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Abstract

Based on the growing relevance of integration of marriage migrants in East Asia, the thesis aims to compare similarities and differences of the legal status of Asian women brides in two countries, South Korea and Taiwan, and how both are regulated to promote and restrict their integration and citizenship. Therefore, throughout the literature review, the emphasis is placed on discussing three concepts; integration, citizenship, and legal status, and how these concepts interact and cut across each other on illustrating the case of Asian women brides, especially those who practice social reproduction roles in household and profession. The discussion is fostered by legal entitlements and rights attached to the legal status of Asian women brides and its relevance on their settlement, along with strong gendered and racialized roles practiced in the destination countries, with traditional family culture. Additionally, the thesis continues with applying an analysis framework, which was introduced in the literature review. The framework developed by Migration Integration Policy Index (MIPEX) is applied to three following dimensions: Access to Nationality, Permanent Residence, and Anti-discrimination. It is found that the three dimensions mentioned above are significant contributing factors to determine the integration of the women brides, however, it cannot be limited and confined to that. Derived from the assessment, the thesis concludes that South Korea and Taiwan share some similarities in regulating the legal status and factors contributing to the unfair treatment of Asian women brides. However, for most of the criteria, it shows great discrepancies. Similarities are attributed to strong nationhood and assimilative approaches to address integration and their citizenship, and these aspects are included into immigrant legislations, this is fostered by ethnic homogeneity, stigmas, incomplete and insufficient multicultural education to cultivate diversity and equality in two countries. Differences are shown between two different political scenarios and attitudes implementing the institutions and the evolvement of CATM, the Taiwan case shows that Taiwan is more inclined to proactively adopting approaches to resolve the migrant integration issues, compared to South Korea. Extended discussions are made to investigate the similarities two countries share to restrict the legality of Asian women brides to prioritize its nationals, and a lack of applications for international standards to the domestic legislation is pointed out. The conclusion summarizes the findings and makes further research recommendations.

Key words: Marriage Migration, Integration, Citizenship, Legal Status, Asian women brides, South Korea, Taiwan

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List of Abbreviations

AHRLIM	Alliance for Human Rights Legislation for Immigrants and Migrant
APRC	Alien Permanent Resident Certificate
ARC	Alien Resident Certificate
CATM	Commercially Arranged Transnational Marriage
CEDAW	United Nations Convention on the Elimination of Discrimination against Women
CIDOB	Barcelona Centre for International Affairs
DPP	Democratic Progressive Party
ICER	UN International Convention on the Elimination of All Forms of Racial Discrimination
ILO	International Labour Office
IMGP	International Marriage Guide Program
KIIP	Korean Immigration and Integration Program
KMT	Kuomintang
KWDI	Korean Women's Gender Development Institute
MIPEX	Migration Integration Policy Index
MoC	Ministry of Culture
MoE	Ministry of Education
MoFA	Ministry of Foreign Affairs
MoGEF	Ministry of Gender Equality and Family
MoI	Ministry of Interior
MoJ	Ministry of Justice (South Korea and Taiwan)
MoHW	Ministry of Health and Welfare
MPG	Migration Policy Group
NDC	National Development Council
NHRCA	National Human Rights Commission Act
NIA	National Immigration Agency
OECD	Organisation for Economic Co-operation and Development

TASAT	TransAsia Sisters Association in Taiwan
TOPIK	Test of Proficiency in Korean
UNHRC	United Nations Human Rights Council

1. Introduction

1.1 The Shift toward East Asian Migration Regime

East Asia has experienced a massive transformation in the last three decades. It results in changes in demographic structure, fertility rate, imbalances in sex and aging ratio, moreover, how people move from one region to another (Kim et al. 2011). It has been said that international migration is an ongoing phenomenon in East Asia, at the same time, it is a phenomenon also inevitable for the countries to accept. According to the changes, East Asian countries have been discussing integrating inbound populations from overseas into the host societies, utilizing them as human capital (Kim et al. 2011).

Despite this, East Asian countries have implemented limited and slow policy changes in integrating migrants (Kim et al. 2011), exploiting 'passive multiculturalism' and 'assimilative approach' (p.1563). The states view migrants as temporal residents instead of a part of the union, allowing citizenship exclusively to those highly- skilled and the professionals, even it intentionally has delayed their settlement for the sake of reducing economic costs to integrate them into the host society (Seol et al. 2009, 580). It goes along with the argument that public perception of migrants has been eroded by media which propagates the possibility of migrants being a threat to domestic populations and hosting social security (Kim et al. 2011). Also, it is said that, in East Asia, the needs of migrant groups are often contested by the governance of migration, dominant social traditional family roles, and ethnic homogeneity (Kim et al. 2011).

However, in addition to perpetuating elements, there are also elements in the existing system interfering East Asian countries to enhance the migration regime regardless of economic development and government interventions (Hugo 2005), which reinforces East Asian states to more incline toward sustaining the purposes of supporting their settlement in pursuits of political and social stability (Le et al. 2014, 100). With the recent industrialization, the East Asian states have put the interests of host society and development in the first place (Seol et al. 2009). While it made a good comparison with the other traditional immigrant model of migration exploited by other developed nations from the West, it is questionable if Asia could mirror their style of multiculturalism with all the resettlement and social issues. Comparatively, despite shared similarities, the migration regime in East Asia reflects different concepts of nationhood, followed by a lot of divergence of immigrant institutions (Kraler 2006, 41-42). It is important to mention that, in general, compared to the traditional immigrant countries, the lack of experiences of East Asian countries in managing diversity has manifested immigrant trajectories of East Asia. (Kim et al 2011). Furthermore, for many aspects, inherent homogenous traits of East Asian societies

greatly contribute to shaping the East Asian migration regime. It is said that, despite migrants bringing their own culture into the host society, public discourses on the concepts are recently articulated (Kim et al 2011).

The ethnic component in East Asia is also mentioned in migration discourses, migrant groups moving to the East Asia region are ethnically and culturally close to host country populations, compared to other parts of the world, especially East Asian countries have been mainly accepting migrants from ethnic descendants from mainland China¹. It partly explains a reason why East Asian governments favour assimilationist policy (Kim et al. 2011, 1578). As it shows great divergences from the precedented immigrant countries, which worked on migrant issues for a long time, the East Asian migration regime shows that it is their early stage to identify factors that facilitate and prevent integration of immigrants coming from the neighbouring countries.

1.2 Marriage and Gendered Migration in East Asia

Marriage migration has been the most dominant type of migration, next to labour migration (Kim et al. 2011). Marriage migration has been a centre of migration discourse in East Asia after the 1960s as East Asian countries had transformed into receiving countries, it has challenged pre-existing ideologies of host countries on concepts of nationalism, population homogeneity, ethnicity, and citizenship in unprecedented ways (Be´langer et al. 2010). In Asia, marriage migration carries different forms than any other region, because it highly depends on the economic status and age of women, usually moving from economic disadvantaged countries to developed countries (Global Commission on International Migration 2005, 17). Also, the authors argue that the migration flow can increase or decrease according to demographic, social, economic, institutional factors as well as personal agencies and networks of the migrants (i.e. ties with communities). Immigrant spouses are largely studied as a main focus of marriage migration research, it is because the migration flow of the brides constitutes mainly female spouses, and the immigrant pattern produces family unification and reproduction in the process (Be´langer et al. 2010, 1109). Therefore, in this thesis, ‘marriage migrants’ reasonably refers to the migrant groups of ‘female spouses’, who underwent the transnational marriage in East Asia, further applied to South Korea (hereafter ‘Korea’) and Taiwan cases.

Also, it is mentioned that marriage migration is strongly related to the hegemony of Confucius's family ideology, based on a model of the welfare state in East Asia (Le et al. 2014). The welfare state incurs a debate on the East Asian model of family and welfare policies, therefore,

¹ In this thesis, ethnic mainland Chinese is not included in the target migrant group of “Asian women brides”

the marriage migration often is analysed in the context of changing family welfare and the role of care providers in gendered regimes (Le et al. 2014). This involves the discussions on how migrant women reproduce themselves culturally, socially, and economically. Therefore, it confirms that marriage migration raised fundamental questions regarding the gendered and feminization nature of the migration, especially in the case of Asia (Be´langer et al. 2010). To demonstrate the relationship between gendered and marriage migration, it is important to be aware that marriage migration is not a final goal or a cause of women migrants but rather it should be viewed as a consequence of migration (Be´langer et al. 2010). However, in globalizing migration flows, it still shows a positive correlation between international travel and marriages (Be´langer et al. 2010). Thus, International marriage is reinforced by the increasing spatial mobility and made possible with diverse forms of intercultural interactions.

On the other hand, reaching back to the fundamental roots of gendered migration, many scholars have illuminated interactions between gender systems and gender dynamics in the migrant origin and destination. According to Jones and Shen (2007), the definition of gendered migration goes beyond ‘the mobility of population’, as the term ‘gendered migration’ also implies the phenomenon that an increasing number of marriage migrants flow into the East Asia region. It further goes on to say that the gendered migration combines the existing definition of migration ‘population movement’ with ‘the process of individual agencies to negotiate power and status in the marital family and host society’, which implies social and economic mobility of migrant brides (Chang 2014). It is reflected in a term- “gendered geographies of power”, resulting from structural inequality across nations to those men and women entering international marriages (Jones et al. 2007, 14-17; Chang 2019, 2).

Therefore, it is important to mention that marriage migration shows gendered aspects of migration. Even though, both terms ‘marriage migration’ and ‘gendered migration’ could not be interchangeably used nor a synonym. In this thesis, it aims to reflect on how marriage migration is gendered, however, in practice, the relationship between marriage and gendered migration is complex with diverse motivations and typologies for the marriage migration (Be´langer et al. 2010).

1.3 Marriage Migrants in South Korea and Taiwan & Discussions on Integration

As a relatively young history of the migrant regime in Korea and Taiwan, an increasing marriage migration opens diverse discourses. The migration studies in both countries are largely studied by feminist scholars or sociologists due to a fact that migration flow consists of a great number of women and families (Be´langer et al. 2010, 1109). Even though the female spouses

migrate at an early age in their 20s and they might switch their migrant status between marriage migrants and labour migrants, their social status is complicated with individual agency and marital status (Chang 2014). The reproduction of female spouses is controlled by migration governance based on Confucius's family ideology in Korea and Taiwan (Le et al. 2014). Along with the fact that there is barely any comprehensive migration policy in both countries, marriage migration is misrepresented in mass media and poorly understood by host locals (Be' langer et al. 2010). Just recently, East Asian governments started to pay attention to their roles in marital families and shape the social construction of immigrant spouses by efforts of different participants: governments, the public, and mass media (Be' langer et al. 2010). However, the confines of the current 'foreign brides' box, immigrant women's agency, networks, resourcefulness, and the ethnic necessity as citizens have yet to be acknowledged through data and knowledge production, not to mention their unstable legal status, all the elements contribute to the phenomenon negatively (Be' langer et al. 2010).

However, it also imposes the risks of oversimplifying the decisions and complexity of the marriage (Jones et al. 2007). Even though we should not underestimate the role of female migrants play in marriage migration, the literature argues that the broad spectrum falls under individual agencies, depending on the 'age cohort of the individual, level of education, place of residence and other social and economic factors' that can contribute to the delivery of various integration result and experiences of individuals (Chang 2019, 16).

In examining the immigrant integration policy to approach marriage migration, some scholars have pointed out the problematic aspects of defining the term-'integration' (Westin 2000; Cho et al. 2012; Park 2019). The concept of 'multiculturalism' has thus become one of the main concepts in the migration discourse to address integration, in a large context, that is meant to manage cultural diversity in pursuit of 'political stability in the region' (Kim et al 2011). One distinctive category of multiculturalism is a mix of traditional society in which different ethnicities, religious and cultural groups have been able to co-exist side by side, among various discussions on discerning cases of multiculturalism (Westin 2000, 58). Derived from the literature, multicultural society is not necessarily ideal or always in peace, as it brings other social issues to adjust. However, the approach of integrating and incorporating arrived migrants corresponds to the goal of multiculturalism (Westin 2000, 58). According to Castles and Miller (2003), the model of integration by states shapes the social integration framework by characterizing three models: differential exclusionary model, assimilationist model, and multicultural model. It is argued that Korea and Taiwan are largely explained by the differential exclusionary model that

selectively integrates the migrants for the receiving country to utilize them as human capital before constraints the rights of the domestic population (Cho 2012). This also goes align with constrained rights for a family of migrant women, which makes family union difficult (Seol et al. 2009, 594).

Accordingly, the differentiation between the concept 'assimilation' and 'integration' strongly be involved with policy designs in each model, influencing the formulation of affiliated institutions. (Westin 2000; Cho 2012; Reitz 2016). The following table presents how the interplay between migrants and host society works in terms of language, society culture, and institutions in integration policy. It further explains four categories of relationship- the idea of Cossey (2000) is reflected that, integration is the option to recognize and embrace both the culture of the host community (or dominant) and at the same time to preserve identity with one's origins in the culture of minorities (and parents). Different combinations of acceptance and rejection reflect assimilation and separation. Finally, marginalization is seen as an acculturation method that rejects both dominant and minority cultures as an identity and acceptance factor (p.58).

		maintaining identification with minority culture	
		YES	NO
accepting identification	YES	INTEGRATION	ASSIMILATION
with host society culture	NO	SEPARATION	MARGINALIZATION

Figure 1. The framework of Integration Policies. (Cossey 2000, 58)

To sum, the discussions on settlement and incorporation of arrived migrants at the early stage of migration are often found when it comes to integration. However, in a more dynamic perspective, integration is not a simple choice between models, however, it applies to every stage of the process over an extended period (Westin 2000, 59).

Derived from the discourses on migrant women and integration, we could confirm that the migrant women's agencies are not fully negotiated in marital family and host countries, it is reinforced by the assimilationist and passive multiculturalism approach to the migrant in East Asia. Therefore, having said that, the assessment of integration extent is hampered in investigating immigrant integration, still, the debates on the identifying dimensions to define integration and scientific measurement of immigrant success is in progress (Harder et al. 2018).

1.4 Asian Women Brides in Migration

As we briefly overview the marriage migrants in East Asia, the role of female spouses is also getting attention to be studied. It raises inquiry into Commercially Arranged Marriage (CATM)

widely practiced in Asia region, through which Asian women brides may 'marrying up' to men in wealthier countries. In that, socio-economic factors coming into play for Asian women brides to engage in the marriage transactions are discussed. To answer this, there are various bodies of literature to particularly investigate the limited role the women migrants play after entering international marriage, especially in Korea and Taiwan. Lee (2011) studies women migrants as service workers or housewives, this goes hand in hand with a study from Liang (2017) analysing care work provided by women migrants as a facilitator of labour based on gender, race, and ethnicity. Yang (2014) attempts to analyse the citizenship dilemma female spouses face by investigating dimensions of civil, political, and social rights, and Isabella (2014) studies the legal status of migrants to engage in the host society. In the meanwhile, Chang (2014) examines socioeconomic status influencing Asian women migrants' well-being as one of the indicators. Even the public opinion on those women migrant workers is downgraded by the fact that numerous of them work in service industries that are considered as low-skilled jobs (Song 2008). However, Jones and Shen (2008), nonetheless, argue that understanding the economic status of women who migrated to relatively developed countries is complex, in terms of the issue of agencies. Also, the 'low-socioeconomic status of women migrants' does not necessarily mean the failure of immigrants (Reitz 2016). Add to that, it is important to mention, women migrants are neither victims nor free subjects in many aspects of marriage migration (Jone et al. 2008). Also, discourses on Asian women brides are in a relation to family union both in-home and destination countries, in the same vein, the family transition on marriage migration and population changes in Asia are discussed (Yang 2010). Along with that, the interplay between gender dynamics, socioeconomic status, and integration (Chang 2014), as well as women migrant's experiences and agency in the marriage are all pointed out (Jone et al. 2008).

Asian women migrants have emerged as the main subject of studies on international marriage in Korea and Taiwan, considering a high ratio of specific nationality groups in two countries from South-east Asia (Jones et al. 2008; Yang 2010; Lee 2011; Liu 2014). Among East Asian countries, in Korea and Taiwan, international marriage takes up the highest proportion of the marriage (Jones et al. 2008, 13). Derived from the East Asian case, it is noted the nationality composition of women brides who have moved for an international marriage to East Asia region are mainly from mainland China and South-east Asia (ibid., 13-14).

In the case of Korea, females account for 65% of a total of 200,000 foreign national spouses in Korea. The most popular brides for Korean men in Asia are those from mainland China. – Most marriage migrants to Korea constitute Chinese women brides, followed by ones from Vietnam, Japan, the Philippines, and Cambodia. Matchmaking is a legitimate trade-in Korea, for

further, the existence of a commercial brokerage system is noteworthy, which is established by transnational matchmaking agencies in the Asian Pacific region.

On the other hand, the situation in Taiwan is even more dramatic, with international marriages accounting for 32% of all marriages in 2003 (Jones et al. 2008, 10). International marriage is overwhelmingly Taiwanese men marrying international brides – female spouses were 92%. In align with the Korean case, most of the Taiwanese men marry women from mainland China, while the rest overwhelmingly come from South-east Asia. Among South-east Asian spouses, 69 percent are Vietnamese, followed by Indonesians (15 percent), Thais (6.5 percent), Filipinos (4.8 percent), and Cambodians (3.5 percent) (ibid.). Therefore, derived from the data, in the thesis, the target group indicating ‘Asian women migrants’ in Korea and Taiwan is put on the distinctive nationalities. It aims to focus on the women migrant spouses from the above categories with a heavy focus on South-east Asian women.

1.5 Research Question and Relevance

An analytical framework derived from upcoming literature review will be applied to the case studies of Korea and Taiwan to identify similarities and differences among both country's migrant integration policies on regulating citizenship of the target group: Asian women brides. The relevant time frame for analysis will be the period after 1990 until recently when in both countries the number of incoming marriage migrants started to increase and transformed from sending countries into hosting countries (Bail 2017).

Targeting this understudied migrant population ‘Asian (women) brides’ in Taiwan, I was motivated and informed by two works of literature addressing the experiences of female migrants from Asia. One literature review is about ‘Asian women brides’ who mainly move for a voluntarily/arranged marriage or labour in East Asia (Chang 2014). In the literature, the author studied the major group of Asian marriage migrants- especially those Han-Chinese, Vietnamese, and Korean- Chinese ethnicities. The other literature is on East Asia as a migrant destination for a multicultural family (Kim et al. 201). This thesis is partially also to respond to controversies over multiculturalism in East Asia. However, so far besides Chinese-related ethnicities, Asian women brides are rarely investigated as a target migrant group and despite the close cultural relationship between Korean and Taiwan in history, one big reason is that history of population movement for Korean ethnicities is not so long (ibid.).

Among different groups of Asian women brides, especially, in the dissertation, the Asian women brides who play their social reproduction roles as a housekeeper, care service provider in household and labour market will be focused to investigate and compare the legal status of the migrant group.

In the meanwhile, through the search of possible research sites, I found it very interesting to observe the link between Korea and Taiwan for the following reasons:

First, the evolution of Korea and Taiwan as new immigrant destinations is pointed out. As two countries recently have been transformed into immigrant-receiving countries from sending countries. Secondly, both governments are in a rather early stage to make immigration policy to accommodate the needs of different types of migrants, compared to other industrialized countries (Chang 2014, 7). Thirdly, given the great continuous demographic transition, both are based on Confucian family culture with the low-fertility rate among women, two government has supported child-care to raise a fertility rate. It is also noted that "flight from marriage" is the ongoing phenomenon of Korea and Taiwan's societies for hosting nationals (Chang 2013, 8). followingly, the phenomenon of the host societies embodies the various levels of institutions on granting citizenship and adopting integration policies. Having investigated the background of the two countries, therefore, it is interesting and valuable to investigate how the legal status of the target group hinders and develop their marriage life and their citizenship and integration to the host societies with their multicultural family.

Based on these reasons and backgrounds above, my research question in this dissertation will be: *What are the similarities and differences between the legal status imposed on Asian women brides to improve and restrict their integration and citizenship in South Korea and Taiwan, what lessons can we derive from the analysis?*

1.6 Thesis Outline

The following literature review will illustrate state-of-the-art approaches in examining assessing integration policy on citizenship, resulting in an analytical framework developed by the MIPEX (Migration Integration Policy Index) published in 2015 which will be applied in the subsequent practical part to the case studies of Asian women brides in Korea and Taiwan. For further, the dissertation intends to illuminate the dimensions of Asian women brides as care service providers both in households and professions, through the comparative analysis of both case studies, discussions will deal with the implications resulting from potential similarities and differences identified in both approaches. Conclusions will close this thesis with a summary of obtained findings and an outlook in further potential research fields.

2. Literature Review

2.1 Definition and Overview

Tracing back to the fundamental roots of marriage migration, marriage migration can be defined in two key terms: ‘cross-border and transnational marriage’. The former definition encompasses both on a nation-state level (immigration and citizenship) and inter-group level (race, class, gender, ethnicity) (Le et al. 2014, 89). While, cross-border definition expresses the legal boundaries and legal status of migrants, on a group level, it includes the more fluid nature of a social group. The definition of transnational marriage is the notion to describe the social space transnational families are sharing (ibid.). However, marriage migration has been explained by other different terms to address both marriage and migration, such as ‘multicultural marriage’. According to Chang (2014), the terms, cross - border, and transnational marriage distinguish others from ‘inter-ethnic’ or ‘interracial marriages’ in a border (p.11). In this dissertation, I aim to focus on the concept of marriage migration as a ‘cross border and transnational marriage’ that involves the issue of citizenship and social, political, economic rights on migrants.

In mass media, ‘Asia women brides’ are often reported as “Internet marriages”, “mail bride orders”, “bogus marriages” and “the selling of sex for visas”, also the others emphasize their roles in the marital family and as wives: ‘women brides, migrant wives, female spouses’ (Be’langer et al. 2010; Chang 2014, 10). these terms are said to influence host local’s perception of migrant women and can be interchangeably used (Be’langer et al. 2010, 183). Moreover, Asian women brides often carry the downgraded meaning for women from developing countries to refer to be a social problem, who married up local men for economic reasons (ibid., 183). Therefore, the author could confirm that the definition of women brides is feminized in migration discourses. The terms also reflect the integration progress in Korea and Taiwan, from the analysis of B  langer, Lee, and Wang (2010), Taiwan’s definition of Asian women brides is narrower than Korea’s. Female marriage migrants are called by the term of “*damunwha*” or “multicultural marriages” in Korea; “*Waiji/dalu Xinni*ang” (foreign/mainland brides) in Taiwan (Le et al. 2014, 89).

The definition of citizenship has transformed from old times. However, in essence, according to the International Migration, Integration and Social Cohesion, the concept refers to “a formal legal status and the membership with rights and duties attached by political authorities” (Baub  ck 2006, 15). Given the interdisciplinary aspects of migration studies, the conceptual approach to citizenship combines and chooses a theoretical background from various disciplines, which are constantly amenable to different interpretations (Lewicki 2017, 377). There are three main dimensions of the conceptual framework: citizenship as a political and legal status; legal rights and responsibilities attached to this status; individual identities and practices (Baub  ck

2006, 16). Also, we should not neglect the term- ‘nationality’ in defining citizenship. Based on international law, nationality is perceived as citizenship. However, Bauböck (2006) made a clearer distinguishment between the two terms. saying “the term nationality indicates the international and external aspects of the relation between an individual and a sovereign state, whereas citizenship pertains to the internal aspects of this relation that are regulated by domestic law” (p. 17).

Therefore, in this dissertation, I propose to analyse the citizenship explicitly on the laws, institutions, or social norms imposed on the Asian women bride who immigrated for cross-border and transnational marriage. In this view, citizenship is a measurable and recognizable concept, that lays a threshold to impact the integration of migrants.

2.2 Integration

While there have been various discourses on immigrant success (Chang 2014; Reitz 2016), many host countries set the integration goal, and scholars have negotiated the indicators of integration (Coussey 2000; Jansen et al. 2006 Harder et al. 2018). It has been found that the range of factors of immigrant success is often corresponding to the dimensions of integration (Reitz 2016, 2340). Especially, criteria to measure integration by way of empirical methods is still daunting, however, it has progressed in the field substantially (Reitz 2016). Previous attempts are as follows. A scholar studies well-being and social integration of migrants as a measurement to gauge the success (Chang 2014; 2017). Westin (2000) goes deeper into studying the effectiveness of integration policy by referring to the Scandinavian integration policy. Some bodies of literature examine the implication of one indicator on the outcome of integration policies, for example, Song (2008) studies public attitudes on migrants, citizenship (Jones et al. 2008; Yang 2014), the legal status of immigrants (Isabella 2014), gender systems (Chang 2019). The integration of the migrant family also emerges as a key concept, for example, the Organisation for Economic Co-operation and Development (OECD) also publishes its lessons for integrating family migrants in OECD countries in comparative perspectives in 2017. On the other hand, to make the comparison more valid, Reitz (2016) notes that merely comparing migrant groups at low socioeconomic status can be problematic as the status may not entirely be attributed to different experiences across different country settings. While Castles and Miller (1993) describe four typologies of the national model that differentiate the process of integration: the imperial model, the ethnic model, the Republican model, and the multicultural model. Also, one country may not entirely belong to one model.

There are studies on the illuminating relationship between migration and elements of integration. Scholars who investigate social cohesion and integration, state that both concepts consensus on reproducing social orders (Jansen et al. 2006). It goes on to assert that both concepts

call for migrants to commit to the social order that heavily depends on engagement in, access to, and regularized social practices (ibid, 192-193). It goes hand in hand with the study on the emerging paradigm of migration in East and South-east Asia, considering that transnational marriage occurs through marriage life, child-bearing and the care of the family, the author especially stresses the role of migrant spouses' social reproduction in the marriage and household (Douglas 2011). Also, Bélanger and Flynn (2018) illuminate on transforming gender norms brought by migrant women. Also, Kim (2014) examines the compensatory masculinity of male counterparts, how gender strategies interact with socioeconomic status, regional identity, and, more specifically, wives' nationality. According to the author, the integration of migrant women is impacted by perceived gender norms adopted by male partners. It implies that integration is not a short-term swap, in which various intrinsic factors come to effect, that might support and delay the integration of migrant women. In essence, Integration is thereby a core process that expresses to build a new social practice and production and to interact with the existing ones in the host society.

To assess the integration, scholars have initiated an empirical approach to gauge the extent of integration. Despite its ambiguous and complex concept, Cho (2012) mentions 'system integration' as a rather measurable concept. The other authors mention that legal integration (including gauging the legal status of migrants) is rather measurable, while social integration is a complex issue with its normative peculiarities (Bachmeier et al. 2014; Reitz 2016).

Indicators have been built based on the dimensions of the integration, which have been categorized by various scholars. Coussey (2000) incorporates the framework of integration from different levels, covering a wide range of areas: legal measures, employment, housing, health, religion, culture and language, education, the media, government functions, and monitoring and evaluation. On the other hands, the following dimensions of integration, which include employment, economic mobility, overall economic well-being, residential inclusion and marginality based on race and religion, access to citizenship and political influence, schooling for immigrant children, inter-group marriages and national society identity, are examined by Reitz (2016). The other talks about components include economic mobility, residential concentrations, the significance of race and religion, intermarriage, mobility in the second generation, and political participation. (Reitz 2016, 2340). A sociologist, Chang (2014), focuses on the aspect of social integration by way of investigating social relationships with native people and co-ethnic networks, also the author assesses the integration by formulating a two-stage integration model into the marital family and host society. Including Chang (2014), many sociologists analyse the integration of migrants byways of investigating migrant experiences, in that qualitative interview method and

case studies are adopted. (Chang 2014; Kim 2014; Torres et al. 2014; Yang 2015; Enns-Kananen 2017; Tseng 2017). The authors conduct in-depth interviews with the population of interest could provide a thorough understanding including nuanced details about lay people's lived experiences and personal agencies. In terms of integration, due to its subtle characteristics of the notion, gaining first-hand insight through field research is getting more attention, however, scholars still combine various qualitative and quantitative methods to measure the integration.

However, there is no universal agreed understanding of 'integration' and its assessment framework (Reitz 2016). Also, many pieces of research have provided a comprehensive comparative study on integration in limited settings (Cho 2012; Kneebone 2012; Chang 2017; Chang 2019) and often focus on a specific migrant group (Lan 2011; Liang 2017; Park 2019), or have illuminated on particular dimensions of a sub-category of immigrant integration, for example, employment, health, etc. (Kneebone 2012; Chang 2014). However, the empirical question to measure integration and direct comparison of the actual experiences of marriage migrants is limited (Reitz 2016).

In sum, there is no defined concept of integration and empirical criteria, integration is a continuous process and not a final state. Thus, it is important to mention very different integration approaches and citizenship policies on integration can be added, the integration policies vary country by country cases. Moreover, as the above-mentioned dimensions have shown, the dimensions provide comprehensive, but not limited to social, political, economic, and legal integration. To evaluate each indicator, economic integration (employment, economic mobility) can be a significant indicator to explain inclusion, while political integration (exemplified in citizenship law, nationality, and political participation) is sensitive to national models of integration that is also considered as a paramount indicator (Coussey 2000; Reitz 2016, 2342-2343). However, religion and identity as indicators can be less standardized and follow historical context (Reitz 2016). While other dimensions of integration remain important to migration success (Coussey 2000; Westin 2000), given the significance of the term 'integration' in defining immigrant success, the scholars explain throughout the pieces of literature, why integration is necessary for studying migrants and how should be gauged in different policy areas.

Derived from the literature review, it is examined that there are ongoing discussions on what are measurable and not measurable, and what areas are worthy to focus, it shows great discrepancies in dimensions studied by the scholars and approaches, in this dissertation, the author aims to investigate relatively measurable aspects of integration explained as formal aspects of the integration- the legal status of migrants.

2.3 Citizenship: Assessing Integration Policy

Some bodies of literature argue that examining citizenship is a part of implementing integration policy, studied citizenship as separate categories. Cossey (2000) provides the framework for integration policies made in various Council of Europe bodies, the research also takes human rights standards into account in revising the policies, in that the author includes the categories for ‘residence rights’, ‘citizenship, nationalities and political participation’, also, ‘legal measures against racism, xenophobia, and discrimination’. Similarly, Migration Integration Policy Index (MIPEX) published in 2015 has distinguished the citizenship between ‘residence rights’, ‘access to nationality’, and ‘anti-discrimination measures’. On the other hand, Helbing (2011) argues that, based on citizenship assessment, the outcomes of policy on citizenship are summarized as immigration, integration, and naturalization policies (Helbing 2011). This means the discussion on citizenship opens a possibility that the citizenship index could be an indicator to measure the extent of integration, also it is important to mention naturalization is not a central goal for citizenship policy to achieve.

Republican perspectives on citizenship have emphasized not only the legal status of migrants but also, civic virtues and cultural rights to sustain migrants living in the host society (Bauböck 2006, 31). Liberal understanding of citizenship lies in the argument that both state and individuals have rights and obligations, in which the notion can be expanded to the rights stemming from legal status. Still, traditionally citizenship can be understood as a privilege attached to practice political participation, such practices are studied concerning to the factors: integration and resettlement (ibid.). In the meanwhile, other pieces of literature note interactions between various levels of governing orders and actors. Valverde (2010) suggests looking at citizenship beyond simply a static legal and philosophical concept, rather it is a contingent and interactive politico-legal notion with constitutive groups (p. 218). According to the author, scales on measuring citizenship and existing citizenship practices are not so different, and scale and practice interact and work on different levels (p. 240). On the other hand, Dobrowolsky and Tastsoglou (2006), in the book, shed a light on the multi-layered existence of migrant women. Migrant women’s agency and identities are also affected by the structural process (global, transnational, national, and local), while they strive for living under immigrant regulations and a confined citizenship. Thus, it is important to mention, through citizenship, female migrant spouses navigate their individual, social, economic, political, and psychological spaces and negotiate their legal belongs on different levels of their citizenship.

While there are other aspects of citizenship, Bloemraad (2008) asserts dimensions of citizenship cut across each other and shape the contents and process of policy implementation.

According to the author, the elements of citizenship: legal status, rights, political participation, and belonging, accompany each other. In the meanwhile, Marshall wrote in his book 'Citizenship and Social Class' published in 1950, that civil, political, and social rights do not uniformly apply to all social classes. In the context of his perspective, the extended rights approach does not necessarily bring full- citizenship. This goes against the traditional view on citizenship that prioritizes full rights. This idea goes parallel to Chung (2019), who asserts on the interaction between *de facto* and *de jure* of institutions, the incorporation, and extension of regulation does not mean full citizenship. The author also points out the hierarchy of citizenship by different visa categories. In East Asia, low-skilled migrants with their families are assumed to be more likely to bring economic, cultural and social challenges to a state, so the industrialized states are pursuing 'citizenship without settlement' to gain net positive benefits (Seol et al. 2009, 579).

On the other hand, classifying the citizenship approach by civic or ethnic bases is also raising questions in terms of national models or different trajectories (Bloemraad et al. 2008, 158). Therefore, we should not neglect the fact that one country may offer institutional arguments on the legal status of migrants. The distinction between civic, ethnic, political, and legal citizenship makes a difference in migrant's membership (ibid., 159). This argument goes hand in hand with Lewicki (2017), "As integration policies move higher up on the political agenda, citizenship is no longer determined by one or two specific laws and influenced by the actions of one or two ministries, but shaped by a spectrum of laws, institutions, initiatives, and actors who negotiate the contours of policy by drawing on distinct discursive visions of democracy" (p.394). It makes a difference in which theory prevails in the discourse and implementation and adoption of policy (Lewicki 2017).

Other works of literature mention actual practices of citizenship may differ from what is regulated (Valverde 2010). We should note that there are interactive reactions between governing orders on different levels (p.240). Eizaguirre, Pradel-Miquel, and García (2017) also assert the ongoing discussion on 'the act of citizenship', in the literature, the authors highlight actual practices and discrepancies between the local governance model and agenda (p. 425). Thus, considering the high proportion of women migrant brides live outside of capital cities, Seoul and Taipei, in Korea and Taiwan, the policy concerning migration from local government be differently applied. The difference between the actual practice of citizenship and regulation is also reflected in the concept of liminal citizenship. Swerts (2017) and Maria Torres & Wicks-Asbun (2014), investigate the aspects of citizenship that are undocumented, in-between, and ambivalent. According to it, citizenship is not confined to the legal documentations, as migrants are entitled to partial rights, they are at the status of 'permanent temporaries' legally (Marria Torres 2014, 196).

Especially, citizenship of women has raised debates on sexism and racism that is deeply rooted in societies, that women will achieve 'incomplete citizenship' nonetheless (Dobrowolsky et al. 2006, 10-11). The authors especially illuminate on gendered implications on the practice of citizenship, it explains complicated socio-politico-economic realities, in that women might have different relationships to rights and obligations resulting in different participation and practices (p.13)

Derived from the literature, studies on citizenship assert on extending civil, political and social rights of migrants, however, I could confirm that full citizenship couldn't be delivered merely through the legality of citizenship. It illustrates personal narratives of migrants make significant differences to the migrant experiences on citizenship. Thus, it is important to mention the actual practice of citizenship are constrained by various factors, moreover, for the cases of women migrants, the performance of citizenship is complicated and be presented differently across the country settings and gender norms, the roles they play in the host society, which might reinforce the social inequality. Their complex challenges and agencies are not fully recognized and addressed.

2.4 Legal Status of Asian Women Brides

When it comes to East Asian countries, for state interests, the receiving countries in the region effectively accept more highly professional (Kraler 2006, 56). It goes hands in hands with the explanation that acquisition of nationality in non-West countries is rarely studied as immigrant destinations, also, the legal status and citizenship of migrant are poorly documented (ibid.). Kraler (2006) argues that it is because migrants are more less likely to being given a membership from non-traditional immigrant destinations, and there is often a big disparity between citizenship regulation on the one hand and actual institutional practice on the other in less developed states, perhaps more apparent in 'weaker' states and politics. (p.56).

While commonly the legal status of the migrant is often understood as regulation concerning 'legal stay', 'formal citizenship' such as visa policy and access to nationalities, it is said to be sensitive to migrants (Bachmeier et al. 2014, Chung 2019). In the meanwhile, temporary residence, permanent residence and naturalization compose three main 'entry gates' of legal entitlement (Kraler 2006, 37). Integration policy concerning regulating the status of migrant women has been centered on studying different legal opportunities for full membership acquisition in citizenship (ibid.) In this sense, the legal status of migrant structures opportunities for migrant women and their children (Kruma 2014, 415-416). Moreover, it is quite obvious that the limited legal space of Asian women brides constraints every aspect of living in the destination country (Kim et al.2011), as they are more inclined to enter the country for a long residence (Lee et al.

2006, 161).

Access to nationality is discussed in a relation to acquiring citizenship, in which regulates whether the migrants are eligible for applying nationality of the receiving country, this is especially relevant for the target group: Asian women brides, as their acquisition of nationality is dependent on partners, or their marital status and reproduction roles (Cheng 2013, 158). Acquisition of nationality is susceptible to three key factors: “(1) The country of residence, (2) The former citizenship and (3) The characteristics of migrants” (Kraler 2006, 62). Precarious legal status of migrants leads to upsurge in demand of naturalizations and vice versa (ibid.). While, all three factors are important and determinant to naturalization rates. The requirements for acquiring nationality are clarified by the characteristics of migrants themselves, the tendency to naturalize is affected by migrants' immigration background, i.e. “the time of arrival of migrants in their country of residence; socio-demographic characteristics such as gender, age, job status and place of birth (country or abroad); potential migration plans of migrants; ; Awareness of naturalization options; the existence of mental, social or family ties to the country of residence and country of origin; a desire for political involvement in the country of residence that is highly dependent on the structure of political opportunity; and the impact of ethnic networks and elites on the structure of political opportunity and political decisions by migrants” (p.63).

Kruma (2014) argues that the concept of eligibility is based on human rights theory in terms of three aspects (p.415-416). First, the consent of the individual remains important, nationality is acquired based on individual will to become a member of a particular community (ibid.). And nationality is also hereditary basis, the discourses remain important for children of migrants, i.e., *ius sanguinis* or *ius soli* (ibid.). According to Human Rights Committee, naturalizing migrants are more encouraged than remaining them as long-term residents, giving them extra rights on a basis of residence length (ibid.,427). Second, the state has an interest in accepting as its national persons who have an effective link to particular territory (ibid.). Third, the legal status of states remains important for migrants whether they are entitled or eligible for a particular nationality (ibid.).

The report of the Council of Europe published in 2000, declares that legal measures of migrant rather measurable and a core concept to be gauged (Coussey 2000, Hutcheson et al. 2012), Reitz (2016) asserts that the legal status of the migrant has salient characteristics with integration, and it is a dimension that has been focused by comparative studies (p.2339). However, the concept is associated with also political integration and often explained by ‘citizenship’, which reflects on the so-called national models embodying each country’s distinctive ideas about immigrant integration (Bloemraad et al. 2006, 262). This idea is especially reflected in Cheng (2015), who

studies the national building of Taiwan and the role of immigration legislation. In that, immigration institutions lay a foundation for national transformation in the light of re-drawing the state border and re-defining the boundary of the national community (p.96). It has been said that the legal status of migrants defines ‘outsiders’ and ‘insiders’, migrant institutions play a role to decide who to incorporate (Yang 2015). The point was taken up by Kraler (2006), in the book, he mentions that the expansion of the rights can be corresponding to narrowing the gap between the rights enjoyed at the home country and migrant destination country.

In terms of marriage migration, the simultaneity of transnational practices of individuals takes place in multiple localities. Transnational aspects of citizenship bring various entitlement and membership to women brides. Tseng (2017) studies the marriage trajectories in that migrants carry residues of the social, legal, political setting from their home country. Thus, marriages involve the regulations and policies of multiple countries. Therefore, citizenship opens discourses on policies concerning legal entitlement and belonging imposed from the origin and destination countries (ibid., 424). Thus, in the sense, it is important to note not only on a nation-state level, but the presence of migrant brides is also shaping and reacting to the citizenship that originated from various locations.

On the other hand, obtaining citizenship by marriage or family union for first generation is usual in the migrant regime, however, still governments fear that marriage is misused, therefore, strict residence and time limits were enforced before an application could be submitted (Kraler 2006, 47). The literatures highlight that the eligibility of nationality is closely associated with nationhood of states, also it goes pair with migration control policy, and the state plan of integration (Kraler 2006; Kruma 2014). The eligibility also classifies the migrants into various categories based on the legality (Kraler 2006). It regulates the legal entitlement of migrants with sets of rules and being disentangled as categories such as: “naturalisation rules for first generation migrants, access to citizenship for children born to parents with foreign citizenship, acquisition of citizenship through marriage (as a spouse/ partner/ family member), transmission of citizenship to children born to nationals abroad, and dual nationality” (p.41).

Also, multiple memberships are closely linked to dual or multiple citizenship, denizenship, and de-naturalization in the context (Bauböck 2006; Tseng 2017). As traditional citizenship studies are largely based on a nation-state level, kinds of literature discuss more on 'gaining the citizenship' and ‘acquisition of rights’. While, multiple citizenship has granted people multiple territory-based entitlements, but a scholar insists on looking at an individual's decision to secure the rights rather than mere territory-based membership (Bloemraad et al. 2008, 167-168). The discourses on integration are more likely defending dual citizenship, also scholars argue citizenship policy on

integration is a matter of increasing the number of dual citizenship holders and naturalized migrants (Kraler 2006). According to the author, he mentions “Naturalisation rates – the ratio of naturalisations in a given year to the foreign population at the beginning of the year – have been frequently used in arguments on the degree of ‘restrictiveness’ or liberality of citizenship laws, and, by extension, of immigration regimes more generally.” (p.61). In a traditional perspective, the extended rights should bring full citizenship, However, the length of residence does not necessary bring better eligibility to apply nationality of the territory. (Kraler 2006, 54; Kruma 2014).

Also, it is important to mention that political units and structural conditions of the countries are strongly involved in defining the range of rights and choices available to migrants (Kraler 2006, 59-60). In the meanwhile, there are little studies on driving forces behind the change of policies on citizenship (ibid., 60). Naturalization and multiple citizenships bring many benefits to a migrant who wish to be integrated into the host society (mainly out of economic reasons), still, decisions are highly dependable for individual agencies, so to speak, economic background, education level of the migrants, and also the change of policies (p.64). In the literature, it has been said that “restrictive changes in laws regulating family reunification and denizenship may lead to an upsurge in naturalizations, while the reverse an implementation of the legal status of foreign nationals may cause a decrease in the naturalization propensity of migrants” (p. 62). Thus, the naturalization and multiple citizenships are also strategically adopted by migrant women to be integrated and it is also up to the individual agency to be naturalized or retain an original nationality.

Despite its unclear empirical approaches to measure citizenship and legal status, it is important to mention there is an interactive relationship between legal status, migrant women's agency, and national planning, to further the ideology of political authorities. While the decisions of women migrants to extend or reduce their legal belonging are hardly studied, it is still a significant concept to be exemplified as a contributor to integration. Also, the pieces of literature illuminate that migrant women's decision is complicated with the policy changes and their purpose to be integrated into the host society. In this context, the legality of the migrant women's status is conceived beyond the confines of the traditional argument that naturalization or permanent residence status are policy goals of citizenship.

2.5 Asian Women Brides as Care Service Providers

According to Reitz (2016), to analyse the linkage between the status of a migrant on integration, it is important to compare similar immigrants across settings, comparator groups are crucial. While there are various groups of migrant women who are addressed as ‘low status’. While ‘the low legal status’ only shares a partial similarity of the target migrant groups, we should

not neglect the fact that it would not entirely explain the experiences of the migration (p. 2341). Nevertheless, it draws inferences and distinguishes the integration experience between those so-called, high skilled professionals and women spouses who are at the low socio-economic status and have few options in every aspect.

As many pieces of literature point out gendered and racialized aspects of women migrants (Le et al. 2014, Song 2015), especially in Asia, the debates begin from CATM that specifies on brokerage marriage features through which Asian women brides 'marry up' the native citizens (Dobrowolsky et al. 2006; Le et al. 2014). The type of marriage based on the lack of citizenship and weak legal status creates unequal power relationships with a male partner (Song 2015; Yang 2015). In the context of transnational marriage, it has strongly associated with family and welfare policy as women brides are mostly playing the role of social reproduction in the family (Le et al. 2014, 88). On the other hand, In the labour market of the destination country, they are found in these low-paid, taking globalized social reproductive labour as nannies and domestic workers (Dobrowolsky 2006, 3). In the literature, this phenomenon is explained in the term 'social reproduction', including both the notion 'biological production' and 'global reproductive chain' (p. 88). The emergence of CATM is strongly associated with "the individual experience of transiency, isolation, and loneliness and with the intensive effects of intensified industrialization and accelerated urbanization as well as improved international mobility" (Lee 2014, 1254). In the cases of Korea and Taiwan, there are rising demands on certain types of care works, it goes align with the expansion of the middle class and increasing women's labour participation after industrialization (Kim et al. 2018; Liang 2018).

Lee (2014) studies specifically on the CATM, arguing marriage migrants are poorly recognized as individuals as they are said to selling their social reproduction roles and intimacy (Lee 2014). Plus, their reproduction roles are bargained and negotiated under market dynamics and commodification (Le et al. 90). The context of CATM, the scale of the marriage industry and the characteristics of women migrant vary region to region, but, in East Asia, it is deemed more problematic, as some of women use marriage migrant to better their life, however, are confined to the blanket designation of them as victims of marriage migration that constraints their mobility (Lee 2014, 1251).

Some literature links the marriage migration and their care role of women migrants with masculinity and patriarchal family. Kaku (2013) finds the root of Confucian family culture and the development of family-based regimes in Korea and Taiwan, patriarchy especially assign women to work for private reproductive roles. This goes hand in hand with the argument of Kim (2014), who highlights the intersection between gender roles and socioeconomic status, region,

and nationality of female spouses. However, the author also asserts that there should be also a deeper understanding of the life of male counterparts, also viewing the women migrants as victims of CATM does not provide a full understanding on the migrant experience. In the meanwhile, Song (2015) investigates five phases of brokered international marriage in Korea. Le, Truong, and Khuat (2014) investigate the marriage migrants in the context of the family-based welfare model and social reproduction. Liang (2018) illuminates on migrant life in- care workers and introduces the background of gendered racialized care labour work in Taiwan. Also, caregiving is deemed as a modified version of the international production of reproductive labour in Korea (Kim et al. 2018; 126).

On the other hand, Cheng (2014), Le, Truong, and Khuat (2014), and Yang (2015) study on specific ethnicities and their care roles in the marriage. All previous kinds of literature support the argument that migrant women as care service providers are highly gendered and racialized, and their feminized gender practices are increasingly becoming trendy. In the context, Liang (2018) mentions “triple shifts”, which explains three stages of care works women experience from wage-earning work to household chores (including child upbringing) to elderly care. However, it is important to mention women are found in all classifications of migrants (employment-based migrants, refugees, illegal migrants) besides family reunification categories, nonetheless, it is noteworthy that women’s reproduction role practiced in household and their job in care service industry share a vast amount of patterns in common and marriage migrant spouses are more susceptible to the caring practices, also more burdened with their roles, compared to local females (Kim et al. 2017, 12).

Taking into consideration that unequal family culture is strongly embedded in regulations concerning citizenship for Asian women brides in Korea and Taiwan (Lee 2014; Wong et al. 2014), women as care service providers utilize their feminization as a gender strategy to survive in the household (Wong et al. 2014; Kim 2014), in order to achieve the ‘unity of family’ (Cheng 2013, 166). Also, literatures argue that the citizenship is not automatically granted with the marriage with local man or even naturalizations (ibid). In both countries, in migration regulations, they define the women spouses as ‘others’ and view them as a threat to national identity and prosperity (Cheng 2013; Song 2015). Also, the issues on the legality are attached to the marital status and biological reproduction (p.159). Despite this, it is likely that Asian women brides fight for citizenship in pursuit of motherhood (ibid). The author also points out the phenomenon is owing to the failure of the government in dealing with the systemic crisis of reproduction (Kim et al. 2018, 126). As the increasing number of women migrant brides and the

arrival of caregiving regimes are inevitable, it points out that the integration policy implemented on the women is a policy instrument to address the domestic challenge Korea and Taiwan will face.

In this dissertation, it would be valuable to address the how the citizenship poses the migrant women to weak legal presence as individuals and the notion of commodification appear or disappear during the migrant marriage. According to the previous literatures, the victimization prevails in the discourses of Asian women brides, the fact that the commercial marriage brokerage industry meets the needs of numerous stakeholders and social groups in Korea and Taiwan to cope with the fertility crisis should not be dismissed. In sum, the phenomenon is linked to the socio-demographic and institutional contexts.

2.6 Pillars of Integration Policy: Relevant Factors

2.6.1 Equality

International Labour Office (ILO) Geneva introduced three main three pillars of integration policy. It was a commission held in 1974 on immigrants which presented the essence of three slogans (Westin 2000). It is a good reference to set unified norms and guideline for other countries in policy formulations.

The slogan- equality is mentioned a lot throughout the literature concerning integration. It was quite apparent and reflected in the various index set by international organizations and relevant institutions. Council of Europe (2000) and OECD (2017) incorporate all different wide range of dimensions. In the OECD report, it sets policy concerning joining and accompanying family members as a vast majority of the migrant group are women spouses and children, and it implies that family is an important gender dimension. Thus, there are often cases somehow women migrant brides outside of the family are not recognized as an individual being and excluded in the policy (Park 2012). According to the literature. It is crucial to give equal opportunity to members to fill the gaps coming from the lack of knowledge and supports, limited proficiency in the host country's language (OECD 2017, 6). Labour market policies, childcare, and education of migrant children are especially given the attention to focus in terms of equality, employing general social policies (Westin 2000, 24). Guiding principles of equality, however, encompass all facets of life such as health care, social benefits, housing, and public policies to ensure the goal of integration policy to achieve equality (Coussey 2000; Westin 2000, OECD 2017). On the other hand, the equality principle is strongly associated with anti-discrimination measures and legal protection against racism, xenophobia, and discrimination. (Westin 2000, Kneebone 2012), in the aftermath of opportunities, as migrant experience abuses and unequal treatment at all stages of the integration

process from pre-departure to practices (Kneebone 2012; 368). Also, in addressing the principle, human right standards ²are mentioned by Coussey (2000), it has been taken into account by the government when devising the integration policies. The standards promulgated that family and households are fundamental to comprehensive migrant regulations (Seol et al. 2009, 592). Throughout the literature, it is worthy of noticing that equality is a complicated issue with discourses on gender dimensions.

2.6.2 Freedom of Choice

Freedom of choice is described as a principle accompanied by an orientation toward language learning of migrants (Westin 2000, 26). While some literature has included language learning as a paramount integration indicator (Cossey 2000, Harder et al. 2018), and often stipulated by a dimension of general education (MIPEX 2015; OECD 2017). It is also an essential instrument to integrate migrant children by instructing their mother tongue or language of the destination country (Westin 2000, 26). However, we should not neglect the fact that the acquisition of local language is premised on all aspects of integration, from pre-departure to adaption, the countries have regulated participation of optional or mandatory language learning tool (OECD 2017). The freedom of choice on language learning broadens the economic, cultural, and social capital of migrants at all different stages of integration (Enns-Kananen et al. 2017; Iikkanen 2019).

However, the authors also provide contrasting perspective on language acquisition and its impact on the integration of women migrants, it says language learning does not entirely ensure to secure employment and migrant women instead they need to go through the re-skilling process (Iikkanen 2019, 2), it goes hand in hand with the argument that it does not necessarily translate into the advancement of socio-economic status (ibid., 595). Also, obstacles for migrant women are about the limited availability of courses (access to the courses) and limited family sources, and childcare schedules and responsibilities (practical issues), women also face interruption imposed by male spouses, and experience being controlled by gender norms as a housekeeper (ibid., 593-594). Nonetheless, the acquisition still significantly contributes to the integration, migrants who do not speak the local language left rather isolated in social life and been more deprived of professional opportunities (Harder et al. 2018, 11486). Linguistic resources are tied to social capital and civil rights (Enns-Kananen et al. 2017, 586).

² The phrase “the family is the natural and fundamental group unit in society and is entitled to protection by society and the state” appears in Article 16(3) of the Universal Declaration of Human Rights and Article 23 of the 1966 International Covenant on Civil and Political Rights.

Thus, the principle explains that it is still valuable to provide more accessible opportunities to acquire languages and not only their improvement of language, but the expansion of their cultural capital (networks, understanding in economic mobility and understanding their human capital) and minimizing practical obstacles (childcare responsibilities and in accessing the courses) through integration policy.

2.6.3 Partnership

According to Westin (2000), the principle of partnership mainly pertains to the support of migrant organizations and the extended political participation of migrants. Seol and Skrentny (2009), in their literature, the authors investigate why settlement in East Asia is more challenging than in European countries. It illuminates the elements of partnership and sets the relevant key variables: supranational/ interstate institutions, independent courts, interest groups (employers, NGOs, unions) political culture, and the perceptions of migrants. While, the other author, who conducted a comparative analysis of institutions and environment across countries, asserts about the role of migrant organizations as 'intermediates' (Pries et al. 2012). Their roles are explicitly expressed in the sentences "migrant organization's work as 'intermediates' at a meso-level between the micro-level of the everyday social life of individuals and the macro-level of societal institutions, political bodies, and aggregated societal structures" (ibid., 272). The organization's bridge and bond the gap between individuals, receiving countries, and destination countries (ibid.).

While most of the kinds of literature study about the scale of micro and macro levels, on a micro-level, individuals, families, and households are central unit to the measurement of integration and assimilation for migration studies, In the meanwhile, the macro-level of studies remain on the level of societal institutions and political authorities (Pries et al. 2012, 272-273). Nonetheless, there are dimensions such as migration and social movements, functions, and development of migrant organizations, institutional opportunity structures for migrants as collective actors, migration-related organizational fields and social networks could be associated with this meso-level, that functions as an instrument to integration policy (ibid., 272).

When it comes to the partnership in East Asia, compared to European countries, institutions concerning human rights and public-private partnerships are not as strongly coordinated by migrant institutions (Seol et al. 2009, 595). However, the authors who study the civil society, state, and NGO partnerships in Asia, assert that public-private partnerships can erode the public opinions and erode human rights in the interest of the institutions (Tan et al. 2017,1). It goes on to assert that NGOs and private organizations often fill the gaps of the states' role and migrant organizations tend to focus on disadvantaged groups and emerging civil society (ibid., 2), Also, it lacks regional supranational institutions that could assist European countries to integrate migrants, and it says

that is also owing to a fact that there are not enough regional institutional bodies and human right institutions (p. 595). The other author mentions the transnational field is often composed of dynamic interactions between states and organizations, it results in diverse tensions and strategies (Itzigsohn 2017, 468).

Even though every state has its distinctive approach to address the migration, Korea and Taiwan, and in general East Asia, have shown little difference in implementation and designing the policy (Seol et al.2009, 607). The author argues that a strong partnership between migrant organizations in Europe to set norms and standards to manage the migration is not yet a case for East Asia (ibid.)

Derived from the forementioned standards set by ILO, through implementation of the integration policy, the principles- promoting equality irrespective of personal backgrounds of migrant, equal and long-term chances provided to support their language learning, organization partnership and emergence of affiliated organizations to coordinate the partnership, are significant to be instilled into the integration policy.

3. Methodology

3.1 The MIPEX Framework for Migrant Integration Policy on Citizenship

To investigate the integration policy on citizenship, in this dissertation, the 4th edition Migration Integration Policy Index (MIPEX) was published in 2015 (edited 2013-2015) by Huddleston, Thomas; Bilgili, Özge; Joki, Anne-Linde and Vankova, Zvezda, is adopted by the author. MIPEX is a unique assessing and monitoring tool which gauges integration extent across various dimensions created from 2004 (MIPEX 2020). Integration policy is often described as too comprehensive and daunting, and it is still difficult to choose which empirical indicators to base on, however, MIPEX has tried to draw key findings from various dimensions measured in five continents, so the tool makes a progress to assess, compare and improve the integration policy (ibid.).

The framework is widely used by European scholars, NGOs, researchers, policymakers, European and international institutions (ibid.,). Especially, the Integration Policy Index fourth edition (2015) measured policies to integrate migrants in five continents, including all EU Member States (including the UK), other European countries (Albania, Iceland, North Macedonia, Moldova, Norway, Serbia, Switzerland, Russia, Turkey, and Ukraine), Asian countries (China, India, Indonesia, Israel, Japan, and South Korea), North American countries (Canada, Mexico, and the US), South American countries (Argentina, Brazil, Chile), and Australia and New Zealand in Oceania (Huddleston et al. 2015 [2], 6). Policy indicators covering eight policy areas were used: labour market mobility; family reunification; education; political participation; long-term residence; nationality access; anti-discrimination; and health (ibid.). The MIPEX is created by various partners and institutions from the above-mentioned countries led by MPG (Migration Policy Group) and CIDOB (Barcelona Centre for International Affairs). The fourth edition was produced as part of the project “Integration policies: Who benefits?”, co-funded by the European Fund for the Integration of Third-Country Nationals (MIPEX 2020).

Derived from the ‘Integration Policies: Who Benefits?’, published in 2015 by Huddleston and Sánchez-Montijano from MPG and CIDOB as a part of MIPEX research, dimensions such as residence and citizenship policies are specifically political contested area, and other dimensions on integration policy depend a lot on the legal status of migrants, that shows explicit impacts on vulnerable groups such as migrant women disproportionately (Huddleston et al. 2015). Also, the literature mentions how residence and citizenship facilitate differently, or how political will or public opinions shape the two dimensions (Huddleston et al. 2015 [2], 4).

The selected indicators are to measure the dimensions of aspects for citizenship and legal status of migrants. The table of indicators above are a result of MIPeX research and partnership, suitable reference for the evaluation of marriage migrant integration specifically applies to Asian women brides as care service providers.

Dimensions	Access to Nationality	Permanent Residence	Anti-discrimination
Indicators	Eligibility	Eligibility	Definitions and Concepts
	Conditions for Acquisition	Conditions for Acquisition of Status	Enforcement Mechanisms
	Security of Status	Security of Status	Equality Policies
	Dual Nationality	Rights Associated with Status	Education

Table 1: Indicators to Measure Legal Status (Source: Adapted from MIPeX 2015, 220-221).

*Modification by the author to the framework is applied.

Since researchers are just started to measure citizenship, as well as integration, there is no one universal indicator (Helbing 2011, 8; Reitz 2016). In terms of citizenship, the goal and the performance of policy are also unclear, as a high naturalization rate is not an outcome and the criterion reflects general citizenship models (p.9). According to Helbing, who assess citizenship, “We see that with regard to policy fields, some indicators are very parsimonious and cover specific aspects like naturalization rights or cultural rights whereas others include both naturalization and integration aspects or even all three policy fields” (p.13).

Compared to other empirical approaches on citizenship, MIPeX is based on a large range of 167 indicators to capture integration and citizenship across 8 dimensions in 38 countries and collected by experts for the long-term period (Helbing 2011, 12; MIPeX 2015). Although citizenship models have been linked to specific political discourses, the recombined MIPeX data corresponds to the desired conception of citizenship models and can be applied to all countries covered in the MIPeX (Ruedin 2015, 629). Furthermore, MIPeX indicators adapt existing data to reduce the workload to a reasonable level and also allow the indicators to reconstruct a framework that fits into a particular research query, leading to a valid comparison (Ruedin 2015, 630). Therefore, the criterion can be found on each three dimensions, through the framework, this thesis aims to investigate legal status imposed on Asian women brides, that is regulated to promote and restrict the integration and citizenship, this framework is modified by the author, to focus on the key indicators derived from literature review.

Dimension: Access to Nationality	
Indicator	Measure
Eligibility	• Residence period, Permits considered • Period of prior absence allowed • Requirement for spouses and partners • Birth-right citizenship for second generation
Conditions for Acquisition	• Naturalisation language requirement • Naturalisation integration requirement • Economic resources
Security of Status	• Maximum duration of procedure • Legal protection • Protection against withdraw of citizenship (in the case of divorce and separation)
Dual Nationality	• Dual nationality for first generation • Dual nationality for second generation

Table 2a: Access to Nationality: Indicators and Criteria (Source: Based on MIPEX 2015, 220).

*Modification by the author to the framework is applied.

Dimension: Permanent Residence	
Indicator	Measure
Eligibility	• Residence period • Permits considered • Period of prior absence allowed
Conditions for Acquisition of Status	• Economic resources • Criminal record • Good character
Security of Status	• Maximum duration of procedure • Duration of validity of permit • Renewable permit • Period of absence allowed • Grounds for rejection, withdrawal, refusal • Personal circumstances considered before expulsion • Expulsion precluded • Legal protection
Rights Associated with Status	• Access to employment • Access to social security and assistance

Table 2b: Permanent Residence: Indicators and Criteria (Source: Based on MIPEX 2015, 220).

*Modification by the author to the framework is applied.

Dimension: Anti-discrimination	
Indicator	Measure
Definitions and Concepts	• Laws cover direct/indirect discrimination
Enforcement Mechanism	• Procedures available for victims • Shifts in burden of proof in procedures • Protection against victimisation • State assistance for victims • Role of legal entities in proceedings
Equality polices	• Ensuring compliance of mainstream legislation • Public bodies obliged to promote equality • Law covers positive action measures
Education	• Education for migrant children • Multicultural education

Table 2c: Anti- discrimination: Indicators and Criteria (Source: Based on MIPEX 2015, 220-221).

*Modification by the author to the framework is applied.

3.2 MIPEX Dimensions as a Tool to Assess and Monitor the Migrant

Integration

3.2.1 Access to Nationality

According to the MIPEX (2015), access to nationality is equivalent to acquire naturalization, expanding citizenship corresponds to increase naturalization rates, which is expected to lead to outcomes for a larger number of citizens. It is also linked to a question ‘how easily can migrants become citizens?’, the dimension measures requirements (residence duration, integration test, job requirement, language level, and economic sources, etc.) to gains access and whether the policy encourages more migrants to apply and succeed as a citizen (ibid.). Also, it is a key principle to stipulate extended rights for children of migrants (born or raised in the receiving countries) and allow dual citizenship, where they can more freely choose the citizenship entitlement across different spaces (ibid.).

3.2.2 Permanent Residence

Permanent residence is also a leading principle to affect migrant’s livelihood to settle in the country, however, it argues that the less educated, economic disadvantaged, very young or very old, newcomers, refugees, other vulnerable groups, and women are more susceptible to the policy, how long they can live in the destination country (MIPEX 2015). Under the inclusive permanent residence policy, it is more likely for migrant women to being integrated and become a citizen, in this regard, the number of permanent residents reflects the countries’ path to integrate incoming populations (ibid.). Generally speaking, in most of the countries from the list of MIPEX, 5 years residence duration (maximum 7 years) entitle migrants to apply for permanent residence (ibid.). In the meanwhile, some parts of the world are more inclusive than the other (the US or Northwest European countries), the requirement to acquire permeant residence varies across countries, this is a reason why migrants have accommodated to meet the standards (ibid.). However, MIPEX (2015) demonstrates country cases that have worst examples on the dimension. Foreigners, without equal opportunities and rights to invest in their integration, are trapped in a 'permanently temporary' legal status (ibid.). For example, because of his form of visa, a legal immigrant might be disqualified to apply, even if he meets all the other criteria, all applications, including the elderly, invalid, disabled, are subject to high-level language fluency and ambiguous 'integration' criteria., all without enough free courses and materials for them to pass (ibid.). He has to pass a demanding check on wages, jobs, and integration that would fail many national people. On some unclear grounds, he may even be refused (ibid.). His status, if eventually recognized, remains insecure and his rights limited. Every few years, he faces renewals and the possibility of

deportation for minor absences or crimes, even after decades in the country. Unless he can naturalize as a citizen, he can still not access all types of jobs, housing, or social programs(ibid.).

3.2.3 Anti-discrimination

The principle of anti-discrimination based on religion, ethnicity, and race is most well-presented and practiced in traditional immigrant countries such as the US and Canada, also discrimination is reported more and better protected in the countries (MIPEx 2015). In all areas of life, the principle encompasses to guarantee equal protections on all grounds as native citizens, however, generally not reporting discrimination is the norm for a migrant in daily lives (ibid.). Despite this, migrants tend to report more as they reside in the country much longer or they experience repeated discriminations or they have a naturalized status (ibid.). Anti-discrimination is a component of this regard that defines the empowerment of migrants to seek justice when laws are well applied and used, as well as ensuring that independent equity bodies and NGOs assist in the trials, courts use wide-ranging penalties to avoid, deter and correct discrimination, In addition, the state takes constructive responsibilities and behaviour, motivating other organizations to open up, also selecting the right person for the job or contract, while better representing the community they represent (MIPEx 2015).

4. Empirical Part

4.1 The Case of South Korea

4.1.1 Access to Nationality

Being Korea as one of the famous immigrant destinations for Asian women brides through marriage migration or CATM alongside Taiwan in East Asia, Kraler (2006) argues that emerging immigrant countries are more reluctant to give membership to migrants, in that Korea is a country example which adopted a restrictive policy in granting full citizenship. The main laws that currently regulate Asian women brides' legal stay in the country are Nationality Law, Multicultural Families Support Act, Act on Regulation of Marriage Brokerage Agency, Immigration Control Act, and Foreigners in Korea Treatment Act. Korean government defines the multicultural family that constitutes women migrant and Korean male spouse in a support of the Multicultural Family Act enacted in 2008 (Lee et al. 2020, 91). In 1997, A significant amendment was made on regulating two years mandatory residence prerequisite for Asian women brides before they apply for Korean nationality (ibid.). However, still, there are many aspects of immigration legislation that includes weak bargaining power of the women brides with the local spouse, which makes them legally depend on the male spouse, which put the women at a status susceptible to verbal and physical abuse (ibid.,91-92). This seems much worse from the previous Nationality Law enacted in 1948 to regulate the legal status of the multicultural family in general, before the law revision, it regulated the children of migrants are only able to follow the nationality of father side, moreover, women brides who marry Korean men can immediately acquire the citizenship, while on the other cases have to wait two years in between (Lee 2008, 112).

To give an introduction on granting residency to the women brides, at first, Asian women brides were able to get visa F-1 (Visiting and Joining Families), but they were not permitted to work in Korea. Later on, it was changed to visa F-2 (Long Term Residence), F-5 (Permanent Residence), especially visa F-6 (Spouse of Korean Nationals) was specifically promulgated for spouses of Korean nationals that improved their legal status to get employment (Lee 2008, 113; Kim 202). In the meanwhile, problems continually arise from CATM, such as 'fake marriage' and 'the violations of human rights' due to the traits of mail-order marriages that are criticized as human trafficking (ibid., 115). In particular, in Korea, the matchmaking process and advertising of international marriage agencies have been disapproved by some women's feminist associations, female migrant support NGOs and the self-help organizations of Asian women brides (ibid.,115).In a support of improving the situations of Asian women brides to discuss the issue, 'Law to Regulate Marriage Agencies' is promulgated and, more importantly, followingly in the year 2006, 14 key governmental institutions; the Ministry of Gender Equality and Family (MoGEF)

became the leading and major coordinating department, and other ministries including the Ministry of Justice (MoJ), Labour (MoL), Welfare and Health (MoWH), local and central government departments were joined to implement the ‘Grand Plan’, That was produced in a national meeting with President Roh Moohyun (Lee et al.2020, 116).

Foremost, it is one of the first attempts for the Korean state to initiate the public course on immigrant integration, ‘Grand Plan’ declares that the goal of the regulation is to promote social integration of marriage migrants and arrival of a multicultural society (ibid.,116). The major policies are sevenfold: “(1) Regulation of international marriage agencies and protection of foreign wives before entry into Korea; (2) Support for victims of domestic violence; (3) Support and orientation for newly arrived foreign wives, such as offering Korean language and culture classes; (4) Support for children of international marriages in schools; (5) Providing social welfare to foreign wives; (6) Raising social awareness of multicultural issues; and (7) Making a comprehensive support system to attain the goals” (ibid., 116). The policies are managed and collaborated with diverse governmental institutions to attain the goal, it marked a significant point to regulate the first regulation on Asian women brides in a collaboration with multiple stakeholders to mitigate their status. Although it has failed to change the fundamental loopholes of immigrant legislation, it played a normative role in pushing the government to pay attention to the integration of marriage migrants and regulate the process of commercial brokerage marriage.

Therefore, the key regulations mentioned above, which includes provisions on the controlling and protecting the legal status of the marriage migrants will be investigated throughout this dissertation as they provide the legal overview on nationalities and relevant issues on Asian women brides in Korea.

Eligibility

These four categories to describe eligibility: residence period, permits considered, a period of prior absence to be allowed, the requirement for spouses and partners and birth-right citizenship for the second generation are not only important to Asian women brides themselves, but to their family in their origin of country, family-in-law and children of migrants (Lee et al. 2020).

Acquisition of nationality is a core process to long-term residence for Asian women brides to remain in Korea. The Korean government has enacted and revised laws regarding nationality in a way of mitigating their legal status and promoting multicultural society since mid- 2000s (Chung et al. 2012, 215). Marriage migration also took up a great portion of all naturalized people. According to the MoJ, Among the 11,556 naturalized people in 2018, 64.8% (7,484 people) were simple naturalized people (marriage naturalized people) through marriage with Koreans. According to Nationality Law Article 5,6 and 7, their naturalization process in Korea can be

divided into three categories: general; simple; and special. Specific entitlement and requirements varies by each migrant depends on their qualification, however, it is noteworthy that the majority of Asian women brides belong to the category of simple naturalization.

In addition, the target group: Asian women brides living in Korea and Taiwan face different situations compared to other regions in which they should justify their legal belonging, due to the intention of the Korean government to prevent possible fake marriage problems stemming from CATM (ibid.,114). As their acquisition of nationality is dependent on the partner's willingness to support the application process and interest in their legal status, or Asian women brides are eligible to apply because of their marital status and reproduction roles (Chung et al. 2012, Cheng 2013, 158). This comes across as a problematic discourse in Korea, as more legal vulnerabilities they face, the more they seek nationalities (Chung et al. 2012, 216). Given the rights attached to the naturalization, the dimension of 'Eligibility' became very relevant to the case of Asian women bride.

Previously, F-2 visas (Long term residence) require Asian women migrants to reside in Korea for at least two years as a prerequisite residence period to apply for nationality, the condition of the residence period is to protect Korean nationals from sham marriage (Lee et al. 2020, 95). On the other hands, in 2011, F-6 visas (Spouses of Korean nationals) were newly promulgated exclusively for the marriage migrants to support the settlement of the growing number of marriage migrants living in Korea and started to apply exceptions for them to be more acquirable to Korean nationality (Lee 2011).

The entitlements of F-6 visas (Spouses of Korean nationals) are elaborated as a table followingly.

Categories of F-6 visas		
F-6-1	F-6-2	F-6-3
Foreigners whose marriage is valid in both countries and intends to stay in Korea to continue their marriage with Koreans	The death of the spouse while staying in Korea while marrying a Korean spouse or a parent or mother who is raising or intending to raise a minor child born in Korea, but not in F-6-1, but in a marriage relationship with a Korean	Foreigners who are unable to maintain a normal marital relationship due to disappearance or other reasons not responsible for themselves

Table 3: The Categories of F-6 Visas (Source: Adapted from Kim 2019).

Previously, Asian women brides were only eligible for applying F-2 who wish to stay more than 90 days in Korea (ibid.). It also expanded the eligibility to those migrants whose husbands are died or missing (ibid.). While, Korea regulates strong requirements to nationality, most of Asian women brides remain as long-term residents, which poses weaker legal status during their marriages with higher possibility to be exploited (Kim 2019). Additionally, when it comes to counting the period of absence, the period the migrants are staying overseas is exempted from residence period in Korea (ibid.). Therefore, it is noted that residence period in the host country is a strong prerequisite when counting the period in eligibility of naturalization. For married migrants, they must be married to a Korean national for at least two years while remaining married, or they must have been married to a Korean national for at least three years and have been residing in Korea for at least one year (Hwang 2015, 381). The residence period should be met by only staying in the country consecutively.

The entitlements of simple naturalization are described in a table followingly.

Simple Naturalization (Article 6 of Nationality Law)	• As a foreigner who has been in Korea for more than 3 years and falls under any of the following: (1) A person whose father or mother was a Korean citizen. (2) A person born in Korea whose father or mother was born in Korea (3) An adoptive child of the Korean people who was an adult under the Civil Law of the Republic of Korea at the time of adoption • As a foreigner whose spouse is a Korean national and falls under any of the following: (1) A person who has been married to the spouse and has an address in Korea for more than two years. (2) A person who has been married for 3 years after marriage to the spouse and has lived in Korea for at least 1 year and has an address (3) Married to the spouse and had an address in Korea, - A person who was unable to live a normal marriage due to the death or disappearance of his or her spouse, or other reasons not responsible for himself/herself, and who has completed the remaining period of time and is recognized by the Minister of Justice as considerable (4) A person who is raising or is required to raise underage children born during the marriage with his or her spouse, who has fulfilled
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	the remaining period and that the Minister of Justice considers it to be significant
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Table 4: The Categories of Simple Naturalization (Source: Adapted from Nationality Law)

Also, the member states regulate on granting permanent residence, combining both ways of ‘*ius soli*’ or ‘*ius sanguinis*’ to first and second-generation (Klaner 2006, 38). For example, ideally, the states grant first-generation citizenship through a long-term residence period and naturalization process, and second-generation is eligible by the right of birth, however, it is not the case for every country (ibid., 44). In the case of Korea, granting citizenship to the second generation is based on the ethnicities of the parents, which follows the principle of ‘*ius sanguinis*’ to keep the pure bloodline of Korean nationals (Choe 2010, 234-235). In 1997, the amendment on the Nationality Law is made to expand the rights of the second generation, to allow the choose either of parents, that significantly lifted the unfairly gendered restriction, however, a strong nationalism is strongly reflected in their citizenship acquisition (ibid.).

Overall, it comes in very strict fashions in that granting nationality to non-Korean ethnicities, and often, the eligibility is too comprehensive to cover specific migrant groups among Asian women brides (Lee 2008, 120). Also, several shifts in Nationality Law define Asian women bride as a 'spouse' or 'a mother' or 'daughter-in-laws' instead of their more significant role as “independent human beings” (ibid.).

Conditions for Acquisition

The dimension for the ‘Conditions for Acquisition’ is divided into three big categories: naturalization language requirement, naturalization integration requirement, and economic resources. Among other MIPEX indicators to define conditions for Acquisition, including the cost of applications, criminal record, and good character, these are the dimensions that are paid most attention and found to deter nationality acquisition of Asian women brides (Hwang 2015, 376).

The revision in 2018 also required that they take a naturalization exam and attain a certain score on Korean language proficiency corresponding to elementary level and knowledge about Korean history, culture, politics, and customs, it also requires Asian women brides to obtain a consensus and a statement of financial support from their Korean spouses when applying for Korean nationality and citizenship (Lee 2013, 11; Lee et al. 2016, 176; Lee et al. 2020, 95-96). The amendment thus created the conditions under which a marriage immigrant’s ability to acquire citizenship and reside in Korea depends exclusively on the support of the male spouse and the stability of the marriage, which is described as a 'spouse guarantee system' (Lee et al. 2020, 95-96). When the brides enter Korea, most of them acquire Spouse of Korean (F2) status or Permanent

Residents (F5) at a status of being a potential long-term resident (ibid.). The legal status of F2 is generally extended every three years, in addition to that, an F-2 visa requires a married status with a Korean national spouse and a spousal reference (ibid.).

To prove their liveability in the country, Asian women brides must demonstrate economic sufficiency by presenting the following requirements: “(1) Having a bank balance that exceeds 30 million Korean won (KRW); (2) Owning real property worth over KRW 30 million; (3) Proof of employment; or (4) Proof of prospective employment” (Hwang 2015, 377; MoFA 2020). To be exempted from this, you must complete step 4 of the Social Integration Program ³that is known as the Korean Immigration and Integration Program (KIIP) which is carried out by MoJ (Kim 2019). KIIP is governmental naturalization (permanent residence) exam designed for migrants, which combines an understanding of Korean culture and language to test the adaptability (Lee 2013, 15-16). If migrant women passed the KIIP, they can be exempted from the naturalization exam (Lee 2013, 16). Furthermore, to gain the F-6-1 visas, language requirement varies, either the brides can get a certificate from the designated institution, Certificate of Test of Proficiency in Korean (TOPIK) Level 1 and Certificate of completion of KIIP Level 2 and above is accepted, a copy of college/postgraduate degree diploma in the Korean language, a proof of having stayed in a third country or Korea for more than 1 year (MoFA, 2020).

From 2018, According to Article 18-3 of the Enforcement Rule of the Immigration Control Act, the Korean government started to distinguish the difference between KIIP for the purposes of naturalization and permanent residents, in there they are evaluated for their qualifications and entitlement (MoJ). Also, MoJ introduced International Marriage Guide Program (IMGP) as a prerequisite to apply for a marriage migrant visa application (MoFA 2000; MoJ 2000). In general, it shows that the state regulation is relaxed and mitigated for women in pregnancy (20 weeks or above) or those with a child who was born during the marriage.

³ The benefits for participants of the KIIP are as follows. (Lee 2013, 16)

- (1) Naturalization written test and interview exemption, etc.
- (2) Additional points are given when changing the status of residency (F-2) for professional personnel based on the scoring system.
- (3) If you change your general permanent resident status (F-5-1), you are exempted from submitting Korean test scores.
- (4) Exemption from submitting Korean language test scores when changing specific activities (E-7) of foreign workers.
- (5) When the citizen's spouse and minor children's permanent residence status (F-5) change Exemption from submitting Korean test scores.
- (6) When the residence (F-2) status of a long-term foreigner changes Exemption from submitting Korean test scores.
- (7) After completing the Korean language course, if you pass the intermediate evaluation, Issuance of 'KIIP-KLT' pass certificate.
- (8) If you pass the comprehensive evaluation after completing all courses Issued the 'Korean Immigration Naturalization Qualification Test (KINAT) Pass Certificate'.

In sum, however, it is not easier than expected for married migrant women to acquire nationality without being dependent on a male spouse and their in-laws. According to data from the Ministry of Public Administration and Security, 48.9% of female marriage immigrants are unable to acquire nationality due to the high requirement (ibid.).

Security of Status

Under this dimension, it introduces nationality regulations on the security of status regarding the maximum duration of the procedure, legal protection, and protection against denizenship, especially in the case of divorce and separation.

According to Kim (2019), all three types of F6 visas, it takes from 10 to 20 months for the Korean government to process the naturalization of Asian women brides, the duration of the procedure is greatly determined by a fact whether the migrant has children from the marriage with a Korean husband (F-6-2), and they can reside in Korea until the children turn to the legal adult age. In the meanwhile, an F-6-3 visa can be acquired in the cases of disappearance or death of husband during marriage, but in the cases of divorce or separation, women have to prove that the husband is entirely responsible for it. This is because the F-6 visas will no longer count be extended if the reason for the husband's fault cannot be proved through a divorce trial (ibid.). Moreover, it only can be granted to a maximum of three years per application depends on the conditions of the migrant women (Heo 2020). Also, the Nationality Law strongly encourages women brides to take a childbearing role, which strengthens the insecure status of the migrants as a caretaker in the household. As a result, many migrants women are very likely to go back to the country of origin, undocumented, or maintain the status of short-term visas.

The eligibility of accessing nationality is also in linkage with divorce, separation, and denizenship, it is based on assumption that if the migrant women were more eligible for access to nationality, then it should be also easier for them to be legally independent in the country (Lee et al. 2020). An author shed light on the fact increasing divorce rates due to domestic violence lead Asian women brides and their children to become stateless or undocumented after divorce/separation and it is very common to live on short-term resident permits (Chung et al. 2012, 216).

Divorce and separation from the marriage put Asian women brides, at a legally ambiguous status, which limits their capacity to be integrated into the host country, and further, reintegrated into the home country (Kim et al. 2017). This is derived from their status as "resident aliens" in Korea or returning citizens in their home countries, which undermines the Korean state's policy aim of gradually integrating them by granting full citizenship rights, but contributes to a precarious life in the lead-up to naturalization (ibid., 39). Also, the problem arises in the case of denizenship,

brides are interfered to live a stable life in their origin country as the state assumes them to receive social welfare benefits in the husband's country (ibid., 40). Even though Asian bride women, who are undergoing court trials, investigations by investigative agencies, or other remedies against private rights in the case of domestic violence, are allowed to extend their stay until the end of the procedure if they apply for permission to extend the period of stay, even if the extension period is over, the period of stay may be extended again if deemed necessary for their damage and recovery, etc (Immigrant Control Act Article 25-2). Their incomplete legal procedures on divorce interfere with them enjoying the benefits during the divorce procedure, also their children can't gain citizenship after return (ibid.,). This lies also in the fact that most of the divorce is not based on a mutual consent and the serious power imbalance from the Korean guarantee system (Kim et al. 2017, 42). On average it takes Asian women brides, four years to gain citizenship, but marriage life for a divorced couple last less than four years (ibid.,)

In the meanwhile, there are more discussions on providing legal protection for the brides, and also, more cases of physical/verbal abuses are reported. Correspondingly, to mitigate the precarious legal status of brides and domestic violence, the Ministry of Gender Equality ⁴and affiliated organizations including Multicultural Family Support Centres have provided interpretation services for brides who need counselling and legal services since 2002 (Lee et al. 2020, 116).

Dual Citizenship

Allowing dual citizenship has been studied as an indicator of the host country to show its extent to openness to newly coming populations, as it is considered as a privilege to enjoy the multiple rights and entitlement, that even local nationals could not enjoy (Krager 2006, 59). At the same time, also it causes social problems coming from multiple loyalty, that most nations are inclined to shy away a threat to social security (ibid.,). Due to the reasons, Korea, in general, also does not allow dual nationalities, therefore, before a new revision is made, Asian women brides who want to have independent legal status in Korea typically pursue naturalization, which forces them to give up their original nationality (Lee et al. 2020, 95-96).

It finally became possible through amendment of Korean Nationality Law in 1997, the Korean government started to allow dual citizenship under certain requirements to women migrants and their children (Chung et al. 2012, 216). In 2011, it finally has been extended to foreign nationals to hold dual citizenship (Hwang 2015, 378). Still, it is noted that being

⁴ Ministry of Gender Equality, later on, changed its name to Ministry of Gender Equality and Family in 2005, as it took the role from Ministry of Social Welfare and Health to take charge of childcare and family service roles (Lee et al. 2020, 116)

naturalized remains one of the few options available to Asian women brides in Korea since dual citizenship and permanent residence are very restrictive to their eligibility than naturalization (Lee et al. 2020, 95-96).

It was still a big breakthrough for migrant women and their children since before the revision, it was only able to grant nationality through Korean male nationals, and birthright citizenship for second-generation was strictly prohibited only with Asian brides. “(1) Highly skilled foreigners with ‘exceptional talent’ in the fields of culture and arts, athletics, management, specialized technical expertise as evaluated by a committee within the MoJ; (2) Koreans who gained dual citizenship at birth, by being born in a country that grants birthright citizenship and has fulfilled military service; (3) Overseas Koreans over sixty-five years of age; and (4) Marriage migrants who are presently married to Korean nationals” (Chung et al. 2012, 214-215). Accordingly, we could confirm that the Korean state separately regulates the rights of holding dual citizenship for married spouses of local nationals in nowadays. This is a significant amendment for Asian women brides to exercise their rights in both countries.

4.1.1 Permanent Residence

The dimension highlights that the first generation of migrant's access to permanent residence through studying, working, marriage, adoption, and so on, in a way of extending a short-term residence period. Normally, depending on the continuous residency in the destination country, permanent residence is granted. More specifically, the continued possession of a short-term, renewable permit. Thus, most states require that permanent residence is a prerequisite to be eligible and obtain the acquisition (Klaner 2006, 38). However, in the case of Korea, the permanent residence regulation is introduced in 2002 relatively late, and that is irrespective of institutions related to nationality (Choe 2010, 236).

The requirement on the length of residence in host states is concerning immigration policy's goal to 'select' and 'integrate' the migrants, by expanding the rights (Kim 2020, 3). Permanent residence is first enacted in 2002 to grant Korean Chinese ethnicities the legal entitlement to stay in Korea, and it was newly revised in 2008 to efficiently select and integrate the migrants (ibid.,35). After the introduction, to a large extent, its effectiveness has been transformed and critically evaluated. The issue of redundancy with permanent resident status and inconsistency with immigration policy is raised (Kim 2020, 108).

For the case of Asian women brides, permanent residence plays a role as a bridge to gain Korean nationality and citizenship, as being naturalized allows brides to enjoy full rights as a Korean national, also for their children (Hwang 2015, Kim 2020). However, in terms of granting permanent residence status, the state has the least motivation for integrating women brides, in

terms of economic benefits and industrial development (Kim 2020, 116). Therefore, it is important to mention that, in Korea, eligibility for permanent residence is more comprehensive than in other countries, for the reason, it was criticized for not being reflective on agencies of migrant women (education level, economic status and the purpose of staying in the country, etc.) (ibid, 38).

Eligibility

In alignment with the ‘Eligibility’ dimension from Access to Nationality, the indicators including ‘Residence period, Permits considered and Period of prior absence allowed’ will be followingly discussed.

The eligibility described in the Nationality Law and immigrant regulations regulated little difference between permanent residence and naturalization until 2002 (Lee 2013, 38). In the beginning, apart from naturalization, the permanent residence was promulgated separately for a purpose of integrating a specific migrant group in Korea (ibid.). Even after the revision, Lee (2020) asserts that the policy fails to meet the demands of marriage migrants, as the revision does not necessarily extend the boundary of migrant groups who are eligible (p.4). However, it partly relaxed the eligibility of naturalization for migrant women, and the revision in 2017 regulates that migrant women spouses no longer need to gain the permanent residence status to achieve the naturalization (Kim 2020, 116). On the other hand, other groups of migrants have to meet the required prior residence period of 5 years to be eligible for F-5 visas under the Immigrant Control Act (ibid.).

In Korea, a Permanent residence visa is said to F5, however, Asian women brides who entered Korea can apply for visa F-2, F-5 or F-6 depend on the conditions (qualifications) of the individual. When introduced in the early 2000s, the F-5 was essentially an upgraded status for holders of spousal visas. It is said that after the F-6 (Spouses of Korean Nationals) were newly introduced, F-2 and F-5 are less demanded by marriage migrants because F-6 visas replace and share the functions of the pre-existing F-2 and F-5 visas. The indicator also applies differently to a general group of applicants and migrant spouses, similar to visa F-6, the group of the migrant spouse is applied to the two categories in F-5 visas, (1) F-5-2: A immigrant spouse of a nation who has a marriage immigration (F-6, F-2-1) status and has stayed in Korea for more than 2 years, (2) F-5-3: A child of a national who holds a residence (F-2-2) status and has stayed in Korea for more than two years, (Enforcement Decree of the Immigration Control Act 12-2).

According to the Immigration Control Act, the forementioned first category of the applicants can be also extended to the following groups: (1) If the marriage continues with the Korean spouse, (2) When a Korean spouse is declared dead or missing by the court, (3) If a person who is divorced or separated from a Korean spouse can prove that the Korean spouse is attributable

to the divorce or separation, and (4) In the case of raising a minor born by marriage with a Korean spouse even if the marriage relationship is interrupted. This is the same as previously promulgated in naturalization regulations.

In alignment with the regulation for naturalization, permanent residence in Korea requires the migrants to live in the country consecutively, and long absence terminates the residency rights. While it is mentioned that the linkage of the permanent residence to naturalization entitlement is a key issue in granting permanent residence, in fact, in Korea, it is said that, being eligible for naturalization is easier than accessing to permanent resident visa in general, especially after the regulation for Asian women brides is significantly relaxed on the required residence period which is reduced to 2 years, which is as long as prerequisite residence period for naturalization (Enforcement Decree of the Immigration Control Act 12-2). Also, Korean immigration laws widely differentiate eligibility for short-term residence permits and ones for permanent residence and immigration (Kim 2020, 107).

Conditions for Acquisition

Dimensions of Permanent Residence, the indicator of 'Conditions for Acquisition' include the following: Economic resource, Criminal record, and Good character. The requirement of permanent residence is almost similar to that of naturalization. Applicants must comply with the following requirements: citizenship in Korea; evidence of no criminal record; sufficient economic means to show their country's sustainability; evidence that they can be a good citizen of Korea. (Hwang 2015, 383).

To fulfill the economic criteria, Article 10-3-2 of the Immigration Act of Korea stipulates as a requirement for obtaining permanent resident status that 'they must have the ability to sustain a living based on the income and property of the person or family with whom they live.' In this regard, the enforcement regulations stipulate that 'the sum of the income of the person or a family member with whom the living is being shared is not less than the previous year's gross national income per capita (GNI) announced by the Bank of Korea or household assets of the median level or higher'. According to this, the provision seems comprehensive but makes the application easier by only setting one unified criterion.

The regulation on the good character is recently debated among applicants, "the applicant should have a good character" stipulated in Article 5 of the Nationality Law does not simply mean that he has never committed an offense. It means showing a character and behaviour that does not interfere with the community and society (Lim 2010). Thus, it notes that good character simply does not indicate a 'person with no criminal records', but considering various circumstances such as occupation, family, criminal record, a good character refers to a 'person who can be a good

citizen of Korea'.

Security of Status

This indicator is to evaluate the level of administrative discretion when deciding to refuse to acquire a residence permit or to refuse to renew or deport after obtaining a permanent residence. Asian women brides are inclined to apply for permanent residence in a way of gaining Korean nationality. Even though F-5 visa types are for the long term, it is still a short-term basis in which the spouses need to renew every year or every three years, but Asian women brides renew their permits multiple times in a hope of accessing permanent residence. (Lee et al. 2020, 96).

A meanwhile, same with neutralization process, a period of absence is not allowed thereby women spouses have to live in the country consecutively to be qualified for acquisition or in case of holding re-entry permission, in the case of absence, brides can apply for an exemption to stay abroad up to three months (Kim 2019, 185). Also, the application procedure to F-5-2 (Spouse to Korean Nationals), F-5-3 (The Children of the Multicultural Family), F-5-4 (Spouse to F5 holders) visa types could take up one month to one year to process (Kim 2020, 76). Thus, in the procedure of applying for permanent residence, marriage migrants are at risk to become stateless and are not eligible for receiving any social welfare benefits, also it takes great consideration for their financial conditions and employment.

In the 'Grounds for rejection/withdrawal/refusal' policy indicator, Korea has various reasons for refusing to renew permanent resident status until 2018, and the scope to reject the application or renewal is broadly and well-defined (Kim 2018, 188). while in other countries, the refusals are more applied when it interferes the national security, however, in the case of Korea, according to Article 46 of the Immigration Control Act, it strictly regulates that force eviction is possible under 'certain' circumstances that is subject to interpretation and judicial decisions.

'Personal circumstances considered before expulsion' policy indicator, regardless of the forced eviction clause, other traditional immigrant countries consider the age of the permanent resident, the duration of having the permanent resident status, and the problems that may arise to permanent residents and their families after the forced eviction (ibid.). However, in Korea, the provisions of protection against forced eviction are not applied, so there is no consideration for the individual special circumstances of permanent residents. Therefore, it is important to note that Korean provisions on expulsion lack humanitarian levels of consideration, which could apply to women brides who have lived more than 20 years, or the underage children of the family who were born and raised in Korea (ibid.).

Therefore, it is noteworthy that in the case of Korea, the dimension highlights that indicators such as 'Grounds for rejection, withdrawal, refusal, Personal circumstances considered

before the expulsion, 'Expulsion precluded' are hardly applied to Asian women brides, while for some cases, legal protections are provided, it is still said to put women brides in a weak legal status, which is vulnerable to separation and divorce.

Rights Associated with Status

Under this indicator, among various rights, rights especially on employment and social security attached to the legal status of Asian women brides will be discussed among various entitlements. For the case of Korea, little differentiation between naturalization and permanent residence and little additional rights attached to permanent residence make it less attractive. Therefore, acquiring nationality is a profoundly more appealing option for migrant women when it comes to legal entitlements and advantages, for the aspects of employment, political participation, residency rights, education, and social welfare assistance (Choe 2010, 245; Hwang 2015, 377; Kim 2020).

Other traditional immigrant countries require acquiring permanent residence as a prerequisite to gain access to naturalization, as the length of previous residence period is taken into consideration to lower the risk of having less integrated migrants and giving corresponding rights to the legal status such as social security benefits (*ibid.*, 37). The debates on legal benefits attached to permanent residence raised questions regarding an improvement of legal rights for Asian women brides. However, the difficult process to obtain one and little extra benefits for permanent residence discourages the likelihood of acquisition.

Naturalized people have conferred rights, social welfare benefits, permanent settlement, public assistance, employment, and political participation in Korea. Thus, naturalization grants equal rights to Korean nationals, in the meanwhile, permanent residence visas hardly provide any extra rights and are also partly applied (Hwang 2015, 381). The extra rights from acquiring permanent residence are said to be, (1) There is no need to renounce original nationality, (2) Re-entry permission not required for re-entering into Korea within two years since departure, (3) Foreign nationals ages 19 or older may vote in local elections three years after obtaining permanent residency, (4) Re-entry permit is exempted, and forcibly deported, 5) Their employment insurance is applied to their employment, permanent residents are obligated to pay taxes, but their rights are not obligated to education and work (Choe 2010, 245). Despite the written rights, it was criticized that permanent residents as treated as same as temporal foreign visitors (*ibid.*).

Moreover, the liminal legality of Asian women's brides interferes with them to enjoy employment and residency rights with their permanent residency status. After separation and divorce, the problem can be raised again whether they are legally entitled to not only access to residence or employment, also custody of children, because of their heavy legal reliance on their

husbands (Kim et al. 2017). If the husbands withdraw the financial or residence sponsorship, the migrant women can be reported as run away and be subject to deportation (ibid.,42). On the other hand, according to Korean immigration laws, Korean male spouses can proceed to divorce to end the marriage without the immigrant spouses' agreement (ibid.).

Regarding rights for 'Access to Employment', migrant women who resided in Korean with F-5 visa legally have jobs in the country, especially with the F-5 types of visa, the brides are allowed to work freely without restrictions and have their own business (Kim 2019, 89). When divorced and separated, however, this status changes into a F-1 (Visiting and Joining the Family) visa that does forbid economic activities in Korea. This raises problems that during marriage life or legal procedures, worsening financial difficulties women brides face in childbearing, paying back marriage brokers, or taking legal procedures for divorce (Seol 2005, 55-56).

The 'Access to Social Security and Assistance' policy indicator evaluates whether permanent residents are receiving the same level of social security benefits as the citizens, which includes the elements such as unemployment benefit, pension, maternity leave, family allowance, and public assistance. Most of the migrants are not aware of the existence of the benefits even in some cases they are entitled to, including social welfare facilities and counselling services for women migrants (Seol 2005, 49). Besides, it is noteworthy that the Nationality Law, the Immigrant Control Act, and related immigration laws which regulate social welfare treat the immigrants the same as temporal visitors unless they are fully naturalized (Seol 2006; 37). According to Kim (2019), the social welfare net especially public assistance including family allowance and pensions are not explicitly promulgated on the regulation, also not in practice.

Among all other factors hindering women brides' access to social welfare, besides, Asian women brides tend to not actively seeking for social welfare benefits (Seol 2006, 50), also it shows that access to medical benefits is worse in rural areas. Most women brides were mistaken that they are not entitled to medical welfare benefits, which leads them to give up the treatment or not receive proper medical assistance (Seol 2006, 51). Therefore, it is important to note that the education and promotional policy is necessary to inform the entitlement and welfare system for them to access it.

4.1.2 Anti-discrimination

This dimension aims to discuss the anti-discrimination provisions regulated in Korea, that includes 'Definitions and Concept's on the main principles, 'Enforcement Mechanism' and provisions for 'Equality policy'.

International human rights institutions, especially United Nations Committees such as anti-discrimination has been discussed by the United Nations Human Rights Council as an important

agenda to realize equality and prevent abuses of human rights, and the responsibility to enforce a comprehensive ban on discrimination has become a fundamental norm of human rights in developed countries (Lee 2014). Also, through several multilateral treaties, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, and the Convention on the Rights of the Child and the advice of the UN Committee on the Elimination of Racial Discrimination are suggested to mitigate the discrimination issues in Korea, however, the government has not seriously initiated to reform the anti-discrimination clauses and change the racial prejudice (Han 2017, 52). Being a homogenous society, Korea has tried to make a transition to a multicultural society, to address following issues such as discrimination against marriage migrants, multicultural families, and children of them, also it became a public policy discourse to discuss resettlement and adjustment (Chung et al. 2016, 2895). However, in Korea, despite policy goals, still there are strong tendencies and prejudice against different skin colours and hold prejudices for multicultural families, especially it applies to marriage migrants from low economic standing countries (ibid., 2901). The discrimination in Korea is raced based and is said to be very discriminatory against 'non-white' races, it is reflected on public forum where dissident voices are against multiculturalism (Han 2017, 46). Considering that a majority of Asian women brides who came to Korea through CATM are from relatively developing countries, they are persistent targets of racial prejudice and anti-immigrant sentiment (ibid., 49).

Scholars mentioned the perceived discrimination has significantly impacted the health of migrant women, which often leads to maternal depression, also bullying on multicultural children leads to similar mental distress symptoms (Chung et al. 2016; Kim et al. 2016). Therefore, not only the psychological health of the multicultural family but the dimension is important for children of the migrant women in aspects of adolescent psychological adjustment and education. Also, in the case of Asian women brides, gender discourses, and their system capture every aspect of married life in Korea (Chang 2019, 4). These gendered aspects of the reproduction of Asian women brides illustrate their everyday social, cultural, and political environments, that includes “gender cultures, gender regimes, gender systems, and gender arrangements” and it measures the different layers of institutional inequality (ibid.).

Previous dimensions regarding naturalization and permanent residence, highlight the unbalanced power in relationship with their male spouses and liminal legality they face in divorce/separation procedures. The weak bargaining power of Asian women brides is stemming from various dimensions of current immigration laws in Korea, which are often assimilatory and consider little about their presence (Lee et al. 2020, 91). While scholars illuminate unfair articles

included in immigration laws in Korea, the public attitudes and perceptions of the locals on the multicultural family erode the necessity of equal treatment as Korean nationals (Park 2014).

In alignment with that, this part intends to shed light on enforcement mechanism and different judicial bodies to process and assist victimization, and comprehensively covers government and other institutions' approach to address the unequal treatment. At this point, the unfair treatment Asian women brides receive as a wife/mother/ citizen are important to be addressed in pursuing a better life in Korea. On the other hand, speaking of their marriage life, it is noteworthy that, in the face of divorce and separation, also in cases of physical and verbal abuses reported during the marriage, how enforcement mechanism on anti-racial discrimination law and immigration-related law regulates the procedures.

Definitions and Concepts

The indicator outlines the principles and existing institutions to prevent direct and indirect discrimination. Underlying the whole concept of CATM, the power relationship is played out in the reproduction role by Asian women brides, leading to some aspects of reproduction are subject to commodification and market dynamics of the marriage (Le et al. 2014). This shapes the trajectories of direct/ indirect discrimination against migrant marriage women. On the other hand, there is no anti-discrimination law in place in Korea, the significance of enacting the law is raised in setting the principle of what is acceptable or non-acceptable in people's attitude to deal with non-Korean ethnicities (Han et al. 2016, 60). National Human Rights Commission Act (NHRCA) and so on prescribe prohibition on discrimination, however, the prohibition has practically no legal binding force and only takes corrective action through advice, which leads to no effective anti-discriminatory prohibition (Lee 2014, 130).

Article 5 from NHRCA, prescribes an anti-discrimination clause, "no discrimination on the grounds of gender, age, social status, area of origin, country of origin, national origin, a physical condition such as appearance, medical history, marital status, political opinion, and sexual orientation". Nonetheless, the decision of the National Human Rights Commission of Korea has only played an advising role, and it is not a final decision on the case or a decision giving explicit rights or obligations to the citizens. It can be understood that the NHRC's complaint system is not a final and definitive system for securing rights, but rather as a system to monitor human rights violations and it was established as an indirect control system for organizations or individuals who infringe on human rights (ibid.). While in Korea, the anti-discrimination clauses are comprehensively included in human rights-related regulations, therefore the enactment of separate anti-discrimination laws is necessary (ibid.). The universal human rights would be applying in recognizing rights for Asian women brides irrespective of their races and origin of

countries. the main question is when to enact the anti-discrimination law to better integrate them because the legislation cannot be done in a glimpse and should not be done in a hurry (Han 2017, 61). Rather, legislating new laws can be jointly promulgated by a way of a collaboration with other governmental institutions such as Ministries of Social Welfare, Labour, Gender Equality & Family and Law (ibid., 62).

Enforcement Mechanism

Concerning this dimension, it aims to illuminate on enforcement mechanisms of anti-discriminatory or discriminatory provisions or aspects practiced by government structures, law enforcement bodies, the judiciary, legislative bodies. This applies to all aspects of marriage life of Asian women brides, and their marital dissolutions. Also, related legislations analyse the discrepancy between actual practice and the regulations should not be neglected.

Yet, there is no anti-discrimination law in Korea, comprehensive implementation of non-discrimination law and equality standards assist to set principles and conditions for different ethnic groups (Ndiage 2019, 10-11), which would be further elaborated in dimension of 'Equality Policy'. The indicator 'Enforcement Mechanism' examines existing mechanisms that mainly functions to ensure procedures to understand their situations, concerns, and their issues and process their lawsuit cases and complaints (ibid.). Especially, the case of Asian women brides demonstrates that, during the marriage, or in the face of divorce and separation, in which verbal/ physical abuses or violence take place, including in post-conflict situations, building such mechanism is of importance (ibid.).

While there is no international conventions applied to practice enforcement mechanism on the cases of discrimination in Korea, on July 29, 2011, the 49th United Nations Convention on the Elimination of Discrimination against Women (CEDAW) raised a voice on the matter of acquisition of nationality for marriage migrant women in Korea, "it is recommendable to the Korean government to support marriage migrant women by making legal and institutional arrangements to obtain nationality and permanent residence status regardless of the presence of children." This seems to go against the strong emphasis that was put on Korean law to recognize a spouse with children to smooth the acquisition procedure, however, it did not impact Korean state to make a chance (Kim et al. 2011, 233-234).

Moreover, discriminatory dimensions of the regulations on Korean Nationality Law are pointed out for a reason that the dissolution of the marital relation is difficult to argue the entire fault of the one spouse (ibid., 234). According to Nationality Law Article 6 Clause 3, "To maintain the residence status the reason for divorce should not be on the immigrant spouse overly strict to interpret the cause of the divorce to meet the simplified naturalization requirements" (ibid.,). In

particular, it is more difficult to prove the dissolution such as emotional and economic violence that are not apparent visually in addition to physical violence. Also, it is also mentioned that it is almost impossible for a marriage immigrant who is not familiar with the Korean language and system with a relatively weak economic and social base to apply for the further residence permit, after proving the reason of divorce is attributable to the Korean spouse.

Under the Korean divorce law, the legislation regulates overall consensual and contested divorce (Yune 2012, 247). In the case of the judicial divorce process, the dissolution of the marital status is decided by a judgment of the family court, divorce procedure applies to no difference with other civil procedures in Korea, to get the judgment (June 2012, 248). One partner files a divorce case against the other, and the court makes a decision after a hearing (ibid.). Spouses may also end their marriage by means of a consensual divorce process, which does not require court judgment, unlike judicial divorce (Yune 2012, 249). However, very few cases from Korean dissolution of the international marriage demonstrate that their divorce was based on mutual consent and had followed all legal procedures in processing the divorce (Kim et al. 2017, 41). Asian women brides are more likely to be advised or being better off to apply for judicial divorce including divorce mediation and divorce trial, even though it shows prevalent unpleasant discrimination cases (Choi 2009, Yune 2012, Kim et al. 2017), because Asian women brides have to prove that the Korean national husband is liable for the divorce, to continue living in Korea (Kim et al. 2017; Lee et al. 2019; Lim 2019). Yet, in most cases, it is difficult for foreign brides to prove that the Korean spouses are liable for the divorce (Kim et al. 2011, 233-234).

In addition, their legal status is already ambiguous to remain in the country to discuss property, residence rights and child custody rights (ibid., 40). Immigration-related laws control the cases of divorce and separation of Asian women brides (Choi 2009, 131). Especially, during the dissolution of marital relationship, Korean divorce laws are applied to Asian women brides along with International law in judicial procedures, as it follows the that of male spouses (ibid., 142). It is for the convenience of the Korean state to regulate a legal entitlement for the spouses of Korean nationals and negotiating child support including custody (ibid.).

It is reflected on that, Korean spouses can complete the divorce proceedings without the consent of Asian women brides, thus, they can be still tied to the unwanted marriage or divorced status (Kim et al. 2017, 39). In doing so, the immigrant spouse can get a court decree which certifies the Korean spouse is the liable party (ibid.). It shows that recent interpretations on the proof of Korean spouse's fault in marriage are allowing more flexibility and a wider spectrum, however, it is still difficult (Lee et al. 2019; Lim 2019).

The multicultural families and foreigner support organizations provide a wide range of services targeting multicultural households and immigrant spouses (Hanultari-Seoul 2020). One prevalent type is counselling service, which is divided into different categories: domestic violence, sexual violence, general violence counselling, counselling for sex workers, marital conflict and family conflict counselling, counselling for legal stay & residence permit, counselling for divorce & corresponding legal procedures and employment & separation & affair & medical counselling (ibid.). A body of multicultural family centres specializes in the division of human rights also offer legal advisory service in the case of violations of the rights, in addition to laws and institutions applicable to multicultural families Immigrants and human rights (ibid.). Even though there are many efforts to eliminate the discriminatory treatment toward ethnic minorities in Korea, also the assistance programs offered by the state and other related organizations are criticized to produce 'Koreanized' migrants following an assimilatory approach (Kang 2010, 290).

The study especially illuminates on discriminatory aspects reflected on enforcement mechanism, that focuses on divorce procedures of Asian women brides. Recent lawsuits show that the Korea judiciaries recognize the discriminatory and assimilative aspects from clauses of the immigrant institutions, and there are some trials to mitigate the discriminatory aspects, however, still the institutions are very protective of Korean nationals in international marriage than the rights of Asian women brides. Moreover, in the case of Korea, it shows that, without anti-discrimination laws in place, enforcement cannot be practically carried out and has a legal bounding.

Equality Policy

Equality policies describe about how you will avoid discriminating against people, and how you will create a safe and inclusive atmosphere for residents living in the country. Under this indicator, it aims to provide equality policies distributed on mainstream legislations, public bodies obliged to promote equality and legislations that encourages equality and diversity.

Equality policies are discussed through various outlets in Korea, that helps to shape the public opinions on gender and ethnic minority rights, however, without the enactment of anti-discrimination laws in place, the journey to deliver multiculturalism by equality policies lacks judicial powers and granting citizenship and better legal entitlement are considered legitimate and realistic ways to bring one (Han 2017). Targeting Asian women brides, various equality policies are applied, the institutional effort to promote their rights can be found in several organizations and civic society.

While, other factors are involved including race, ethnicity, employment status, and age, unsurprisingly gender equality policies are discussed in alignment with family policies. Family

policies are a part of promoting the social integration of Asian women brides to solve family problems (Cho 2010). It is owing to a fact that the life of the migrant women is strongly based-on their marital status and their reproduction roles in households.

The Framework Act on Healthy Family (HF Act) and Framework Act on Family Support (FFS Act) are enacted as a part of efforts to realize equality among families despite several failures of revision attempted by the feministic movement (Cho 2010, 172). Derived from the HF Act, it regulates “The family must be sustained and developed for it to function well and meet individual needs and well support social integration” (The HF Act, article 2). While individuals have the right to a 'healthy family' life, they also must “make the family healthy through marriage and the birth of the child” (The HF Act, article 8). Followingly, it implies the state’s role in that “the state should provide education and consultation to prevent family disruption” (The HF Act, article 26, 31, 35). These articles still stipulate the healthy environment for family and emphasize the state's concerns on family welfare (Cho 2010, 179). What is considered as 'healthy' or non-healthy' still controversial, as the migrant families can fall into 'unhealthy' types of family categories, therefore, it reveals seemingly groundless aspects of equality policy to protect the rights of multicultural families and Asian women. Considering the strong legal 'otherness' tendency of Korean legislation, its legal justification to support mainstream other immigrant legislation is subject to interpretation (Han 2017, 52-53).

Besides, since the mid-1980s, many legislations related to gender issues are promulgated in various sectors to reduce discrimination and bring gender equality. According to Lee (2015), The Act on Equal Employment for Both Sexes (1987) to achieve equality in the labour market; the Infant Care Act (1991) was enacted to support child-rearing; the Revision on the Three Laws on Maternity Protection (2001) was implemented to mitigate the cost burden of pregnancy, childbearing, upbringing, and parenting; Also, in the mid-2000s, the enactment of the Equal Employment Opportunity and Work-Family Balance Assistance Act (2007), the Act on the Promotion of the Creation of a Family-Friendly Social Environment (2007), and the Act on the Promotion of Economic Activities of Career-Interrupted Women had been promulgated to better labour environment for women and intended to make work and life in balance. Besides, efforts had been flourished o reflect gender perspectives in general policymaking by the MoGE and other ministries, such as by introducing the Gender Impact Assessment Act (2004), Gender Budget Statements, and Gender Budget Balance Sheets (2009), which shine a light on international society as an exemplary case.

Several Korean-state-run institutions work on gender issues, including a think tank- Korean Women's Development Institute (KWDI), Ministry of Health and Welfare (MoHW), and MOGEF.

The gender issues are increasingly being concerned with family discourses. Especially, family discourses are made to mitigate the so-called 'family crisis' agenda in Korea, the goal of building an equal and healthy family is prioritized by MoHF and MoGEF (ibid., 172). Besides, KWGDI functions as an institution that lay a legal basis and conducts research for gender-related issues, and introduces it as a provider of the basic foundation for the legislation implementation system (KWGDI, Lee 2015). Therefore, it confirms that it serves an advisory role in promulgating the legislation, in alignment with that, MoGEF and MoHF are failed to serve the functions to promote equality policies in Korea and made successful reference due to institutional constraints as a state agency of democratic polity and bureaucracy (ibid.). Also, in a comparison with conservative civil society groups and pro-family groups, the Ministries relatively possess weak power to implement the policies (ibid.).

In terms of equality policy, MoGEF is an organization that is mostly in charge of family and gendered discourses, which is taken many related roles over from MoHF. In the early 2000s, discourses on gender equality are not so be reflected in the legislation until the year 2003, MoGEF has worked as a state agency to organize different opinions from various political organizations in partnership with other social organizations, in the meanwhile it has to fight for the survivor as an organization (ibid.). However, its weak position to push forward the equality policy and it is a neutral trait as a state organization, where it has to collaborate with other social organizations in a form of existing infrastructure, it cannot be extremely radical in policy implementation (ibid.,197). When it comes to women's problem, equality policy stipulates rather clear, as anti-discrimination, rights protection, while family issues are more complicated with the involvement of more stakeholders and various dimensions, including youth, elderly, etc. That means to implement the policy, it takes a long process to accept and revise the different opinions, which very likely to slow down the revision process (ibid., 199). Under this circumstance, to strengthen the power of equality policy, the growing power of grassroots organizations on relevant matters is significant (ibid., 297).

While current women's right advocacy organizations are going through structural changes and their conservative tendency to convey the messages and support more socially 'acceptable' institutions, they nonetheless find it difficult to break the political grounds on gender issues and find a common ground for interactions with other civic organizations, pro-family groups, and feminists (ibid.,294). Their relationships to the state and the president's affinity to gender equality are rather more likely to be accountable for influencing the changes. Furthermore, even though in recent decades, Korean governments pursued significant efforts to enact new laws on gender

equality, still it is very ambiguous how the Acts are being carried out in practice and judicial bodies are not promoting and interpreting the legislation in favour of women issues. due to prevalent passive attitudes and the lack of pro-female consideration (ibid., 285-303, Park 2018).

Therefore, it is important to mention that the equality policies are *de facto* not as practiced as what is promulgated, this applies not only to Asian women brides but also to Korean nationals, due to its long pre-existing history to practice distinguished gender norms and its strong nationalistic and male-centred legal approach.

Education

This dimension highlights the education of migrant children from a multicultural family, and also general multicultural education conducted in Korea for publics and migrants. the study from Kang (2010) examines that a high proportion of the children experience group exclusion in school (p. 293). The biggest obstacles for immigrant children are two in and out of school: 1) Low academic achievement, 2) Being alien in school life (ibid.). There is learning difficulty for them and relatively the lack of understanding of Korean language and culture, this stems from their multicultural background in the home (ibid.). Due to this fact, the children frequently feel shameful of their background and having a non-Korean mother, as they are excluded from having a foreign mother (ibid., 294). Therefore, the Korean government pays attention to the education of multicultural children by promulgating the Supportive Act for Multicultural Families (ibid., 293). However, the assistance for education is too comprehensive and does not live up to individualized needs like preferred subjects, and so on (ibid., 294). It also raises the controversy that learning material is ready-made and teaching strategies are not diversified (ibid.). The inclusive approach does not help to mitigate the drop-out rate among mixed-blood children in Korea. As their needs are getting individualized and it worries the Asian women, brides, that their children not to be accepted in Korean society. Still. Korea strives for an integrated system of education, conveying the principle of education for migrant children (p.296).

For the children of a multicultural family, Rainbow Youth Centre of the Migrant Youth Foundation is in support of multicultural youth to adapt to school life and living in Korea, the institution especially assists with their psychological and emotional hardships and healthcare support for children of married immigrants in the face of discrimination (Hanultari-Seoul 2020). As it should not be dismissed that raising bicultural, bilingual children are core to build the identity of children, nonetheless, Asian women brides are reluctant to teach their children their native language in fear of social exclusion in succeeding their life in Korea (Park 2019, 431). Their strong desire for wishing their children to be accepted in the Korean society may not fully reflect

on the policy of multicultural education (ibid.). This is strengthened by a belief that their native language is not an aid to academic and social success for the children (ibid., 440). The institutions are not responsive to calls for the current Korean transition to a new immigrant destination.

Besides, in aspects of multicultural education in Korea. The studies confirm that multicultural education is somewhat required for both parties – Korean publics and migrant children, for a better social inclusion (Kang 2010; Kim et al. 2011, 2012; Jo 2017, Park 2019). The assimilatory aspects of the current multicultural education policy can result in further labeling and stigmatization of migrant children in the long run. The top-down supports from the government to support the mixed family is most likely necessary for the co-existence of diverse cultures (Kim et al. 2012, 119). Even though now it shows limited central planning by the related organizations and education conducted for the host population in Korea. Multiethnic issues can be only addressed by education and thus the needs call for further policy suggestions. The term 'multicultural education' was once irrelevant to the Korean public and make the least state's interest until the 2000s, it was just unknown in the context of Korea (Jo 2017, 13). After the influx of migrants, the government rapidly constitutes various programs for multicultural education and social integration programs to various groups (ibid.). The enactment of the Multicultural Family Support Act (2014) stipulates promoting rights of marriage migrants by a way of expanding understanding of their presence.

Currently, multicultural education is also given only in selected schools, especially in Seoul Metropolitan City. Designated multicultural-education-oriented schools in Seoul provide programs for both non-multicultural and multicultural families to encourage multiculturalism. (ibid.). It is still discussed whether and how to include multicultural educations in an official Korean curriculum, also the selection of schools and assigned funding vary according to budget planning, which changes every year (ibid.). Therefore, it is still subject to central planning to operate and design the programs, also the number of programs is dependent on each local system, and that students are offered to participate in unbalanced amounts and qualities of programs (ibid., 16).

In sum, to eliminate the fundamental discrimination embedded in Korea, it is highly recommendable to offer multicultural education to Korean nationals to gain an understanding of integrating the multicultural families. Despite, current multicultural programs implemented by various organizations still hold a nationalistic view on designing ones, and prioritizing Korean language, morals, values, sentiments, and identity. Giving equal importance to different cultures as well as theirs should be learned in a way of education (ibid., 27).

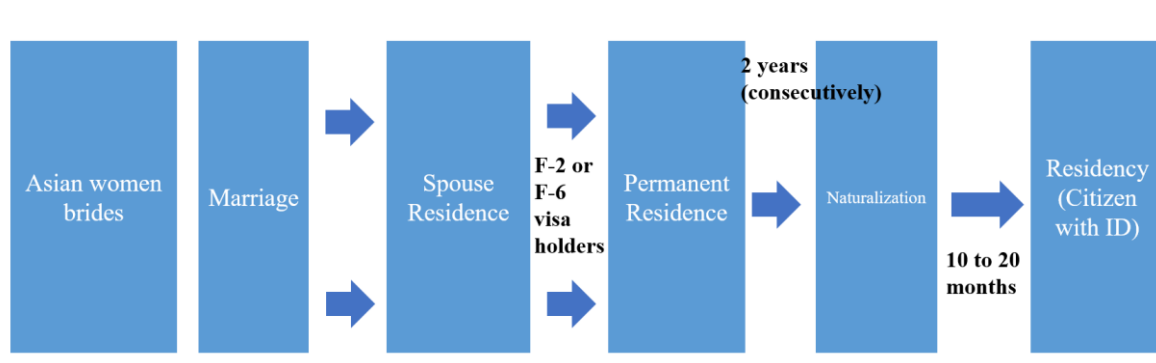


Figure 2: The Procedure for Acquiring Korean Nationality and Permanent Residency Status (Source: Author's design)

4.2 The Case of Taiwan

4.2.1 Access to Nationality

The studies examine that the migrant regime similarly presents itself with that of Korean trajectories, especially when it comes to granting legal entitlement to Asian women brides (Williams 2006; Hsia 2009; Momesso 2016; Cheng 2017, Chien 2018). Given the controversial statehood of Taiwan, Taiwan is in a position to continually negotiate its sovereignty with PRC and also to be recognized internationally, these political discourses are reflected upon intersections of the legal entitlement to citizenship for Asian women brides (Hsia 2009, 19) as well as its nationalism, sexism, patriarchy, and classism (Cheng 2017, 440). The unique political paradox of the Taiwan government is a controversial debate in Taiwan in terms of granting its citizenship to non-locals.

It is mentioned that Taiwan stipulates different residency regulations based on nationalities, due to its lack of recognition for its sovereignty, and importantly cross-strait relations with China (Chien 2018). Because the complexities of issuing citizenship create legally differentiated treatment between Chinese and other immigrant spouses, the studies focus on how the immigrant legislation is constructed to be a part of a national building project (ibid.). Accordingly, the legislation is relaxed for relatively non-Chinese women brides under the law of Taiwan (Cheng 2017, 88-89). Therefore, the experience of receiving citizenship varies across nationalities, as well as by migrant groups (ibid.). Focusing on the cases of Asian women brides, since the mid-80s, Taiwan has transitioned to 'semi-periphery' in the world system, when it begins to seek marriage partners in South-east Asia for Taiwanese peasants and working-class males (Hsia 2009, 27).

To regulate the citizenship and legal status of Taiwanese women migrants, several legislations were promulgated, including Household Registration Law revised in 2004, the Immigration Act enacted in 2003, and the Enforcement Rules of the Nationality Law revised in

2004 (Sheu 2007, 190). Besides, several public agencies are involved during the procedure, including the Ministry of Foreign Affairs (MoFA), National Immigration Agency (NIA), and its offices, Ministry of Interior (MoI). Also, a public organization called TransAsia Sisters Association in Taiwan (TASAT), and a public immigrant rights advocacy organization- Alliance for Human Rights Legislation for Immigrants and Migrants (AHRLIM) play a significant role in impacting positive changes on related laws for marriage migrants to better access the legal entitlement (Hsia 2009). Asian women brides enter the territory with a visitor visa after they registered at the household registration office and then apply for a resident visa, in which they acquire Alien Resident Certificate (ARC), and after 3 years, they are qualified to apply for naturalization (MoI 2020).

Eligibility

According to Isabella Cheng (2017), in total 115,392 foreign women out of 152,817 were granted citizenship ranging from 1987 to 2016, the number of naturalized immigrants still takes up a relatively high proportion of the total naturalized population in Taiwan. As the number of Asian women brides mainly from South-east Asia increases, the role of immigrant legislation plays a great role as a part of the nation-building project (Cheng 2014, 2017). However, still acquiring citizenship is considered relatively relaxed for groups of marriage migrants and their children (Cheng 2017, 26). It is the most 'naturalizable' group among other immigrants, despite its renowned high requirement and barriers to be fulfilled, including the requirements include undergoing more medical examinations, residence in Taiwan for a certain period, abandoning their original nationality, good character, criminal record, financial status, reaching certain Chinese language level and passing the test of knowledge of Taiwan (Article 3 and 4) (ibid.).

For non- Chinese Asian women brides, to be eligible for applying for naturalization, every year immigrant spouses should have stayed in Taiwan more than 183 days for more than three years, alongside meeting the requirements (ibid., 89). In this way, the marriage migrants become 'national without registered permanent residence in the Taiwan Area' officially, However, after being naturalized, they still need to wait for one year to get full citizenship (ibid.). Therefore, technically Asian women brides are required to reside in the country for four years to get citizenship. The Taiwanese immigrant law also stipulates in other cases, for example, In the fourth year, if the brides do not meet the requirement, they may still apply for citizen status after being naturalized and staying in the country for two full years for 270 days or more each year or staying for five full years for 183 days or more each year. Therefore, it is important to mention that, in the case of the terms- 'citizenship' and 'nationality', in the case of Taiwan, it shall be not interchangeably used, as having citizenship comes after accessing nationality.

The spouses are ought to reside in the country less long than that of Korea to be eligible, however, citizenship of their children remains essentially still – *jus sanguinis* to citizenship acquisition to be integrated into the Taiwan society (Hsia 2009, 41). However, it is noteworthy that the Taiwan government regulates from Article 4 of the Nationality Law that, the children born in Taiwan territory are also entitled to enjoying birth rights citizenship.

Besides, another study mentions that the Nationality law includes another dimension of gender discrimination in assigning the children's nationality. Under the law, the principle of *jus sanguinis* was patrilineal and prohibit a citizen-mother from granting nationality to a child between a Taiwanese husband or a male spouse who had later accepted the child (Chen 2009, 301). These children ended up having the only option to claiming citizenship of mother, in a case of Taiwanese father fail to meet the fatherhood, also under the Nationality Law, maternal responsibility is more strongly regulated, even though the Nationality Law of male spouses triumph over that of Asian women brides (ibid., 301). The immigrant-related legislation follows the principle of descent, it is said that therefore, only children and spouses of Taiwanese citizens are viewed as citizens in a perspective of continuation of the Taiwanese "blood" (Hsia 2009, 26). This stems from the national identity of Taiwan, a founding father- Sun Yat-Sen, who emphasize Chinese ancestry and lineage, which reflects the strong nationalism and gender norms (ibid.). In that, despite several changes of Nationality Law and immigrant legislation, that regards women spouses as a breeding object, rather than the qualified individual to be a citizen of the country, perpetuating patriarchy values onto them (ibid.). As a clear boundary between rights-holding citizens and unprotected immigrants tells, in Taiwan, Nationality law also makes gaining nationality a precondition to social integration and citizenship benefits (Chen 2009, 293).

Conditions for Acquisition

According to the Nationality Law Article from 3 to 9, the legislation describes “He/She possesses basic language ability in the language of our country and understands the basic common knowledge of national’s rights and obligations”. Accordingly, the applicants are obliged to submit the documents to prove the applicant possesses basic language ability in the language of our country and understands the basic common knowledge of national’s rights and obligations. Accordingly, Asian women, brides need to submit documents to prove their language ability, the regulations on naturalization language and integration test are promulgated to increase their understanding of their rights and obligations in Taiwan, and to motivate their participation in society economically and socially (MoI 2020). Also, it is associated with the fact that the Taiwanese government encourages boosts in their communication ability to better educate their

children (ibid.,).

To fulfill the language test requirement, According to the MoI, foreign national spouses can either be “(1) Studying in public or private schools at all levels for at least 1 year; or (2) Gaining a certificate to prove participating hours in courses established by governmental departments of Taiwan, (including all collection of courses the governmental departments establish on their own, authorize or assist other private/public organizations, groups, schools to establish); This applies to not only marriage migrants but also who, after divorce from a Taiwan national, have exercising responsibility of the right and obligation for the minor children, in this case, migrants need a proof of minimum 72 hours participation” (ibid.,).

Another requirement on naturalization tests includes an oral and written test, 20 questions respectively for both tests, 5 points for each question, total score: 100 points, out of those, marriage migrants need to gain minimum total score, 60 points to be eligible for naturalization. Considered that other groups of applicants need to reach 70 points to pass the exam, it is noteworthy that the Taiwanese government sets lower criteria for immigrant spouses. Nonetheless, it prerequisites that still the case of Asian women brides show that they lack a language ability to make a living and build a strong network in Taiwan, it is doubtable it is of real assistance during and after the process of naturalization.

In terms of financial proof and economic source, marriage migrants are obliged to proving financial security, by submitting “(1) The bank statement of average monthly income earned within the ROC in the past year is more than double the basic wage as promulgated by the Council of Labour Affairs, Executive Yuan, e.g. at least NT\$ 38,546; or (2) A bank statement or (3) Official receipts for income tax wherein the amount should be at least equal to 24 times the basic wage, at least NT\$ 462,552” (Sheu 2007, 191; Hsia 2009, 27). Also, other than a bank statement, to prove the household income, deduction bills and deduction exemption vouchers, tax payment certificates, and other related evidential documents from the past year can be submitted (Enforcement Rules of the Nationality Law, Article 8). It goes align with the Taiwanese case that, most Asian women brides come to Taiwan in a hope of escaping poverty, thus they are comparatively from disadvantaged economic backgrounds (ibid., 28). South-east Asian brides make less than NT\$ 2,0000 every month, However, they are married to Taiwanese who are mostly working-class (ibid.). The male spouses are less educated and less skilled than the average Taiwanese man (Sheu 2007, 188). The professions they have are more likely to be not stable, high-risk, including taxi or truck driving, construction work, they work for very long working hours daily and uncertain income (ibid.). Also, Asian women brides rely on their male spouses to provide financial supports, especially in the process of proving their financial security, dependency

on male spouses are inevitable since those working immigrant spouses from South-east Asia make less than NT\$ 2,0000 every month (Hsia 2009, 28). The amount they earn for their living is less than that they ought to be proving in gaining nationality. Therefore, a person who possesses sufficient property or professional skills to enable him/her to be self-reliant' might not be applied to the cases of Asian women brides, nor their Taiwanese male spouse and family-in-law (Sheu 2007, 191). It previously triggered anger for Asian women brides, that they protested for reasonable financial requirement on gaining citizenship, collaborated with Coalition Against Financial Requirements for Immigrants and AHRIM, the regulation of financial requirement was finally significantly relaxed in November 2008, however, still challenging for women brides to meet it independently (ibid., 200).

The sponsorship regime in Taiwan undermines the degree of financial and legal dependence of migrant women, it is adopted by the Taiwanese government to better the transition to multicultural society while minimizing the risks, however, it aggravates the existing socio-economic status of women brides, remaining as quasi-citizens (ibid., 192). Thus, the conditions for the acquisition of Asian women brides largely rely on the goodwill and financial provision of Taiwan's national spouses.

Security of Status

The long procedure of naturalization process discourages the application of women brides, as nationality application takes at least 6 months to 1 year to process and nine steps of the procedure, that involves eight different public state agencies, including household registration offices, National Immigrant Agency and its offices, Ministry of Interior (Sheu 2007, 191, MoI 2020). According to the Nationality Law in Taiwan, it regulates that Asian women brides are eligible for naturalization if they are assured to meet the aforementioned criteria, in addition to 3 consecutive years of residence. Besides, Nationality Law requires foreigners in applying to become naturalized Taiwanese citizens to submit a "certification of his/her loss of the previous nationality." (Article 9). Also, the law states that the Ministry of Interior can revoke such citizenship if the naturalization application was not by the requirements of the law (Article 3 & 19). Thus, they are vulnerable to become stateless during the procedure. Therefore, the precondition for migrant women to fulfill in long procedure in transnational marriages put them in a precarious status, in which they have to be bound by marital status for a certain duration before they can access expanded rights independent of the local male spouses (Hsia 2009, 25).

Formal citizenship that is related to legal matters (such as residential, civil, political, social, and labour rights), in the case of Taiwan, also makes it difficult for Asian women brides to independently go through the preconditioned process (ibid.). If problems such as physical/ verbal

abuses occur before the end of this period and foreign women seek legal protection including filing a remedy or divorce/separation, they are exposed themselves to deportation to their country of origin (ibid.). The court decision often neglects their language difficulties, lack of capital and access to information, accreditation of their qualifications, as well as the lack of legal assistance (ibid.). For a large number of cases, the MoI revoked their Taiwanese citizenship after court conviction for committing fraudulent marriage (ibid.). Accordingly, Before the Immigration Act was amended in 2008, in a fear of deportation or rejection, most women could not visit their home country during the application, especially in a case they have children in Taiwan, they are more inclined to ask for legal protection against physical/ verbal abuses in a fear of being deprived of custody of children and being deported (ibid., 33).

In Taiwan, the relatively rejection rate of naturalization for non-mainland women is low, when they are the spouse of Taiwan nationals, especially compared to the mainland marriage migrants. Considering various dimensions come into play to gain legal security, their journey to gain citizenship is still a turmoil, restrictive in a sense of long procedures and decentralized agencies to take charge.

Dual Nationality

It does not allow double or multiple citizens without a few exceptions (Cheng 2017, 446). Article 9 stipulates that marriage migrants need to relinquish their nationality of origin country to obtain Taiwanese (ibid.). However, In March of 2017, the ministry promulgated a regulation as a supplement to an amendment to the Nationality Law assessed by the legislature in 2016, allowing special exemptions and extensions for the acquisition of nationality for foreign nationals to renounce their citizenship without being having to relinquish their foreign nationality. The exceptions are said to be the people “who made special contributions to Taiwan but (don’t) meet the requisites.” (Article 6 of the Nationality Law) and the people are “high-level professionals in the technological, economic, educational, cultural, art, sports, or other domains.” (Article 9 of the Nationality Law). Previously, all foreign nationals had to first relinquish their citizenship of origin country in the case they want to be approved as Taiwanese nationals, a naturalization procedure that might put them into stateless status if the Taiwanese authorities rejected their applications. Despite the changes on the legislation, Everington (2018) reveals that only 0.008 % of foreign nationals are entitled to hold dual citizenship, and they are exceptionally highly professional and qualified, thereby, based on the criteria, we could confirm that dual nationality largely cannot be exempted from enjoying rights in both origin and host countries.

One peculiarity of the acquisition is that, after submitting the denizenship of origin country, the brides will be given 'quasi-naturalization' status to remain in the country, which usually lasts

for a year (ibid.). On the status, in a sum to be naturalized, the applicants would have to wait from one to five years during proceedings, before gaining full citizenship of Taiwan (Article 4, Notice for the Supporting Documents Required for the Applications of Entry, Residency, and Settlement of Nationals without Household Registration in Taiwan) (ibid.). During the period, Asian women brides are exposed to the risk of becoming stateless in the cases of divorce, the death of Taiwan national spouse, and separation (ibid.). It raises the possibility to be deported and face expulsion because the dissolution of the marriage breaks the legality of Asian women brides to remain in the country, that gives legally no justifiable reason to naturalize them as a citizen. Therefore, several women brides were able to regain their nationality in their home countries after being revoked, whereas others were not able to do so, partly leading from the overly regulated bureaucracy or their tendency to stick to legislations and official rules of the home country, and the high cost of the citizenship reacquisition process charged by matchmaking agencies (Cheng 2017, 448). It is noteworthy that holding dual citizenships without renunciation of original nationality is difficult for Asian women brides in Taiwan (MoI 2020).

4.2.2 Permanent Residence

For permanent residence, named as Alien Permanent Resident Certificate (APRC) ⁵in a category of family-based APRC, it is regulated through the Nationality Law and Immigration Act, which enforces restrictions on residence terms and permits (Cheng 2020, 457). According to MoI, especially for the case of women brides, as a spouse of Taiwan nationals, family-based APRC requires for them to be registered as a Joint Family Residence Visa (MoI 2020) As a holder of APRC, Asian women brides no longer need to renew their ARC every three years, that brings them a great advantage in terms of granting spatial mobility and work permits in Taiwan (ibid.,). However, according to National Development Council (NDC), Taiwan's immigrant policy has inclined to promote foreign talents, investors and professionals, thus immigrant legislation on issuing APRC has been eased for the target group and their families in last years (Everington 2018). Foreign professionals would be specially included in the retirement pension system under the Labour Pension Act after retirement and are entitled to receive insurance and tax benefits (NDC 2017). In the meanwhile, little changes have been made on improving entitlements of APRC

⁵There are 5 category groups of APRC:

- (1) Normal foreign worker APRC
- (2) Spouse/Child of Taiwan national APRC (Joint Family Resident Visa, family dependent ARC).
- (3) Dependent on foreign skilled professional APRC holder APRC
- (4) Investment (Plum Blossom) APRC
- (5) Missionary APRC

for marriage migrants in Taiwan, despite several amendments, especially women from South-east Asia are at low policy priority for integration (Cheng 2017, 447). It also demonstrates a stark contrast to marriage migrants from developed countries such as Japan, whose Taiwanese government is in a favor of issuing residence entitlement and make an exception to the requirement of the residence certificate (ibid., 446). This is owing to a fact that the sending countries of Asian women brides are not overruling the requirements to prevent them from being stateless.

Throughout the studies, it is important to mention that while naturalization grant Asian women brides a wide range of freedom to enjoy citizenship as equal as Taiwanese, difficulties encountered by Asian women brides are reinforced in a procedure of applying for naturalization and being failed to meet the naturalization criteria, that leads them to be trapped in the status of quasi-naturalization and forever temporal residents in Taiwan. Thus, still, naturalization brings more benefits to Asian women brides to reside in the country, in the case of APRC holders in Taiwan, their legal dependency on Taiwan partners is more apparent, and are granted fewer benefits, because *de facto* they are not as regulated 'permanent residents' in the territory, it also demonstrates that in the case of divorce and separation, divorced migrants without naturalization, can encounter greater difficulties with their minor children (Pan et al. 2014, 4).

Eligibility

It goes align with the Korean case that, acquiring a permanent residence is more complicated and entangled with various ineligibility of migrant groups. According to MoI, Applicants who have resided and hold valid household registration in Taiwan for one year without departure from the day of naturalization; for two years and more than 270 days per year; for five years and more than 183 days per year), or more than ten years are eligible for applying the APRC. The aforementioned periods shall not include the period of residing permitted due to studies or employment in Taiwan as approved by authorities in charge of labour affairs or the field of their employment based on Article 46 of the Employment Service Act. Therefore, in the case of denial of naturalization or after the application, immigrant spouses have a choice to stay longer in the country and apply for permanent residence, Isabelle Chang (2020) argues that it risks them to be permanently temporarily in the territory with their unstable legal status (p.457).

Moreover, it is mentioned that, following the legislation, their role as a spouse and marital status is reinforced by the legal bounding, as they have little room to negotiate other residence permits as a student or employee, in the meanwhile, Taiwanese law seems to be more flexible on the dimension of the 'Period of prior absence allowed', as marriage migrants can more freely choose their territory between their origin and Taiwan, at the same time, however, it also prolongs required residence period.

Conditions for Acquisition of Status

In a same vein with Korean case, sufficient economic resources, a clear criminal record, and good character are prerequisites to acquire APRC in Taiwan. Police criminal record certificates issued by the government of the applicant's home country and by Taiwan in the most recent five years need to be submitted to local service stations of the NIA from MoI (MoI 2019). Moreover, in terms of economic resources, legislations including the Immigration Act and the Enforcement Rules of the Immigration Act describe that women spouses can prove financial sufficiency by submitting any of these (ibid.): (1) Statement of income, taxation, chattel or real estate in Taiwan; (2) Statement issued by the employer to certify employment, or the applicant's statement in writing detailing job descriptions and incomes; (3) Certificate issued by the Taiwan government certifying that its holder is a professional or technician or has passed a technical test; (4) Other documents that are sufficient to prove that the applicant is capable of supporting himself or herself or making a living. In Taiwan case, derived from the requirement imposed on proving economic sufficiency, it provides more alternative ways to prove.

Security of Status

The procedure for spouses takes as following: to submit the completed APRC application form to a local service center of the NIA. After the application form has been received and passed the preliminary review, the NIA, MoI will conduct a secondary review on the application. The processing time takes 14 days (excluding the time of request for additional documents, to conduct an interview or verification by the relevant authorities). Asian women spouses gain their permanent residency through 2 steps- (i.e., residency and 3 years of permanent residency) (Pan et al. 2014, 4). In the case of maintaining the APRC, Asian women brides need to meet the prementioned residency period requirement for at least 2 years of residency with a possibility to extend another year, also they can't leave the country for other purposes such as studies or medical treatment without applying for exemptions (Cheng 2020, 457). Therefore, the women brides are required to apply online for an exemption if you plan to leave the country for more than 183 days in a year for 2 years, otherwise, your APRC can be revoked (MoI 2020).

As the cases of divorce and separation often occur between international marriage couples in Taiwan, their legal status can't be protected unless they are fully naturalized (Pan et al. 2014, 5). If not, they are very likely to have to leave the country, it says that marriage migrants can continue to reside in Taiwan only in cases when they acquire custody of their minor children or protection order stemming from domestic physical or verbal violence. Also, the study demonstrates that, compared to Taiwanese women, Asian women brides go through fewer stages of divorce remedies and recovery period (ibid., 9-10). It also shows that at the time of applying

for naturalization after 5 years of residency, in which they are eligible for applying naturalization, a high number of women spouses file a divorce (ibid.). Partly, this is because they have endured the marriage until the point of gaining naturalization. Accordingly, it is noteworthy that APRC status does not guarantee the women spouses any solid foundation to live in Taiwan with their children before getting the naturalization status. Besides, the grounds on deportation that is regulated on immigrant legislation — such as “threatening national security” and “violating the public interest” — are vague articulations that are subject to manipulation (Hsia 2008, 194). In alignment with that, the institutions barely describe specifically due procedures or mechanisms to follow (ibid.). Therefore, For the indicators of 'Grounds for rejection, withdrawal, refusal, Personal circumstances considered before the expulsion, Expulsion precluded', we could confirm that not many considerations are given to women brides in the case of APRC holders, the only reason to be considered is the liability of Taiwan male spouses and whether they have children during the marriage.

Rights Associated with Status

Various studies illuminate the life and phenomenon of Asian women brides deprived of basic social and labour rights with partial citizenship (Scheu 2007; Hsia 2009; Wang 2010; Sung 2012; Cheng 2017, 2020). In the meanwhile, foreign brides play a wide range of roles as wives, daughter and daughter-in-law, mother and worker accompanied by a full responsibility (Scheu 2007, 180-181). Derive from the kinds of literature, their rights are complicatedly entangled with relationships and the goodwill of male spouses and family-in-law. Besides, Although Taiwan has passed a law that regulates to offer of different types of social services, language barriers to gain sufficient information and lack of training of social service workers to give real assistance to migrant women prevents them from receiving rights they are entitled to (Hsia 2009, 29).

Despite maternal depression and difficulty in parenting for women, stemming from perceived discrimination experienced in receiving countries (Chung et al. 2016), also the lack of social support, lack of network, poorly adapted to marriage, being physically ill to look for help, Immigrant spouses seek more assistance and health care support from the public sector – and the high number of them take ‘entitlement and access to National Health Insurance’ as their utmost social service need (scheu 2007, 189). Some answered that they wish the state would offer more health check-ups for young children, and others said would like to access more information and training/ education in terms of skills for parenting and raising kids (ibid.) some others said a translating/interpreting service in receiving social welfare services is needed (ibid.). It is noteworthy that immigrant women have no access to health insurance and care; they merely have to provide care (ibid.,180). However, in the case of Taiwan, there are still restrictions for their

access to the health welfare system. The majority of them have not been included in the public health system- the National Health Insurance System due to their financial difficulties of their family to pay the monthly insurance fee (ibid.). Therefore, their physical and emotional needs are not met by the national welfare system, which impacts their parenting to educate the next generation of Taiwan.

Even though we should not neglect that spouse as a migrant worker or a wife/mother should be differentiated, Taiwanese legislation deeply embedded rejection of South-east Asian women (Cheng 2020, 461). Naturalization and permanent residency are fairly relaxed about the employment of Asia women brides, in the case of Taiwan, especially the APRC holders are granted access to the labour market and work permit, however, the enforcement of legal entitlement is a barrier by their employment status (Cheng 2020). In terms of the care-service industry, the Employment Services Act that was responsible for the employment of Asian women brides and, their pregnancy up until 2015, and the Labour Standards Act, which oversees their labour rights was newly regulated to support their rights in the workplace (ibid., 457). Nonetheless. A policy measure specifically applied to domestic foreign caregivers is to exclude them from the application of the Labour Standards Act or certain articles of the employment Services Act (ibid., 459). Especially, their legal temporariness is reinforced by the legislation to limit their fertility (so-called pregnancy clearance) and be trapped in a contract-bound residency (ibid., 457-458). Their residency could be extended several times based on contracts, often leading to a restriction to apply for naturalization and permanent residence, as previously to work permit, brides as care service providers were required to go back to the country for 40 days (ibid.,). That is, to extend for a new work permit, they also need to pay broker recruitment fees to smooth the administrative process for application, so that they become also valuable at the workplace to the employer's needs (ibid., 458). Moreover, their spatial and employment, thus, their status and their market value are continually consumed by Taiwan nationals, but the legislation neither intends nor is willing to integrate them into Taiwan society (ibid., 461).

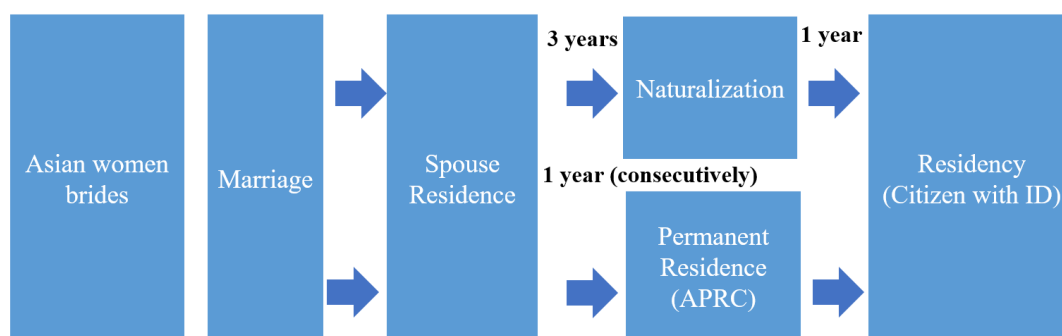


Figure 3: The Procedure for Acquiring Taiwanese Nationality and Permanent Residency Status (Source:

4.2.3 Anti-discrimination

Unlike the Korean case, in Taiwan, international marriage with Asian women bride, Anti-discrimination and human rights legislation has evolved differently, since the 1990s, when the Taiwanese government invests in South-east Asian countries (Wang 2010, 221). The evolvement is in a close linkage with Southbound policy declared from the Taiwanese government, for example, Democratic Progressive Party (DPP) has been promoting their rights and social security nets of women brides from South-east Asia, which goes hands in hands with a president Tsai Ing-wen's policy to strengthen ties between South-east Asian countries and Taiwan (Tseng 2019). The policy has made new immigrants and their children's discriminated experiences, education, and integration issue on public discourses (ibid.). In alignment with that, the number of CATM has increased significantly (Wang 2010, 221). Since then, many local and travel agencies have begun to organize the arranged marriage with women especially from South-east Asia, in addition to that, the people who previously experienced the marriage started to engage in the matchmaking process informally (ibid., 222).

Taiwan has progressed on incorporating international human rights standards into its legal regulations, including immigrant-related regulations (Cheng 2020, 461). This demonstrates in the promulgation of human rights legislation for anti-trafficking in 2009 and great modifications in the requirement of becoming Taiwanese citizens in the 2000s amidst the DPP and Kuomintang (KMT) governments. Earlier, the former was presented by a way of the KMT government approach practiced by the United States when it comes to improving migrants' rights, also the government worked against the anti-sentiment for Chinese migrants (ibid., Tseng 2019). The latter was stemmed from local activists' criticism of the DPP government for propagandizing the self-advertised human rights protection for political purposes (ibid.).

Definitions and Concepts

Compared to the Korean case, Taiwan presents more attempts to alter the social atmosphere on different levels. It is closed in a relation to KMT and DPP administration's political appeals to make values such as human rights, citizenship, civic participation, multi-culturalism, and democracy on public discourses (Hsia 2008). This seems to stem from a fact that Taiwan being a state with a lack of recognition of its sovereignty in the world market, Taiwan government has strived hard for accommodating to international standards set by international organizations (ibid., 198). In this regard, anti-discrimination legislation makes themselves good examples. Migrants and related organizations have advocated on promoting the rights of marriage migrants and

multicultural family, also compliance with international conventions, making several proposals (Hsia 2008, Drillsma 2018). The NIA proclaimed that Taiwan has ratified the international conventions, including the UN International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), according to it, 'nothing in this Convention may be interpreted as affecting in any way the legal provisions of States Parties concerning nationality, citizenship or naturalization, provided that such provisions do not discriminate against any particular nationality', despite the discrepancy between citizenship, regulations on permanent residency and naturalization, there should not be radical discriminations (Chien 2018, 103). which is still controversial if their contents are indeed included in Taiwan's domestic laws (Hsia 2008, 198). According to the Enforcement Act of Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) enacted in 2011, Article 3 "All rules, regulations, ordinances and administrative measures applicable to the Convention shall refer to the intention of the Convention, and any interpretations and explanations provided by the Committee on the Elimination of All Forms of Discrimination against Women of the United Nations.". Also, it describes that the definition of discrimination follows the one from the convention, Article 4 "Upon exercising its authority, all government units shall do so per all rules and regulations regarding protection to genders and human rights specified in the Convention, eliminate gender discrimination, and actively promote the realization of gender equality". Therefore, the Articles illuminate that those conventions are speculated in domestic laws. It is said that after the MoJ reviews whether it is necessary to include additional laws to regulate anti-discrimination, which is also subject to the conventions (Hsia 2008, 198).

Specifically, in terms of immigrant legislation, anti-discrimination clauses are speculated in Immigrant Act formulated by NIA, to be specific, Immigrant Act Article 62, describes that "Any person shall not discriminate against people residing in the Taiwan Area based on nationality, race, color, class, and place of birth. Any person whose rights are trespassed due to the discrimination mentioned in the preceding Paragraph can file a complaint to the competent authorities based on the situations of the trespass unless the matter is regulated by other laws otherwise. The competent authorities shall enact regulations that govern items, requirements for filing a complaint mentioned in the preceding Paragraph, complaint procedures, and the composition of a review committee."

Enforcement Mechanism

Some actual enforcement mechanism could be found in regulations, Enforcement Act of CEDAW states its enforcement in Article 6 "The government shall, under the Convention, establish a reporting system for eliminating all forms of discrimination against women, provide a

national report every four years, and invite all relevant experts and representatives of non-government organizations to peruse such report. The government shall, based on the comments and suggestions so provided, review the current circumstance and draw up subsequent resolutions". Moreover, according to Regulation for Petitions against Discrimination against People Residing in the Taiwan Area enacted in 2008, speculates on Article 2 that "Anyone residing in Taiwan Area, if discriminated against based on nationality, ethnicity, skin color, class, or birthplace, may petition the competent authorities for the resultant infringement of his/her rights, unless otherwise stipulated in other laws.". It implies that marriage migrants whose rights were violated are entitled to filing to the corresponding authorities in a required format within 2 months (MoI 2020). Thus, in the case of Taiwan, the laws about carrying out the enforcement exist in domestic laws and despite its ambiguity in specializing organizations, due process, and mechanism, also it is likely that, in standard practices of jurisdictions, these still can be taken as common sense and subject to arbitral interpretation. Therefore, it is important to mention that identifying numerous loopholes that circumvent the compliance of enforcement, derived from the Articles, the factors such as language barrier, the lack of understanding in the principles and mechanism from sides of petitioner and defendant.

Despite Taiwan has ratified this Universal Declaration of Human rights, that describes fundamental rights of individual regardless gender, race, ethnicities, and nationality, NIA has planned out by Executive Yuan (the executive branch of Taiwan government) to incorporate the functions of police, investigation, and judiciary into a single government body, that seems to perpetuate to portray migrants as a potential threat to Taiwan nationals (Hsia 2008, 194-195).

NIA was initially established under the MoI to share the functions of other organizations that are based on the border control subject to the former Exit and Entry Service Bureau (NIA 2019). In line with this planning, NIA personnel from Police Departments would take up the majority (Hsia 2008, 194-195). To be specific, The NIA administers Northern, Central, and Southern Affairs Corps distributed across 22 bridges and 4 detention centres in Taiwan. The corps is responsible for home visits, interviews, investigations, detentions, and repatriations of immigrants, to enforce the law, the overstaying or unqualified cases will be sent to NIA and proceed to be deported (NIA 2019). Therefore, it has been criticized by migrant rights advocacy groups that NIA is mainly responsible for policing, investigating, and deporting the migrants rather than providing protective services (*ibid.*). Thus, the enforcement mechanism tends to focus on the preventive controls than protecting the rights, in the case of deportation, as the migrant related institutions rarely provide information on the corresponding process and enforcement mechanism before they are deported (*ibid.*, 194). It is unfair for marriage migrants who are

unfamiliar with due process and owing to that, they are not given a chance to appeal (ibid.,). Therefore, it is important to mention that, even though international conventions and domestic anti-discrimination legislations are legally binding, however, the judicial and executive branches such as Executive Yuan have been reluctant and not fast enough to recognize the principles of equality and anti-discrimination and prevention of human rights violations (Amnesty International 2019).

Moreover, the same goes for the Taiwan case that, human violations are committed across various dimensions of immigrant life, under the regime of sponsorship and protecting national security (Hsia 2008, Chien 2018). Among different marriage migrant groups, women brides in Taiwan seemingly more reluctant to terminate their marriage and endure more unfair treatment in the meantime (Pan et al. 2014, 9-10). Facing the divorce, separation, following the Immigration Act, immigrant spouses become no longer entitled to their marriage-based residency unless they are raising underage children and hold certain custody rights (Maxon 2018). To make it worse, in the case of divorces resulting from domestic violence, their residency can be extended as long as a restraining order or only when the woman's spouse was beaten half-dead (ibid.). Moreover, if the restraining order is over, Asian women brides need to leave the country usually after 6 or 1 year (ibid.). Since the legislation applies to the women brides, it is obvious that this weights more weights to brides to prove the legibility of male spouses for the divorce, and for women who have not yet obtained naturalization status, including APRC holders, cannot remain in Taiwan, unless judges make exceptions (Central News Agency 2016). Also, this implies that in the case of Taiwan, the legibility of male spouses does not make Asian women brides entirely free from the burden of proof, custody rights, and further allowance for residency in the territory.

Equality policies

For the case of Taiwan, various equality principles are and described distributed across the following legislations: most relevantly Cultural Fundamental Act enacted in 2019 (MoJ 2020), as well as legislation such as Act of Gender Equality in Employment, Gender Equity Education Act (ibid.) and Family Act (ibid.), etc. Derived from the Family Act, similar with the Korean case, it starts with a clause the purpose of the promulgation that is articulated in Article 1 "This Act is enacted to ensure proper, expeditious and integrated handling of family matters, to maintain human dignity, protect gender equality, seek the best interest of the minor child, and protect healthy family life in contemporary societies." It also specializes that the violated cases are undertaken and governed by the juvenile and family court to bring an equal environment in households.

In terms of employment of migrant, the following Article from Employment Services Act also can be applied, "To ensure national's equal opportunity in employment, the employer is prohibited from discriminating against any job applicant or employee based on race, class, language, thought, religion, political party, place of origin, place of birth, gender, gender orientation, age, marital status, appearance, facial features, disability, horoscope, blood type, or past membership in any labour union; matters stated clearly in other laws shall be followed in priority.". Among those, it is noteworthy that Cultural Fundamental Act regulates to promote the multicultural idea in Taiwan, and Article 1 stipulates "This Act is specially drafted to protect the cultural rights of the people, expand cultural participation, realize multiculturalism, promote the development of many cultures, and set fundamental principles and a policy direction for national cultural development." (MoC 2020). Nonetheless, the progressive rhetoric of bringing multiculturalism to Taiwan is not yet actively practiced, also very exclusionary. It seems that also, cultural values and language assets of Asian women brides are largely ignored by the Taiwanese local publics (Hsia 2008, 199). Therefore, the studies suggested closely investigate the discrepancies between equality policy goals and actual practice and utilization.

In terms of promulgating equality principles and revising immigrant legislations, AHRLIM has played a key role, collaborating with affiliated organizations (Hsia 2008, 199). Here, In the case of Taiwan, the role of AHRIM should not be neglected in terms of advocating Anti-discrimination principles. AHRLIM has purposefully adopted such as ICERD to develop a more comprehensive immigration policy (ibid., 198). AHRIM has triggered many human rights proclaiming demonstrations and has taken many opportunities to push for radicalizing multicultural values to set the public discourses on being more receptive of their rights (ibid., 200). Also, since the mid-1990s, feministic NGOs have strategically employed to incorporate gender streaming approach to domestic policy and institutions formulations (Chang 2018, 344). However, despite the attempt, current equality policy adopted by the state is criticized that current formulation of gender equality policies is lack of transversality, in that said to be conceptualizing gender, race, ethnicities as separate categories are not of real assistance to build interdimensional, inclusive policies (ibid, 345).

Taiwan's government has been applying agenda-setting positive actions to increase women's participation and eliminate discrimination by gender and race, specifically by a way of setting up quota systems and running social programs to promote gender sensitive principles (ibid., 347). However, still in the case of Taiwan, between the ministries including MoI, NIA, MoHW, and MoJ, there are not sufficient amount of good communication channels to design, implement, monitor, and evaluate the gender topics (ibid.). Therefore, inter-ministerial communication seems

to be limited and bound by a one-dimensional approach from heading organizations, the lack of communication and collaboration is shown in the slowing process of sharing crucial information and reflecting the idea on policy formulations (ibid., 348).

Moreover, the leadership of key ministries in charge of managing equality goals and institutions is highly bureaucratic, in which a high number of them are composed of junior bureaucratic, which have taken many other responsibilities in the organizations (ibid.). They have often taken the role with not sufficient knowledge and motivation in achieving equality principles, also this is problematic when there are no financial incentives for taking extra tasks more than meeting minimal requirement (ibid.). As trivial as it sounds, personnel from junior bureaucratic usually do not have a motivation to focus on one specific task and far from their interests to put it on active discourses, thus, Executive Yuan from the Taiwan government has tried to hire gender experts from academic fields and feministic activists from NGOs and civil society (ibid.). Moreover, the Gender Equality Committee of the Executive Yuan is founded by Executive Yuan to shape national and regional policies in a relation to gender equality and the rights of women (Lubin 2017). Therefore, there is a high need to employ and include professionals who can fully be committed and work on gender issues in each ministry to bring meaningful changes.

Hsia (2008) mentioned key organizations affiliated with AHRLIM to empower marriage migrants to promote the equality principles, that includes a wide range of public, civic, NGOs, regional networks and grassroots organizations, such as TransAsia Sisters Association in Taiwan (TASAT), Awakening Foundation, etc. (Hsia 2008, 208). The affiliated network was initiated and reinforced by AHRLIM and throughout consultation meetings (ibid.). It shows that in the case of Taiwan, the movement is relatively activated by public bodies through organization partnership, especially it is highly attributed to the existence of AHRLIM, which exclusively works for advocating the rights of migrants residing in Taiwan. Therefore, it confirms that as a leading public organization to protect the rights of migrants, it encourages positive actions throughout the partnership with other organizations by way of involving with many migrant issues (ibid., 198)

Education

In Taiwan, the term 'foreign brides' has been constructed by governmental policies, mass media, and public discourses especially those from mainland China and South-east Asia (Hsia 2008, 191). Alongside, there are substantial amounts of illustrations that portray 'the new Taiwan Children', the media reports the migrant children and children born from multicultural families as 'inferior others', constructing prejudice on their slow development on learning and adaption to Taiwanese school life (ibid.). However, immigrant rights advocacy organizations such as TASAT and NGOs have tried to create a better environment for married spouses and their multicultural

families, via films, poems, arts, paintings writings, forums, and other types of outlets and activities (Hsia 2008, 39). It significantly improved and subverted the prejudices on Asian women brides in the recent decade (ibid.). Prejudices that remain are deeply instilled in the idea that Asian women are generally lack of skills to properly educate their children, thus deteriorating next generation of Taiwan, even though these prejudices are backed up by unreliable data and evidence, it spreads quickly (ibid.). In the case of Taiwan, being more multiethnic in their local populations than other East Asian counterparts, including Korea and Japan, Taiwan initiated relatively earlier multicultural education and implementing policies of multiculturalism after the mid-1900s (Kim et al. 2012, 120). Thus, multiethnic and multicultural legislations, especially such as Taiwanese policy of Cultural Citizenship, are also firstly enacted among East Asian countries, at the beginning those are targeting local multiethnic groups such as Aborigines, *Hakkas* and *Hoklos* (ibid., 121), the policy formulation changes as Taiwan becomes an immigrant-receiving country in the late 1900s. it is noted that, thus, Taiwan's multicultural model faces two main crises to deal with discrimination on local ethnic populations and prejudice and unfair treatment on incoming new multicultural populations (ibid.). Besides, it is noteworthy that multicultural education is suggested to be parallel with the education of the domestic population and multicultural families.

To educate the Taiwanese nationals about multicultural ideas, the Taiwan state implemented an education policy to include South-east Asian languages in primary and junior school curriculums in 2014 (Chen 2018, 842). Besides, it has established a national coordinated system and empowerment plan, called Developing the Potential of New Residents: Further Empowerment of New Residents and Their Second-Generation Plan, throughout the project, the state aims to empower all three groups: Asian women brides, the children, and multicultural families, by providing internship opportunities, international activities, school grants and overseas program (ibid., 843). This is not the first time in Taiwan history, various funds have supported the education of migrant children and spouses, mainly targeting learning disadvantaged groups and rural students, largely subsidized through the Ministry of Education (MoE) and MoI (Ho 2012, 93). Also, the trajectory of the education goals has moved from recognizing the needs of migrant children and to utilize them as economic resources to potentially expand the South-east Asian market (ibid.,). However, the assimilation approach to their languages and multicultural education conducted in Taiwan do not fully recognize the mother tongue of migrant children as valuable as their dominant language (Chen 2018, 840-841).

Various multicultural education of Taiwan is mainly focused on two big dimensions: (1) Teaching foreign languages, and (2) Informing knowledge about South-east Asian countries (Chen 2018., 844). However, despite the implementation of language programs, still, Taiwan nationals

choose languages from developed countries, it is also mentioned that the lack of qualifications of South-east Asian language teachers and not sufficient training of educators and multicultural awareness (ibid., 843). Thus, the language programs are mainly targeting migrant children, not public pupils, also the curriculum has failed to attract Taiwanese students to be aware of the advantages of learning about the cultures, language, and history (ibid., 846). The programs are perceived as not as valuable as the cultural education programs from developed countries such as Japan and European countries. Thus, it is important to mention that Taiwan's multicultural education remains at the school-level and has not yet been expanded to all publics, including non-immigrant students.

From the Taiwan case, it is noteworthy that Taiwan has transitioned from recognizing their languages as a right, further to as an economic resource, however, still their language asset and cross-cultural background are largely neglected and secondary to other local languages.

5. Analysis

5.1 Access to Nationality

5.1.1 Eligibility

Both countries intend to smooth the naturalization process for the target group- a spouse of domestic nationals, in that both in recent decades made a great transition to accommodate to international standards and to face domestic fertility and family crisis. Also, derived from the immigrant legislation in both countries, it shows that high legal dependency on local spouses and tied to marital status, also the legal status of Asian women brides is more eligible when they stay in the marriage status, their agency is largely neglected besides. Moreover, in both cases, nationalism, sexism, patriarchy, and classism are strongly reflected in terms of granting citizenship, in the same vein, both countries grant birth rights based on *jus sanguinis* to their children and rely on the goodwill of male spouses and family-in-laws to support their naturalization. However, it is noted that, in Taiwan, children born on Taiwanese territory are also entitled to birthrights. It is noteworthy that bargaining power to gain access to nationality is not fairly fulfilled on the sides of women brides by local legislations. Derived from both cases, citizenship rights are fully entitled to the second generation born during the marriage. Furthermore, diverging approaches can be found in requirement and institutional trajectories in terms of residence period and prior absence to be allowed.

The Korean case implements more specialized eligibility for Asian women brides, also in general for marriage migrant groups, it shows that the state is more aware of integration issues stemming from CATM, it also tends to separate all migrant groups into categories to manage their stays, therefore Asian women brides largely belong to specific residency entitlement to gain naturalization- F-6 visa type, simple naturalization. However, the institutional priority of immigrant legislations is put onto protecting Korean nationals from fake marriages. Also, the required 2 year-period of residency is shorter and allows more flexibility than that of Taiwan that regulates 3 years of residency, however, the absence of residency period is more strictly prohibited, thus to reside consecutively in the country is strongly encouraged to be eligible for application. This seems to be more problematic, as before application, that makes family union very challenging, also difficult for the families to independently pursue education and employment, also the aspect exposes them to be vulnerable with their legal status to be stateless.

Regarding the Taiwanese case, the naturalization rate of Asian women brides is higher than that of Korean, while Taiwan states seek out national sovereignty from outside, it appears that non- Chinese groups are considered as naturalizable and therefore, more accessible to the

citizenship, but, Taiwan represents more comprehensive eligibility and roughly regulate the entitlement of women brides, that seemingly confuses the brides to be knowledgeable about their eligibility, that risks them to remain forever temporal residents in the territory.

5.1.2 Conditions for Acquisition

In Taiwan, the naturalization language requirement, naturalization integration requirement, and economic resources are also regulated to acquire the Nationality. It is said that the financial proof is the most difficult aspect of Asian women brides to independently acquire, even with the assistance of their male husbands, and also it was criticized that the amount to prove their sufficient living in both countries are unreasonably high, considered that the majority of local male spouses are working-class, it was stated that the financial requirement should be more relaxed, as a result, previously amendment was made on Taiwan case. Derived from both cases, it is noteworthy that the conditions are of no real assistance for integration of Asian women brides, as naturalization tests and language tests require them to only reach certain command of local languages, also both Korea and Taiwan provide no long-term integration programs and the majorities of them are subject to budget planning, that can be done one-time for a short period time. It was reported that marriage migrants still encounter difficulties to be integrated due to the lack of understanding of the language. Therefore, it is important to mention that the test of language and integration regulated to gauge their understanding of Korea and Taiwan do not provide good assistance for boosting their adaptability and integration before and after the application.

Whereas, in Korea, the state regulates them to pass Korean language test (TOPIK), integration program (KIIP), and naturalization test, and strongly encouraging the participation in the program. However, at the same time, it allows more substitutions to replace the naturalization test, granting them more flexibility for their choice in reaching the requirement. In Taiwan, the emphasis on language test is placed on taking the required hours of courses, it also allows an exemption for a divorced migrant to take a year-long course at all levels, it is more relaxed particularly for marriage migrant even compared to highly professionals (200 hours). An exemption applies to Asian women brides who face divorce with underage children (72 hours).

Both cases demonstrate that fulfilling the criteria of language and integration tests are slightly mitigating for marriage migrants compared to other migrant groups.

5.1.3 Security of Status

Concerning the dimension of security of legal status for Asian women brides, both country cases demonstrate that the nationality law strongly intersects with nationhood, family unit, and membership, this is more apparent in the cases of divorce and separation.

Both Korea and Taiwan case shows that naturalization procedures are complicated with its long duration of the procedure and involvement of many state agencies, in a total from arrival to gain citizenship, both take approximately 4 years. In the case of Korea, the application takes 10 to 20 months, in the meanwhile, in Taiwan, it can take up to 1 year, however, the duration differs and is usually shorter for those high-level professionals and investors. Also, both cases demonstrate that the legal security of the marriage migrants becomes subtle and risky in the face of separation and divorce, as they are exposed to be deported and more likely being deprived of custody rights before and after the application without marital status. It shows that, in the Korean case, it seems more severe, since male spouses can withdraw the application and end the marriage on themselves, considering that F6 visas are ought to be extended every three years, women migrants are very likely to be undocumented and remain at a status of short-term visas, or to having to stay in the origin country. In Taiwan, Nationality Law regulates that Asian women brides are required to submit "a certification of his/her loss of the previous nationality." This puts the brides in a precarious status to be stateless during the procedure. For both countries, the aforementioned aspects expose the migrant women to physical and verbal abuses without taking proper legal protections in a fear of being deported and being deprived of custody rights, also it confirms the lack of legal assistance provided at all levels, moreover, practically their language difficulties, not sufficient information and network disturb them to reach out to legal protection.

5.1.4 Dual Nationality

For both cases, holding dual nationality is being gradually allowed with high restrictions, and derived from the studies, it applies to three exceptional cases: those who cannot renounce due to the laws of their home country, secondly, those who have made extraordinary contributions to the target country, or those who are recognized by the government as highly skilled senior professionals, and lastly, spouses married to local nationals. The Korean government revised the law in 1997 and correspondingly in Taiwan in 2017, the modification was made, however, holding local nationality without giving up their original nationality is extremely difficult. Therefore, Asian women brides who mainly are housewives or work as a care service provider are not considered suitable for the entitlement and find themselves irrelevant to the modification. Even though two governments have strived for allowing more dual nationalities and improving the procedure, the rate of dual nationalities held overall is still very low. Also, the definition of "highly professional" and "exceptionally talented groups" are subtle and most of the marriage migrants find it difficult to figure out if they are qualified or not, also there are no unified criteria. However, in Korea, women brides are more likely to be granted dual nationality compared to Taiwan since

Taiwan still grants nationalities exclusively to foreign professionals. Considered that the Asian women's spouses are the ones who are at most need to acquire dual nationality in Taiwan, the provisions on dual nationality regulations are irrelevant and not useful to the brides.

The analysis results for Access to Nationality dimension are listed below.

Dimension: Access to Nationality		
Indicators	Korea	Taiwan
Eligibility	• At least two years of prerequisite residency while remaining married to a Korean national, or married to a Korean national for at least three years and have lived in Korea for at least one year • Period of prior absence is allowed with application up to three months, stricter absence period • Specialized naturalization and visa types • Prerequisite to acquire permanent residency • Required to secure a guarantee from Korean national spouse • <i>jus sanguinis</i> is applied to second generation, also to those born in Korea territory, are entitled to full citizenship rights	• At least three years (staying at least 183 days per year) of prerequisite residency while remaining married to a Taiwan national • Period of prior absence allowed with application, less stricter absence period than Korea • Not prerequisite to acquire permanent residency • One naturalization type • Required to acquire sponsorship from Taiwan national spouse • <i>jus sanguinis</i> is applied to second generation immigrants, however, also to those born in Taiwan territory, are entitled to full citizenship rights
Evaluation	Medium	Medium
Conditions for Acquisition	• Required to take a KIIP program (can be exempted from a naturalization test and Korean language test) • Having a financial asset that exceeds KRW₩ 30 million	• Required to submit the participation of courses more than 1 year (72 hours for who face divorce with underage children) • Required to pass a naturalization test

	(USD ⁶ \$27,598.90) or a proof of employment	Having a financial asset that exceeds 25 times to basic wage, at least NT\$462,552(USD \$16,523.36)
Evaluation	Low to Medium	Low to Medium
Security of Status	- Long procedure (in total 4 years) - Application procedure takes 10 to 20 months - The lack of legal protection - Being more exposed to the risk of being undocumented and to be deported	- Long procedure (in total 4 years) - Application procedure takes up to 1 year - The lack of legal protection - Being exposed to become stateless
Evaluation	Low	Low
Dual Nationality	Dual nationality is allowed with restrictions	- Dual nationality is allowed with high restrictions - Dual nationality is exclusively granted to the highly professionals
Evaluation	Low to Medium	Low

Table 5a: The Comparative Evaluation of the Dimension- Access to Nationality (Source: Author's design)

⁶ 1 USD\$=1087 KRW₩, 1 USD\$=30 NT\$ (exchange rate from 01.05, 2021)

5.2 Permanent Residence

5.2.1 Eligibility

In both countries, there is little difference on difficulties to gain between permanent residence and naturalization, thus, it is said that acquiring naturalization status brings more benefit to marriage migrants as it grants as same amounts of rights as Korean or Taiwan nationals. For other groups of migrants, it is considered that gaining country nationalities are unnecessary or bring lesser benefits compared to Asian women brides, especially migrant groups from relatively developed countries. It is because the precondition to maintain dual citizenship is challenging, that it is also very likely that they would have to relinquish their origin nationalities. Therefore, in Korea and Taiwan, the state has utilized policies on permanent residency to effectively select and integrate the professional migrants, however, it results in marginalized women brides who came through CATM, who are at the bottom of policy priority, as they are illustrated as bringing no economic benefits to the nations.

Regarding Korea, gaining permanent residency is a prerequisite to acquire naturalization, this allows Asian women brides to reside in the country on a short-term visa before the application of naturalization, also compared to other groups of migrants (5 years), Asian women brides are only required to live in the country for 2 years consecutively. Moreover, the permanent residence visas expand the eligibility to those vulnerable groups whose Korean national spouse is missing or dead, or for those who face the divorce or separation (male spouse is liable for it), and who raise the underage children born during the marriage. This significantly lifted the weights from women brides to live on continuously the extensions of short-term visas through studying, working, etc. After F-6 (Spouses of Korean Nationals) visa is newly introduced, the functions of F-5 (Permanent Residence) visa are of no use and replaced.

In alignment with the Korean case, the Taiwanese state also distinguishes permanent residence and naturalized citizens. It seems that, as a part of a national building project, immigrant legislations are largely relaxed for non-Chinese brides to be accessible to APRC. Granting citizenship is attributed to the political complexities of Taiwan, thus it is said that the experience varies across nationalities. Acquiring APRC remains a second option during the procedure or after denial of naturalization. To be eligible for permanent residency, applicants must have resided and held valid household registration in Taiwan for one year consecutively; for two years and more than 270 days per year; for five years and more than 183 days per year or more than ten years are eligible for applying the APRC, on the APRC status, women brides do not need to extend ARC every three years, which allows them to stay in the country. The Korean case has a more specialized visa and has expanded the eligibility to more groups of women brides, while in Taiwan,

the absence period is greater.

5.2.2 Conditions for Acquisition of Status

For both cases, conditions for acquisition include three elements: economic resource, criminal record, and good character. All marriage migrants are obliged to submitting sufficient economic resources, a clear criminal record, and proof that they can be good citizens of the countries. In terms of economic resources, Korea stipulates a more comprehensive standard on requiring proof of the income of the household, while Taiwan is allowing more options on the financial proof. To define the 'good character', during the examination, migrants are evaluated by various dimensions such as their occupation, education level, family background, etc. This suggests that the aspect of interpreting 'good character' is controversial, in terms of its subtlety of the term, thus, it is mentioned that it is subject to interpretations of governmental agencies or judicial decisions. Given the strong judicial inclination to its nationals in making decisions, it is suggested to specifically describe specific standards to subordinate laws.

5.2.3 Security of Status

The precarious legal status shows apparent in facing family dissolutions, resulting from the fact that in both Korea and Taiwan, the dimensions of 'Grounds for rejection, withdrawal, refusal, Personal circumstances considered before the expulsion, Expulsion precluded and Legal protection' are not so much considered on a humanitarian level compared to international standards.

As they are extending their permanent residency regularly (in Korea each year or three years, in Taiwan every two years), the scope of rejection is also more broadly defined than traditional immigrant countries. The aspects expose women, migrants, to the risks of being legally marginalized in both origin and receiving countries, which implies it is very likely that none of the social benefits are granted to Asian women brides which they need for raising their minor children and manage their living. It still demonstrates that, for their circumstance to be considered, the liability of male spouse and having children during the marriage matters before and after they are forcibly evicted. Accordingly, it shows that the two countries provide not sufficient legal supports in terms of repulsion and securing legal stays. Another problem also lies in the fact that the permanent residence does not grant long-term residency entitlement nor a guarantee to acquire nationalities. So that, women marriage migrants extend their visas every a few years in hope of gaining a naturalization status.

Besides, In Korea, the application procedure for F-5 visa types takes from one month to one year, and women brides are obliged to live in the country consecutively, or they can apply application for an exemption to stay abroad up to three months. In Taiwan, it is shorter, since it only takes 14 days to be processed, and in addition to that allows more days to stay aboard. Taiwan

state allows more than 183 days in a year for up to 2 years. It is mentioned that long absence can revoke their legal status in both countries and therefore, their absence is strictly counted, in this regard, Taiwan is more inclined to giving more rooms to Asian women brides for negotiating their choices and supporting their family union.

5.2.4 Rights Associated with Status

In Korea and Taiwan, the governments strictly distinguished short-term residents and naturalized citizens, as the latter group is fully granted citizenship rights and benefits, including political participation, running the business, investment, employment, education, social welfare assistance, child-care supports, family allowance, and pension rights. The studies examine that they are not able to access the afore-mentioned rights unless they are fully naturalized. Derived from it, being a permanent resident, they are granted the rights to freely work in the country, however, many women brides are reported to be bound by contracts and dependent on the employer's will to extend their residency. That interferes with the women brides from exercising their rights in the workplace and endure unfair treatments. Only naturalized citizens are given a right not to be deported from the country, and it is said that permanent residency provides no real assistance to freely reside in the country nor is facing marital dissolution, which prevents them from taking the proper action in securing custody rights from the male spouse. This applies more unfairly to Korean cases, in that, their legal status changes to F-1 (visiting and joining the family) which is restrictive on economic activities. Thus, it is important to mention that rights for permanent residents are partly provided and not applied in practice.

Moreover, Asian women brides face difficulties acquiring knowledge about rights attached to their legal status, also social workers on duty are not qualified and lack in understanding of managing their multicultural matters. Owing to that, despite their entitlement, their rights are partially recognized or mistaken by social workers and multicultural families, thus resulting in seeking out helps passively and unnoticed. Therefore, it confirms that the training of affiliated domestic workers and promotional policy should be implemented in alignment for them to practice their rights.

It is even worse with their not sufficient language skills, networks, weak legality, and legal dependency on their husbands. In both cases, the problems stemming from partial medical benefits and exclusion from public welfare assistance, especially a health care system is present. This shows more apparently in the case of Taiwan. Considering that majority of them raise their children in the host countries, it is strongly suggested to provide more child-care supports, parenting education, maternity benefits, and counseling services.

The analysis results for Permanent Residence dimension are listed below.

Dimension: Permanent Residence		
Indicators	Korea	Taiwan
Eligibility	• At least 2 years of residency consecutively • The period of absence is counted strictly • Required residency period should not include other purposes of stay	• At least 1 year of residency consecutively (two years and more than 270 days per year; for five years and more than 183 days per year, or more than ten years) • The period of absence is counted less strictly • Required residency period should not include other purposes of stay
Evaluation	Medium	High
Conditions for Acquisition	• Sufficient economic resource: More comprehensive • Clear criminal record • Subtle and unclear provisions on ‘good character’	• Sufficient economic resource: More substitutions are provided • Clear criminal record • Subtle and unclear provisions on ‘good character’
Evaluation	Medium	High
Security of Status	• Required to extend visa each year or every three year • Application takes one month to one year • Personal circumstances are not considered for repulsion • Grounds for rejection, withdrawal, refusal are not well-defined • Short absence period is allowed each year	• Required to extend visa every two year • Application takes for 14 days • Personal circumstances are not considered for repulsion • Grounds for rejection, withdrawal, refusal are not well-defined • Longer absence period is allowed each year with more flexibility • Not sufficient legal protection

	• Not sufficient legal protection	
Evaluation	Low	Low
Rights Associated with Status	• Entitled to work freely (employment status is less strictly regulated) • Partially entitled to public welfare assistance (less restricted to access health care system)	• Entitled to work freely (employment status is more strictly regulated) • Partially entitled to public welfare assistance (restricted to access health care system)
Evaluation	Low to Medium	Low

Table 5b: The Comparative Evaluation of the Dimension- Permanent Residence (Source: Author's design)

5.3 Anti-discrimination

5.3.1 Definition and Concepts

In Korea, it is noteworthy that, yet there is no anti-discrimination law in place, despite several suggestions made by international conventions for Korean governments to address the discrimination issues in Korea. With no one single unified standard on regulating discrimination, Korean nationals are not so knowledgeable about international principles to prevent racial prejudice against Asian women brides, especially the ones from South-east Asian countries. Only NHRCA plays an advisory role to comment on the discriminatory cases in Korea, however, it is not legally bounding. Therefore, it illuminates that there is no final and defined system for the Korean case to cover anti-discrimination. Also, it is important to mention that anti-discrimination provisions are roughly included in various domestic legislation to overwatch the dimensions.

In Taiwan, despite its controversies over whether international conventions are included in domestic laws, it shows that it has advanced in its progress to set the anti-discrimination standard. It is explicitly revealed in the Immigrant Act promulgated from the governmental agency, along with other separate anti-discrimination laws. NIA, Along with Southbound policy, Taiwan seems to be more proactive to promote migrant's rights and support their integration, also, that results in various attempts to incorporate international standards into immigrant legislations. Especially, since it has a long history to be compliance with advocating anti-discrimination rights based on ethnicities, as its multi-ethnic background with local minor populations (*Hoklo, Hakka, Waisheng ren* and aborigines) (Kim et al. 2011,1574). Moreover, many governmental institutions are aware of the existence of the provisions and have made progress to refer to international treaties.

Both country cases include anti-discrimination provisions on preventing discriminative treatment and protecting the rights of people living in Korea and Taiwan, irrespective of their nationality, race, class, place of birth and gender.

5.3.2 Enforcement Mechanisms

Derived from the two country cases, it is quite apparent that the enforcement mechanism is not so explicit and clearly articulated from the provisions, which results in Asian women brides to take proper legal action against the discriminatory treatment. Plus, arranging legal arrangements during and after and divorce, fighting for custody rights and unfair treatment in the workplace is difficult, given their legal legality, language, and financial difficulties. Also, it is noteworthy that legal protection and advisory service provided to women spouses in two countries often adopts an assimilative approach. Korean and Taiwanese governments have interpreted and made judicial decisions in a favour of their local nationals, especially to prevent sham marriage issues, so it implies that even though enforcement mechanism is in place, it is likely that enforcement bodies

and judiciary make unfair decisions, under their interpretations. It implies the discriminatory dimension based on nationality and gender on judicial mechanisms. Moreover, after going back to their home country, their legal status is precarious in both origin and receiving countries due to stigma imposed on them to be a returned migrant, a failed daughter, or a housewife. Therefore, it is important to mention that legal remedies from their sending countries are also significant.

In the Korean case, discriminatory treatment applies to judicial divorce. It is found in regulation that Korean national spouse can complete the divorce proceedings without the consent of women brides, also, they are responsible for proving the liability of male spouses, to get positive results from judicial decisions on custody and residency rights. It is also examined that proving liability is only on the side of the male spouse is nearly not possible, besides, the causes of divorces are subtle and not provable in many cases.

In the Taiwanese case, it regulates enforcement mechanisms on several domestic legislation, according to it, it describes a corresponding reporting and petition system. However, it is still not well noticed by Asian women brides and the general public, also largely being considered as common sense. Also, Taiwan states have planned out and overwatched their illegal stay and deportation rather than focusing on implementing protective measures. In facing the divorce and separation, the burden of proving the liability of male counterpart is heavily weighed, courts have made exceptional positive decisions on women spouses who were severely abused or filed a restraining order. It is still considered exceptional when law enforcement is strictly or well-applied as it is written.

5.3.3 Equality Policies

Derived from the previous investigation, both countries regulate equality principles and are included in various legislations. Because two countries possess relatively vague anti-discrimination provisions compared to international standards, it is said to be weak in judicial power and legal bounding. However, it also demonstrates that it expands boundaries to regulate fair treatment irrespective of marital status and pregnancy and maternity. In both cases, institutions are bureaucratic and tied to political interests, two-country differs in approaching the agenda on the women marriage migrants. Moreover, it shows that from both cases, it is important for organizations to be separate from political discourses and granting organizational autonomy to encourage advocacy and more active in inter-organizational communication.

In Korea, Gender and family affiliated organizations such as MoGEF and MoHW take charge of the tasks, while in Taiwan, it introduces public advocacy institution for migrants-AHRLM. With functions of the organization, Taiwan case is more active in organization partnership at all levels, having more interests in putting it on active public discourses to promote

the rights specifically of women migrants. Derived from the Taiwan case, the leadership of key public organizations that focus on migrant issues is of more help than imposing responsibilities on other ministries. It shows that approaching Asian women brides as a gender topic is less effective than as a migrant topic.

Both cases regulate fairly a similar amount of equality policies in dimensions of family and employment, however, it lacks the policies on acceptable behaviour policy, communication standards, and accessing information about diversity principles compared to other developed countries. Korean cases incorporate equality provisions into various legislations and are more specialized by a way of including gender impact assessment to monitor the effects on policy formulations and actual practice. while Taiwanese equality policies seem to be more explicitly articulated through the enactment of the Cultural Fundamental Act. Compared to the Korean case, it demonstrates more judicial power in encouraging positive actions and setting the principle for acceptable behaviours. Considering that, in both cases, the public are committing discrimination unlawfully, it is important to construct a separate principle and guidance to foster prevention.

5.3.4 Education

The dimension of education intends to highlight the education conducted on immigrant children and the local public (including school pupils). In both countries, multicultural education is neglected and at least state interest before the influx of migrants in the 2000s. The prejudice against the multicultural family is constructed by mass media and the governments to convey the idea that immigrant families are uneducated. Therefore, they are falsely portrayed as a mother incapable of properly upbringing their children. Two cases show the lack of understanding from the general public results in failing to recognize their language and cultural values. It strongly reinforces biases to see them as inferior others rather than as a citizen, we could confirm the vicious cycle when multicultural education is not provided from the cases. Several further policy suggestions are made to raise awareness of general multicultural understanding and reduce the difficulties migrant children face in school life and in learning.

Yet, the Taiwan case presents a relatively more specialized and proactive approach to multicultural education due to its multiethnic local background with the enactment of policy for Cultural Citizenship (such as Cultural Fundamental Act), but it tends to more focus on education for indigenous people as a priority group. While, Korean case focuses on running education and social integration program for children who has low academic achievement and face difficulty in adapting school life, Taiwan tends to pay more attention to learning disadvantaged groups and migrant children in a rural area.

There is also a discrepancy between the program content two provided, Taiwan provides South-east Asian language courses and cultural introduction programs and has transited its approach to utilizing foreign languages as an economic resource to expand the international market since the implementation of Southbound policy. Derived from this, it is safe to say that Taiwan developed a relatively better national coordinated system and empowerment plan, yet the problem mainly comes from failing to attract Taiwan nationals to be interested and appeal advantages of the education. It is often replaced by language and culture courses about developed countries. Therefore, it reports that course participants are mostly multicultural children. In Korea, it seems more challenging to run education programs despite its effort to promulgate the Supportive Act for Multicultural Families. The programs offered by multicultural centres are too comprehensive to cover individual needs and being more repetitive, also subject to governmental budget planning. It is criticized that multicultural education is not generally suggested to be included in the formal education curriculum so that it is very selective and rare to offer multicultural education programs to school pupils.

The analysis results for Anti-discrimination dimension are listed below.

Dimension: Anti-discrimination		
Indicators	Korea	Taiwan
Definitions and Concepts	• No separate anti-discrimination laws • International conventions are not applied • National Human Rights Commission Act (NHRCA) supports the implementation and plays an advisory role to discriminative cases	• Separate Anti-discrimination laws • International conventions are applied • Various governmental organizations at all levels including National Immigrant Agency (NIA) supports the implementation
Evaluation	Low	Medium
Enforcement Mechanism	• Procedure is not explicitly described • A huge burden on proving the liability of male spouse • Not sufficient protection against victimisation • Provided legal protection and counselling against victimisation on a state level but still not sufficient	• Procedure is roughly described • A huge burden on the proving the liability of male spouse • Not sufficient protection against victimisation • Not sufficient legal protection and counselling against victimisation
Evaluation	Low	Low
Equality Policies	• Regulated more broadly in definition and boundary across various legislations (positive actions legislations) • Lacks the policies on acceptable behaviour policy, communication standards and accessing	• Regulated moderately in definition and boundary across various legislations (positive actions legislations) • Lacks the policies on acceptable behaviour policy, communication standards and accessing information about diversity principles

	information about diversity principles • Specialized in regulating gender monitoring system • Weak in judicial power and legal bounding • Taken charge by gender and welfare-affiliated organizations • Bureaucratic and hierarchical public bodies	• Moderate in judicial power and legal bounding • Taken charge by immigrant-affiliated organizations • More active in organization partnership, weak in inter-organization communication • Bureaucratic and hierarchical public bodies
Evaluation	Low to Medium	Medium
Education	• To assist migrant children with low academic achievement and to adapt school-life • Selectively offered general multicultural education courses • The enactment of Supportive Act for Multicultural Families • Comprehensive education and social integration programs, not tailed to needs of multicultural families	• To assist migrant children with learning disadvantages and in rural area • Selectively offered South-east language and cultural introduction courses • The enactment of cultural citizenship policy (Cultural Fundamental Act) • Education and social integration programs to utilize multicultural family for economic resources (Taiwan focuses more on education for indigenous people)
Evaluation	Low	Low to Medium

Table 5c: The Comparative Evaluation of the Dimension- Anti- discrimination (Source: Author's design)

6. Discussions

6.1 Similarities and Differences in South Korea's and Taiwan's Approach

Having investigated Korea's and Taiwan's approach to in regulating the legal status of Asian women, brides, in addressing citizenship and integration, the implications of those results are stated as below.

As previous analysis has shown, there are a few similarities shared between two country cases, reinforced by assimilative integration policy on the foreign women brides. It is generally evaluated as 'low to medium' results spanning across three dimensions: Access to nationality, Permanent Residence, and Anti-discrimination. This is shown in *Eligibility*, *Security of Status* for the dimension of Access to Nationality, *Security of Status* for the dimension of Permanent Residence, and *Enforcement Mechanism* for the dimension of Anti-discrimination. the analysis highlights that the similarities are critical indicators to define and contribute to the legal liminality of migrants. It also shows that both countries implemented exclusionary, nationalistic, and male-centred regulations for Asian women brides to be eligible for being accepted as citizens. It should be noted that for both dimensions of access to nationality and permanent residence, weak security of status is mentioned. We can thus derive that both countries could not mitigate their precarious status through residency legislations. In alignment with this, this aspect is also reflected in enforcing anti-discrimination legislation as it is highly noted that awareness of multicultural families in Korea and Taiwan are not raised by the public. On top of this, two governments' tendency to not prioritize Asian women brides for a policy concern is noteworthy.

Other than the prementioned similarities, a large discrepancy between the two governmental approaches is examined. Taiwanese case demonstrates it has, in general, more relaxed, favourable, and well-defined legislations toward Asian women brides. The great gaps are specially identified for the dimension of Anti-discrimination, specifically in indicators such as *Definition and Concept*. It is the only dimension that demonstrates obvious advancement of Taiwan's legislation to regulate the unfair treatment of migrants, given that most of the criteria show no great differences.

6.2 Factors Accounting for Similarities and Differences

With both countries sharing some similarities in granting rights, entitlement, and restrictions by a way of regulating the legal status derived from the afore-mentioned criteria, it is notable that similarities and differences are fostered and explained in the following by the contributing factors.

6.2.1 The Elements Contributing to Unfair Treatment of Asian Women Brides

Derived from the overall assessment, various unfair treatments were found in many aspects of Asian women brides' marriage and life in Korea and Taiwan. There are various factors in common to explain the phenomenon.

First, their precarious legal status in leading up to permanent residence and naturalization is one of the biggest obstacles prevents them from enjoying stable marriage life and strive for a better standard of their living in Korea and Taiwan. Marriage migrants are defined as merely 'a spouse of local nationals' or 'a mother of children', which puts marriage migrants more vulnerable to discriminative acts, especially it prevents the women brides from taking proper measures against physical/verbal abuses (Lim 2019). The discriminative treatment is highlighted in how the bride is seen as a family member. With their legality being dependent on the Korean/Taiwanese male spouses, upon ending the marriage, they are typically deported as they are deemed as "not fit for citizenship or even further residence in the society" (Kim et al. 2017, 39). Moreover, in the process of divorce, it was strongly suggested that the right of the division of property and custody rights should consider their status as an immigrant spouse. For this reason, a special agreement was made to protect the interests of Asian women's brides, their children, and their families. (Choi 2010, 151-152).

Second, the Asian women brides and especially those who are in divorce and separation procedures, perceive discrimination both in sending and receiving countries, and experience transnational production of precarity (Kim et al. 2017, 41). The precarity constraints their life in both countries as individuals, women, mothers, as the divorce process and life after return are severely affected by the social, moral, and legal regulations from both sides of the countries (ibid., 39). As the enforcement system processing the divorce and separation prevents them from gaining stable work, residence and citizenship in both their country of origin – Korea, and Taiwan, this results in them being both a "resident alien" in the destination country and "returned migrant" or "failed wife/daughter" in their home country. (ibid.). This dimension prevents them from receiving fair treatment, as living as a full citizen in both countries because of the following stigma (ibid., Seong 2012; 145).

Third, their trap in 'precarious, low-waged, unskilled, semi-compliant, and unprotected jobs' contribute to their willingness to endure the unfair treatment at work (ibid., Seong 2012; 145). Facing language and economic difficulties in Korea and Taiwan, with little government supports are provided, there is a limited number of jobs they can apply for, and those are often shunned by the locals. Asian women brides in the care-service sector for example, are known for their 24/7 availability to work and their motivation for 24/7 service and their motivation for

enduring hardships at the workplaces (Seong 2012, 121-128). They are more likely to suffer from basic human rights violations including overtime work, intermediate exploitation by agencies, binding contracts abuses (Kang 2010, 290). Their compliance in difficult working conditions often leads to justifying the discrimination at work, which is sometimes in denial of basic human rights (Seong 2012, 121-128).

Fourth, the strict legal regulations and procedures are set up to protect Korean and Taiwanese national spouses, specifically from sham marriage stemming from CATM (Choi 2010, 146-147). In the case of Korean cases, the Korean government regulates that, if the marriage is invalidated by a false invitation or disguised marriage, the immigrant spouse may be forcibly deported under Article 46 of the Immigration Control Act. However, it is still not easy to prove that the marriage is fake, and their intention to start the marriage, therefore, is highly subjected to interpretation from the courts (ibid.). Marriage is a contractual act between equal parties but, in the case of CATM, it is very unlikely that an equal relationship would be built between 1) a male Korean or Taiwanese spouse who pays an intermediary fee to choose a spouse and 2) a person who wishes to marry to escape poverty. (Park 2014, 116-117). Besides, for the brokerage business of 'international marriage' to become a normal commercial activity, the importance of providing accurate information is often neglected (ibid.). However, the amount of information provided by international marriage brokers, who want to generate profits of brokerage fees is limited (ibid.). Furthermore, there are also cases of brokers providing false information or concealing facts from the information just to establish a successful marriage. or conceal or distort the contents of the information to establish marriage (ibid.). For these reasons, it is easy for Asian women brides to marry a person who is difficult to sustain a marriage life with, for instance, a person who suffers from alcoholism or mental sickness or is unemployed. He may also have a big age gap from the bride or be an international marriage addict (ibid.).

Therefore, having studied that, two country cases show that the similarities on unfair treatment Asian women brides receive are deeply rooted in the distinctive marriage trajectories of CATM, and reinforced by the stigmas, precarity of their legal status in residency and the labour market, which fosters their attitudes on enduring the discriminatory treatment to manage their living in the destination countries.

6.2.2 Approaching CATM and the Emergence of Brokerage Marriage Legislations

The discrepancies stem from two different political backgrounds on viewing the transnational marriage, especially the type of CATM. Korea states that CATM issue has given more attention compared to the Taiwan case, as it is been more systematically constructed and

emerges through. It also indicates that more agents and stakeholders have been active in Korea, consisting of a significant number of migrant marriages, hosting spouses and their relatives, marriage brokers, states, service providers, and organizations campaigning for immigrant rights. In the system, their interests are more entangled with interactions between actors, thus triggering more discussions on assessing the cost & benefits of the marriage from each agent. This stimulates more emergence of norms and institutions on regulating CATM in Korea. The policy concern is clearly shown in the promulgation of corresponding legislations, such as 'Law to Regulate Marriage Agencies' and the implementation of 'Grand plan' for Asian women brides (Lee 2008, 113). Previous studies have demonstrated that this partly results from the fact that the Korean government has been proactive in solving the family and fertility crisis, especially in rural areas (Lu 2005; Song 2015), which is closely related to the state's interest.

On the other hand, Taiwan's brokered marriage migration has included more diverse groups who are genuinely attracted to the marriage itself. Also, the agents interact and negotiate their interests less systemically, which has led to a reduced interest from the state in regulating CATM. Marriage brokers in Taiwan are more likely to advertise personally and matchmake within their social network in exchange for gifts and introduce the marriage within their social network in an exchange for gifts. Having investigated that, it corresponds with Taiwan's move to strengthen ties with south-east countries, especially after Southbound policy has implemented as the migrants started to be viewed as economic resources that could potentially assist the state to expand the South-east market (Chen 2018, 847). Also, the political circumstance in Taiwan manifests differently with its complex cross-strait relation with mainland China. It has adopted a political strategy to appealing its independence to the international system by being more compliant with international standards and foster an image of promoting a democratic regime (Hsia 2008, 198). Under such circumstances, South-east Asian women brides are viewed as no immediate threat to the legal existence of Taiwan and therefore, the discourse on Asian women brides tend to be more included in general migrant issues. (Cheng 2017, 439). This makes the Taiwan government more relaxed about promulgating separate institutions for the women brides who came with the CATM system (Lu 2005, 283).

6.2.3 Assimilative Integration Approach to Marriage Migrants and Multicultural Family

Having studied both country cases, In the study of both cases, there is an observed assimilative approach to integrate immigrant spouses and their families. It is demonstrated through various dimensions from the assessment. It contributes to the similarities two countries share to determine the legal status of Asian women brides. We could identify a strong state tendency to

welcome highly skilled migrant groups who are beneficial to national development, even though holding citizenship is more needed and attractive to Asian women brides at precarious legal status (Bauböck 2006, 62). Considering the approach to examine citizenship as members of the state, both countries strictly restrict the 'twin loyalty' coming from holding dual citizenship, thus acquiring secure legal status is rather a 'privilege' than a right (Bauböck 2006, 59). Still, in both countries, migrants are prejudiced as a threat to security concern and deteriorating quality of the host populations, this contention is further applied to the governance of the East Asian model for integration and multiculturalism (Kim et al. 2011, 1574-1576).

It is pointed out from the study that the concepts of multiculturalism are not articulated or neglected by policymakers, the state, and the public (ibid.). It reveals from the criteria that the goal of the assimilative approach adopted by Korea and Taiwan is to subsume its minor culture into that of the host society. Also, across all dimensions, the preparationist approach to deporting and control unqualified migrants are apparent, in the case of the marriage migrants, the most significant qualifications to be considered by the states are 'marital status' and 'raising children born from the marriage with hosting spouse' (ibid.). It violates the domestic and international provisions on promoting equality and diversity in that dignity should be respected regardless. The underlying approach to integrating the marriage migrants and their family therefore cannot be identified as multicultural. Given that integration is not the linear procedure that can be accomplished in one day by a few legislations, it is deemed as important to watch over the role of the promoting legal status and its interaction with other factors (Reitz 2016).

The approaches to residency legislation are found in the following table.

Policy dimensions	Korea	Taiwan
Residency Policies	Assimilationist or preparationist	Assimilationist or preparationist
Anti-discrimination legislations	None or preparationist	None or preparationist
Education	Assimilationist or preparationist	Passive multicultural

Table 6: The Comparative Evaluation of the Pre-mentioned Dimensions (Source: Kim et al. 2011, 1575; Author's design)

Derived from the investigation, it is significant for the states to incorporate suggested international principles on diversity and equality, for the own sake of its social and economic development. Also, even though it is not a good option for East Asian countries to mirror the pre-

existing western model of multiculturalism, what has been found in other developed countries from the West is not taken for granted in East Asia, regarding supporting the settlement of the migrants and their family union (Seol et al. 2009, 582).

6.2.4 Towards the Promoting Legal Status of Asian Women Brides, Integration and Citizenship

From the theoretical part to explain citizenship and legal status, we could derive that two concepts are interactively shaping and contributing to each other at all levels of migrant settlement and integration. Additionally, immigrant issues have emerged as a significant public discourse as it has gotten more attention after the 2000s in both countries, having examined from the analysis that, accordingly Korea and Taiwan significantly lifted the restrictions on legislations imposed on marriage migrants, especially toward Asian women brides, several movements were made to advocate their rights to reside in the host countries (Hsia 2008; Song 2015). To take one good example, in both countries, the amendments were accordingly made on regulating dual citizenship and financial requirement in acquiring residency rights (Sheu 2007, 191). However, Taiwan's progress on putting the immigrant agenda on public discourse is still noteworthy, compared to the Korean case. This is greatly attributed to Taiwan's public immigrant rights advocacy organization-AHRIM, as it was successful in reinforcing partnerships between inter-ministries, private organizations, NGOs and grassroots organizations. While it is still disputable if all aspects of public and private partnership are desirable, the absence of supranational immigrant rights organizations to set the norms on integration and to push forward family reunion is a contributing factor to shape the discouraging similarity (Seol et al. 2009, 580).

The prementioned assessment on criteria demonstrates that, despite the attempts, it has not improved the legal liminality of Asian women brides and transnational marital stability. This aspect is reflected in low assessment results from the *Security of Status*. Also, having said that, from both cases, the weak bargaining power is reinforced in the face of marital dissolutions in both country cases, especially in facing divorce and separation, it is largely attributed to the fear of state on the sham marriages would be prevalent. However, it is not well examined that the state concerns defining their presences.

6.2.5 Fighting Discrimination, Prejudices and Building Next Generations

Having investigated two cases, the great divergence on the Anti-discrimination dimension is largely attributed to Taiwan's long history of managing its heterogeneous ethnicities, and a tendency to being more aware of immigrant agendas than Korea. Lastly, the Korean case shows that it is still at an early stage of accommodating international standards in terms of setting anti-discriminatory principles.

It is shown in the indicator of *Definition and Concepts*, Taiwan legislative bodies define discriminatory behaviors more sophisticatedly than Korean cases on what is acceptable or non-acceptable. In both countries, the women spouses are strongly imaged as an uneducated mother and stigmatized as wives/daughter married for a financial benefit in rich countries: these are expressed in terms such as “commoditized female” and “money marriage” (Han 2017, 49; Hsia 2009, 29-30; Chen 2018). In Korea and Taiwan, despite existing anti-discrimination provisions promulgated across various legislations, while it is criticized as partial, incomplete, the lack of transversality dimensions: (Chien 2018, 348). In the Korean case, it proves to be more challenging to include international standards and enact separate anti-discrimination legislation, as the governments and industries are reluctant to bring about new changes in the legislations, the aspect is explained by Han (2017), “They are unwilling to take the reformation of relevant laws in connection with the required anti-racial discrimination law (p. 52)”. Interestingly, the two countries' slowing movement to add anti-discriminative contents is strongly related to national anxiety and a false image of multiculturalism, which goes against the other parts of the world (ibid., 54, 57). The biased images on migrants are also constructed by government agencies, alongside media and publics, reinforced by the insufficient and assimilationist multicultural education provided to local populations (Hsia 2009, 29-30, Kim et al. 2015, 111). It is often found in East Asia, where concepts of equality and ethnic or cultural diversity are ignored or suppressed by the majority hosting group (ibid.,). Both Korea and Taiwan's case show that it is noteworthy to further investigate the role which mass media and education plays in propagandizing in propagandizing the biased views on Asian women brides in both countries.

Besides, the importance of multicultural education provided to second-generation children and the public is pointed out from the assessment. According to Kang (2010), 'Multicultural education is arguably the best answer to the educational problems of children not belonging to the majority cultural group' (p. 292). Having said that, two countries have taken similar steps in paying more attention to multicultural education due to the increasing number of cross-border marriages (Kennedy et al. 2018, 805). Given the marriage migration trends in both countries, school integration programs and assistance are suggested not to be one-time or be carried out in more flexible formats, tailing to individual needs of the children. This voice also corresponds to the ILO pillars of integration policy (ILO 2000; Kang 2010; Chen 2018). For this aspect, both cases share similarities in only providing short-term and not considering the individual needs of immigrant women, which could be deemed as not worthy of assistance.

Meanwhile, Taiwan provides multicultural education in a more specialized fashion to accommodate to South-east Asia region, revitalizing the foreign languages and culture in the host

society, while Korea seems to adopt more tools to fill their learning deficiency and encouraging social participation (ibid.). In this sense, Taiwan has progressed more in terms of recognizing the values of Asian women brides and view their mother tongue language as a resource' than that of Korean approach on language as 'a right' (Kang 2010, 293; Chen 2018, 842).

The discrepancy in approaching multicultural education lies in two different political trajectories. In Korea, the movement toward multicultural education is seen as a part of the “post-colonialism” and “de-colonialism” regime in the Korean context, as the education is getting exploited to overcome the colonized thinking as a ‘developed’ and ‘third country’ in the way of coping with multicultural concepts (Kang 2010, 289). It is noteworthy that multicultural education conducted in Korea is deemed as being more a part of the process to de-colonize the thinking of the publics in the nation (ibid.). On the other hand, Hsia (2008) mentioned that during the transitions of Taiwan administrations between KMT and DPP, the rhetoric such as human rights, multiculturalism, and democracy are radically promoted by the political parties to gain power and portray the image of its governance as being more “democratic and progressive”, as well as in a way of proclaiming its state independence in the world system (p. 198).

However, it should be noted that two political scenarios on immigrant agenda manifest on a level of political discourse, and the concept of multiculturalism is highly contested in political space. (Hsia 2016, 143). This is reflected on the education provided to multicultural families and publics that, it takes different views and approaches to truly implement multicultural education, the education should serve to transform the perspective on marriage migrants, their children, multicultural family and their relationship with the hosting populations (ibid., 146-147).

7. Conclusions

This thesis has conducted a comparative analysis of similarities and differences of integration policy and citizenship by way of investigating the legal status of Asian women brides in Korea and Taiwan. Especially it focuses on those who play social reproduction roles in a household and labour market, based on its relevance of discourses on marriage migration in East Asia. At first, the introduction provides a general overview of its relevance of marriage and gendered migration in East Asia, discussed the marriage migrants in Korea and Taiwan, and briefly addressed current contentions of integration issues, it specifically investigated components of Asian women brides in two country cases, it noted the women spouses come from relatively developing countries, mainly from South-east Asia, it made a great relation to the explanation on trajectories of CATM. In the theoretical part, it progressed to study followingly on three interactive concepts: Integration, citizenship, and legal status, and made assessment on various scholars' view on its relevance to immigrant issues, on top of that, their highly gendered and racialized roles taken by the women brides is pointed out. Alongside, it has briefly introduced international standards set by ILO, to give a glimpse of universal principles.

Having illustrated the indicators and criteria derived from the Migration Integration Policy Index (MIPEX) which are created by a collaboration of various international immigrant organizations, with aims to compare similarities and differences of legal status to promote and restrict their integration and citizenship.

As the analysis results have shown, two-country cases illuminate some shared similarities, but apart from those, most of the criteria highlight seemingly great divergences in exploiting policies on integrating women migrants. The differences are explained by some elements, based on different political scenarios and background, in which Korean case shows that it has been more involved with adopted approaches to handle integration issues to solve its demographic changes and fertility crisis, therefore it exploits more protective regulations to control the legal status of the migrants, to minimize the social security issue derived from it. While, Taiwan has made its precedent progress to manage diversity with their local ethnic populations and has been more politically proactive in resolving the integration issues through a public immigrant rights advocacy organization, and compared to the Korean case, the interests of CATM are less complicatedly entangled. The assessment also illuminates that Korea has applied more Confucius, male-centric, and stronger gender norms in implementing and interpreting the immigrant legislations, also have shown seemingly more reluctant attitudes on amending the provisions according to the international standards.

Mutual similarities between the two countries are laid on its strong Assimilationist approach to address multiculturalism and their inclination to conduct a relatively comprehensive and incomplete multicultural education provided to both host nationals and children of the migrants. It is found that, in both countries, strong prejudices are reinforced by the precarious legal status of the migrants, media, and governance of the countries. In that, the principles of equality are not instilled into the affiliated legislations and well-practiced, and also enforcement mechanisms are not explicitly articulated. On the other hand, it is notable from both country cases that Asian women spouses are subject to live on continuous extensions of short-term residence permits, rejection, withdrawal of citizenship, deportation, and legal dependency on local nationals, while their legal liminality shows more apparent in the face of the dissolution of marital status. Both country cases show that Asian women brides are unfairly treated for many aspects of their life, and the prementioned points and distinctive characteristics of the CATM are contributing to it.

The discussions were previously made on the relationship between integration, citizenship, and legal status, as it shows that all three terms are flexible and open-ended concepts that are interactive at influencing each other at all levels. While this thesis has focused on rather measurable and formal aspects of integration and citizenship, that can be described as a legal status. Having investigated that, integration cannot be accomplished by a few legislations, nor simply by extensions of rights, nor can be completed by residency legislations such as prementioned criteria- Access to Nationality and Permanent Residence. Furthermore, it is important to mention that, integration does not fully define immigrant success, however, it is still relevant to the case of Asian women brides, as their personal, economic, social, cultural, and legal belongings are very limited in the spaces of Korea and Taiwan, thus, negotiating their membership is foremost to manage their life in the destination countries, accordingly highlights the needs to carry out reflective policy formulations and professional approaches to address the integration issues. However, the limitation of this thesis lies in its limited focus on their caring services providing roles in the labour market in both countries.

Two further research recommendations can be notably made, firstly, on the role of mass media in propagandizing prejudices on immigrants and its reverse role to broadcast multicultural ideas through various outlets in East Asia, and secondly, on the application of international conventions and multilateral treaty to domestic legislation in East Asia, as well as its mechanism to promote the immigrant rights and diversity. It is also noted that the failure of international organizations to take leading roles to set unified principles and norms in East Asia, that goes against the cases of other developed countries in the West. In sum, the integration, citizenship,

and legal status of Asian women brides should be approached in a way of providing them practical and actual resistances beyond the different political contentions on the concepts and nationalistic perspectives on defining their presences.

Reference

- Amilhat Szary, Anne-Laure. 2017. "Boundaries and Borders" In *The Wiley Blackwell Companion to Political Geography*, edited by John Agnew, Virginie Mamadouh, Anna J. Secor, and Joanne Sharp, 13-25. Hoboken: John Wiley & Sons.
- Amnesty International. n.d. "Everything You Need to Know About Human Rights in Taiwan." Accessed January 9, 2021.
<https://www.amnesty.org/en/countries/asia-and-the-pacific/taiwan/report-taiwan/>.
- Bachmeier, James D., Jennifer Van Hook, and Frank D. Bean. 2014. "Can We Measure Immigrants' Legal Status? Lessons from Two U.S. Surveys." *International Migration Review* 48, no. 2: 538-566. doi:10.1111/imre.12059.
- Banting, Keith, and Will Kymlicka. 2013. "Is there really a retreat from multiculturalism policies? New evidence from the multiculturalism policy index." *Comparative European Politics* 11, no. 5: 577-598. doi:10.1057/cep.2013.12.
- Bélanger, Danièle, and Andrea Flynn. 2018. "Gender and Migration: Evidence from Transnational Marriage Migration." *International Handbook on Gender and Demographic Processes*: 183-201. doi:10.1007/978-94-024-1290-1_13.
- Bélanger, Danièle, Hye-Kyung Lee, and Hong-Zen Wang. 2010. "Ethnic diversity and statistics in East Asia: 'foreign brides' surveys in Taiwan and South Korea." *Ethnic and Racial Studies* 33, no. 6: 1108-1130. doi:10.1080/01419870903427507.
- Bloemraad, Irene, Anna Korteweg, and Gökçe Yurdakul. 2008. "Citizenship and Immigration: Multiculturalism, Assimilation, and Challenges to the Nation-State." *Annual Review of Sociology* 34, no. 1: 153-179. doi:10.1146/annurev.soc.34.040507.134608.
- Böcker, Anita, and Tineke Strik. 2011. "Language and Knowledge Tests for Permanent Residence Rights: Help or Hindrance for Integration?" *European Journal of Migration and Law* 13, no. 2: 157-184. doi:10.1163/157181611x571268.
- Castles, Stephen, Hein D. Haas, and Mark J. Miller. 2013. *The Age of Migration: International Population Movements in the Modern World*. London: Macmillan International Higher Education.
- Central News Agency. 2016. "Taiwan eases rules on naturalization of foreign spouses." *Taiwan Times*, December 10, 2016. Accessed January 8, 2021.
<https://www.taiwannews.com.tw/en/news/3048627>.
- Chang, Hsin-Chieh. 2014. "Transnational Marriage, Gendered Migration, and the Wellbeing of Asian Women Migrants: A Mixed-Methods Comparative Study of Taiwan and South Korea." Ph.D. diss., The University of California.
- Chang, Hsin-Chieh. 2017. "A two-step social integration model for transnational marriage migrants in Taiwan and South Korea." *International Marriages and Marital Citizenship*: 176-195. doi:10.4324/9781315446363-10.
- Chang, Hsin-Chieh. 2019. "Do gender systems in the origin and destination societies affect immigrant integration? Vietnamese marriage migrants in Taiwan and South Korea." *Journal of Ethnic and Migration Studies*: 1-19. doi:10.1080/1369183x.2019.1585014.
- Chang, Doris T. 2018. "Gender Mainstreaming and Gender Policies in Contemporary Taiwan." *Journal of International Women's Studies* 19, no. 6 (Summer): 344-358.

- Chen, Chao-ju. 2009. "Gendered Borders: The Historical Formation of Women's Nationality under Law in Taiwan." *positions: east asia cultures critique* 17, no. 2: 289-314. doi:10.1215/10679847-2009-003.
- Chen, Jian-Jhou, and Jeng Liu. 2017. "Under-Valued Human Capital? Returns to Education of Immigrant Foreign Brides in Taiwan." *Journal of Comparative Family Studies* 48, no. 4: 349-363. doi:10.3138/jcfs.48.4.349.
- Chen, I-ru D. 2016. "The Changing Policy Discourse and the Implication of Multicultural Education in Taiwan in the 21st Century: Education for new immigrant children and beyond" In *Educating Marginalized Communities in East and Southeast Asia: State, civil society and NGO partnerships*. Oxfordshire: Taylor & Francis.
- Chen, Yu-Hua. "The Growing Complexity and Diversity of Taiwanese Families." *Taiwan Insight*, September 9, 2020. Accessed January 3, 2021.
<https://taiwaninsight.org/2020/09/09/the-growing-complexity-and-diversity-of-taiwanese-families/>.
- Cheng, Isabelle. 2013. "Making foreign women the mother of our nation: the exclusion and assimilation of immigrant women in Taiwan." *Asian Ethnicity* 14, no. 2: 157-179. doi:10.1080/14631369.2012.759749.
- Cheng, Isabella. 2014. "Making the National Community Congruent with the State: The Role of Immigration Legislation in the National-building of Taiwan" In *The Immigration Societies: Taiwan and Beyond*, edited by Astrid Lipinsky, 75-103. Münster: LIT Verlag.
- Cheng, Isabelle. 2017. "Reality or pretense? Renouncing nationality and organized hypocrisy of the sovereignty of Taiwan." *Asian and Pacific Migration Journal* 26, no. 4: 436-458. doi:10.1177/0117196817746429.
- Cheng, Isabelle. 2020. "We want productive workers, not fertile women: The expediency of employing Southeast Asian caregivers in Taiwan." *Asia Pacific Viewpoint* 61, no. 3: 453-465. doi:10.1111/apv.12275.
- Chen, Yu-Hua. "The Growing Complexity and Diversity of Taiwanese Families." *Taiwan Insight*, September 9, 2020. Accessed December 1, 2020.
<https://taiwaninsight.org/2020/09/09/the-growing-complexity-and-diversity-of-taiwanese-families/>.
- Chiu, Kuei-fen. 2014. "Migration to and from Taiwan" In *the Migration to and from Taiwan*, edited by Chiu Kuei-Fen, Dafydd Fell, and Lin Ping. London and New York: Routledge, 2014.
- Cho, Seok-Ju, and Ji-young Park. 2012. "Improvement Plan on Policies for Immigrants of Local Autonomous Bodies for the Settlement of Multi-cultural Communities." *Research Report* 30, no. 460.
- Coussey, Mary. 2000. *A Framework of integration policies*, 1-49. Germany: Council of Europe.
- Cho, Se-Hyun. "The Power of the Ideology of Gender Equality and the Limitations of State Bureaucracy: Paradoxes in the Institutionalization of Gender Equality Policies in South Korea." PhD diss., University of California, 2010.
- Choe, Hyun. 최현. 2010. "dae-han-min-gug-ui gug-jeog je-do-ui gae-seon bang-an mo-saeg yeong-ju-gwon-jeon-chi-ju-ui-leul jung-sim-eu-lo 대한민국의 국적 제도의 개선 방안 모색 영주권 전치주의를 중심으로 [Searching for Alternative Nationality Policy Supplemented by

- Permanent Residency]." *min-ju-ju-ui-wa in-gwon 민주주의와 인권*[Journal of Democracy and Human Rights]10, no. 2 (Summer): 221-261.
- Choi, Bong-Kyung. 최봉경. 2010. "gug-je-i-ju-yeo-seong-ui beob-jeog mun-je-e gwan-han so-go 국제이주여성의 법적 문제에 관한 소고 [About the legal problems surrounding immigrant women through international marriage]." *seo-ul-dae-hag-gyo beob-hag 서울대학교 법학* [Seoul Law Journal] 51, no. 2 (Spring): 131-162.
- Choi, Yool, Doo-Sub Kim, and Jung-Kyung Ryu. 2019. "Marital dissolution of transnational couples in South Korea." *Journal of Ethnic and Migration Studies* 46, no. 14: 3014-3039. doi:10.1080/1369183x.2019.1585021.
- Chung, Erin A. 2019. "Creating hierarchies of noncitizens: race, gender, and visa categories in South Korea." *Journal of Ethnic and Migration Studies* 46, no. 12: 2497-2514. doi:10.1080/1369183x.2018.1561061.
- Chung, Grace H., and Ji-Young Lim. 2016. "Marriage Immigrant Mothers' Experience of Perceived Discrimination, Maternal Depression, Parenting Behaviors, and Adolescent Psychological Adjustment Among Multicultural Families in South Korea." *Journal of Child and Family Studies* 25, no. 9 :2894-2903. doi:10.1007/s10826-016-0445-2.
- Contreras, Ricardo, and David Griffith. 2012. "Managing Migration, Managing Motherhood: The Moral Economy of Gendered Migration." *International Migration* 50, no. 4: 51-66. doi:10.1111/j.1468-2435.2012.00771.x.
- Dobrowolsky, Alexandra, and Evangelia Tastsoglou. 2013. "Crossing Boundaries and Making Connections." In *Women, Migration and Citizenship: Making Local, National and Transnational Connections*, edited by Alexandra Dobrowolsky and Evangelia Tastsoglou. Surrey: Ashgate Publishing.
- Drillsma, Ryan.2018. "Taiwan new immigrants propose anti-discrimination laws." *Taiwan News*, November 9, 2018. Accessed December 1, 2020. <https://www.taiwannews.com.tw/en/news/3571468>.
- Duffy,Mignon, and Randy Albelda, Clare Hammonds. 2013. "Counting Care Work: The Empirical and Policy Applications of Care Theory." *Social Problems* 60, no. 2:145-167. doi:10.1525/sp.2013.60.2.145.
- Dunbar, Jon. 2019. "Renewing F-5 'permanent' resident visas." *The Korea Times*, September 10, 2019. Accessed December 4, 2020. https://www.koreatimes.co.kr/www/nation/2020/03/113_275397.html.
- Eizaguirre, Santiago, Marc Pradel-Miquel, and Marisol García. 2019."Citizenship practices and democratic governance: 'Barcelona en Comú' as an urban citizenship confluence promoting a new policy agenda." *Changing Landscapes of Urban Citizenship*: 47-61. doi:10.4324/9781351121316-4.
- Ennsner-Kananen, Johanna, and Nicole Pettitt. 2017."“I want to speak like the other people”: Second language learning as a virtuous spiral for migrant women?" *International Review of Education* 63, no. 4: 583-604. doi:10.1007/s11159-017-9653-2.
- Everington, Keoni. 2018. "Only 0.008% of foreigners in Taiwan granted dual citizenship over 2 years." *Taiwan News*, December 20, 2018. Accessed December 2, 2020. <https://www.taiwannews.com.tw/en/news/3600798>.

- Everington, Keoni. "Taiwanese citizenship process simplified for foreigners with 'Plum Blossom' APRC." *Taiwan News*, October 2, 2018. Accessed December 4, 2020. <https://www.taiwannews.com.tw/en/news/3543129>.
- Friedman, Sara L. 2010. "Marital Immigration and Graduated Citizenship: Post-Naturalization Restrictions on Mainland Chinese Spouses in Taiwan." *Pacific Affairs* 83, no. 1: 73-93. doi:10.5509/201083173.
- Goodman, Sara W. 2011. "Measurement and Interpretation Issues in Civic Integration Studies: A Rejoinder." *Journal of Ethnic and Migration Studies* 38, no. 1: 173-186. doi:10.1080/1369183x.2012.640028.
- Government 24. n.d. "Marriage Migrant, International marriage guide program." *Services for Foreigners |Government 24*. Accessed December 11, 2020. <https://www.gov.kr/portal/foreigner/en/m030101>.
- Guild, Elspeth, Steve Peers, and Jonathan Tomkin. 2014. "Right of Permanent Residence Section I—Eligibility." In *The EU Citizenship Directive: A Commentary*, 187-228. Oxford: OUP Oxford.
- Han, Gil-Soo. 2015. "A struggle to legislate anti-racial discrimination law in Korea A dissident grassroots' perspective." In *Nouveau-riche Nationalism and Multiculturalism in Korea: A media narrative analysis*, 46-66. London: Routledge.
- Harder, Niklas, Lucila Figueroa, Rachel M. Gillum, Dominik Hangartner, David D. Laitin, and Jens Hainmueller. 2018. "Multidimensional measure of immigrant integration." *Proceedings of the National Academy of Sciences* 115, no. 45 (Winter): 11483-11488. doi:10.1073/pnas.1808793115.
- Helbling, Marc. 2011. *Validating citizenship indicators*. Berlin: Social Science Research Center Berlin (WZB).
- Ho, Hsin-Jui. 2012. "A Comparative Analysis on Education Policies for children of Migrants in Taiwan." PhD diss., University of Exeter.
- Hsia, Hsiao-Chuan. 2008. "The Development of Immigrant Movement in Taiwan: The Case of Alliance in Human Rights Legislation for Immigrants and Migrant." *Development and Society* 37, no. 2 (Winter): 187-217.
- Hsia, Hsiao-Chuan. 2009. "Foreign Brides, Multiple Citizenship and the Immigrant Movement in Taiwan." *Asian and Pacific Migration Journal* 18, no. 1: 17-46. doi:10.1177/011719680901800102.
- Hsia, Hsiao-Chuan. 2019. "TransAsia Sisters Association, Taiwan (TASAT)." *Journal of Asian American Studies* 22, no. 1: 103-112. doi:10.1353/jaas.2019.0009.
- Hsieh, Milho. "As Taiwan Develops, can Racism and Discrimination be Avoided?" *Taiwan Insight*, August 31, 2020. Accessed December 4, 2020. <https://taiwaninsight.org/2020/08/31/as-taiwan-develops-can-racism-and-discrimination-be-avoided/>.
- Huddleston, Thomas, Özge Bilgili, Anne-Linde Joki, and Zvezda Vankova. 2015 [1]. *Migration Integration Policy Index*. MIPEX, 3-222.
- Huddleston, Thomas, and Elena Sánchez-Montijano. 2015 [2]. *Integration Policies: Who benefits? The development and use of indicators in integration debates*. Policy Brief. MIPEX, 1-5.

- Hutcheson, Derek, and Kristen Jeffers. 2012. *Citizenship Status and the Integration of Immigrants: CITINT Indicators*, 1-57. Dublin: University College Dublin.
- Hugo, Graeme. 2005. "International Migration in the Asia-Pacific Region: Emerging Trends and Issues." *International Migration*: 77-103. doi:10.1093/0199269009.003.0005.
- Hwang, Min-Chul. 2015. "Exploring marriage migrants' citizenship acquisition in South Korea." *Asian and Pacific Migration Journal* 24, no. 3: 376-402. doi:10.1177/0117196815596291.
- Iikkanen, Päivi. 2019. "Migrant women, work, and investment in language learning: Two success stories." *Applied Linguistics Review* 0, no. 0. doi:10.1515/applirev-2019-0052.
- Itzigsohn, José. 2017. "Migrant organizations, transnationalism, and incorporation." *Ethnic and Racial Studies* 40, no. 3: 466-472. doi:10.1080/01419870.2017.1249493.
- Iwabuchi, Koichi, Hyun-Mee. Kim, and Hsiao-Chuan Hsia. 2016. *Multiculturalism in East Asia: A Transnational Exploration of Japan, South Korea and Taiwan*. Lanham: Rowman & Littlefield.
- Jansen, Th., N. Chioncel, and H. Dekkers. 2006. "Social cohesion and integration: learning active citizenship." *British Journal of Sociology of Education* 27, no. 2 (Spring): 189-205. doi:10.1080/01425690600556305.
- Jo, Ji-Yeon, and Min-Seung Jung. 2017. "Rethinking Diversity in South Korea: Examining the Ideological Underpinnings of Multicultural Education Policies and Programs." *Second International Handbook of Urban Education*: 195-212. doi:10.1007/978-3-319-40317-5_13.
- Jones, Gavin, and Hsiu-Hua Shen. 2008. "International marriage in East and Southeast Asia: trends and research emphases." *Citizenship Studies* 12, no. 1: 9-25. doi:10.1080/13621020701794091.
- Jwa, Young-gil. 좌, 영길. 2014. "4wol-bu-teo han-gug-eo gu-sa-neung-lyeog gaj-chwo-ya gyeol-hon-i-min-bi-ja bal-geub 4월부터 한국어 구사능력 갖춰야 결혼이민비자 발급 [Marriage immigrant visa is issued only when you have the ability to speak Korean from April]." *beob-lyul-sin-mun 법률신문[Lawtimes]*, February 6, 2014. <https://www.lawtimes.co.kr/Legal-News/Legal-News-View?serial=82309>.
- Kang, Soon-Won. 2010. "Multicultural education and the rights to education of migrant children in South Korea." *Educational Review* 62, no. 3: 287-300. doi:10.1080/00131911.2010.503599.
- Kennedy, Kerry J., and John C. Lee. *Routledge International Handbook of Schools and Schooling in Asia*. London: Routledge, 2018.
- Kim, Jaeil. 김재일. 2019. "u-li-na-la che-lyu-oe-gug-in-ui yeong-ju-gwon chwi-deug je-do pyeong-ga: i-ju-ja-tong-hab-jeong-chaeg-ji-su-leul tong-han bi-gyo-bun-seog 우리나라 체류외국인의 영주권 취득 제도 평가: 이주자통합정책지수를 통한 비교분석 [Evaluating the Long-Term Residency Accessibility for Foreigners in Korea through Comparative Analysis of MIPEX]." *han-gug-gong-gong-gwan-li-hag-bo 한국공공관리학보[Korea Public Management Review]* 33, no. 2 (spring): 175-192.
- Kim, Ji-Young, 김지영 and Hoonseok Choi 최훈석. 2011. " gyeol-hon-i-ju-yeo-seong-ui in-gwon-chim-hae-sil-tae mich dae-chaeg-e gwan-han yeon-gu 결혼이주여성의 인권침해실태 및 대책에 관한 연구 [A Study on Violation of Human Right of International Marriage Migrant Women]." *yeon-gu chong-seo 연구 총서[Research Series]* 11, no. 1 (Winter): 1-378.

- Kim, Gyu-chan. 2017. "The patterns of 'care migrantisation' in South Korea." *Journal of Ethnic and Migration Studies* 44, no. 13: 2286-2302. doi:10.1080/1369183x.2017.1388158.
- Kim, Hye-jung. 김, 혜정. 2019. " gug-jeog chwi-deug-eun god ga-chul 국적 취득은 곧 가출 [Acquisition of nationality means a run away?]" a-i-do-min 아이도민[Idomin], December 17, 2019. Accessed November 4, 2020. <http://www.idomin.com/news/articleView.html?idxno=716024>.
- Kim, Hyuk-Rae, and In-gyu Oh. 2011. "Foreigners Cometh! Paths to Multiculturalism in Japan, Korea, and Taiwan." *Asian and Pacific Migration Journal* 21, no. 1: 105-133. doi:10.1177/011719681202100105.
- Kim, Hyun-Mee, Shin-Hye Park, and Ariun Shukhertei. 2017. "Returning home: marriage migrants' legal precarity and the experience of divorce." *Critical Asian Studies* 49, no. 1: 38-53. doi:10.1080/14672715.2016.1266679.
- Kim, Keuntae, and Chin-Sung Chung. 2017. "Caring practices of marriage migrant women in Korea." *Asia Pacific Journal of Social Work and Development* 27, no. 3-4 :115-128. doi:10.1080/02185385.2017.1368412.
- Kim, Min-Jeong. 2014. "South Korean Rural Husbands, Compensatory Masculinity, and International Marriage." *Journal of Korean Studies* 19, no. 2: 291-325. doi:10.1353/jks.2014.0030.
- Kim, Pan-Suk, and Heung-Ju Kim. 2016. "Transnational marriage in East Asia- The evolving migration policy in South Korea and its implications" In *Advancing the Regional Commons in the New East Asia*. London: Routledge.
- Kim, Sang-Sub. 김상섭. " u-li-na-la yeong-ju-gwon-je-do-e gwan-han yeon-gu - yeong-ju-gwon-jeong-chaeg-ui jeong-chi-wa yeong-ju-gwon beob-je yang-sang-eul jung-sim-eu-lo 우리나라 영주권제도에 관한 연구 - 영주권정책의 정치와 영주권 법제 양상을 중심으로 [A Study on Permanent Residency in Korea: Focusing on the Politics of Permanent Residency Policies and the Legislative Aspects of Permanent Residency]." PhD diss., In-ha-dae-hag-gyo 인하대학교 [Inha University], 2020.
- Kim, Young-hwa. 김, 영화. 2019. " gyeol-hon i-ju-yeo-seong og-joe-neun i-sang-han na-la-ui beob-deul 결혼 이주여성 옥죄는 이상한 나라의 법률 [Marriage immigrant women imprisonment is the laws of Wonderland]." si-sa-en [시사엔] Sisa N, August 6, 2019. Accessed August 30, 2020. <https://www.sisain.co.kr/news/articleView.html?idxno=35247>.
- Kim, Yug-Yun, In-seo Son, Dainn Wie, Carles Muntaner, Hyunwoo Kim, and Seung-Sup Kim. 2016. "Don't ask for fair treatment? A gender analysis of ethnic discrimination, response to discrimination, and self-rated health among marriage migrants in South Korea." *International Journal for Equity in Health* 15, no. 1. doi:10.1186/s12939-016-0396-7.
- Kneebone, Susan. 2012. "Introduction Migrant Workers between States: In Search of Exit and Integration Strategies in South East Asia." *Asian Journal of Social Science* 40, no. 4: 367-391. doi:10.1163/15685314-12341246.
- Korean Women's Development Institute. n.d. " Implementation Basis on Gender Equality Policy" Accessed December 15, 2020. <https://eng.kwdi.re.kr/publications/genderPolicy.do>.
- Kraler, Albert. 2006. "The legal status of immigrants and their access to nationality" In *Migration and Citizenship: Legal Status, Rights and Political Participation*. Amsterdam: Amsterdam University Press.

- 2:117-131. doi:10.1177/011719681102000201.
- Lewicki, Aleksandra. 2017. "The blind spots of liberal citizenship and integration policy." *Patterns of Prejudice* 51, no. 5: 375-395. doi:10.1080/0031322x.2017.1389350.
- Liang, Li-Fang. 2017. "Creating a Gendered-Racialized Care Labor Market: Migrant Labor Policy and the Transformation of Care Work in Taiwan." *Gender, Care and Migration in East Asia*: 139-156. doi:10.1007/978-981-10-7025-9_7.
- Lu, Melody. 2005. "Commercially Arranged Marriage Migration: Case Studies of Cross-Border Marriages in Taiwan." *Marriage, Migration and Gender*: 125-151. doi:10.4135/9788132100324.n5.
- Lubin, Matthew. 2017. "Taiwan seeks to improve women's safety amid rising domestic violence." *Taiwan Times*, March 8, 2017. Accessed August 5, 2020. <https://www.taiwannews.com.tw/en/news/3111531>.
- Im, Jun-Hyung 임준형. 2019. "beob-mu-bu gyeol-hon-i-min-je-do gae-jeong-an: che-lyu wi-hae nam-pyeon-e-ge ui-jon-hae-ya ha-neun hyeon-sil yeo-jeon 법무부 결혼이민제도 개정안: 체류 위해 남편에게 의존해야 하는 현실 여전 [Ministry of Justice's Marriage Immigration System Amendment: The Reality of Relying on Husbands to Stay in South Korea]." *no-dong-ja yeon-dae 노동자 연대[Worker's Solidarity]*, September 18, 2019. Accessed November 20, 2020. <https://wspaper.org/article/22676>.
- Im, Soo-Jung 임수정. 2010. "pum-haeng-dan-jeong' gwi-hwa-yo-geon, beom-beob-ja ui-mi a-ni-da 품행단정' 귀화요건, 非범죄자 의미 아니다 [Good character- naturalization requirement does not mean no crime history]." *yeon-hab-nyu-seu 연합뉴스[Yonhapnews]*, October 9, 2010. Accessed August 5, 2020. <https://www.yna.co.kr/view/AKR20100912062800004>.
- Im, Soon-Hyun 임순현. 2019. "dae-beob "gyeol-hon-i-ju-yeo-seong, i-hon-chaeg-im nam-pyeon-i deo keu-myeon che-lyu-ja-gyeog yeon-jang 대법 "결혼이주여성, 이혼책임 남편이 더 크면 체류자격 연장 [Supreme Law "Marriage immigrant woman, extension of status is possible if husband is more liable for divorce"]." *yeon-hab-nyu-seu 연합뉴스[Yonhapnews]*, July 10, 2019. Accessed November 20, 2020. <https://www.yna.co.kr/view/AKR20190709156800004>.
- National Immigrant Agency. Taipei, Taiwan: Ministry of Interior, 2019.
- Marshall, Thomas H. 1950. *Citizenship and Social Class*. Cambridge: Cambridge at the University Press.
- Ministry of Culture of ROC. 2019. "Laws and Regulations Retrieving System." Accessed December 2, 2020. <https://law.moc.gov.tw/law/EngLawContent.aspx?id=70>.
- Ministry of Foreign Affairs of ROK. 2021. "Spouse Visa Requirements (F61 Visa) Embassy of the Republic of Korea in the Republic of the Philippines." Ministry of Foreign Affairs. Accessed January 2, 2021. https://overseas.mofa.go.kr/phn/brd/m_3281/view.do?seq=761459&srchFr=&srchTo=&srchWord=&srchTp=&multi_itm_seq=0&itm_seq_1=0&itm_seq_2=0&company_cd=&company_nm=&page=1
- Ministry of Foreign Affairs of ROK. 2021. "F-6 Visas Notice" Ministry of Foreign Affairs. Accessed January 2, 2021.

https://overseas.mofa.go.kr/vnko/brd/m_2198/view.do?seq=1343476&srchFr=&srchTo=&srchWord=&srchTp=&multi_itm_seq=0&itm_seq_1=0&itm_seq_2=0&company_cd=&company_nm=&page=1.

Ministry of Interior of ROC. 2017. "National Development Council." Last modified December 27, 2017. Accessed January 8, 2021

https://www.ndc.gov.tw/en/News_Content.aspx?n=0E2DCBAA6CB72F12&sms=B079565EECDD8520&s=225ABA2660D863FE.

Ministry of Interior of ROC. n.d. "Dept. of Household Registration, Ministry of the Interior. Republic of China (Taiwan) - FAQs." Last modified May 1, 2018. Accessed January 8, 2021

<https://www.ris.gov.tw/app/en/3051>.

Ministry of Justice of ROK. n.d. "Nationality." Accessed December 3, 2020.

<https://www.moj.go.kr/moj/2413/subview.do?>.

Ministry of Justice of ROK. n.d. "Immigration Act - Article Content - Laws & Regulations Database of The Republic of China." Accessed January 9, 2021.

<https://law.moj.gov.tw/Eng/LawClass/LawAll.aspx?PCode=D0080132>.

Ministry of Justice. n.d. "Korea Immigration & Integration Program." Accessed December 10, 2020.

https://www.socinet.go.kr/soci/contents/PgmIntrPurp.jsp?q_global_menu_id=S_SIP_SUB01.

Ministry of Justice. n.d. "Korea Immigration & Integration Program." Accessed December 11, 2020.

https://www.socinet.go.kr/soci/contents/PgmConnLt.jsp?q_global_menu_id=S_SIP_SUB13.

MIPEX 2020. "Access to Nationality." www.mipex.eu. Accessed November 14, 2020.

<https://mipex.eu/access-nationality>.

MIPEX 2020. "Anti-discrimination." www.mipex.eu. Accessed November 14, 2020.

<https://mipex.eu/anti-discrimination>.

MIPEX 2020. "Main Findings." www.mipex.eu. Accessed November 14, 2020. <https://mipex.eu/key-findings>.

MIPEX 2020. "Permanent Residence." www.mipex.eu. Accessed November 15, 2020.

<https://mipex.eu/permanent-residence>.

MIPEX 2020." www.mipex.eu. Accessed November 15, 2020. <https://mipex.eu/what-is-mipex>.

Momesso, Lara. 2016. "Marriage Migration and State Interests: Reflections from the Experiences of Marriage Migrants from the People's Republic of China in Taiwan." *Asiatische Studien - Études Asiatiques* 70, no. 3. doi:10.1515/asia-2015-1025.

Moon, Byoung-Hyo. 문병호. 2018. "han-gug chul-ib-gug-gwan-li-beob-ui jaeng-jeom-gwa bal-jeon-bang-hyang 한국 출입국관리법의 쟁점과 발전방향 [Issues and Challenges of the Immigration Control Act of Korea]." *gang-won-beob-hag 강원법학 [Kangwon Review]* 55 (Fall): 243-281.

Moon, Myung-ki. 문명기. 2018. "20se-gi jeon-ban-gi dae-man-in-gwa jo-seon-in-ui yeog-oe-i-ju-wa gwi-hwan: yeog-oe-i-ju mich gwi-hwan gyu-mo-ui chu-san-eul jung-sim-eu-lo 20 세기 전반기 대만인과 조선인의 역외이주와 귀환: 역외이주 및 귀환 규모의 추산을 중심으로 [The

- Scale of Taiwanese and Korean Migrants in the Colonial Period and Taiwanese and Korean Returnees Since 1945]." *han-gug-hag-non-chong 한국학논총 [Korean studies]* 50: 517-553.
- OECD. 2017, *Making Integration Work: Family Migrants*, OECD Publishing, Paris.
<http://dx.doi.org/10.1787/9789264279520-en>
- Ong, Aihwa. 2017. "Mutations in Citizenship." In *Theory, Culture & Society* 23, no. 2-3: 363-369.
doi:10.4324/9781315260211-15.
- Park, Hye-Seo. 2019. "Social Integration of North Korean Defectors in Korean Society: Implications of German Intercultural Policies." Master's thesis, Kyung Hee University, 2019.
- Park, Hyun-ik. 박현익. 2018. "[beob-do duing-cha-byeol-ha-na] peol-beob-eun cha-byeol mal-la-neun-de...sil-je-lon nam-nyeo-im-geum-gyeog-cha 15nyeon-jjae 'OECD 1wi [법도 성차별하나] ③법은 차별 말라는데...실제론 남녀임금격차 15년째 'OECD 1 위'" [The law on gender discriminations] ③The law says not to discriminate...In reality, the gender wage gap' No. 1 in OECD' for 15 years'." *jo-seon-il-bo 조선일보 [Chosun Ilbo]*, September 2, 2018. Accessed November 20, 2020.
https://www.chosun.com/site/data/html_dir/2018/09/02/2018090200872.html.
- Park, Seung-Yong. 박승용. 2014. "gug-je-gyeol-hon-i-ju-yeo-seong-e gwan-han beob-jeog-je-do-jeog cheug-myeon go-chal 국제결혼이주여성에 관한 법적제도적 측면 고찰 [A Study on the legal and Institutional Aspects of Migrant Women via International Marriage]." *han-gug-jeong-chaeg-yeon-gu 한국정책연구 [The Journal of Korean Policy Studies]* 14, no. 3 (Fall): 107-130.
- Pan, Shu-Man, and Huey-Fen Lu. 2014. "Why stay or not to stay? Divorce of transnational marriages in Taiwan." Symposium The 2014 Asian Symposium on Human Rights Education, Taiwan, January 21.
- Park, Mi Yung. 2019. "Challenges of maintaining the mother's language: marriage-migrants and their mixed-heritage children in South Korea." *Language and Education* 33, no. 5: 431-444.
doi:10.1080/09500782.2019.1582662.
- Park, Won-Jung J., 2008. "A More Meaningful Citizenship Test? Unmasking the Construction of a Universalist, Principle-Based Citizenship Ideology." *California Law Review* 96, no. 4 (Summer): 999-1048.
- Pries, Ludger, Dirk Halm and Zeynep Sezgin. 2012. "Cross-Border Migrant Organizations in Their Organizational and Institutional Environment: A Comparison of Countries and Cases" In *Cross Border Migrant Organizations in Comparative Perspective*. London: Palgrave Macmillan.
- Ramsay, Jonathan E., and Joyce S. Pang. 2015. "Anti-Immigrant Prejudice in Rising East Asia: A Stereotype Content and Integrated Threat Analysis." *Political Psychology* 38, no. 2: 227-244.
doi:10.1111/pops.12312.
- Ramsay, Jonathan E., and Joyce S. Pang. 2015. "Anti-Immigrant Prejudice in Rising East Asia: A Stereotype Content and Integrated Threat Analysis." *Political Psychology* 38, no. 2: 227-244.
doi:10.1111/pops.12312.
- Reitz, Jeffrey G. 2016. "Towards empirical comparison of immigrant integration across nations." *Ethnic and Racial Studies* 39, no. 13: 2338-2345.
doi:10.1080/01419870.2016.1203448.

- Rogers, Sarah, and Brooke Wilmsen. 2019. "Towards a Critical Geography of Resettlement." *Progress in Human Geography* 44, no. 2: 256-275. doi:10.1177/0309132518824659.
- Ruedin, Didier. 2015. "Increasing Validity by Recombining Existing Indices: MIPEX as a Measure of Citizenship Models*." *Social Science Quarterly* 96, no. 2: 629-638. doi:10.1111/ssqu.12162.
- Sechiyama, Kaku. 2013. "South Korean Patriarchy." In *Patriarchy in East Asia: A Comparative Sociology of Gender*, 137-170. Leiden: BRILL.
- Sechiyama, Kaku. 2013. "Taiwanese Patriarchy." In *Patriarchy in East Asia: A Comparative Sociology of Gender*, 171-201. Leiden: BRILL.
- Sheu, Yea-huey. 2007. "Full Responsibility with Partial Citizenship: Immigrant Wives in Taiwan." *Social Policy & Administration* 41, no. 2: 179-196. doi:10.1111/j.1467-9515.2007.00546.x.
- Song, Ji-Young. 2015. "Five Phases of Brokered International Marriages in South Korea: A Complexity Perspective." *Asian Studies* 1, no. 1 (Fall): 147-176.
- Song, Yu-jin. 송유진. 2008. "han-gug, dae-man, il-bon-ui i-min-ja-e dae-han tae-do 한국, 대만, 일본의 이민자에 대한 태도 [A Comparative Analysis of Individual Attitudes toward Immigrants in Korea, Taiwan, and Japan]." *han-gug-in-gu-hag 한국인구학 [Korean Population Studies]* 31, no. 2: 1-20.
- Sung, Ko-Yin. 2012. "Minority Education Plans: Stories of "Foreign Brides" in Taiwan." *Women's Studies* 41, no. 5: 515-535. doi:10.1080/00497878.2012.683704.
- Swerts, Thomas. 2017. "Creating Space for Citizenship: The Liminal Politics of Undocumented Activism." *International Journal of Urban and Regional Research* 41, no. 3: 379-395. doi:10.1111/1468-2427.12480.
- Tam, Siumi M., Wai C. Wong, and Danning Wang. 2014. "Introduction: gender and family in East Asia." In *Gender and Family in East Asia*, edited by Siumi M. Tam., Wai C. Wong, and Danning Wang, 1-16. London: Routledge.
- Torres, Rebecca M., and Melissa Wicks-Asbun. 2013. "Undocumented Students' Narratives of Liminal Citizenship: High Aspirations, Exclusion, and "In-Between" Identities." *The Professional Geographer* 66, no. 2: 195-204. doi:10.1080/00330124.2012.735936.
- Torpey, John. 2013. "Coming and Going: On the State Monopolization of the Legitimate "Means of Movement"." *The Invention of the Passport*, 1999, 4-20. doi:10.1017/cbo9780511520990.002.
- Tseng, Yu-chin. 2017. "Should I Stay or Should I Go? Migration trajectories of Chinese–Taiwanese couples in third countries." *Asian and Pacific Migration Journal* 26, no. 4: 413-435. doi:10.1177/0117196817747296.
- Tseng, Yu-chin. 2019. "Taiwan's Immigration Policy Challenges in 2020." *The News Lens*, December 19, 2019. Accessed November 25, 2020. <https://international.thenewslens.com/article/128979>.
- Um, Seong Gee. 2012. "At the Bottom: Migrant Workers in the South Korean Long-term Care Market." PhD diss., University of Toronto.

- Valverde, Mariana. 2010. "Practices of Citizenship and Scales of Governance." *New Criminal Law Review* 13, no. 2: 216-240. doi:10.1525/nclr.2010.13.2.216.
- Wang, Hong-zen, and Mei-hua Chen. 2017. "Taiwan's cross-border marriages: Discrimination via the discourse of love." *Taiwan Insight*, November 6, 2017. Accessed December 14, 2020. <https://taiwaninsight.org/2017/11/06/taiwans-cross-border-marriages-discrimination-via-the-discourse-of-love/>.
- Wang, Yi-Han. 2010. "From "Farming Daughters" to "Virgin Brides"." *Gender, Technology and Development* 14, no. 2: 217-239. doi:10.1177/097185241001400205.
- Westin, Charles. 2000. "The Effectiveness of Settlement and Integration Policies Towards Immigrants and Their Descendants in Sweden." International Labour Organization. Last modified 2000.
- Williams, Lucy, and Mei-Kuei Yu. 2006. "Domestic Violence in Cross-border Marriage - A Case Study from Taiwan." *International Journal of Migration, Health and Social Care* 2, no. 3/4: 58-69. doi:10.1108/17479894200600032.
- Winter, Elke. 2016. "Toward an Actor-Centered Political Sociology of Citizenship." *Canadian Review of Sociology/Revue canadienne de sociologie* 53, no. 3: 361-364. doi:10.1111/cars.12117.
- Yang, Kyung-Eun. 2017. "Unequal Chance of Obtaining a Secure Job: Marriage Migrant Women in the Korean Labor Market." *Journal of International Migration and Integration* 19, no. 1: 91-110. doi:10.1007/s12134-017-0528-y.
- Yang, Wan-Ying. 2014. "The Differentiated Civil, Social, and Political Rights of Female Mainland Spouses in Taiwan." In *The Immigration Societies: Taiwan and Beyond*, edited by Astrid Lipinsky, 105-129. Münster: LIT Verlag.
- Yang, Wen-Shan, and Melody C. Lu. 2010. *Asian Cross-border Marriage Migration: Demographic Patterns and Social Issues*. Amsterdam: Amsterdam University Press.
- Youngdeungpogu Multicultural Family Support Center. n.d. "Hanultari." *Hanultari-Seoul*. Accessed December 8, 2020. <https://www.mcfamily.or.kr/web/hcontents/hcontents.php?Spageno=9&thislangcd=en>.
- Yune, Jin-Su. 2012. "The Reform of the Consensual Divorce Process and the Child Support Enforcement System in Korea." *Journal of Korean Law* 11: 247-261.

Appendix

Abstract

(German version)

Basierend auf der wachsenden Relevanz der Integration von Heiratsmigranten in Ostasien zielt die Arbeit darauf ab, Ähnlichkeiten und Unterschiede des rechtlichen Status asiatischer Bräute in zwei Ländern, Südkorea und Taiwan, zu vergleichen, und darzustellen, wie beide reguliert sind, um die Integration und Staatsbürgerschaft zu fördern und einzuschränken. Während der gesamten Literaturrecherche liegt der Schwerpunkt daher auf der Erörterung der drei Konzepte Integration, Staatsbürgerschaft und Rechtsstatus sowie der Frage, wie diese Konzepte zusammenwirken und sich gegenseitig beeinflussen, um den Fall asiatischer Bräute zu veranschaulichen, insbesondere derjenigen, die soziale Reproduktion in Haushalt und Beruf praktizieren. Die Diskussion wird durch rechtliche Ansprüche und Rechte gefördert, die mit dem rechtlichen Status asiatischer Bräute und ihrer Relevanz für ihre Ansiedlung verbunden sind, sowie durch starke geschlechtsspezifische und rassistische Rollen, die in den Zielländern mit traditioneller Familienkultur ausgeübt werden. In der Arbeit wird ein Analyserahmen angewendet, der in der Literaturübersicht eingeführt wurde. Der vom Migration Integration Policy Index (MIPEX) entwickelte Rahmen wird auf drei folgende Dimensionen angewendet: Zugang zur Staatsangehörigkeit, ständiger Wohnsitz und Antidiskriminierung. Es wird festgestellt, dass die oben genannten drei Dimensionen wesentliche Faktoren sind, die zur Bestimmung der Integration der Bräute beitragen. Sie können jedoch nicht darauf beschränkt werden. Von dieser Bewertung abgeleitet, kommt die These zu dem Schluss, dass Südkorea und Taiwan einige Ähnlichkeiten bei der Regulierung des rechtlichen Status und der Faktoren aufweisen, welcher zur unfairen Behandlung asiatischer Bräute beitragen. Es zeigt jedoch große Abweichungen für die meisten Kriterien. Die Ähnlichkeiten werden auf eine starke Nationalität und assimilative Ansätze zur Bekämpfung der Integration und ihrer Staatsbürgerschaft zurückgeführt. Diese Aspekte fließen in die Gesetzgebung der Einwanderer mit ein. Dies wird durch ethnische Homogenität, Stigmen, unvollständige und unzureichende multikulturelle Bildung zur Förderung von Vielfalt und Gleichheit in zwei Ländern gefördert. Es werden Unterschiede zwischen zwei unterschiedlichen politischen Szenarien und Einstellungen bei der Umsetzung der Institutionen und der Entwicklung von CATM festgestellt. Der Fall Taiwan zeigt, dass es im Vergleich zu Südkorea dazu neigt, mehr proaktivere Ansätze zur Lösung der Integrationsprobleme von Migranten zu verfolgen. Es werden ausführliche Diskussionen geführt, um die Ähnlichkeiten zu untersuchen, welche die zwei Länder

teilen, um die Legalität asiatischer Bräute einzuschränken und ihre Staatsangehörigen zu priorisieren, und es wird auf fehlende Anträge auf internationale Standards für die innerstaatliche Gesetzgebung hingewiesen. Die Schlussfolgerung fasst die Ergebnisse zusammen und gibt weitere Forschungsempfehlungen.

Schlagworte: Heiratsmigration, Integration, Staatsbürgerschaft, rechtlicher Status, asiatische Bräute, Südkorea, Taiwan