepting space for a controversial Illegal Migration Act 2023 (Morgan & Willmington, 2023). At the same time, the coalition government in the Netherlands were forced to prioritize the reduction of asylum seekers in coalition agreements due to a discourse led by the populist right PVV (Van der Brug, 2024). Thus, which solutions become legitimate is determined by political stream dynamics where policymakers tailor their proposals to dominant ideologies and electoral incentives.

2.4.4 Policy Windows and Entrepreneurs

Policy windows, meaning when the problem, policy, and political streams coincide, enable accelerated policy change. These windows are most often opened through focusing events such as a migration crises, electoral change or bureaucratic opportunities (Kingdon, 1984). In the UK, the 2022 Channel crossings surge acted as an impulse, which allowed then Prime Minister Rishi Sunak to fast-track the Rwanda scheme amidst heightened public concern (McKiernan & Wright, 2024). In the Netherlands, the 2023 housing shortage crisis provided Geert Wilders' PVV with bargaining power to demand more stringent asylum policies in coalition talks (Van der Brug, 2024). Policy entrepreneurs, such as populist leaders or bureaucrats, play an important role in connecting solutions with problems during these windows of opportunity. An example would be Suella Braverman, Home Secretary of the UK, linking the Rwanda scheme to border security narratives, framing it as a deterrent as well as a humanitarian approach (Walker, 2023).

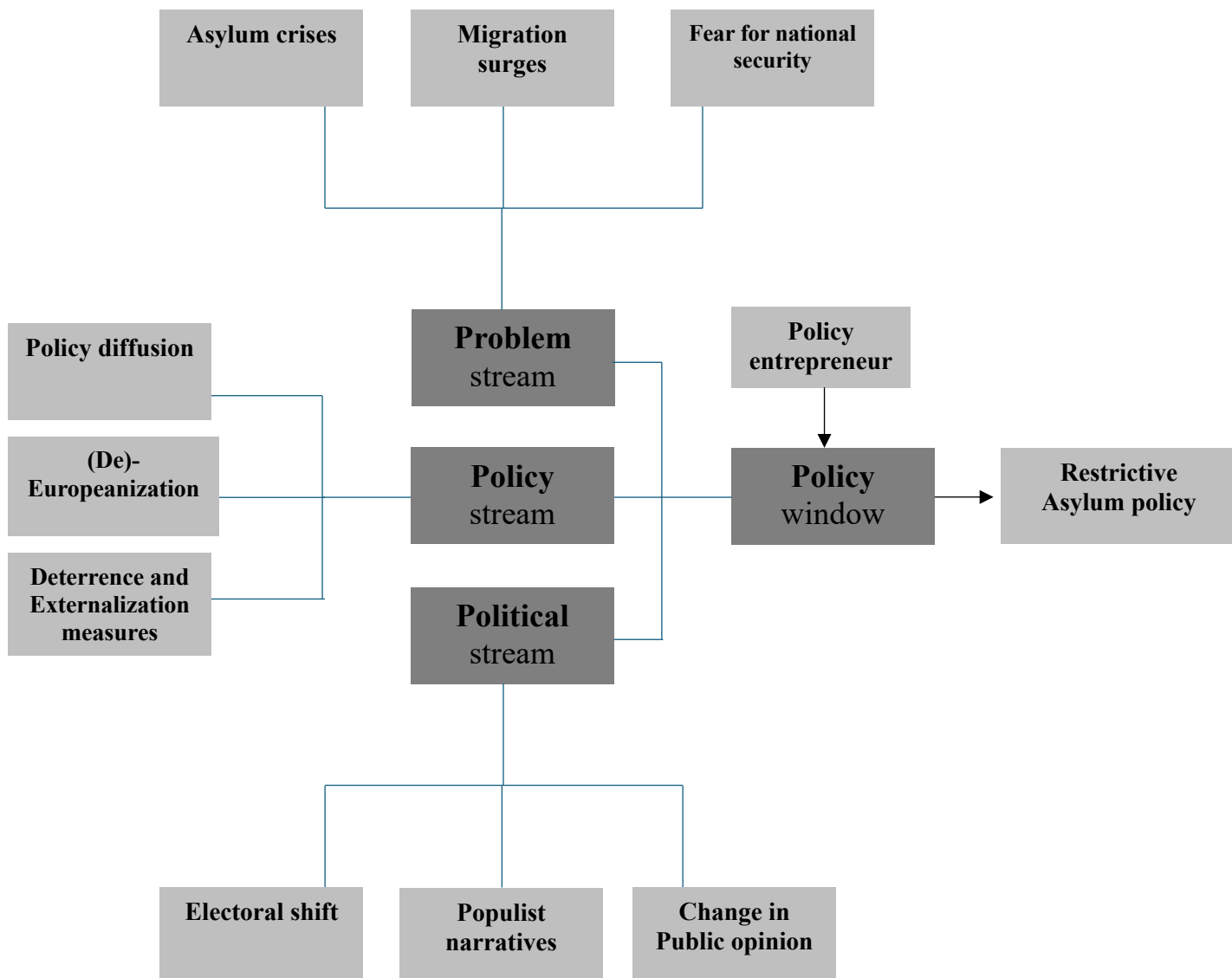
Theoretical Discussion

Kingdon's Multiple Streams Framework accounts for how restrictive asylum policies emerge from the interplay between problem definition, pre-existing solutions, and political opportunism. The Netherlands and UK cases demonstrate that restrictiveness is not a necessity but a fair outcome of a long process of strategic agency: policymakers using crises to legitimize exclusionary policies, while political actors experiment with frames and narratives to match public opinion with punitive solutions. This theoretical framework emphasizes the time and context specificity of policy change, showing how windows of opportunity, whether created by migration spikes or electoral changes, make room for the institutionalization of restrictiveness.

Going across domestic and transnational factors, MSF highlights the dynamics of asylum governance and policy making in a time of growing populism and securitization.

2.5 Conceptual model

Figure 2. *Conceptual model*



This conceptual model integrates Kingdon's Multiple Streams Framework (MSF) with transnational and domestic pressures to account for restrictive asylum policy (see Figure 2). The **problem** stream (e.g., migration crises) puts asylum on the agenda as an emergent issue, reframing it through securitization or welfare chauvinism (Buzan et al., 1998; Andersen &

Bjørklund, 2021). The **policy** stream (e.g., new asylum legislation) contains current solutions diffused over borders. This can be seen with the alignment of the Netherlands with EU norms (Europeanization) or Britain's post-Brexit Rwanda idea (de-Europeanization) (Guérin, 2016; Wolff et al., 2024). The **political** stream (e.g., rising populism) rephrases narratives to influence the public and institutional agendas so that parties like the PVV or UK Tories can introduce and establish anti-asylum policies (Mudde, 2007).

When these streams come together during a policy window, that is triggered by an electoral shift or crises, the **policy entrepreneurs** (e.g., Geert Wilders, Suella Braverman) couple the emerged problems with politically viable solutions to legitimize the restrictive policies. For example, the Netherlands' 2024 asylum reforms were the outcome of populist electoral gains (political stream), reception crises (problem stream), and EU-driven procedural changes (policy stream). Conversely, the UK's Rwanda strategy illustrates de-Europeanization, rejecting EU norms and replicating other deterrence policy models (Blatter et al., 2021). Policy diffusion then operates through learning (EU frameworks) or symbolic imitation (post-Brexit unilateralism).

Transnationally, policy diffusion will take place through various mechanisms. EU member nations like the Netherlands will, under the umbrella of supranational norms, reinterpret asylum systems in a restrictive sense (contested Europeanization), while post-Brexit, the UK will experience symbolic imitation of external models of deterrence and securitization. This as an effort to refuse EU authority but matching the deterrence practice through bilateral agreements (de-Europeanization). The diffusion is both functional learning for addressing shared challenges and strategic emulation to validate their own sovereignty or legitimacy.

Crisis, such as waves of migration, housing crises, or electoral shifts, will be **policy windows** of opportunity through which policy entrepreneurs can match the asylum problem streams with available solutions. Policy entrepreneurs, including populist leaders and other politicians, will use transnational examples and domestic narratives to frame crises, navigate institutional barriers, and institutionalize the exclusionary policies. This process, based on agency, reinforces the centrality of political agents to balance transnational pressures and domestic contexts in an effort to shape the pace and form of asylum restrictiveness in Europe.

Chapter 3. Research design and Methodology

This chapter outlines the methodological approach that is used to investigate the factors behind the Dutch and UK restrictive asylum policies. This study will adopt a multiple case study design that has the most similar characteristics as a dissimilar cases design, to comparatively analyze systematically how domestic and transnational variables interact in the Netherlands and the UK. The research applies expert interviews and content analysis of original and secondary materials like policy briefs, parliament debates, media reports, and political party statements using the Atlas.ti software to code and analyze asylum discourse and decision-making trends.

The structure of the chapter is as follows: **Section 3.1** describes the research design, stating why a multiple dissimilar cases study was chosen within this case study approach. **Section 3.2** describes the reasons why the Netherlands and the UK were selected as contrasting yet informative cases with varying EU engagement and shared restrictive tendencies. **Section 3.3** operationalizes the variables such as populist rhetoric, policy diffusion, and framing the crisis by connecting them to empirical and measurable indicators. **Section 3.4** details the data gathering process. **Section 3.5** addresses the selection of documents and finally **Section 3.6** explains the methodological strengths and limitations.

3.1 Research design

This study uses an explanatory qualitative multiple case study design in analyzing the explanations for increased restrictiveness in asylum policy in the Netherlands and the United Kingdom. Following Swanborn's (2010) framework, the research is aimed at studying social phenomena in their naturalistic environments, with an emphasis on determining how political, institutional, and transnational factors have shaped the changes in asylum policy (Beach, 2020). Case studies are strongly suited to this type of research as they are facilitating in-depth analysis of complex policy changes while still retaining the richness of naturalistic settings such as public opinion shifting (Swanborn, 2010).

The design concentrates on two national cases, selected for their differing relationships with the European Union and similar pathways toward restrictive asylum policies. By comparing these cases, the study aims to uncover patterns and variances in how domestic and transnational processes shape policy outcomes. The study employs a qualitative multiple cases analysis, a technique that systematically tests combinations of conditions (e.g., populist rhetoric, crisis

frames, EU norms) to identify pathways to restrictive reforms. This method is ideal for the comparative nature of this study since it provides a balance between structured comparison and sensitivity to contextual contingencies without oversimplifying (Heale & Twycross, 2018).

3.2 Justification case selection

The Netherlands and the UK demonstrate a interesting comparison because of their different institutional frameworks while, in the end, having similar policy outcomes. Firstly, the Netherlands, as an EU member, is directed by the supranational framework like the Common European Asylum System (CEAS) within the EU. This framework mandates shared responsibility for asylum seekers (Lavenex, 2001). The UK, on the other hand, has left the EU responsibilities such as the Dublin regulation and in lieu opted for bilateral agreements such as the Rwanda partnership. This as an effort to prioritize sovereignty instead of multilateralism (Limb, 2022).

Another reason for this comparative analysis is the similar rise of right-wing parties in both countries. In the Netherlands, Party for Freedom (PVV), has changed the mainstream narrative towards immigration and influencing the policy agenda as an effort to limit the asylum intake (Van Spanje & Azrout, 2019). In the UK, the Conservative’s party campaigned with the ‘Stop the Boats’ slogan that highlighted their strict stance towards asylum seekers (Bonansinga & Forrest, 2025). Table 1 below visualizes the key differences in the two countries.

Table 1. *The institutional and administrative differences*

<i>Category</i>	<i>The Netherlands</i>	<i>United Kingdom</i>
<i>EU Membership</i>	EU-member state; bound by CEAS, Dublin Regulation, and EU solidarity mechanisms.	Post-Brexit; no longer bound by EU asylum frameworks.
<i>Legal Framework</i>	CEAS compliance in combination with domestic legislation that are in line with the EU system.	Domestic legislation (e.g., <i>Illegal Migration Act 2023</i>).

<i>Electoral System</i>	Proportional representation (multi-party coalition governments).	Majoritarian system (single-party dominance, e.g., Conservative majority 2019–2024).
<i>Administrative Structure</i>	Unitary state with decentralized municipal asylum implementation.	Unitary state with devolved powers (Scotland, Wales) but asylum policy centralized.
<i>Key Governing Coalition</i>	PVV-VVD-BBB coalition (2024–present), emphasizing asylum restrictions.	Conservative Party (2010–2024), post-Brexit emphasis on sovereignty and security.
<i>Outcome to be explained</i>	Restrictive Asylum policies in 2024	Restrictive Asylum policies in 2024

Despite differing administrative frameworks and systems (see Table 1), both countries have adopted similar policy initiatives. Prioritization of fast asylum procedures, deportation and offshore processing are characteristics found in both policy reforms within the countries (Ministerie van Asiel en Migratie, 2024; Home Office, 2025). For these reasons, it is highly interesting to compare the Netherlands and the UK.

3.3 Operationalization

As this research adopts a qualitative data gathering method, it is of importance to explain how data will be found and in what way documents will be coded. The primary and secondary documents that will be used for the analysis, will be coded by looking for specific terms within the documents. These terms are visualized in the table below. It is imperative to note that these terms are a starting point in the analysis and that terms can be added during the analysis. Any added terms will be given and explained in the reflection section of Chapter 5.

Table 2. *Operationalization table*

<i>Variable</i>	<i>Definition</i>	<i>Operationalization</i>	<i>Method of Gathering</i>
<i>Populist Political Strategy</i>	‘A thin ideology juxtaposing a virtuous ‘people’ against a corrupt elite’ (Mudde, 2004).	- ‘Elite’ - ‘Invasion’ - ‘Take back control’ - ‘Welfare strain’ - ‘Sovereignty,’	Document analysis Expert interviews
<i>Transnational Influences</i>	‘Cross-border policy diffusion via learning or symbolic emulation’ (Gilardi, 2013).	- ‘EU’ - Mention of other countries - ‘Australian precedent’ - ‘Bilateralism’	Policy texts Expert interviews
<i>Problem Stream</i>	‘Conditions perceived as crises that elevate issues to policy agendas’ (Kingdon, 1984).	- ‘Crisis’ - ‘Surge’ - ‘Overcrowding’ - ‘Security’ - ‘Threat’	Media analysis Government reports
<i>Policy Stream</i>	‘Pre-existing solutions circulating among policymakers’ (Kingdon, 1984).	- ‘Externalization’ - ‘Fast-track procedures’ - ‘Detention centers’	Legislative/ policy drafts NGO reports
<i>Political Stream</i>	‘Shifts in public opinion, electoral dynamics, or coalition priorities’ (Kingdon, 1984).	- ‘Stop the Boats’ - ‘Public anxiety’ - ‘Coalition agreement’	Polls Party manifestos
<i>Policy Window</i>	‘Temporal alignment of streams enabling rapid policy change’ (Kingdon, 1984).	- ‘Post-Brexit moment’ - ‘Crisis-response’	Policy statements Expert interviews

<i>Restrictive Asylum Policy</i>	‘Legislative or procedural	- ‘Strictest asylum	Legislative
	changes reducing asylum	policy’	texts
	access or protections’	- ‘Deportation’	
	(Lavenex, 2021).	- ‘Detention	Government
		expansion’	reports
		- ‘Securitization’	
		- ‘Border control’	

The coding table above reshapes the abstract theoretical concepts of Chapter 2 into concrete and measurable indicators for the qualitative content analysis. Populist political strategy is enacted in words constructing elites as betraying ‘the people’ or casting migration as cultural/economic threat such as the UK's ‘Stop the Boats’ campaign. Transnational policy drivers are found through a clear reference to EU norms, like the Dutch problematic compliance with the CEAS, or by recognizing emulation from external models, like the UK’s Rwanda program emulating the Australian offshore processing policy model.

For Kingdon's MSF, the problem stream is measured by crisis discourse in policy papers and media reports, such as Dutch debates regarding overcrowding of asylum reception. The policy stream addresses already existing policy solutions, such as accelerated asylum procedures in legislative bills. The political stream is analyzed by election promises like the Dutch PVV demands to reduce asylum, and coalition agreements. Policy windows are identified by studying temporary overlap of aligning situations, such as the rhetoric of post-Brexit British sovereignty coinciding with Channel crossing crises to rush through the Illegal Migration Act 2023.

3.4 Method of data collection

This research applies a qualitative content analysis as the primary data gathering method, building on textual sources to structurally examine asylum policy discourse and decision-making processes in the Netherlands and UK. Data are taken from primary sources, such as legislative texts, coalition agreements, parliamentary debates, government policy briefs, and secondary sources, such as press coverage, NGO reports and academic sources to achieve a triangulate and well-rounded view and enhance validity. For example, the Netherlands' 2024

Asylum Acceleration Act and the UK's Illegal Migration Act 2023 are primary sources that will be seen as the foundation, whereas media discourse from sources such as NOS and BBC offer an understanding of public and political framing of migration topics.

Content analysis is particularly suited for this research, as it allows systematic identification of language themes, patterns, and policy rationales that are linked with theoretical concepts such as securitization, welfare chauvinism, and populist strategies (Krippendorff, 2018). The study uses Atlas.ti software to code keywords (e.g., 'crisis,' 'invasion,' 'externalization') and situate them within the context of the documents and interviews.

The method of systemic coding can be divided into three stages (Creswell, & Creswell, 2017). The first stage is initial coding, which entails the identification of recurring patterns like 'crisis' or 'sovereignty'. Secondly, there is a thematic analysis where the researcher will be mapping the code interactions to recognize any intersecting situations such as populism in populist leader rhetoric and similar populist media narratives. This method allows for comparative examination of how political party manifestos (for example, the Dutch PVV's election program) correspond with legislative action, or how public fears are exacerbated in media stories. The last stage is axial coding where the researcher will be assigning codes to theoretical categories like populism or Europeanization.

Triangulation is achieved through the integration of three types of data: the first type, primary policy documents provide official data on institutional decision-making; the second type, media discourse reveals how policies are presented for public consumption; and thirdly, secondary analyses, including NGO reports and academic literature, place policies in the context of broader human rights and political debates. For example, coding the "Stop the Boats" campaign language of the UK Conservative Party with the Illegal Migration Act 2023 illustrates explicitly how political rhetoric is converted into legal policy.

Triangulation is enhanced by combining content analysis with expert interviews. The interviews with two experts (see Table 3) will be used as a 'member check' to the findings of the document analysis, to ensure triangulation, empirical consistency and minimize bias.

Table 3. *Expert interviewees*

<i>Respondent</i>	<i>Role</i>	<i>Organization</i>
1. <i>Prof.dr. Daphne Halikiopoulou</i>	Political scientist and professor specializing in populism, radical right comparative politics.	Professor in Comparative politics at University of York
2. <i>Prof.dr. Peter Scholten</i>	Political scientist and professor specializing in migration governance and integration policy.	Full professor in the Governance of Migration and Diversity in the team Policy, Politics and Society at Erasmus University

Professor Daphne Halikiopoulou is a leading specialist on populism and far-right politics, and Professor Peter Scholten is a leading migration policy specialist. Halikiopoulou's views contribute an English-oriented perspective, particularly in the role of the English governance structures and populist narratives used in shaping asylum debate through sovereigntist and crisis rhetoric. Scholten, by contrast, offers a Dutch comparative view, drawing from his extended efforts on Dutch migration policy to examine transnational policy diffusion and encounters of EU norms. The experts are used as a validity precaution by letting them look at the conclusions made in the analysis and seeing if they would agree/disagree or have any added information on the matter.

3.5 Selection of Documents

To provide an accurate analysis of the UK and Dutch asylum policy, this study uses multiple sources for the content analysis. Using policy documents, government documents, media articles, and NGO-reports allows for triangulation, in combination with the expert interviews, with higher validity in the analysis findings. The chosen documents are listed in two tables available in the appendices.

The selected documents are a narrowed-down list of 26 primary and secondary sources for the Netherlands' and UK's recent asylum policy developments. The documents were chosen based

on reliability, relevance to post-2020 policy developments, and inclusivity of key political, legislative, and public discussions. Highest priority was given to each state to the latest legislative bills, draft or act, such as the 2024 Regeerakkoord of the Netherlands and the 2024 Safety Act in the UK. Main party election manifestos (The 2023 Dutch PVV anti-immigration policy and the UK Conservatives' 2024 "Stop the Boats" agenda) were incorporated to highlight populist rhetoric behind the policies

Parliamentary debates, such as the Dutch 2024 debates on the newly drafted asylum policies and the UK's 2025 Border Security Bill committee discussions, reveal how migration is framed as a crisis requiring immediate action. Media reports from prominent outlets (Trouw, Telegraaf, The Times, The Guardian) illustrate the different (and polarized) narratives, ranging from humanitarian critiques to security-focused framing of asylum issues. EU agreements like the CEAS, UK's treaty with Rwanda and NGO/Think tank reports (Dutch Migration Report 2024, Ipsos/British Future Tracker) show the transnational influences and policy feedback. By focusing on these important and relevant sources, this selection of content analysis makes sure that there is a clear systemic and fair comparison between the two countries.

3.6 Validity and reliability

This section addresses the methodological strengths and limitations of the study by highlighting the challenges accompanying case study research, including subjective bias, generalizability, and managing complexity. By using Flyvbjerg's (2006) argument for case studies as a rigid scientific tool, the analysis identifies procedures to ensure a high degree of validity and reliability while being aware of the limitations. Blatter & Haverland (2012) second this by stating that case study research as valuable for those interested in explaining specific processes and results of political decision-making.

Qualitative research inevitably calls for subjective bias, as interpretation by the researcher guides data analysis (Creswell, 2017). To ensure this, the research utilized triangulation on several dimensions. Parliamentary debates, policy documents, media accounts, and secondary sources were examined to cross-check findings. For example, populist discourse found in party manifestos was compared to that of its representation in media reports. This is made sure of to be consistent and enhance reliability in the identification of themes such as "sovereignty" or

"security." Using content analysis allows for structured comparability and contextual insights. Reflexivity is maintained in the form of a research document with decisions documented, for instance, code changes when terms like "crisis" had different meanings in the Dutch and UK contexts. Transparency gives room for readers to assess potential biases.

External validity in case study research prioritizes analytical generalization, meaning creating insights transferable to similar theoretical conditions, over statistical generalization (Yin, 2017). The Netherlands and the UK were selected using a 'Most-Different Systems Design', with regard to their different EU relationship but comparable regarding prohibitive outcomes. This method shows how varying institutional paths lead to similar policy results, highlighting mechanisms like crisis framing and policy diffusion. While findings are not generalizable, the purposive sampling is aligned with Creswell's (2017) criteria for qualitative research because of the theoretical significance and high information value. The cases illustrate important concepts such as populism and Europeanization and offer perspectives into policy making processes that have led to securitization that may have relevance in other democracies with pressures of migration.

For managing the complexity, the use of a dissimilar multiple case study with thematic analysis is effective. A qualitative multiple case study sets apart the theoretical patterns of conditions that were sufficient for restrictive policies, including populist discourse and crisis narrative. It is important to note that the complexity of policymaking on asylum, by combining legal, social, and geopolitical factors, means that variables and themes can overlap each other in reality.

Ethical and feasibility considerations were addressed through the use of publicly available documents thus bypassing privacy concerns. While this method of data collection assures accessibility, it does take away from the insights that are present behind closed doors and that are not made public. Reliability was enhanced through systematic coding in Atlas.ti, but due to the structure of this research process, is it not possible to achieve full intercoder reliability in this thesis. Discussions with peers during coding session has reduced this partly.

It is of importance that ethical transparency is noted in this research. For this reason, an informed consent form has been used for the expert interviews. In this form the experts can read about the thesis, the information that will be publicized and how they want this to take shape for their contributions. See appendices for the full form. Also, it is important to provide a

researcher positionality. The main researcher in this study has academic training in policy and governance analysis. My positionality as a first-generation Dutch citizen of Moroccan descent equips me with a dual understanding of on one hand Dutch societal dynamics and on the other hand the familiarity of migration narratives and frames that can be used in discussions like these. This positionality has contributed to the choice of topic. I aim to contribute to the academic debates with this perspective.

To summarize, the research's methodological basis, through triangulation, reflexive design, and purposive case selection, provides a good foundation to examine the dynamic of asylum restrictiveness. Even if the method is not necessarily cross-nationally generalizable, the findings present a sufficient framework for understanding restrictive asylum policymaking. Interviews with policymakers and politicians as an extension to non-European cases are possible pathways for future research to enhance the generalizability and add more context to this debate.

Chapter 4 Results

4.1 Introduction

This chapter analyzes the dynamics between domestic and transnational factors and restrictive asylum policy in the Netherlands and United Kingdom. This chapter will be structured around the conceptual framework that was established in Chapter 2. Each variable is examined in a sub-chapter through a three-step process: (1) reporting empirical findings from legislative texts, media, and NGO-reports; (2) interpreting these findings through the theoretical lenses (e.g. Europeanization, crisis framing); and (3) drawing comparative conclusions on how each variable manifests in both countries. Through the dissection of political shifts, rhetorical strategies, and international influences, the analysis tries to shed light on divergences and convergences in how asylum governance is shaped in the two countries.

4.2 The interplay of Forces: Domestic and Transnational Factors

The United Kingdom and the Netherlands each have distinct domestic and transnational factors that shape their reactions to asylum policy. The Netherlands, a highly populated country within the Schengen area and with borders to other Schengen countries, is confronted with migration flows fueled by the accessible intra-EU mobility. In 2023, asylum applications rose by 23% compared to 2022 as a result of instability in regions such as the Middle East and Africa (Algemene Bestuursdienst, 2024). The UK, being an island nation, has the issue of unauthorized migration via Channel crossings, a phenomenon that is not present in the Netherlands. The UK experienced over 46,000 small boat arrivals in 2023 (Home Office, 2024). The two countries share comparable proportions of foreign-born populations according to the OECD (2023) but with varying institutional responses. The Netherlands operates under the EU's Common European Asylum System (CEAS), even though recent developments under the Nationaal Implementatieplan Asiel Pact (2024) show the country's direction towards more centralized and streamlined procedures. In contrast, the post-Brexit UK regime is centered on unilateral policies and bilateral agreements, such as the Safety of Rwanda Act (2024), which outlines the UK's plan to outsource asylum processing which is inspired by Australia's approach to offshore processing (Blatter et al., 2021).

Despite the different institutional frameworks, the two countries have responded to systemic pressures by restricting asylum policy. These factors, consisting of the Netherlands' Schengen borders within the EU and the UK's island geography post-Brexit and well as the Netherlands' right-wing coalition influence versus the UK's Conservatives and Labor disputes, are the foundations to analyze the choice of both countries to allow for more restrictive asylum policies.

4.3 Problems and Crises

4.3.1 Securitization in the Netherlands

The Netherlands' restrictive asylum policy is framed as necessary responses to waves of migration, national security threats, and pressures on the existing system, that shows a broader EU-trend of securitizing migration (Demirkol, 2022). The government points to 'instrumentalising' (Algemene Bestuursdienst, 2024, p.110), a concept referring to migration as a destabilizing tool used by enemy forces, to justify measures like intensified border surveillance and re-established internal border checks.

These responses are presented as solutions to irregular migration and to combat human smuggling, on the grounds that intensified controls protect public order and deter dangerous routes (Algemene Bestuursdienst, 2024). This type of presentation, however, will tend to associate humanitarian asylum seekers with security threats by thinking of them under one umbrella. This displaces the legal provisions under EU directives. For instance, the 'nareismaatregel' (Raad van State, 2024, p.155-156), a policy created in 2023 that delays family reunification visas, was declared invalid by the Dutch Council of State for lack of lawful basis and violating the EU Family Reunification Directive.

The Netherlands also faces systemic pressures of rising asylum applications, with the 23% increase in applications in 2023 (Algemene Bestuursdienst, 2024). Despite the efforts by the Immigration and Naturalization Service (IND) to enhance procedural effectiveness, such as backlog reduction and staff expansion, delays in processing persist as application volumes surpass institutional capacity (Ministerie van Asiel en Migratie, 2024). Border management, particularly at airports and seaports, is strained under operational pressures like the staff shortages in the Royal Marechaussee and their dual mandate to facilitate travel while looking out for migration threats. Solutions offered, such as data-driven border management and

technological innovation, attempt to diminish these shortcomings but require long-term investment and have to be entirely permitted under the existing human rights standards, where tensions exist between the security-focused policy and rising systemic pressures (Algemene Bestuursdienst, 2024).

4.3.2 The 'Disorganized' UK

The UK's asylum system is being challenged by shifting migration patterns and systemic inefficiencies (Home office, 2024). As situations concerning the small boat Channel crossings dominate public and political discourse, these now account for a decreasing proportion of asylum claims (The Times, 20224). It is reported that asylum seekers are increasingly approaching other methods of entry, such as hidden travel by lorry (or truck), due to the increasing risks and enforcement on Channel routes (The Times, 2024). This change makes it harder to collect accurate statistics, since 'ad hoc' non-Channel routes have less systematic reporting. Even while the government says it is slowing down small boat arrivals, total asylum-related pressures continue to remain, and there is no evident net reduction of people seeking refuge (Ipsos/British Future, 2024).

A growing backlog of asylum appeals further adds to system pressure. In the aftermath of efforts to clear a 92,000-case backlog under Rishi Sunak's Conservative's party administration, new complications emerged: appeals situated at the First-tier Tribunal, the chamber of government that handles (asylum) disputes, quadrupled, from 7,601 in June 2023 to 33,227 by June 2024 (Home Office, 2024; The Times, 2024). This increase represents procedural backlogs, with prolonged waiting times for appeals that have left thousands in a 'legal limbo' with the UK government.

The Refugee Council is critical of the under-resourced tribunals and calls for the speedy appointment of additional judges to expedite case decisions (Refugee Council, 2024). The Home Office cites progress in claims processing and in cutting costs, highlighting 3,000 removals of individuals 'with no right to be here' since July 2024 and attempts to cut asylum accommodation costs (Home Office, 2024). However, these measures fail to address underlying inefficiencies driving backlogs.

In conclusion, there is a shared phenomenon in both countries: the securitization of asylum as a response to perceived crises, justifying restrictive asylum policies in terms of security narratives. In the Netherlands, this is seen in border surveillance and deterrence measures despite legal challenges focusing on incompatibility with humanitarian obligations. In the UK, bureaucratic inefficiencies and process backlogs persist along with unreliable numbers of individuals entering the country.

4.4 The Power of Politics

4.4.1 The Dutch Directness

The Netherlands' journey to the "strictest asylum policy ever" in 2024 illustrates a change of its political landscape, driven by the combination of electoral change, populist rhetoric, and public anxieties. The coalition cabinet of the Party for Freedom (PVV), the Farmer-Citizen Movement (BBB), and the People's Party for Freedom and Democracy (VVD) has reframed asylum into an existential threat to Dutch identity, sovereignty, and social cohesion. This transformation highlights how political forces have used asylum policy to make gains from public dissatisfaction.

The PVV's electoral success is based on its ability to associate asylum seekers with cultural and demographic destabilization. PVV's manifesto revolves around the topic of an 'asieltsunami' (PVV, 2023, p. 6), a term which invokes visions of waves of asylum seekers flooding throughout the Netherlands. The party warns that 'our neighborhoods and cities have become unrecognizable¹' due to 'mass immigration from non-Western, Islamic countries' (PVV, 2023, p. 6), which directly equates asylum seekers with the loss of Dutch cultural identity. Such nationalist rhetoric is typical for far-right narratives across Europe, which invokes demographic fears, generally without explicitly using the 'Great Replacement' theory by name. This is an elitist conspiracy theory that argues that western countries are becoming unrecognizable as the migrants have become the majority in the countries (Ipsos/British Future, 2024).

Economic issues are also used as a tool to justify restrictive measures. The PVV argues that asylum seekers 'massively profit from welfare' while 'Dutch families have to cut back on groceries' (PVV, 2023, p. 7). These framings exploit systemic deficiencies in housing and public services, redirecting blame onto asylum seekers. For instance, the party claims that status-holders receive 'priority for scarce homes,' which forces Dutch citizens to 'wait longer' (PVV,

2023, p. 7). This rhetoric diverts attention from systemic issues, such as underinvestment in social housing, by framing asylum seekers as competitors for resources. The BBB provides voice to this discourse by demanding the abolition of housing prioritization for status-holders, framing it as a matter of ‘fairness’ (BBB, 2023, p. 93). BBB’s proposed annual asylum quota of 15,000 applicants is presented as a pragmatic solution to ‘restore balance,’ (BBB, 2023, p. 94) but it can be perceived as hostility and force against asylum seekers.

The VVD, traditionally a pro-European liberal party, has also adopted more restrictive points, as with wider trends in European countries. Its electoral platform emphasizes ‘grip on asylum migration’ (VVD, 2023, p. 11), with demands for easier deportations, restricted access to legal aid, and EU migration deals. While avoiding the PVV's openly xenophobic rhetoric, the VVD still pleads for restrictive policies, such as advocating for pushbacks at the borders and its proposal to revoke refugee-residence permits for refugees returning to their country of origin (VVD, 2023, p. 12). VVD's organizational rhetoric in calling for effective procedures and systems and cooperation within the EU, makes the coalition's radical agenda acceptable by wrapping it in bureaucratic legitimization.

4.4.2 UK’s Polarized Climate

On the other hand, The Conservative Party shaped the UK’s asylum policy climate by securitization of migration and asylum by framing the situation as a crisis of sovereignty and public trust. Central to their 2024 manifesto, is the Conservative’s pledge to ‘stop the boats’ and the Rwanda deportation plan, which views asylum seekers as a threat to border security and economic stability (Conservative Party, 2024, p. 36). Conservative discourse is dependent on deterrence, with an emphasis on ‘taking illegal migrants to Rwanda’ to disrupt smuggling and human trafficking networks. This policy sits within broader populist narratives that frame irregular migration as criminality and cultural decline. The party's proposed legal cap on migration, a binding annual reduction target, translates this narrative into actual policy, with control measures prioritized over humanitarian obligations (Conservative Party, 2024).

Labour's manifesto critiques the Conservatives' plans as a ‘desperate gimmick’, framing their plan as performative rather than advocating for systemic reform. Labour suggests substituting

¹ All translations from Dutch sources (Party manifestos etc.) to English are my own

the Rwanda plan with a Border Security Command, focused on targeting smuggling networks with ‘counter-terrorism style powers’ and EU security collaboration (Labour Party, 2024, p. 17). While retaining restrictive elements, such as accelerated removals to ‘safe third countries’ and the hiring of 1,000 enforcement staff, the Labour party redefines asylum as a managed process that requires ‘swift, firm, and fair’ action (Labour Party, 2024, p. 17). This entails clearing the Conservatives' 100,000-case backlog and the end of costly hotel accommodation, presenting efficiency as both an economic and moral necessity.

Public assumptions also distort the asylum discussion: asylum seekers represent only 7% of total UK immigration intakes, yet 37% of the public wrongly believe they represent over a third of immigrants (Ipsos/British Future, 2024). The gap underscores how political framing, and media focus on ‘crisis’ storylines, drowns out empirical realities of asylum system management. Ipsos/British Future Tracker (2024) identifies immigration as the top issue for the public since 2016, driven by a sense of ‘visible lack of control’ (p.5) around Channel crossings and instigative rhetoric linking asylum seekers with threats to destabilize society.

The foundation of the UK Reform Party has resonated and fueled tensions: 21% of its voters supported violent anti-migrant and anti-minority protests. This suggests a general acceptance of such extreme right-wing frames that are in line, again, with the ‘Great Replacement’ theory (Ipsos/British Future, 2024, p.36). This type of rhetoric is being used to radicalize people to get them to stand against migrants (Ipsos/British Future, 2024).

The Labour parties’ promise to ‘smash the gangs’ (p.67) and reduce small boat numbers reflects its attempt to balance enforcement with feasible policies but only works if real concerns such as over-straining of the public services, can be separated from illegitimate, race-based ones. The Conservatives face dilemmas in opposition, torn between convincing Reform-oriented supporters and regaining credibility among centrists that have re-evaluated their position because of the Conservative’s fail to implement the Rwanda plan (Conservative Party, 2024).

To conclude, both countries show how political trends like populist rhetoric, electoral shifts, and misconceptions by the public, drive asylum restrictiveness. In the Netherlands, PVV's asieltsunami-frame places asylum as a cultural danger, normalized by coalition partners (BBB, VVD). UK Conservatives uses ‘stop the boats’ deterrence (Rwanda plan), while Labour

balances enforcement against efficiency. Both nations utilize amplified public anxieties to position security over human rights standards.

4.5 Policies Beyond Borders

4.5.1 The Dutch Steering the Union

The Netherlands has used its EU membership to shape and frame restrictive asylum policies as collective efforts to secure Schengen's "open but secure" borders. Central to this effort is the *EU Asylum and Migration Pact*, which the Netherlands has tried to accelerate by its Nationaal Implementatieplan Asiel Pact (2024), a plan to further implement securitization policies. By encouraging the EU border screening systems, like the Entry/Exit System (ETIAS), and fast-track asylum procedures, the Netherlands reduced procedural safeguards, cutting legal aid obligations and accelerating returns to first-entry EU states (Algemene Bestuursdienst, 2024, p.21).

Furthermore, the Netherlands collaborates with 'like-minded' EU states to outsource responsibility. The Netherlands advocated for Italy's Albania model to outsource processing center and lobbied for reform in the UN Refugee Convention, urging stricter eligibility standards (Algemene Bestuursdienst, 2024, p.23). These programs are overseen by an interdepartmental working group that the new Dutch cabinet has created (Algemene Bestuursdienst, 2024). Also, more intra-Schengen border security is of great importance according to the Dutch coalition agreement. Border security will be intensified with thermal imaging and smart cameras that gather data to eventually share among the neighboring countries (Algemene Bestuursdienst, 2024, p.22). In this case we see that the Netherlands is using the EU and also Schengen specifically as a vehicle to drive more restrictive asylum policies.

However, we can see a new shift from the traditional pro-EU to now a more unilateral approach that places sovereignty over solidarity. While the Netherlands asylum policy remains embedded in EU institutions, the 2024 government program (Regeerprogramma) increasingly desired an opt-out of EU asylum norms and demanded rethinking, or even exiting, the UN Refugee Convention (Algemene Bestuursdienst, 2024). After the desire for an opt-out of the EU asylum norms, the Dutch government has gone through more feasible routes where instead of

contesting the EU norms, they now demand for more EU wide asylum restrictions (Algemene Bestuursdienst, 2024).

This conflicting approach of making use of EU tools and oppose the EU norms at the same time, shows a new change in Dutch confidence in multilateral action when it comes to asylum policy. While the government is suggesting bilateral agreements within the Schengen area, the notion of EU-wide set asylum norms seems to be conflicting for the new coalition (PVV, 2024; BBB, 2024: VVD, 2024).

4.5.2 Creating New Paths In and Beyond Brussels

In the UK, Post-Brexit, they have redefined their international engagements to go around multilateral asylum norms through bilateral agreements and reinterpretation of legal standards. The Rwanda deportation policy, institutionalized in the Safety of Rwanda Act (2024), is the best example of this strategy. By unilaterally deciding that Rwanda is a safe third country, the UK reinterpret the Refugee Convention's non-refoulement obligation to justify overseas asylum processing (UK/Rwanda Treaty, 2024). This goes against the ECHR rulings questioning Rwanda's compliance with Article 3 protections (Council of Europe, 2024).

The UK also participates in more ad hoc transnational relations to replace EU mechanisms. For example, a 2024 working arrangement with Frontex facilitates intelligence-sharing on smuggling routes (EPRS, 2024). Another example is the intensified coastal patrol, that is part of the bilateral agreement between the UK and France, to help lessen the small boat arrivals (House of Commons Library, 2024). This approach shows that even though there is a formal separation of the UK and the EU and their Common European Asylum System (CEAS), the UK is still making use of their previous 'partner-countries' and uses bilateral agreements to benefit from them with their asylum issues.

Another interesting phenomenon in this case is that the new EU Pact on Migration and Asylum (2020), that is focused on restrictive asylum policy, is similar to the new UK Illegal Migration Pact (2023) that will come into force in 2025. This phenomenon can also be seen in the EU approach for asylum processing in third countries, and the UK's bilateral agreement with Rwanda for overseas asylum processing (European Commission, 2024; UK/Rwanda Treaty, 2024). The similarities between the two approaches shows that in midst of formal divergence of the two actors, there is still informal policy convergence on this theme.

Unlike the Netherlands' reliance and barriers from the EU institutions, the UK prioritizes flexible bilateralism. This selective collaboration and policy convergence shows that the UK, in some respects, needs EU cooperation to operate border control and coast patrol, and the EU in return, gains from the intelligence, expertise and personnel that is shared between the UK and EU in their Frontex EU-UK working agreement (EPRS, 2024).

4.6 Expert Interviews and Conclusion

This analysis shows that the Netherlands and UK have reached convergent restrictive asylum outcomes through divergent mechanisms: The Dutch contested Europeanization (adopting EU policies while creating crisis narratives) while the UK chose a post-Brexit symbolic sovereigntist approach (emulating transnational policies while claiming sovereigntist power). The expert interviews offer a valuable member checks of these mechanisms and findings.

Professor Peter Scholten's argument conclusively supports the Dutch case study. His notion that systemic shortcomings like Ter Apel's overcrowding are 'by policy design' (Scholten, 2025, p.6) confirms the analysis finding that backlogs were created politically to create a crisis, which fits with Kingdon's problem stream. He also dismisses the economic threat allegations and states that asylum seekers form this tiny group that get blamed for a housing crisis that is the consequence of 20-year neoliberal policies (Scholten, 2025, p.2). This statement aligns with the study's finding that populist rhetoric justifies restrictive policies by framing asylum seekers as welfare strains.

Interestingly, Professor Scholten reinterprets the transnational findings where the Netherlands want to revise or create a new refugee convention, like the one of the UN. He mentions that the Dutch government was leading in the creation of these conventions and that the call for reinterpretation of the convention are simply symbolic politics for the domestic audiences (Scholten, 2025, p.9). This shows a new turn where the Netherlands is showing performative sovereignty, similar to the UK case.

For the UK case, Professor Daphne Halikiopoulou argues for the far-right ideological approach. She states that the conservatives in the last couple of years have taken over far-right ideological rhetoric, using emotive language (e.g. wanting to send asylum seekers to Rwanda) to securitize

asylum policies (Halikiopoulou, 2025, p.4-5). This notion validates the analysis where ‘Stop the Boats’ rhetoric is being used by the Conservative party that hints to emulative populism.

Contrastingly, Professor Halikiopoulou mentions that the use of frames is also being infiltrated in the mainstream left rather than only the mainstream right (Halikiopoulou, 2025, p.5). She mentions that the Labor party leader Keir Starmer recently talked about the risk of the UK becoming an ‘island of strangers’ due to migration, which is more in line with populist narratives, something that was not picked up on in the content analysis (Halikiopoulou, 2025, p.5-6). Lastly, she also broadens the transnational framework by stating that the bilateral agreements, that are central to the UK’s approach, are in fact a sovereignty-based approach and are not necessarily contradicting this notion. The UK’s choice to leave the EU and rather opt for only bilateral agreements shows this sovereignty (Halikiopoulou, 2025, p.11). This is different than my analysis that assumes that the UK is not participating in sovereign actions but merely used the sovereignty claims for the domestic audiences.

Both experts agree with this study’s point of argument that restrictive asylum policy is a consequence of political agency and not something structurally inevitable. Scholten's arguments for created crises and Halikiopoulou's arguments for the ideological take-overs, show how populist forces use institutional context to legitimize securitization.

Chapter 5 Conclusions

This chapter concludes the study by unfolding the interesting interplay of domestic and transnational factors that pushed both the Netherlands and the UK towards increasingly restrictive asylum policies in 2024. Section 5.1 answers the sub- and main research questions of this study. Section 5.2 is the discussion and argues the advance in scientific knowledge. Lastly, section 5.3 explains the implications of validity of the study as well as the appropriate recommendations for both the academic world and recommendations for practice in both the Netherlands as the UK.

5.1 Answers to the questions

The first sub-question asked how the Netherlands and the UK define and implement their latest asylum policies. The Netherlands and the United Kingdom both have asylum policies based on narratives of crisis and control, but their institutional paths diverge strongly. The Netherlands, tied to EU membership, formulates restrictive measures as a necessary reaction to migration surges that lead to destabilization. Its 2024 ‘Nationaal Implementatieplan Asiel Pact’ centralizes faster asylum processes, delays family reunification, and employs more border control with the use of new technology like thermal imaging. The UK's post-Brexit approach, in contrast, relies on unilateralism, as shown by the ‘Safety of Rwanda Act’ (2024), which outsources asylum processing to Rwanda under reinterpretations of the Refugee Convention. The UK also makes use of bilateral arrangements, for example with France, for coastal patrols and intelligence-sharing. This phenomenon shows the UK's reliance on symbolic sovereignty while opting for bilateral action.

The second sub-question refers to what factors are theorized in Kingdon's Multiple Streams Framework that drive restrictive asylum policies. Kingdon's model explains restrictive asylum policy by the combination of three streams. In the problem stream, issues such as the Netherlands' 23% increase in asylum appeals in 2023 and Channel crossers in the UK were defined as existential threats, opening up ‘policy windows’ for rapid change. The policy stream offers ready-made answers for these problems: the Netherlands uses the EU draft proposals for accelerated asylum processes, and the UK has taken inspiration from other countries' approach, like Australia's offshore detention policy, through the Rwanda plan. The answers gained traction because they were perceived as feasible and in line with transnational deterrence policy trends. For the policy entrepreneurs, political actors such as Geert Wilder and Suella

Bravermann may have led important debates but cannot be credited to a specific policy shift in this case. The political stream, under populist electoral wins, reshaped national agendas. The Netherlands' PVV coalition reframed asylum as an asylum tsunami that is a threat to Dutch identity, while UK Conservatives use Channel crossings to explain the use of restrictive policy and border control that are possible with the new post-Brexit sovereignty. This convergence of three streams, shown in figure 3 and 4, suggests how agency and timing were important drivers for the restrictive policies in 2024.

Figure 3. *Netherlands’ stream convergence*

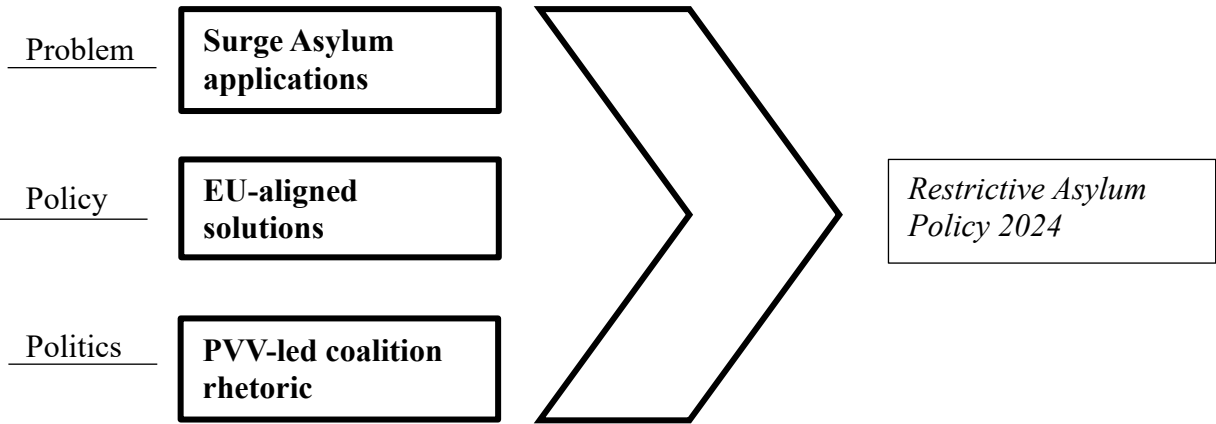
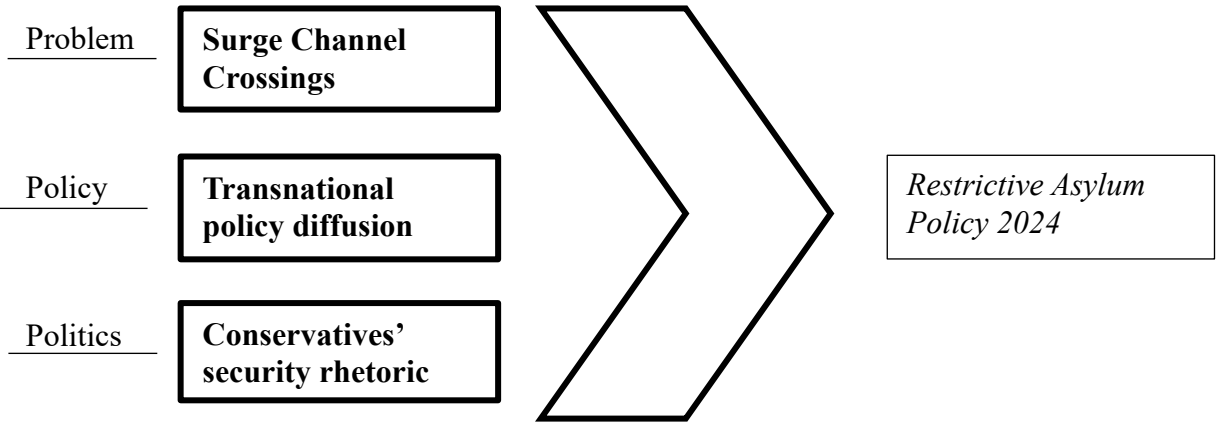


Figure 4. *UK’s streams convergence*



The third and last sub-question asks which domestic and transnational factors the Netherlands and the UK alluded to adopt restrictive asylum measures. Both countries used systemic pressure and public concern to justify restrictive policies domestically. The Dutch coalition appealed to housing shortages and welfare competition, with the PVV framing asylum seekers as economic and cultural burdens. Similarly, the UK highlighted the Channel crossings and tribunal asylum

appeal delays. Across borders, the Netherlands first chose a de-Europeanization strategy, advocating for an opt-out of the asylum norms and institutions set by the EU. After this request was declined the Netherlands contrastingly chose for more Europeanization by advocating for EU-wide externalization and resisting solidarity measures. The UK went into de-Europeanization, mimicking deterrence with bilateral agreements (Rwanda) and, symbolically, deviating from EU norms while its policies conformed to the EU's own restrictive Pact on Migration (2020). These transnational relations illustrate a paradox: even sovereign agendas are dependent on cross-border policy borrowing, and even transnationally bounded countries like the Netherlands still try to make way for sovereigntist measures.

The main research question was:

How do domestic and transnational factors explain the increased restrictiveness of asylum policies in the Netherlands and the UK in 2024?

The restrictiveness of Dutch and UK asylum policies is an outcome of the strategic combination of (1) domestic populism, (2) crisis framing, and (3) transnational policy diffusion. Both cases are good examples of Kingdon's MSF: policy entrepreneurs utilized crises (problem stream), political momentum because of populist waves (political stream), and transnational examples and trends (policy stream) to justify exclusion. Despite divergent institutional frameworks, in this case the EU membership and post-Brexit sovereignty, there are convergent restrictive policy outcomes in the two countries. In conclusion, restrictive policy was not an inevitable outcome but a strategic choice to prioritize security over rights and effectivity.

5.2 Discussion

This research builds on asylum governance knowledge by combining domestic populism, transnational policy diffusion, and Kingdon's (1984) Multiple Streams Framework (MSF) into one coherent analytical framework. Whereas earlier research isolate populist rhetoric as a solely domestic phenomenon (Mudde, 2007) or examines policy diffusion through structural perspectives (Gilardi, 2013), this thesis shows their interdependence. For instance, Mudde's (2007) research on European far-right parties demonstrates how populists frame migration and asylum seekers as a threat to national identity, a phenomenon also evident in the Netherlands' 'asieltsunami' and the UK's 'stop the boats' narratives. Similarly, welfare chauvinism studies (Andersen & Bjørklund, 2021) support this thesis' findings that Dutch and British governments justified restrictions through framing asylum seekers with housing shortages and welfare

competition. Interestingly, professor Halikiopoulou stated that the left-wing parties in the UK are also making use of populist frames against asylum seekers (Halikiopoulou, 2025, p.5-6), that are often credited to the right-wing party, a phenomenon not sufficiently recognized in scientific articles regarding populist framing in Western-Europe.

However, while earlier studies often treat populism as a domestic issue, we see that transnationally there is also an effect. For example, the Netherlands' shift to Europeanization, by simultaneously benefiting from EU deterrence instruments (such as fast asylum procedures) and withholding solidarity instruments (Algemene Bestuursdienst, 2024). This illustrates how governments use their supranational ties for strategic reinterpretation to appeal to their populist domestic supporters. Likewise, the UK post-Brexit unilateralism that copies asylum deterrence models like Australia's offshore processing (Blatter et al., 2021) further exemplifies that sovereigntist-focused countries, like the UK, are willing to engage in transnational policy diffusion. This finding is conflicting with institutionalists beliefs that de-Europeanization is equal to policy isolation (Müller et al., 2021). Instead, we see that the UK's post-Brexit unilateralism allows for a strategic form of selective policy diffusion while maintaining this symbolic sovereigntist ideology.

The application of Kingdon's Multiple Streams Framework (MSF) to asylum policymaking addresses the gaps in migration studies. Since MSF has already been utilized in the analysis of migration crises (Zahariadis & Petridou, 2023), previous research has the tendency to overlook the transnational factors in the policy stream. This thesis utilizes and refines the MSF by demonstrating how transnational solutions are 'recycled' as pre-packaged policy options for domestic crises. Through linking transnational policy solutions (EU's externalization policies, UK-Rwanda plan) to the policy stream, the framework outlines existing models and ideas that are used during moments of crisis.

5.3 Limitations and Recommendations

5.3.1 Implications of Validity

The qualitative comparative design of this study combined content analysis of 25 documents, such as legislative documents, party manifestos, media articles and NGO reports, with two expert interviews. This approach allowed for methodological triangulation to increase validity (Creswell & Creswell, 2018).

However, it is important to note the limitations and points of improvement of this study. First, the focus on two ‘most different’ cases give an automatic preference for depth over breadth at the cost of generalizability to other cases. Second, the reliance on publicly available documentation comes with a risk of selection bias, with government sources possibly reframing crisis situations to try and introduce more nuance to said situations. To mitigate this, the research incorporated NGO reports and media articles to create the full picture. Third, having only two expert interviews, although insightful, could not reflect full stakeholder diversity. The participation of policymakers, asylum advocates and politicians would have contributed to more practical insights as well as deeper knowledge on the cases.

5.3.2 Academic Recommendation

While this study provides a well-formed comparative analysis of restrictive asylum policies in the Netherlands and the UK, it also provides new paths for follow-up research to address the existing gaps and to advance scientific knowledge on this topic. Firstly, the most different case study design, while good in showcasing the similar policy outcomes, does create research possibilities for more intra-EU comparisons. Future studies could compare domestic and transnational factors of asylum policies in other member states of the EU to verify, or falsify, whether the mechanisms identified in this study (i.e. populist crisis framing, selective policy diffusion) hold equally throughout the European Union. Comparing for instance the Netherlands' contested Europeanization, Hungary's clear rejection of EU norms, or Sweden's balanced humanitarian and deterrence approach, could reveal how domestic contexts and geopolitical positions allow or disallow restrictiveness.

Moreover, future studies can build on this thesis' focus on populist crisis framing and transnational policy diffusion. For this recommendation, interviews with politicians and policymakers would show how political powers utilize crises to frame the need for restrictive asylum policies. This angle of research closes the gap in knowledge within this thesis that does not explain the intentionality behind the use of framing narratives and rhetoric. This approach would deepen the understanding of the use of political frames and the power of rhetoric when it comes to policy restrictions.

Lastly, survey experiment methods using data like the Dutch Parliamentary Election Study or British Election Study could analyse how populist narratives shape public opinion about asylum seekers as economic or cultural threats. This method would test this thesis' finding that

restrictive asylum policies are legitimized through public anxiety that is being politicized by political actors. This angle extends the study's arguments and allows for verification or falsification of the findings in this thesis.

5.3.3 Recommendation for Practice

The systemic backlogs in asylum processing, shown by the Netherlands' 23% surge in applications and the UK's 33,000 unresolved tribunal appeals, are not incidental but politically engineered crises, as explained by Professor Scholten. Policymakers in both countries have deliberately constrained reception capacity and procedural efficiency to create inefficient structures and therefore are able to legitimize restrictive policies. To work out this dysfunction, both governments must reallocate resources from restrictive policies toward institutional capacity-building efforts. In practice this would mean a 30% increase in hiring IND personnel in the Netherlands and hiring 500 more Tribunal judges in the UK to clear the appeal backlog. To fund these measures, we should look at earlier allocated funds such as the UK-Rwanda partnership that costs the UK 541 million pounds (The Guardian, 2024). In the Netherlands, the funds for the extra border control and surveillance technology can be redirected to hiring more IND staff to help with the same problems. This recommendation links to the core arguments of this study where populist actors use inefficiencies and self-proclaimed crises to frame asylum surges as security threats.

Also, to counter the crisis framing that are central to restrictive asylum policies, the Netherlands and the UK should task independent electoral commissions (i.e. The Dutch Kiesraad, UK Electoral Commission) to fact check asylum-related claims in party manifestos, parliamentary debates, and campaigns. These organizations can use data and statistics to correct any false claim or misinformation spread by political actors. These fact-checks should be published within 24 hours on governments websites, accessible for the public. Fines can be given for repeated use of false claims or spread of misinformation to deter politicians from using dramatization of situations. This recommendation aligns with this thesis' finding that restrictive asylum policies is influenced by strategic use of frames and narratives.

Bibliography

- Albertazzi, D., Bonansinga, D., & Vampa, D. (2021). *Populism and new patterns of political competition in Western Europe*. Routledge.
- Andersen, R., & Bjørklund, T. (2021). Welfare chauvinism and anti-immigration attitudes. *European Sociological Review*, 37(4), 585–600. <https://doi.org/10.1093/esr/jcab016>
- Atherley, J. (2024, december 1). *There's too much room at the inn; shocking rise in asylum-seeker hotel 'takeovers'*. The Sun (england). [https://advance-lexis-com.eur.idm.oclc.org/api/document?Collection=news&id=urn%3acontentitem%3a6dj7-pm21-jcbw-n489-00000-00&context=1519360&identityprofileid=43csnf56937](https://advance.lexis-com.eur.idm.oclc.org/api/document?Collection=news&id=urn%3acontentitem%3a6dj7-pm21-jcbw-n489-00000-00&context=1519360&identityprofileid=43csnf56937)
- Bakker, M. (2024, december 9). *Op weg naar de ondergrens: waar staat het Nederlandse asielbeleid in Europa?*. De Volkskrant. <https://advance-lexis-com.eur.idm.oclc.org/api/document?Collection=news&id=urn%3acontentitem%3a6dkx-k8m1-dyry-x046-00000-00&context=1519360&identityprofileid=43csnf56937>
- Bale, T. (2013). *The Conservatives since 1945: The drivers of party change*. Oxford University Press.
- Bale, T., Green-Pedersen, C., Krouwel, A., Luther, K. R., & Sitter, N. (2010). If you can't beat them, join them? Explaining social democratic responses to the challenge from the populist radical right in Western Europe. *Political Studies*, 58(3), 410–426. <https://doi.org/10.1111/j.1467-9248.2009.00783.x>
- Beach, D. (2020). *Process tracing methods* (pp. 699–719). Springer Fachmedien Wiesbaden
- Blatter, J., & Haverland, M. (2012). *Designing case studies: Explanatory approaches in small-N research*. Springer.
- Blatter, J., Portmann, L., & Rausis, F. (2021). Theorizing policy diffusion: from a patchy set of mechanisms to a paradigmatic typology. *Journal of European Public Policy*, 29(6), 805–825. <https://doi.org/10.1080/13501763.2021.1892801>
- Boerbürgerbeweging (BBB). (2023, november). BBB-verkiezingsprogramma 2023. https://boerbuergerbeweging.nl/wp-content/uploads/2023/09/bbb_verkiezingsprogramma_nov2023_def.pdf
- Bonansinga, D., & Forrest, C. (2025). “Stop the boats”: populist contagion and migration policymaking in the UK. *Ethnic and Racial Studies*, 1-19.
- Börzel, T. A., & Risse, T. (2009). *The transformative power of Europe: The European Union and the diffusion of ideas*. Freie Universität Berlin.

- Britain Thinks. (2024). Consultation response: New plan for immigration. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005042/ccs207_ccs0621755000-001_consultation_response_new_plan_immigration_web_accessible.pdf
- Buzan, B., Wæver, O., & de Wilde, J. (1998). *Security: A new framework for analysis*. Lynne Rienner.
- Cap, P. (2019). 'Britain is full to bursting point!' In Routledge eBooks (pp. 69–85). <https://doi.org/10.4324/9781351041867-5>
- Carrell, S., Syal, R., & Adu, A. (2024, april 28). *Home office to detain asylum seekers across uk in shock Rwanda operation*. The Guardian (London). <https://advance-lexis-com.eur.idm.oclc.org/api/document?Collection=news&id=urn%3acontentitem%3a6bx1-5d91-dy4h-k3y7-00000-00&context=1519360&identityprofileid=43csnf56937>
- Castles, S., Miller, M. J., & de Haas, H. (2020). *The Age of Migration: International Population Movements in the Modern World*. Red Globe Press.
- Conservative party. (2024, june). Conservative party manifesto 2024. <https://public.conservatives.com/publicweb/ge2024/accessible-manifesto/accessible-pdf-conservative-manifesto-2024.pdf>
- Consterdine, E., & Hampshire, J. (2020). Convergence, capitalist diversity, or political volatility? Immigration policy in Western Europe. *Journal of European Public Policy*, 27(10), 1487-1505.
- Creswell, J. W., & Creswell, J. D. (2017). *Research design: Qualitative, quantitative, and mixed methods approaches*. Sage publications
- Dathan, M. (2024, october 16). *60,000 illegal migrants will be allowed to stay in uk*. The Times. <https://advance-lexis-com.eur.idm.oclc.org/api/document?Collection=news&id=urn%3acontentitem%3a6d6m-1hk1-jbnf-w3xc-00000-00&context=1519360&identityprofileid=43csnf56937>
- Demirkol, A. (2022). An empirical analysis of securitization discourse in the European Union. *Migration Letters*, 19(3), 273-286.
- De Telegraaf. (2024, june 28). *Marjolein faber, rutger belt u zo*. <https://advance-lexis-com.eur.idm.oclc.org/api/document?Collection=news&id=urn%3acontentitem%3a6cb y-dh61-dy4d-y015-00000-00&context=1519360&identityprofileid=43csnf56937>
- Dutch government/ngo. (2024). Migration report 2024 netherlands. <https://open.overheid.nl/documenten/dpc-0070b04e24a9191567efa8d78367b0e294f2e663/pdf>

Dutch government Algemene Bestuursdienst (2024). Reshaping asylum policy nl. <https://open.overheid.nl/documenten/dpc-eafb9540132eca52be59d2cf56c8ebdb646902d7/pdf>

Dutch parliament. (2024, november 5). Debate asylum policy. <https://zoek.officielebekendmakingen.nl/h-tk-20242025-19-15.html>

Dutch parliament. (2024, september 25). First asylum policy debate of calendar year 2024. <https://zoek.officielebekendmakingen.nl/h-tk-20242025-5-9.html>

Esses, V. M., Hamilton, L. K., & Gaucher, D. (2018). The role of attitudes in migration. In *Handbook of Attitudes, Volume 2: Applications* (pp. 455-487). Routledge.

Esses, V. M., Hamilton, L. K., & Gaucher, D. (2017). The global refugee crisis: Empirical evidence and policy implications for improving public attitudes and facilitating refugee resettlement. *Social Issues and Policy Review*, 15(1), 10–56. <https://doi.org/10.1111/sipr.12077>

European commission. (2020, september 23). New pact on migration and asylum. <https://eur-lex.europa.eu/legal-content/en/txt/?Uri=com%3a2020%3a609%3aafin>

European commission. (n.d.). Common European asylum system (ceas). https://home-affairs.ec.europa.eu/policies/migration-and-asylum/common-european-asylum-system_en

European parliament. (2024). EU-UK partnership on asylum and migration. [https://www.europarl.europa.eu/regdata/etudes/atag/2024/759615/eprs_ata\(2024\)759615_en.pdf](https://www.europarl.europa.eu/regdata/etudes/atag/2024/759615/eprs_ata(2024)759615_en.pdf)

Flyvbjerg, B. (2006). Five misunderstandings about case-study research. *Qualitative Inquiry*, 12(2), 219–245

FitzGerald, D. S. (2019). *Refuge beyond reach: How rich democracies repel asylum seekers*. Oxford University Press.

Galloway, M., Smit, M., & Kromhout, M. (2015). Between control and support. The protection of unaccompanied minor asylum seekers at risk: The Dutch case. *International migration*, 53(4), 51-61.

Geddes, A. (2018). The politics of European Union migration governance. *J. Common Mkt. Stud.*, 56, 120.

Geddes, A. (2023). *The politics of migration and immigration in Europe* (3rd ed.). SAGE.

Gilardi, F. (2013). Transnational diffusion: Norms, ideas, and policies. In *Handbook of international relations* (pp. 453–477). SAGE.

- Goodwin-Gill, G. S. (2023). The Rwanda scheme and international refugee law. *International Journal of Refugee Law*, 35(1), 1–15. <https://doi.org/10.1093/ijrl/eead005>
- Guérin, N. (2016). Alignment with European asylum policies: A policy diffusion perspective. *Journal of European Public Policy*, 23(6), 1074–1092. <https://doi.org/10.1080/13501763.2015.1085070>
- Hedegaard, T. F., & Larsen, C. A. (2024). The hidden European consensus on migrant selection: A conjoint survey experiment. *Comparative Migration Studies*, 12(1), 717–735. <https://doi.org/10.1007/s40878-024-00333-w>
- Heale, R., & Twycross, A. (2018). What is a case study? *Evidence-based nursing*, 21(1), 7-8
- Hellwig, T., & Sinno, A. (2017). Different groups, different threats: Public attitudes towards immigrants. *Journal of Ethnic and Migration Studies*, 43(3), 339–358. <https://doi.org/10.1080/1369183X.2016.1202749>
- Home office, Border Security, Asylum and Immigration Bill: overarching information factsheet. (30 january 2025). GOV.UK.
- International Migration Outlook 2023 | OECD. (2023, October 23). https://www.oecd.org/en/publications/international-migration-outlook-2023_b0f40584-en.html
- Ipsos/British future. (2024, september 19). Immigration attitudes tracker: wave 17. https://www.britishfuture.org/wp-content/uploads/2024/09/tracker-report.wave17.final_.embargo19.9.24.pdf
- Jeannet, A. M., Heidland, T., & Ruhs, M. (2021). What asylum and refugee policies do Europeans want? Evidence from a cross-national conjoint experiment. *European Union Politics*, 22(3), 353-376
- King's Printer of Acts of Parliament. (2023, July 20). *Illegal Migration Act 2023*. <https://www.legislation.gov.uk/ukpga/2023/37/enacted>
- Kingdon, J. W. (1984). *Agendas, alternatives, and public policies*. HarperCollins.
- Krippendorff, K. (2018). *Content analysis: An introduction to its methodology*. Sage publications
- Labour party. (2024, june). Labour party manifesto 2024. <https://labour.org.uk/wp-content/uploads/2024/06/labour-party-manifesto-2024.pdf>
- Lavenex, S. (2001). The Europeanization of refugee policies: Normative challenges and institutional legacies. *JCMS: Journal of Common Market Studies*, 39(5), 851-874.

- Liebertson S. (1991). Small N's and big conclusions: an examination of the reasoning in comparative studies based on a small number of cases. *Social Forces*, 70: 307–320.
- Limb, M. (2022). UK-Rwanda migration plan fails to safeguard refugees' medical care, say campaigners.
- Ministerie van asiel en migratie. (2024, december 6). Nationaal implementatieplan asielpact. <https://www.rijksoverheid.nl/onderwerpen/asielbeleid/documenten/rapporten/2024/12/06/ek-bijlage-2-nationaal-implementatieplan-asiel-en-migratiepact>
- Ministerie van Asiel en Migratie. (2024, December 24). *Cabinet approves asylum plans from Minister Faber.* News Item | Government.nl. <https://www.government.nl/latest/news/2024/12/20/cabinet-approves-asylum-plans-from-minister-faber>
- Morgan, J., & Willmington, L. (2023). The duty to remove asylum seekers under the Illegal Migration Act 2023: Is the government's plan to 'Stop the Boats' now doomed to failure?. *Common Law World Review*, 52(4), 103-109.
- Mudde, C. (2004). *The populist zeitgeist*. *Government and Opposition*, 39(4), 541–563. <https://doi.org/10.1111/j.1477-7053.2004.00135.x>
- Mudde, C. (2007). *Populist radical right parties in Europe*. Cambridge University Press.
- Mudde, C. (2013). Three decades of populist radical right parties in Western Europe: So what? *European Journal of Political Research*, 52(1), 1–19. <https://doi.org/10.1111/j.1475-6765.2012.02065.x>
- Mudde, C. (2019). *The far right today*. John Wiley & Sons.
- Mudde, C., & Rovira Kaltwasser, C. (2013). Exclusionary vs. inclusionary populism: Comparing contemporary Europe and Latin America. *Government and Opposition*, 48(2), 147–174. <https://doi.org/10.1017/gov.2012.11>
- Müller, P., Pomorska, K. and Tonra, B. (2021) 'The Domestic Challenge to EU Foreign Policy-Making: From Europeanisation to De-Europeanisation?' *Journal of European Integration*, Vol. 43, No. 5, pp. 519–534.
- Partij voor de vrijheid (PVV). (2023). Pvv verkiezingsprogramma 2023. <https://www.pvv.nl/images/2023/pvv-verkiezingsprogramma-2023.pdf>
- Serious human rights concerns about United Kingdom's Rwanda bill - portal. *Council of Europe*. (2024, April 23). <https://www.coe.int/en/web/portal/-/serious-human-rights-concerns-about-united-kingdom-s-rwanda-bill>
- Spieker, J. (2024). As Strict as Possible: Centre-Right Parties' Approach to Immigration in the Netherlands, France and Belgium.

- Stefan, M., & Cortinovis, R. (2021). Setting the right priorities: is the New Pact on Migration and Asylum addressing the issue of pushbacks at EU external borders. *IN: CARRERA, Sergio*, 180-194.
- Swanborn, P. (2010). What data to collect?. In What data to collect? (First Edition ed., pp. 73-96). *SAGE Publications, Inc.*, <https://doi.org/10.4135/9781526485168>
- Syal, R. (2024, 1 march). Rwanda plan to cost UK £1.8m for each asylum seeker, figures show. *The Guardian*. <https://www.theguardian.com/uk-news/2024/mar/01/rwanda-plan-uk-asylum-seeker-cost-figures>
- UK Government. (2024). Illegal Migration Act 2023: Policy statement. <https://www.gov.uk>
- UNHCR - The UN Refugee Agency. (14 June 2023). *Global Trends Report 2022 | UNHCR*. UNHCR. <https://www.unhcr.org/global-trends-report-2022>
- UK Government. (2024, may 20). Uk-rwanda asylum partnership treaty. https://assets.publishing.service.gov.uk/media/662f6eb4ce557c60ed19ad14/ts_20.2024_uk_rwanda_agreement_provision_asylum_partnership_shared_international_commitments_protection_refugees_migrants.pdf
- UK Home office. (2023). Nationality and borders bill: overseas asylum processing. <https://www.gov.uk/government/publications/nationality-and-borders-bill-overseas-asylum-processing/nationality-and-borders-bill-overseas-asylum-processing>
- UK Parliament. (2024, april 25). Safety of Rwanda (asylum and migration) act 2024. <https://bills.parliament.uk/publications/55112/documents/4724>
- UK Parliament. (2024). Asylum support bill 2024. <https://bills.parliament.uk/publications/56154/documents/5058>
- UK Parliament. (2025, march 18). Border security bill committee debates. https://publications.parliament.uk/pa/bills/cbill/59-01/0173/pbc173_bordersecurity_1st-12th_compilation_18_03_2025_rev.pdf
- Unauthorised Migration: Timeline and overview of UK-French co-operation - *House of Commons Library*. UK Parliament. (2024, December 6). <https://commonslibrary.parliament.uk/research-briefings/cbp-9681/>
- Van Buuren, Y. (2024, may 16). Met vergaande asielpannen zoekt de nieuwe rechtse samenwerking bewust de grenzen van de wet op. *Trouw.nl*. <https://advance-lexis-com.eur.idm.oclc.org/api/document?Collection=news&id=urn%3acontentitem%3a6c1w-5041-jbhv-k3h5-00000-00&context=1519360&identityprofileid=43csnf56937>
- Van der Brug, W. (2024). The populist radical right and migration in the Netherlands. *West European Politics*, 47(2), 1–25. <https://doi.org/10.1080/01402382.2024.1234567>

- Van Spanje, J. (2010). Contagious parties: Anti-immigration parties and their impact on other parties' immigration stances in contemporary Western Europe. *Party Politics*, 16(5), 563–586. <https://doi.org/10.1177/1354068809346002>
- Van Spanje, J., Azrout, R. (2019) Tainted Love: How Stigmatization of a Political Party in News Media Reduces Its Electoral Support, *International Journal of Public Opinion Research*, Volume 31, Issue 2, Summer 2019, Pages 283–308, <https://doi.org/10.1093/ijpor/edy009>
- Volkspartij voor vrijheid en democratie (VVD). (2023, october). VVD-verkiezingsprogramma 2023-2027. <https://www.vvd.nl/wp-content/uploads/2023/10/verkiezingsprogramma-vvd-2023-2027-1.pdf>
- Vossen, K. (2011). Classifying Wilders: The ideological development of Geert Wilders and his Party for Freedom. *Politics*, 31(3), 179–189. <https://doi.org/10.1111/j.1467-9256.2011.01417.x>
- Walker, P. (2023, 10 november). Rwanda dreams and the wokerati: the many controversies of Suella Braverman. *The Guardian*. <https://www.theguardian.com/politics/2023/nov/10/invasions-and-hate-marches-suella-bravermans-controversial-statements>
- Wolff, S., Carrapico, H., & Piquet, A. (2024). Out of Sight, Out of Mind? UK–EU Member States Bilateralism as an Enabler of Europeanisation. *JCMS: Journal of Common Market Studies*
- Wright, B. & McKiernan J. (2024, 23 april). Rishi Sunak's Rwanda bill to become law after late-night showdown. <https://www.bbc.com/news/uk-politics-68840441>
- Yahoo! News. (14 February, 2025). <https://uk.news.yahoo.com/youre-lying-time-audience-member-140430350.html>
- Yin, R. K. (2017). *Case Study Research and Applications: Design and Methods*. SAGE Publications.
- Zahariadis, N., & Petridou, E. (2023). Multiple Streams, policy implementation and the Greek refugee crisis. In *A Modern Guide to the Multiple Streams Framework* (pp. 144-159). Edward Elgar Publishing.

Appendices

A. Information sheet and Consent form

Information sheet and Consent form

Information sheet

Introduction

Dear participant,

*Thank you for participating in this master's thesis research project. As part of this study, you will be interviewed to contribute your expertise on **asylum policy dynamics in the Netherlands and the United Kingdom**. This research is conducted in partial fulfilment of the Master's programme in International Public Management and Public Policy at Erasmus University Rotterdam. The research is conducted primarily to obtain in-depth insights of the factors that have led to the policy reforms in the Netherlands and the UK.*

For further inquiries, contact:

Researcher: Hasna el Morabit, Hasna.elmor@gmail.com

Data collection

To proceed with the interview, both the interviewee and the researcher will sign this consent form. The questions will focus on domestic political dynamics and transnational factors shaping restrictive asylum policies in the Netherlands and the UK. Specific topics will include crisis narratives, policy implementation challenges, and institutional responses to migration pressures.

*The interview will be **audio-recorded** (with your consent) and transcribed verbatim to ensure accuracy in analysis. Data will be systematically analysed according to the student's framework and coded to identify themes.*

Potential inconvenience & risks

There are no physical, legal or economic risks associated with your participation in this study. It is not mandatory to answer all questions. Your participation is voluntary, and you can stop at any time.

Reimbursement

There is no reimbursement or monetary benefit for participating in the study.

Confidentiality & data protection

The collected data will be used for an aggregated analysis and no confidential information or personal data will be included in the research outcome. The data is stored in a secure location and will be kept for 5 years.

Data sharing

Please note that this thesis, without the interview transcripts, will be published in the Erasmus University Thesis Repository. Throughout the process of researching and writing the thesis, the interview data will be shared with

Prof. Sandra van Thiel, the supervisor of this thesis. Similarly, they can be shared with the 2nd reader, Prof. Markus Haverland, who is involved in the assessment process.

Voluntary participation & individual rights

Your participation is voluntary, and you can stop at any time. When you participate in the research, you have the rights to request more information about the data collection, analysis or withdraw the consent and ask data erasure before the dataset is anonymized or manuscript submitted for publishing. You can exercise your rights by contacting Hasna el Morabit.

If you have any complaints regarding the processing of personal data in this research, please contact Hasna el Morabit at Hasna.elmor@gmail.com.

Consent form: Shift to Restrictive Asylum Policies

Upon signing of this consent form, I confirm that:

- I've been informed about the purpose of the research, data collection and storage as explained in the information sheet;
- I've read the information sheet, or it has been read to me;
- I've had an opportunity to ask questions about the study; the questions have been answered sufficiently;
- I voluntarily agree to participate in this research;
- I understand that the information will be treated confidentially;
- I understand that I can stop participation any time or refuse to answer any questions without any consequences;
- I understand that I can withdraw my consent before the dataset is submitted for approval.

Additionally, I give permission to:

	Yes	No
I give permission to audio record the interview		
I give permission to video record the interview		
I give permission to use quotes from my interview		
I give permission to use my name with the quote(s)		

Name of research participant: _____

Date: _____

Signature: _____

B. Coding list

Table 4. *Final version Coding list*

<i>Variable/Category</i>	<i>Definition</i>	<i>Code</i>
<i>Populist Political Strategy</i>	A thin ideology juxtaposing a virtuous ‘people’ against a corrupt elite (Mudde, 2004).	Elite
		Invasion
		Take back control
		Welfare strain/pressure
		Sovereignty
		Nationalism
		Save/rescue/help the people
<i>Transnational Influences</i>	Cross-border policy diffusion via learning or symbolic emulation (Gilardi, 2013).	EU
		Mention of any other country
		Bilateralism
		Multilateralism
<i>Problem Stream</i>	Conditions perceived as crises that elevate issues to policy agendas (Kingdon, 1984).	Opt-out
		Crisis
		Surge
		Overcrowding
		Security
		Threat
		No control
<i>Policy Stream</i>	Pre-existing solutions circulating among policymakers (Kingdon, 1984).	Nuisance
		Human smugglers
		Externalization
		Fast-track procedures
		Detention centers
		Court deciding
		Incriminate illegals
<i>Political Stream</i>	Shifts in public opinion, electoral dynamics, or coalition priorities (Kingdon, 1984).	Reshape policy
		Deterrence
		Stop the Boats
		Public Anxiety
		Public opinion
		Coalition agreement
		Public support
		Right wing
		Left wing

Policy Window

Temporal alignment of streams enabling rapid policy change (Kingdon, 1984).

Post-Brexit

Restrictive Asylum Policy

Legislative or procedural changes reducing asylum access or protections (Lavenex, 2021).

Crisis response

Mention of ‘Strictest asylum policy’

Deportation

Detention expansion

Securitization

Border control

Push back

Less assistance

Withdraw citizenship

Stop/Highly reduce asylum applications

Allow asylum seekers

C. Interview Guides

Table 5.1 *Interview Guide 1. Prof. Daphne Halikiopoulou*

<i>Theme</i>	<i>Main Questions</i>	<i>Probing/Follow-Up Questions</i>
<i>Introduction</i>	1. Thank the professor and outline the thesis focus. Confirm consent.	Are there any specific aspects of the UK's asylum debate you believe deserve particular attention?
<i>Populist Narratives</i>	2. My research suggests populist parties like the Conservatives and Reform UK frame asylum seekers as threats. Do you recognize this narrative?	Can you elaborate on how such rhetoric can or cannot influence policy design or policy making?
<i>Public Perception</i>	3. Public misconceptions about asylum numbers (overestimates) seem influential in shaping political strategies according to my research. Is this visible in the UK and if so, how??	What role does media play in bridging or widening gaps between perception and reality?
<i>Securitization</i>	4. My analysis indicates asylum has been securitized in the UK, aligning with broader European trends. How would you describe this trend?	Does framing asylum as a security issue risk undermining humanitarian obligation long-term?
<i>Post-Brexit Sovereignty</i>	5. The UK's emphasis on sovereignty post-Brexit appears central to policies like the Rwanda plan. How would you characterize this relationship?	How do policymakers reconcile sovereignty claims with international legal critiques?
<i>Policy Convergence</i>	6. Despite leaving the EU, the UK's approach to outsourcing asylum processing mirrors some EU	Are the similarities accidental, or does it reflect

	practices. How do you interpret or explain this convergence?	strategic emulation/policy diffusion?
Bilateralism	7. The UK's bilateral agreements (like with France) appear central to its post-Brexit asylum strategy. How would you describe this mechanism?	Does this approach complement or undermine multilateral cooperation?
Policy Outcomes	8. My research highlights risks and benefits of prioritizing deterrence over protection. How do you view this balance?	Can deterrence-based policies align with humanitarian obligations, or are they inherently contradictory?
Closing	9. Based on your expertise, what lessons does the UK's restrictive turn offer for understanding populism's role in European asylum governance?	Are there parallels or differences between the UK's approach and other democracies in Europe?

Table 5.2 Interview Guide 2. Prof. Peter Scholten

Theme	Main Questions	Probing/Follow-Up Questions
Introduction	1. Thank the professor and outline the thesis focus. Confirm consent.	Are there key aspects of Dutch asylum policy in 2024 you believe deserve particular attention?
Populist Coalitions	2. From my research, the PVV-BBB-VVD coalition appears to frame asylum as a cultural or economic threat. Do you recognize this framing?	How do coalition partners reconcile this rhetoric with traditional Dutch liberal values?

<i>EU Compliance</i>	3. My analysis suggests the Netherlands balances EU asylum norms (CEAS) with domestic demands for stricter policies. How would you characterize this?	Would you describe this as ‘contested Europeanization,’ or is there a better framework?
<i>Externalization</i>	4. The Netherlands supports EU externalization strategies like third-country processing centers. What factors might explain this approach?	What ethical considerations arise from outsourcing responsibility?
<i>Normative Contestation</i>	5. I observed reinterpretations of international norms (e.g., family reunification) in Dutch policy. Do you see this as part of broader tensions?	Are there safeguards against norm erosion, or is reinterpretation becoming institutionalized?
<i>Systemic Pressures</i>	6. My research links systemic challenges (backlogs, housing shortages) to political narratives justifying restrictions. Do you see this interaction?	Could addressing inefficiencies reduce reliance on deterrence, or is politicization too entrenched?
<i>EU vs. Sovereignty</i>	7. The Netherlands has recently pushed to opt out of certain EU asylum norms. What factors might explain this shift?	How does this reconcile with Dutch advocacy for EU cooperation in other areas?
<i>Policy Diffusion</i>	8. Dutch policies appear to align with broader EU trends toward securitization. Do you agree, and how would you characterize this alignment?	Are there counterexamples where Dutch policies diverge from EU trends?
<i>Public Discourse</i>	9. Public anxiety about migration seems influential in Dutch politics. How would you	Can empirical data counterbalance populist

Closing	describe its role, and what part do media play?	narratives, or do emotions dominate?
	10. Based on your expertise, what lessons can be drawn from the Dutch case regarding EU membership and restrictive asylum governance?	Could this inspire similar reforms elsewhere, or is the Dutch context too unique?

D. Tables of selected documents

Table 6.1 *Sources of content analysis of The Netherlands*

<i>Document Type</i>	<i>Source</i>	<i>Date of Publication</i>	<i>Author/Source</i>	<i>Characteristics</i>	<i>Matching Variables</i>
Legislative Texts	<u>Regeerakkoord Kabinet</u>	13/0/2024	Dutch Government	Coalition agreement outlining asylum policy overhaul	Restrictive Asylum Policies
	<u>Nationaal Implementatieplan Asiel</u>	06/12/2024	Ministerie van Asiel en Migratie	Implementation details of EU asylum pact, opt-out clauses	Transnational Influences
	<u>Verkiezingsprogramma 2023</u>	2023	PVV (Geert Wilders)	Populist anti-immigration rhetoric, framing migration as threat	Populist Political Strategy
Party Manifestos	<u>VVD Verkiezingsprogramma</u>	10/2023	VVD	Emphasis on stricter asylum processing	Populist Political Strategy

Parliamentary Debates	<u>BBB Verkiezingsprogramma</u>	11/2023	BBB	Rural-focused, anti-"asylum influx" rhetoric	Populist Political Strategy
	<u>First Asylum Policy Debate 2024</u>	25/09/2024	Dutch Parliament	Introduction of 2024 asylum policy package	Problem Stream, Policy Stream
	<u>Debate Asylum Policy 05/11/2024</u>	05/11/2024	Dutch Parliament	Discussion of asylum backlog and enforcement	Problem Stream, Policy Stream
Media Reports	<u>Trouw Article</u>	16/05/2024	Trouw	Analysis of policy impacts on asylum seekers	Problem Stream
	<u>Volkskrant Article</u>	09/12/2024	Volkskrant	Debate on humanitarian costs of strict policies	Problem Stream
	<u>Telegraaf Article</u>	28/06/2024	De Telegraaf	Populist framing of migration as "invasion"	Populist Strategy
EU Agreements	<u>CEAS Agreement</u>	Ongoing updates	European Commission	EU-wide asylum standards and procedures	Transnational Influences
	<u>New Pact on Migration and Asylum (2020)</u>	23/09/2020	European Commission	Framework for solidarity and responsibility-sharing	Transnational Influences

NGO Reports	<u>Migration Report 2024</u>	2024	Dutch Government/N GO	Data on asylum outcomes and policy impacts	Problem Stream, Restrictive Policies
	<u>Reshaping Asylum Policy NL</u>	8/2/2024	Dutch Government/N GO	Critiques of restrictive measures and human rights concerns	Restrictive Asylum Policies

Table 6.2 Sources of content analysis of The United Kingdom

Document Type	Source	Date of Publication	Author/Source	Characteristics	Matching Variables
Legislative Texts	<u>Asylum Support Bill 2024</u>	6/9/2024	UK Parliament	Restrictions on asylum seeker support	Restrictive Asylum Policies
	<u>Safety of Rwanda (Asylum and Migration) Act 2024</u>	25/04/2024	UK Parliament	Legally designates Rwanda as "safe" for asylum seekers	Restrictive Asylum Policies
	<u>Nationality and Borders Bill</u>	2021 (Updated 13/10/2023)	UK Home Office	Offshore asylum processing policy	Restrictive Asylum Policies
	<u>Conservative Party Manifesto 2024</u>	06/2024	Conservative Party	"Stop the Boats" rhetoric and Rwanda deportation focus	Populist Political Strategy

<i>Parliamentary Debates</i>	<u>Labour Party Manifesto 2024</u>	06/2024	Labour Party	Emphasis on reforming asylum system, critiques of Rwanda plan	Populist Political Strategy
	<u>Border Security Bill Committee Debates</u>	18/03/2025	UK Parliament	Debates on expanded enforcement powers and Rwanda partnership	Problem Stream, Policy Stream
<i>Media Reports</i>	<u>The Times Article</u>	16/10/2024	The Times	Coverage Channel crossings	Populist Strategy
	<u>The Guardian Article</u>	28/04/2024	The Guardian	Critique on Rwanda deportation policy	Problem Stream
	<u>The Sun Article</u>	01/12/2024	The Sun	Framing of migration 'crisis'	Populist Strategy
<i>EU/International Agreements</i>	<u>UK-Rwanda Asylum Partnership</u>	20/05/2024	UK Government	Bilateral treaty for offshore asylum processing	Transnational Influences
	<u>EU-UK Partnership on Asylum</u>	2024	EU Parliament	Post-Brexit cooperation on migration	Transnational Influences
<i>NGO Reports</i>	<u>Britain Thinks Report</u>	07/2021	Britain Thinks	Public attitudes on asylum policies	Problem Stream, Restrictive Policies

<u>Ipsos/Britis</u>	19/09/2024	Ipsos/British	Data on public	Problem
<u>h Future</u>		Future	opinion and	Stream,
<u>Tracker</u>			immigration	Restrictive
			attitudes	Policies