

Framing Contemporary Citizenship and Diversity in Europe

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Introduction

The EMILIE project, as stated in Chapter 1, was an investigation into the current nature and extent of multicultural citizenship in nine European countries. Such an investigation, however, has to be conducted in a climate where it is commonly asserted that multiculturalism is or should be dead or dying. A cursory glance at the pages of the popular press or academic texts will reveal that critics of multiculturalism are to be found across Europe and are arguably much greater in number today than a decade or so ago. While preparing this chapter, two European premiers, German Chancellor Angela Merkel and UK Prime Minister David Cameron, made high-profile, internationally discussed speeches which declared respectively that 'multi-kulti has utterly failed' and 'multiculturalism is dead' (Weaver 2010; Cameron 2011). For some, multiculturalism has facilitated social fragmentation and entrenched social divisions (Policy Exchange 2007; Malik 2007). For others, it has distracted attention from core socio-economic disparities (Barry 2001; Hansen 2006) or encouraged a moral hesitancy amongst native populations (Caldwell 2009; Prins and Salisbury 2008). Some even blame it for international terrorism (Phillips 2006; Gove 2006). Independently of whether or not these criticisms are valid, there appears to be a certain consensus amongst scholars and commentators that multiculturalism as a public policy has been and continues to be in retreat (Brubaker 2001; Joppke 2004). What remains much less clear, however, is what this retreat of multiculturalism in Europe actually consists of, and particularly so in Western Europe. For example, does it entail the same thing in different countries? What are states actually doing and not doing? And is there a comparative framework for addressing these questions? The key elements or ideas in the retreat of multiculturalism are therefore far from established and widely understood.

Perhaps on one level, however, the answers to some of these questions can be found in the widespread view that a variety of European nation-states are 're-nationalising' (Orgad 2009; Mouritsen 2009). That is to say that while in the 1980s and 1990s it was argued that there was a trend of denationalising, and that this was the way of the 'post-national' future, from our present vantage point at the beginning of the second decade of the twenty-first century, it appears that many central promises contained within ideas of post-national citizenship and post-war cosmopolitanism have not come to fruition, or at least are not obviously visible across citizenship regimes. This is particularly true of those accounts that saw as the future of citizenship in Europe a retention and administration of citizenship rights in cross-national human rights covenants that would be materially supported by international law (Soysal 1994). Others simultaneously anticipated a diminution in the 'particularistic' content of political communities, such that the boundaries between nations, states, cultures or indeed societies might become empirically porous and even morally irrelevant (Archibugi et al. 2005; Archibugi et al. 1998).

Each of these positions has arguably had something to grapple with, for in recent years there has indeed been a spectre stalking Europe, but this has not been of the historical-materialist kind. Instead, we can witness today something of a trend in the valorisation of national identities in nation-state citizenship across Western Europe, characterised as a re-nationalisation of various citizenship regimes (Kiwan 2008). In the next section we briefly survey this terrain before critically engaging with one scholarly characterisation of it. Following this, we begin to offer our alternative reading and then we step back to register some competing normative frameworks before returning to the empirical discussion in the final section of the chapter. We conclude that a normative conception of multiculturalism remains a resilient means of explicating empirical developments in fields of contemporary nation-state citizenship in Europe. We specifically argue that it is striking how, in interpreting and evaluating a new emphasis on national identities, some authors ignore how some degree of particularity is both pragmatically necessary and justifiable within a variety of ideational and empirical political orientations.

2.1 *The terrain*

The chronology of 're-nationalising' in the context of post-immigration ethno-religious diversity varies between countries and in several

cases has been evident since the 1990s. In the case of the UK it came from the centre-left, beginning with New Labour's invocation of an Orwellian-style patriotism and proposals to modernise and remake Britishness under the terms of 'Cool Britannia' and 're-branding Britain' (Leonard 1997). Not only was this a strand within what is probably the most multiculturalist government the UK has had (1997–2001), but the ideas of rethinking and remaking Britishness in response to ethnic diversity were stimulated by ethnic minority intellectuals (Gilroy 1987; Modood 1992; CMEB 2000¹). That a concern for making national identities more explicit was widespread across Europe is evidenced by the European Council agreement in 2004 on 'common basic principles' supporting nation-states in educating immigrants on 'the host society's language, history, and institutions'.² The European Union Pact on Immigration and Asylum maintains that it is for each Member State to decide on the conditions of admission of legal migrants to its territory and, where necessary, to set their number.³ As such, it facilitates member states with the means to regulate admission criteria. Here we might include the Danes' requirement of Danish language competencies at 'level 3', which 'bars most non-Europeans from ever gaining citizenship' (Mouritsen 2009: 6) and which goes hand in hand with the introduction of a citizenship test that is notable for its emphasis upon questions of a difficult nature concerning historical-national Danish culture. These developments have arisen in a wider political context in Denmark in which the very content of popular discourse, particularly around cultural diversity and Islam, has taken a notably nationalistic tone (Meer and Mouritsen 2009). This is especially true of the ways in which conceptions of commendable political subjectivity and forms of civic association have become related to national identity (Mouritsen 2009).

Similar developments are evident in the debate over a German *Leitkultur*, and which seeks the promotion of a German 'leading culture' in a more explicit way than in its traditional conception of ethnic citizenship. Indeed, this is despite, or perhaps because of, significant movement away from the latter, at least in law. Following decades of pursuing an ethno-national citizenship, Germany has since the late 1990s undergone significant changes in its management of immigration and integration, and in its conception of citizenship. Thus, and after federal policies had previously focused almost entirely on the control and return of migrants (Schönwälder 2001), in 1998 the Red-Green government characterised Germany as an 'immigration country' and amended the Citizenship Law (2000) to introduce the

principle of *ius soli*. These developments have been accompanied by others such as the introduction of the Immigration Law (2005), which encourages the cultivation of 'integration strategies', and which in turn was followed by the invitation to migrants and civil society actors to take part in a National Integration Summit (2006). Yet the content of this 'integration' has also included a nationalist imperative, whereby newcomers are expected to undertake 300 to 600 hours of German language classes and lessons on German society and history (Jacobs and Rea 2007).

Simultaneously in the UK, the Nationality, Immigration and Asylum Act (2002) explicitly introduced a test (implemented in 2005) for residents seeking British citizenship. Thus, applicants should show 'a sufficient knowledge of English, Welsh or Scottish Gaelic' and also 'a sufficient knowledge about life in the United Kingdom' (Home Office 2004: 11). Those immigrants seeking to settle in the UK (applying for 'indefinite leave to remain') equally have to pass the test which has been effectively implemented since 2 April 2007. If applicants do not have sufficient knowledge of English, they are required to attend English for Speakers of Other Languages (ESOL) and citizenship classes. The government has, however, insisted that 'it would be unfair for migrants to have to answer questions on British history that many British people would have difficulties with' (McNulty quoted in Kiwan 2008: 69). Accordingly, the emphasis is on the experience of living in the UK rather than an attempt to test Britishness in terms of scholastic knowledge.

What this brief summary shows is that despite important variations, it is evidently the case that in north-western Europe there is presently a renewed emphasis and explicitness regarding national identities among countries that have not always prioritised this, for example the UK and Denmark, and increasingly Germany. In some cases, the turn to national identities by governments appears to involve a confused means of encouraging forms of social and political unity (cf. Uberoi 2008), whereas in other cases national identities are viewed as a means of engendering a kind of value consensus that may act as a prophylactic against forms of (Muslim) radicalism (MGhee 2008; Uberoi and Modood 2009). In other cases still, it would be hard not to view the turn to national identities as little more than a means of pursuing an assimilationist project. The 'drastic break with multiculturalism' (Entzinger 2007: 201) made by the Dutch has been widely recorded; it has seen the Netherlands discontinue some emblematic multiculturalist policies while introducing others specifically tailored

to ignore ethnic minority differences. These include the large-scale abandonment of dual-citizenship programmes; a withdrawal of national-level funding for minority group organisations and activities supporting cultural difference; reallocating the small percentage of public broadcasting time dedicated to multicultural issues; and a cessation of ethnic monitoring of labour market participation (Entzinger 2007; 2003; Van De Vijver et al. 2006).

In the 1990s, various European states began 're-nationalising' and reforming access to citizenship and the status of citizens just at the point that some scholars were discerning an international trend towards denationalisation. This movement accelerated and 'hardened' as states reacted to 9/11 and the threat of international networks involving citizens or residents in their country, and even more so to an alleged 'failure to integrate' on the part of Muslims, which stood alongside perceptions of Muslims as a cultural threat and demographic projections of Muslim numbers growing at a much faster rate than non-Muslims (cf. Caldwell 2009). The post-national trend has also been deflected by how migrants and subsequent generations have asserted not so much their right to not be citizens in the countries in which they have settled, but various kinds of transnational political identities, especially a solidarity with an imagined global Muslim community (the *ummah*) together with or having primacy over civic solidarities (Mandaville 2009).

In this chapter we are only interested in the first of these developments, namely the policies and discourses of European states and opinion-makers in relation not to issues of war and security but rather to integration. While we note that these two issues can overlap, and have indeed been doing so in some national contexts, we focus much more on the anxieties over perceived failures in minority, and particularly Muslim, integration (Brubaker 2001; Bauböck et al. 2006; Mouritsen 2009). Here, interestingly, a forcefully presented argument by a leading scholar seems to salvage something of the post-national argument, namely Christian Joppke's (2008) claim that re-nationalisation is not what it appears to be.

2.2 Joppke's paradox and alternative readings

Joppke (2008) has argued that present discourses of national identity in Europe are both normatively and practically strengthening liberalism at the expense of nationalism. He argues, for example, that even while some politicians and states talk of national identities as

a means of privileging majority cultures as *Leitkultur*, for example in Germany and Denmark, such movements are structurally bound to fail. When states try to incorporate content into their national identities they invariably end up listing universal principles such as liberty, equality, fairness, human rights, tolerance and so on. This means that while many states are appealing to a national identity, the content they give it will be neither ethnic nor cultural (language, history or religion) but rather one comprised of liberal principles. In this view while the symbolic form may be particularistic, the content is necessarily universal, because if it were more particularistic (for example, Christian) it would fail in its purpose to integrate immigrants, especially Muslims. Joppke maintains, therefore, that 'the typical solution to the problem of collective identity across Europe today is the one pioneered by republican France, according to which to be national is defined in the light of the universalistic precepts of human rights and democracy' (Joppke 2008: 541).

An important feature of Joppke's argument is that where some politicians and states do emphasise particularistic aspects of national identity, such as Lutheranism or Christianity more generally, their own constitutional courts, he maintains, are required to uphold universalist principles. They especially rule in favour of non-discrimination, which is interpreted as the non-privileging of one culture over another. The outcome is that the courts strike down particularistic legislation and support appeals of discrimination from minority individuals and groups, something frequently supported in Joppke's view by the European Court of Human Rights (ECHR).⁴ Of course, Joppke acknowledges that a discourse exists in several countries, typified by Germany and Denmark, in which universalist liberalism is used in an exclusionary particularistic way by arguing that liberalism is 'our culture' and that some others, such as Muslims, cannot become part of the 'We' because they are not sufficiently liberal (Joppke 2008: 541–2; Mouritsen 2008: 21–2, believes that this may be more widespread than Joppke suggests; cf. Müller 2007). Joppke maintains, however, that these exclusionary uses of liberalism have to appeal to the liberal principle of non-discrimination between cultures (as long as liberal norms are observed) and so he believes they cannot be sustained. This means that while some liberals may aggressively enforce liberal norms (this is his reading of the ban on the headscarf in state schools in France) they must do so within liberal constraints (in a non-discriminatory way by not targeting an ethnic group or a religion but by applying universal rules) and so they must

promote liberal principles and not a specific national culture. Thus he argues that 'the decoupling of citizenship and nationhood is the incontrovertible exit position for contemporary state campaigns for unity and integration, especially with respect to immigrants' (Joppke 2008: 543).

Joppke sees these developments in the perspective of a 'retreat of multiculturalism' (Joppke 2004; for critiques see Jacobs and Rea 2007; Meer and Modood 2009) and so it is not surprising that, in interpreting and evaluating the new emphasis on national identities, Joppke ignores the potential theoretical contribution of multiculturalism. That is to say, the ways in which some degree of particularity is both pragmatically necessary but also justifiable within a variety of ideational and empirical political orientations. Where we are currently witnessing various political projects of remaking and updating national identities, they are not being departicularised. There are cases, such as Spain and Greece, that retain a strong orientation toward *ius sanguinis*, but in which an opposing trend would not have to empty out the historical-cultural character of nationality but instead would include minority ethnicities. The latter, therefore, need not be about being blind to minority ethnic groupness but, on the contrary, seeking to pluralise, and not empty out, cultural content. In other words, for the dominant ethnicity to monopolise the state and the citizenship by not making cultural assimilation a condition of full citizenship and of full social acceptance is to respect, not wipe out, the varied ethnicities of fellow citizens. In this chapter we argue that contrary to this view as articulated by Joppke (2008: 535) 'neutrality' must not be mistaken for contentlessness as pure universalism is impossible, so equality in citizenship is best pursued as (1) anti-discrimination; (2) recognition of open, mixed and changing ethnicities/identities; (3) multi-logical plurality; and (4) inclusivity and the fostering of a sense of belonging.

Of course, to illustrate this we need to recognise how citizenship requires some notion of a self-governing political community in which individuals have rights and correlative duties enforced by law but are also likely to have a sense of shaping and being shaped by a public space that goes beyond law and politics. Moreover, it is only when we have a conception of citizenship that we can identify who among long-term residents should remain non-citizens, why they should remain so and what rights they should and should not have. As such we need to ask at least three questions of a theory of citizenship (Patten 2001, cited in Gagnon and Iacovino 2007: 125):

discrimination), what can be distinguished is how countries adopted these directives in terms of anti-discrimination policy action ranging from low to high as follows:

- **Low:** where anti-discrimination laws to promote equality of opportunity are rarely applied in practice, little or no data on ethnicity and race is collected, and no public agency is charged with publicity, coordination and enforcement.
- **High:** where appropriate data is systematically and extensively collected and used, cases are routinely investigated by employers and other institutions, with many reaching the law courts, and are widely publicised by the media and by agencies such as the Belgian or French HALDE (High Authority to Fight Against Discrimination and for Equality) model or the UK EHRC (Equality and Human Rights Commission) that is proactive and responsible for policy development and enforcement and that reports to a government department or minister.

In some respects this issue of non-discrimination is also a question of socio-economic integration and full social citizenship, but it is not merely that. During most of the twentieth century there was a left-right struggle about the extent to which citizenship should or should not entail social welfare and economic rights, as illustrated in Marshall's well-known typology (1950). In the 1980s and early 1990s, there was a shift away from citizenship towards post-national membership (Soysal 1994), since then there has been a focus that put citizenship as identity (Joppke 2008) and citizenship as a common public space for dialogue (Modood 2007; Parekh 2000) at the top of the political agendas. This indeed is the fundamental question in relation to post-immigration diversity: what is the identity of citizenship itself and what does it imply for other identities that citizens may have or want to have?

In an attempt to chart this evolution, we have employed six category ranges examining (1) the promotion of equality of opportunity; (2) the extent of the emphasis on national identity;⁶ (3) the recognition of 'difference'; (4) the issue of neutrality; (5) the bearer of rights; (6) the relationship to the state. We use these category ranges as they reflect the most salient or core elements across a variety of normative accounts of citizenship in social and political theory. Equally, each of the three questions about citizenship raised by Patten (2001) above, including the question of civic identity, is not about merely vertical (state to citizen) but also horizontal (citizen to citizen) relationships

1. **Membership:** who is to be granted this status?
2. **Entitlement:** what rights are implied by this status?⁵
3. **Social expectations:** what responsibilities, dispositions and identities are expected of someone who holds this status?

In relation to the first question of membership, there is indeed a trend in some countries to de-ethnicise citizenship, or at least to dilute the link between citizenship and a single ethnicity. This also means breaking the link between mono-nationality and citizenship, which sees several states, such as Germany, moving towards the British and French example of taking a pragmatic view of dual citizenship (Modood and Meer 2009). By the beginning of the twenty-first century, most EU states were awarding citizenship to long-term residents and those born to non-citizens, though some states were struggling with the concept of dual nationality. In relation to the second question of entitlement, the fundamental point is that citizenship is about equal membership. Increasingly, member states and the European Union as a whole have recognised that non-white immigrants and their children and grandchildren do not have effective equality. While some EU states to differing degrees select or deselect by ethnicity those to whom they will grant citizenship, all EU states are now committed to the principle of non-discrimination amongst citizens.

In accordance with the Treaty of Amsterdam (1997), two broad directives were issued to member states to prevent discrimination on the basis of race, ethnicity or religion. The first established a general framework for equal treatment in employment and occupation (the Employment Directive), which would require member states to make discrimination unlawful on grounds of racial or ethnic origin, religion or belief, disability, age or sexual orientation. The second directive implemented the principle of equal treatment irrespective of racial or ethnic origin (the Race Directive). Like the Employment Directive, the Race Directive required member states to make discrimination on grounds of racial or ethnic origin unlawful in employment and training. It went further than the Employment Directive in requiring member states to provide protection against discrimination in non-employment areas, such as education, access to social welfare and the provision of goods and services. While these directives were accompanied by an 'Action Programme' (which was set up by the Commission and allocated a budget of 100 million euros over six years to fund practical action by member states in promoting non-

(Gagnon and Iacovino 2007: 125). To address the questions of citizenship, especially the third concerning social expectations, is also to ask about how the state and citizens should relate to diversity. Let us examine how some scholars, from both European and North American contexts, have typologised these relationships and what normative and explanatory purchase we can derive from them.

2.3 Normative models of citizenship

Modood (1997) has identified five ideal ways in which the state (and its citizens) can respond to the new cultural diversity that is a consequence of the post-war, large-scale immigration into Europe. Putting aside the straightforward default policy of assimilation, the first of Modood's five ideal types is 'The De-Centred State'. This first type is premised on an understanding that because of factors such as migration and the globalisation of economics, consumption and communications, societies can no longer be constituted by stable collective purposes and identities organised territorially by the nation-state. Thus the state cannot supply and attach a primary identity to individuals because identities are fluid and multiple as individuals identify with like-minded people across borders in terms of lifestyle, cultural consumption, peripatetic careers, diasporas and other forms of transnational networks. We present this and the other ideal types in summary form in Table 2.1 (see Appendix for an explanation of the categories used).

The second of Modood's types is 'The Liberal State', where the state exists to protect the rights of individuals and where the question of recognising new ethnic groups does not arise, for the state does not recognise any such groups. Individuals relate to the state as individual citizens, not as members of the group. The ideal liberal state does not promote one or more national cultures, religions, ways of life, and so on. These matters remain private to individuals in their voluntary associations with each other. Nor does the state promote any synthetic vision of common living or of fellow feeling between the inhabitants of that territory other than the legal entitlements and duties that define civic membership.

The third type, 'The Republic', refers to the ideal republic, which, like the liberal state, does not recognise groups amongst the citizenry but instead relates to each citizen as an individual. Yet, unlike the liberal state, it is amenable to one collective project; more precisely, it is itself a collective project which is not reducible to the protection of the

Table 2.1 Derived from Modood (1997)

Type of State →	1. Promotion of Equality of Opportunity	2. Emphasis on National Identity	3. Recognition of Difference	4. Seeking Neutrality	5. Bearer of Rights	6. Relationship to the State
Decentred State	Medium	Low	Medium	Not Possible	Individual	Vertical
Liberal State	Low	Low	Low	Yes	Individual	Vertical
Republic	Low	High (but prescribed)	Low	No	Individual	Vertical
Federation of Communities	Medium	Low	High	No	Group	Horizontal
Plural State	High	High (but remade)	High	No	Individual & Group	Horizontal & Vertical

rights of individuals or to the maximisation of the choices open to individuals. The republic seeks to enhance the lives of its members by making them a part of a way of living that individuals could not create for themselves; its aim is to make the individuals members of a civic community. This community may be based upon subscription to 'universal' principles such as liberty, equality and fraternity; or to the promotion of a national culture; or, as in the case of France, to both. In a republic, the formation of public ethnicity, by immigration or in other ways, would be discouraged and there would be strong expectation, even pressure, for individuals to assimilate to the national identity. 'The Federation of Communities' is Modood's fourth type of categorisation. In contrast to the first three responses to multicultural diversity, this option is built upon the assumption that the individual is not the unit (or at least not the only unit) to which the state must relate. Rather, individuals belong to and are shaped by communities, which are the primary focus of their loyalty and the regulators of their social existence. Far from being confined to the private sphere, communities are rather the primary agents of the public sphere. Public life, in fact, consists of organised communities relating to each other, and the state is therefore a federation of communities that exists to protect the rights of these communities. The millet system of the Ottoman Empire, in which some state powers were delegated to Christian and Jewish communities that had the power to administer personal law within their communities in accordance with their own legal system, is an example of this model of the multicultural state. The last type of state is 'The Plural State', which can have both strong and weak forms. With it comes a recognition that social existence consists of individuals and groups, and both need to be provided for in the formal and informal distribution of powers, not just in law but in representation in the offices of the state, public committees, consultative exercises, and access to public forums. There may be some rights for all individuals as in the liberal state, but mediating institutions such as trade unions, churches, neighbourhoods, immigrant associations and so on may also be encouraged to be active public players and forums for political discussion, and may even have a formal representative or administrative role to play in the state. The plural state, however, allows for and probably requires an ethical conception of citizenship, and not just an instrumental one as in the the conception of a federation of communities. The understanding that individuals are partly constituted by the lives of families and communities fits well with the recognition that the moral individual is partly shaped by the social

Type of State	1. Promotion of Equality of Opportunity	2. Emphasis on National Identity	3. Recognition of Difference	4. Seeking Neutrality	5. Bearer of Rights	6. Relationship to the State
Procedural	Low	Low	Low	Yes	Individual	Vertical
Nationalist	Low	High (but prescribed)	Low	No	Individual	Vertical
Liberal	Medium	Low	Medium	Yes	Individual	Vertical
Plural	High	High (but remade)	High	No	Individual & Group	Horizontal & Vertical
Separatist	Low	Low	High	No	Group	Horizontal

Table 2.2 Derived from CMEB (2000)

order constituted by citizenship and the public that amplifies and qualifies, sustains, critiques and reforms citizenship. For the plural state, then, multicultural diversity means reforming national identity and citizenship and offering an emotional identity with the whole, to counterbalance the emotional loyalties to ethnic and religious communities (Modood 2007).

The types mentioned above are simply one typology; it is not contended that all five options are equally suitable and/or feasible in contemporary Europe. Before we consider that point, let us briefly compare this typology with later conceptualisations. The Commission for Multi-Ethnic Britain (CMEB) (2000: 42), chaired by Lord Professor Bhikhu Parekh, provided the following five possible models of cohesion, equality and difference:

1. **Procedural:** the state is culturally neutral, and leaves individuals and communities to negotiate with each other as they wish, providing they observe certain basic procedures (see Table 2.2).
2. **Nationalist:** the state promotes a single national culture and expects all to assimilate to it. People who do not or cannot assimilate are second-class citizens.
3. **Liberal:** there is a single political culture in the public sphere but substantial diversity in the private lives of individuals and communities.
4. **Plural:** there is both unity and diversity in public life; communities and identities overlap, are interdependent and develop common features.
5. **Separatist:** the state permits and expects each community to remain separate from others and to organise and regulate its own affairs, largely confining itself to maintaining order and civility.

Koopmans et al. (2005) take on the same task, but unlike the previous two models, which are based on identifying positions in political theory, they identify two distinct features of citizenship practice and allow them to interact in order to create four possibilities. Thus, using the following two dimensions

1. The formal basis of citizenship: civic-territorial versus ethnocultural (Patten's Question 1)
2. The cultural obligations tied to citizenship: cultural monism and cultural pluralism (Patten's Question 3).

they produce four conceptions of citizenship:⁷

Table 2.3 Derived from Koopmans et al. (2005)

	Cultural Monism ← ----- → Cultural Diversity
Ethnic ↑	Assimilationism
↓	Segregationism
↓	Republicanism
↓	Pluralism
Civic-territorial ↓	

- (a) Ethnic assimilationism (Germany; Switzerland)
- (b) Ethnic segregationism
- (c) Civic republicanism (France; and the UK, qualified by d below)
- (d) Civic pluralism (Netherlands) (see Table 2.3).

In Koopmans et al. (2005: 73), this model is applied to the position of five countries (as shown above) at three moments in time (1980, 1990 and 2002), and finds that two important movements occurred between 1980 and 2002. The first was a movement towards cultural pluralism in all five countries, though to differing degrees and from quite different starting points, and the second was a movement towards civic conceptions of citizenship.

The North American context is, however, different. Hartmann and Gerreis (2005: 224) produce a two-by-two model but that is not based on dimensions of citizenship but rather on social integration. They produce four ways of responding politically to diversity, according to:

1. the basis for cohesion: substantive moral bonds versus procedural norms
2. the basis for association: individuals in society versus mediating groups.

The four ways are:

protection and encouragement (Rocher et al., cited in Gagnon and Iacovino 2007: 99). Second, Canadian multiculturalism does not locate itself in democratic public culture but rather, 'public space is based on individual participation via a bill of rights' (2007: 110-11); judges and individual choices, not citizens debating and negotiating with each other become the locus of cultural interaction and public multiculturalism.

Gagnon and Iacovino's positive argument for interculturalism can perhaps be expressed as follows:

1. There should be a public space and identity that is not merely about individual constitutional or legal rights.
2. This public space is an important identity for those who share it and so qualifies and counterbalances other identities that citizens value.
3. This public space is created and shared through participation, interaction, debate and common endeavour.
4. This public space is not culture-less but nor is it merely the 'majority culture'; all can participate in its synthesis and evolution and while it has an inescapable historical character, it is always being remade and ought to be remade to include new groups.
5. Quebec, and not merely Federal Canada, is such a public space and so an object immigrants need to identify with and integrate into; they should therefore seek to maintain Quebec as a nation and not just a federal province. (The same point may apply in other multinational states but there are different degrees and variations of 'multinationalism'.)

2.4 The resilience of a multicultural framework

What is remarkable about these four exercises in typology and the idea of interculturalism, despite differences in nomenclature, is the degree of agreement on what the options in relation to diversity are (see Table 2.5). Moreover, there seems to be virtually no difference between Modood's Pluralism and Gagnon and Iacovino's Interculturalism: they all seem to be different ways of stating a preference for a form of multicultural citizenship (Modood 2007). Specifically, there seems to be no difference between Interculturalism and Multiculturalism; Interculturalism is usually stated to be a critical alternative to Multiculturalism, but it seems to be no different from it except for the fact that there is an emphasis

Table 2.4 Derived from Hartman and Gerteis (2005)

Basis for Cohesion		
Basis for Association	Substantive Moral Bonds	Procedural Norms
Individual in Society Mediating Groups	Assimilation Interactive Pluralism	Cosmopolitanism Fragmented Pluralism

- (a) assimilationism (based on social expectations rather than policy)
- (b) cosmopolitanism (multiple hybrid identities based on individual choices)
- (c) interactive pluralism or multiculturalism (substantive moral bonds mediated through groups as well as individuals, so that there is unity in diversity)
- (d) fragmented pluralism (see Table 2.4).

As in the four typologies above, civic or interactive pluralism or multiculturalism emerges as an attractive option, even the favoured one⁸. Let us then look at a typology expressly aimed at showing the limitations of multiculturalism and the attractions of 'interculturalism'. In this respect Alain Gagnon and Raffaele Iacovino (2007) argue that Quebec has developed a distinctive political approach to diversity explicitly in opposition to federal Canadian multiculturalism. Their starting point is that two broad considerations are accepted by a variety of political positions, including liberal nationalist, republican and multiculturalist; indeed by most positions except liberal individualism, which they critique and leave to one side. The first of the two stipulations is that 'full citizenship status requires that all cultural identities be allowed to participate in democratic life equally, without the necessity of reducing conceptions of identity to the level of the individual' (2007: 96). Second, with respect to unity: 'the key element is a sense of common purpose in public matters, a centre which also serves as a marker of identity in the larger society and denotes in itself a pole of allegiance for all citizens' (ibid.).

For Gagnon and Iacovino, however, Canadian multiculturalism has two fatal flaws that make it de facto liberal individualist in practice if not in theory. First, it privileges an individualist approach to culture: as individuals or their choices change, the collective culture must change. In contrast, Quebec's policy states clearly the need to recognise the French language as a collective good that requires

Political Orientation →	Medium	Medium	High (but prescribed)	Low	High	1. Promotion of Equality of Opportunity
	National Cohesion	Liberal Neutrality	Multiculture	Multicultural Citizenship	High	High
	Medium	Low	Low	High (but remade)	High	2. Emphasis on National Identity
	Low	Low	Medium	High	High	3. Recognition of Difference
	No	Yes	No	No	No	4. Seeking Neutrality
	Individual	Individual	Individual	Individual & Group	Individual & Group	5. Bearer of Rights
	Vertical	Horizontal & Vertical	-	Horizontal & Vertical	Vertical	6. Relationship to the State
	Low	Low	Low	High	High	7. Emphasis on Minority Nation Identity
	High	Low	High	High	High	8. Emphasis on Interaction between Groups

Table 2.6 Contemporary responses to migration-related diversity

Type of State →	High	High	High	High	High	1. Promotion of Equality of Opportunity
Plural State (Modood 1997)	High	High (but re-made)	High (but re-made)	High (but re-made)	High	2. Emphasis on National Identity
	High	High	High	High	High	3. Recognition of Difference
	No	No	No	No	No	4. Seeking Neutrality
	Individual & Group	Individual & Group	Individual & Group	Individual & Group	Individual & Group	5. Bearer of Rights
	Horizontal & Vertical	Horizontal & Vertical	Horizontal & Vertical	Horizontal & Vertical	Horizontal & Vertical	6. Relationship to the State
	High	High	High	High	High	7. Emphasis on Minority Nation Identity
	High	High	High	High	High	8. Emphasis on Interaction between Groups

Table 2.5 A synthesis of models of state accommodation of Difference

Europe, normatively or in terms of viability, or will a notion of group recognition prove necessary? This is what we explore in Chapter 3 in relation to the empirical developments on the ground in the nine countries studied in the EMILIE project.

Conclusions

The theoretical formulations in this chapter are not offered as pure models to fit any contemporary country on a one-to-one basis, but rather as a basis for understanding, tabulating and comparing the different perspectives and initiatives that are discernible both in any one country and amongst countries, though in varying combinations and to different degrees. As such, we argued that a normative conception of multiculturalism remains a resilient means of explicating empirical developments in fields of contemporary nation-state citizenship. We have shown how it is striking that, in interpreting and evaluating a new emphasis on national identities, some authors ignore how some degree of particularity is both pragmatically necessary and justifiable within a variety of ideational and empirical political orientations. That is to say that where we are currently witnessing various political projects of remaking and updating national identities that are not being deparcialised, an opposing trend would not have to empty out the historical-cultural character of nationality but instead include minority ethnicities. The latter, therefore, need not be about being blind to minority ethnic groupness but, on the contrary, seeks to pluralise, and not empty, cultural content. We maintain that for the dominant ethnicity to demopolise the state and the citizenship by not making cultural assimilation a condition of full citizenship, full social acceptance, is to respect, not blank out the varied ethnicities of fellow citizens. We have argued that contrary to this view and as articulated by Joppke (2008), 'neutrality' must not be mistaken for contentlessness because pure universalism is impossible. So, equality in citizenship is best pursued as (1) anti-discrimination; (2) recognition of open, mixed and changing ethnicities/identities; (3) multi-logical plurality; and (4) inclusivity and the fostering of a sense of belonging. As such we have detailed a variety of models and shown how these remain valid in traversing the issue of addressing neutrality in contemporary liberal citizenship regimes while advancing a solution from normative accounts of multicultural citizenship.

on multinationalism in the latter, which interestingly is a key feature of Kymlicka's theory of liberal multiculturalism (Kymlicka 1995). This can be seen in Table 2.5, where to emphasise the strengths of interculturalism we have inserted two more categories, one of minority nationalism and another of interaction between groups. Interaction is supposed to be one of the alleged fundamental failings of old-style multiculturalism, of which an explicit emphasis is reflected in the term 'interculturalism'. This, however, is present in the theoretical conceptualisation of multiculturalism we have been considering (for a discussion of interculturalism in relation to multiculturalism, see Meer and Modood forthcoming).

It is clear from the political mood and practical proposals across Europe today that ethno-religious separatism is regarded as the most undesirable outcome, and for many assimilation as a policy is regarded as impractical if not also unjust. Recent events and anxiety about Muslims and whether they are 'integrating', illustrates that the following four political orientations may be the main recommendations for Western Europe. Each takes socio-economic integration (anti-discrimination and countering of social disadvantage) and a certain amount of liberalism (individual rights) as a given:

1. **National cohesion:** the assertion of civic nationhood and placing of social cohesion as a goal above the recognition of group 'difference' (see Table 2.6).
2. **Liberal neutrality:** the state must be neutral between all conceptions of good and should simply administer a uniform set of individual rights and not promote a particular nation, culture or religion.
3. **Multiculture:** an acceptance of the multicultural experience and hybridity at the level of everyday reality (especially in terms of consumption, entertainment and expressive culture) and political emphasis on the local, with scepticism about collective identities, especially the national and the Islamic, but openness to the cosmopolitan.
4. **Multicultural citizenship:** A rebalancing of the politics of accommodation and inclusion focused on ethno-religious groups, with a greater emphasis on hyphenated and plural forms of national citizenship, plural identities and individual rights than some multiculturalists argued for in the 1980s and 1990s.

From the point of view of multiculturalism, these developments can be reduced to the question: can categories 1, 2 or 3 above fully meet the contemporary challenges being experienced in Western

Appendix I

CRITERIA FOR TABLES

1. Promotion of equality of opportunity

- **Low:** where anti-discrimination laws to promote equality of opportunity are rarely applied in practice, and little or no data on ethnicity and race is collected, and no public agency (such as the Belgian or French HALDE model or the UK EHRC) is charged with publicity, coordination and enforcement.
- **High:** where appropriate data is systematically and extensively collected and used, cases are routinely investigated by employers and other institutions, with many reaching the law courts, and are widely publicised by the media and by agencies responsible for policy development and enforcement and that are answerable to a government department or minister.

2. Emphasis on national identity*

- **Low:** where accounts of nationhood do not feature prominently in characterisations of collective identity and/or are de-emphasised in arenas of public policy and public discourse in favour of local, regional or other scales of identification or competing notions of collective identity. So the state does not seek to promote a vision of common living, of fellow feeling between the inhabitants of that territory, other than the legal entitlements and duties that define civic membership.
- **High:** where political and popular discourse promulgates the idea of a collective nationhood through concrete and symbolic means, for instance, educational policy pertaining to the school curricula, particularly with respect to history, naturalisation and civic orientation and requirements that have a strong and clear sense of nationhood, as well as public discourse characterising the collective identity in national terms.

*National identities can be a variety of prescribed or remade categories. The former would be more exclusive in the way of a benign or active *Leitkultur*, while the latter would be more dialogical or incorporating of 'difference'.

3. Recognition of 'difference'

- **Low:** where minorities are expected or even required to privatise their cultural differences in the course of taking part in a pre-organised public space. This implies that the state will not take into account more than minimal involuntary identities (such as those pertaining to disability) in the construction of the public space, such that policies and practices pertaining to education, discrimination and representation, amongst others, will treat minority difference as invisible and not as a source of legitimate contestation.
 - **High:** where minority cultural differences and particularities are incorporated into and help fashion the public space so that there is both unity and diversity in public life, and communities and identities overlap, are interdependent and develop common features. Examples can include the adoption of headscarves, turbans and yarmulkes as part of school or work uniforms, or targeted socio-economic policies that are oriented to the specific obstacles or challenges disproportionately experienced by some minorities.
4. Seeking neutrality – yes/no (and possible or not possible)
- Where the state does not promote one or more national cultures, religions, ways of life, and so on. Such things would remain private to individuals in their voluntary associations with each other. There is a single political culture in the public sphere.
5. Bearer of rights
- **Private:** where although there may be substantial diversity in the private lives of individuals and communities, the state exists to protect the rights of individuals and the question of recognising new minority groups does not arise, for the state does not publicly recognise or enfranchise any groups to represent citizens. Individuals therefore relate to the state as individual citizens, not as members of the group.
 - **Public:** there may be some rights for all individuals but mediating institutions such as immigrant associations or the *Conseil Français du Culte Musulman* are also encouraged to be active public players and forums for political discussion and may even have a formal representative or administrative role to play in the state. Thus, the state recognises that individuals are partly

constituted by the lives of families and communities as well as shaped by the social order constituted by citizenship and the public that amplifies and qualifies, sustains, critiques and reforms citizenship.

6. Relationship to the state

- **Horizontal:** where the state engages and formulates public policy on the understanding that individuals belong to and are shaped by communities which are the primary agents of the public sphere. One outcome is that public life can consist of organised communities relating to each other (which overlaps with the minority nations in Spain and Belgium and with the historical minorities in Greece and Poland). Another outcome is that minority communities would remain intact but outside the public sphere (as in the case of pre-2000 German federal policies oriented towards the return of migrant communities).
- **Vertical:** where the state-citizenship relationship is not mediated by groups, communities or third parties, and more directly seeks the protection of the rights of individuals or the maximisation of the choices open to individuals. Danish social citizenship in the access to highly universal and non-means-tested social welfare provisions is a good illustration of this.

7. Emphasis on minority nation identity

- **Low:** where the very fact of minority or historically autonomous regions does not invite or seek the political capacity to instil or represent its identity in educational and migration policy, and civic or other integrationist measures, such as devolution and regional assemblies in the UK.
- **High:** where federal bodies devolve power, including integration policy, to historically autonomous regions and furnish them with the capacity to promote and sustain minority nation identities through such means as regional languages. Thus in some regions, linguistic departments may be established to enforce laws that give the regional language an equal status to a national language, not least in compulsory education, such as in the Catalan and Basque provinces in Spain.

8. Emphasis on interaction between groups*

- **Low:** where the state does not pursue strategies to engender 'social mixing' either nationally or locally; this may be because it leaves civil society to serve this function or perhaps does not deem it a policy priority.
- **High:** where notions of 'segregation' or other issues of social division are deemed to require concerted efforts and emphases upon social interaction at a variety of levels, and particularly locally. Ideas and emphases upon community cohesion are often illustrative of these sorts of concern, as is the more popular complaint that some minorities 'self-segregate'.

* An inquiry into the emphasis on 'interaction' needs to take into consideration the starting points; for example, in some states there will be little formal emphasis on interaction because civil society performs this function.

Notes

1. The Commission on Multi-Ethnic Britain was chaired by Bhikhu Parekh and included, among others, Stuart Hall, Tariq Modood, Yasmin Alibhai-Brown and Trevor Phillips.
2. See European Council press release, 19 November 2004 (http://ue.eu.int/ueDocs/cms_Data/docs/pressData/en/sha/82745.pdf). Other relevant documents on the issue are the Commission's first response to the Basic Common Principles of the Council (COM/2005/0389 final), the Second Annual Report on Migration and Integration (SEC/2006/892) and the European Parliament Resolution on Integration of Immigrants (P6_TA(2006)0318).
3. Justice and Home Affairs, 2618th Meeting (Council of the EU, 14615/04, 2004, pp. 17-18).
4. See Orgad (2009: 15) for interesting counter examples, showing how even if ECHR verdicts are favourable they are not easily operationalised at national level.
5. To Patten's formulation we should perhaps also add obligations and duties to entitlements.
6. National identities can be more or less open to change and remaking. The less open would be more exclusive in the way of a benign or active *Leitkultur*, while the more open would be characterised by internal differentiation and dialogically woven together through difference.
7. We have adapted their vocabulary.
8. Koopmans et al. (2005) do not express a preference between the alternatives that they track.

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The Multicultural States We're In¹

Nasar Meer and Tariq Modood

Introduction

This chapter directly follows on from the last by applying the theoretical formulations proposed in Chapter 2 to explore the possible ways citizenship conventions concerned with membership, entitlements and social expectations are incorporating minority identities within five north-western European countries and two southern European countries. What emerges from our discussion is that clusters of policy developments in each national context display some similarity but rarely any symmetry, thus suggesting that national models remain an important means of conceptualising developments in political orientations toward migration-related diversity.

3.1 France: embracing anti-discrimination

Within north-western Europe, France is a good illustration of – though not necessarily the closest fit to – a political orientation geared toward national cohesion as set out in Table 2.6 in the previous chapter. It is so because of its assertion of civic nationhood and the placing of social cohesion as a goal above the recognition of group 'difference'. Nationality and citizenship in France remain formally inseparable in a manner that precludes non-French nationals from political and civic participation. This is because the acquisition of French citizenship remains synonymous with a relatively prescriptive political and territorial national identity underlying the state's expectations that migration-related minorities must integrate into an established social and political order. For example, the national school curriculum refuses to incorporate, acknowledge or 'recognise' migration-related experiences, for fear of detracting from the inculcation of a primary republican national and citizenship identity, even while this perpetuates an ethnocentric and exclusive account of French identity.

