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Introduction

The accommodation of Islam within Europe has received a great deal of negative publicity recently. A noticeable interest in 'improving the integration' of Muslims has arisen across Europe. At a recent security conference in Munich, for example, Chancellor Angela Merkel and Prime Minister David Cameron reiterated the tenuous but common, seemingly 'causal' link between multiculturalism and political terrorism (Euractiv 2011). According to the German and British heads of government, European democracies needed to limit the 'uncontrolled' flourishing of cultural distinctness and enforce 'Western' values. More recently, David Cameron spoke of the endurance of the 'indomitable British spirit', and 'the belief in freedom, in democracy, in free speech, in our British values, Western values' in the aftermath of the Woolwich Murder in London (Back 2013). These utterances only hint at how a spectrum of competing discursive visions currently inform and underpin public debates about the accommodation of Islam in Europe. For instance, we observe that multiculturalism, a discourse that advocates equal rights for Muslims in various spheres of life, is increasingly discredited as 'going too far' in its aspiration to accommodate. This diagnosis implies an understanding of social tensions and political violence as 'deviant behaviour' that is rooted in a 'cultural package' that migrant populations have 'imported' from outside of Western Europe; the latter theme is prevalent within discourses that emphasize social cohesion and 'universal' civic values. Finally, the fact that these questions are discussed on a supranational level and with reference to 'Western values' or human rights considerations indicates a degree of commitment to a 'postnational constellation'.

This book is concerned with the discursive framing of contemporary integration debates in two European countries: Germany and Great Britain. It examines how currently salient discursive understandings of

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integration frame the 'Muslim question' in Europe and analyses how social problems and their potential solutions – in relation to Muslim communities – are constructed. More specifically, I interrogate currently dominant mainstream discourses (such as civic universalism or multiculturalism) as to their capacity to problematize structural asymmetries and inequalities. The study therefore comparatively investigates two recent 'integration measures' in greater detail, namely formalized consultations with German and British Muslim community representatives and new legislation protecting from religious discrimination. These case studies were chosen as in both countries, minority actors were involved in the negotiation of these policies, which allowed including the discursive framing of minority claims into the analysis.

The book contributes to the growing body of comparative literature on citizenship in multi-ethnic European societies, which emerged in the early 1990s and has expanded considerably since. In contrast to political debates, which often conceptualize social integration as an individual process of cognitive adaptation or educational and socio-economic performance (Blair 2006, Schäuble 2009a/b, Deutsche Islamkonferenz 2009a/b, Communities and Local Government 2012), political sociology analyses integration as a strategy that is reflected in a 'citizenship model' or 'citizenship regime' (Brubaker 1992, Soysal 1994, 1996, 2012, Ireland 1994, Favell 1998, Koopmans and Statham 1999, 2003, Koopmans et al. 2005, Joppke 1999, 2007, 2010, Joppke and Morawska 2003, Kastoryano 2002, Riedel 2005, 2010, Koenig 2005, 2007, 2009, Brunn 2012, Cinalli and Guigni 2013). This literature has highlighted a variety of dynamics that shape citizenship in diverse societies and explained cross-national differences by emphasizing specific key features. For instance, a group of scholars has pointed to diverging legal norms and political institutions across European nation-states (Koopmans and Statham 1999, Koopmans et al. 2005, Bolognani and Statham 2013, Carol and Koopmans 2013), and another has highlighted the significance of distinct historic ideas of the nation or democracy (Favell 1998, Brunn 2012). Recently, scholarship has also focused on the influence of institutionalized relationships between the state and religious communities (Fetzer and Soper 2003, 2005, Helbling 2012). The continuing divergence of European citizenship regimes has been emphasized by scholars working with the so-called opportunity structures approach, a perspective that demonstrates how national narratives of belonging and institutional or legal frameworks provide specific opportunities for minorities to express and advance political claims (Ireland 1994, Koopmans and Statham 1999, Koopmans et al. 2005, Fetzer and Soper 2003, 2005, Rosenow

and Kortmann 2011, Musch 2011, Helbling 2012, Buckley 2013, Cinalli and Guigni 2013). This literature has offered typologies of citizenship models, distinguishing for instance between 'monist', 'assimilationist', 'pluralist' and 'multicultural' incorporation regimes (Koopmans et al. 2005:10). Based on this typology, Germany is often referred to as an example of an ethno-centric assimilatory-restrictive citizenship regime, while the United Kingdom has frequently been described as a multi-cultural state (Koopmans et al. 2005, Cinalli and Guigni 2013). The 'opportunity structures' approach stresses the legal, institutional and discursive significance of the nation-state in determining the contours of citizenship. Another stream within this literature, most prominently represented by Yasemin Soysal or Christian Joppke, has argued that citizenship regimes have now outlived the respective histories of immigration, such as the guest-worker era or decolonization, and that European societies have begun to share a similar commitment to basic rights and political inclusiveness (Soysal 1994, Joppke 2010). While Soysal demonstrated that the human rights discourse offers references to minorities to advance their claims for inclusion (1994, 1996, 2012), Joppke argued that the exclusiveness of nationalism has been replaced by a liberal notion of citizenship that integrates via a 'thin' identification with 'constitutional patriotism' (2007, 2010).

Whether scholars conclude that the German and British approaches to citizenship converge or continue to differ, they tend to describe convergence or divergence revolving around one specific (national or supranational) 'model', 'regime' or discursive rationale. The implicit understanding of integration often is one of inclusion into a pre-defined cultural collective and its political institutions. Recently, the citizenship literature has thus been criticized as undermining ongoing social change and political contention about integration policies (Bertossi and Duyvendak 2012, Van Reekum, Duyvendak and Bertossi 2012). Supporting this critique, I suggest that perspectives highlighting holistic patterns of institutional or legal convergence or divergence tell us more about how minority claims are shaped by one specific interpretation of laws and institutions, than how minority claims themselves re-shape and interpret laws and institutions. To grasp ongoing political contention and social change, we need to move away from a notion of citizenship as constituted by a single, monolithic regime and account for the contested nature of laws and institutions and the implications their multiple interpretations have for post-migration minorities' position in society.

This book thus contributes to developing a research agenda that understands citizenship not as a static and fixed set of rules, procedures

and values, but as a multi-directional mechanism that can facilitate or inhibit democratic relations and interactions. I focus on the *integrative function of citizenship* as it has been defined by T. H. Marshall, namely its capacity to *translate political claims for equality into effective enforceable rights* (1992 [1950]).[1] However, I do not assume that democratic citizenship is necessarily tied to or dependent on the existence of a nation-state, neither do I conceive of it, as Marshall's account would suggest, as an ever improving and progressive institution. Rather, I understand democratic citizenship as continuously subject to hegemonic struggles between various viewpoints and an ongoing competition over distinct interpretations. The resulting understanding of integration is not one of inclusion into a pre-defined cultural collective and its political institutions, but one of a process that can assist in reducing structural barriers to individual's standing as equals. This conceptual frame emerges from a dialogue between two literatures, the scholarship on democracy in diverse societies and normative theorizing about social justice.

To complicate the 'one country/one citizenship regime' equation, which assumes a single, one-dimensional interpretation of history, cultural identity, political institutions or legal norms, I distinguish between four currently salient citizenship discourses, namely 'civic republicanism', 'multiculturalism', 'civic universalism' and 'denationalization'. Each of these discursive formations encompasses a set of statements, assumptions and arguments that are currently frequently reproduced and reiterated in empirical integration policy debates in Germany and the United Kingdom. These discursive repertoires can, however, also be traced within academic debates. To sketch the specific vision of democratic coexistence that each of these discourses implies I precede the empirical inquiry with a discussion of four influential academic propositions. Robert Putnam's work assists me in summarizing the contours of the civic republican discourse (2007, 2010) and Tariq Modood's writings are used on to sketch multicultural assumptions and concerns (2007, 2012). I draw on Christian Joppke's work to clarify civic universal arguments (Joppke 2007, 2010), while Saskia Sassen's angle offers insights into a discursive formation that is often referred to as cosmopolitanism or postnationalism, although Sassen herself speaks of denationalization (2007, 2008a/b).

The main argument of the book is that citizenship is shaped by competing discourses that facilitate or inhibit the articulation and translation of equality claims into collective institutions. The contention that my argument implies for citizenship regime studies is that laws, political

institutions, history, statistics and political culture or ideas of democracy (including concepts such as equality, secularism or justice) do not have the same meaning for all citizens in society. Rather, different social actors fill these concepts with different interpretative and discursive content; on this basis, the analysis of citizenship can account more explicitly for how laws, institutions, statistics (and so on), are continuously amenable to different interpretations. By sketching a set of currently salient discursive visions of democracy, I point to tensions between dominant and counter-hegemonic narratives. Rather than conceiving of citizenship as a one-directional static holistic regime that constrains or facilitates the content of claims (e.g., Koopmans et al. 2005), I study it as a collective endeavour that is shaped by an ongoing hegemonic struggle and competition of meanings between elites and marginalized actors within mainstream and counter-publics.

To evaluate the four discourses' capacity to problematize structural asymmetries and disadvantages, I draw on Nancy Fraser's suggestions to conceptualize social (in)justice. Fraser directs our attention to political claims of social movements and the way they problematize various forms of structural inequality (2008a, b). She offers a typology that helps to disentangle the information *implicitly or explicitly* reflected in empirical claims-making on the ground. To account for a *spectrum* of claims about structural disadvantages, she proposes an analytical distinction between claims about the maldistribution of resources, about mechanisms of cultural misrecognition and forms of political misrepresentation. Her work invites us to reflect about the distinct meaning institutionalized obstacles to economic, cultural and political '*parity of participation*' can have for a variety of subject positions, including those related to gender, ethnicity, race or religion (and others).

Fraser argues that claimants are more likely to challenge distinct manifestations of domination, oppression or exploitation if they have access to discursive resources that allow them to categorize and assess their social position as unjust rather than simply as unfortunate (2012:46). If interpretative schemes or discursive resources that specify various forms of structural injustice are unavailable or discredited, individuals are encouraged to perceive their inferior status as deserved or justified. Thus the absence of claims that problematize injustice does not necessarily mean that there are no obstacles to parity of participation, but can indicate that certain types of claims are not legitimized. Against this background, I suggest that the four citizenship discourses mentioned above provide different opportunities and discursive resources for individuals or collectives to qualify their experiences as unjust.

In summary, the book explores whether and how theoretical and empirical variants of four currently salient citizenship discourses facilitate or inhibit claims that problematize structural cultural, economic and political inequalities. Based on two case studies of political initiatives in two European settings, I thereby examine democratic citizenship's ability to politically integrate a religiously and ethnically diverse citizenry. I thus reclaim and recoin the term integration, which is not understood as a process of inclusion into a pre-defined set of norms and institutions, but as a mechanism that gradually reduces institutionalized obstacles to individuals' standing as equals.

The empirical analysis is based on a document analysis and semi-structured qualitative interviews with policy makers and minority activists who were actively engaged in the 'making' of integration policies in Germany and the United Kingdom. More specifically, I analyse formal processes of claims-making and deliberation within consultation bodies as well as informal mobilization and lobbying that led to the establishment of new anti-discrimination laws in the area of religion. I examine who articulated claims, how actors defined problems and solutions and establish which claims shaped the political outcomes in Germany and the United Kingdom.

A comparison of the negotiation of integration policy measures in two European contexts is to make each context illuminating to the other. Although framed as a two country comparison, the book seeks to avoid reproducing the main pitfalls of methodological nationalism as they have been identified by Wimmer and Glick-Schiller (2002).[2] I contest the axis of comparison by showing how political rhetoric presents political measures as uniquely national and originating from a particular institutional setting, whereas German and British policies are justified on the basis of similar discursive logics, which have identical implications for how inequalities are problematized. While national languages and legal contexts provide contours for argumentation and frame political contention, the analysis also shows that political actors in Germany and the United Kingdom make use of similar arguments to advance policy in the desired direction. The analysis is furthermore not confined to the nation-state as a forum for democratic relations, but includes mobilization on the supranational level of policy making. Finally, the focus on the interaction of a spectrum of discursive schemes enables me to move away from a managerial perspective on minority actors as objects of policy and to instead account for their role in political negotiations. Although I find similarities (and key differences) between Germany and the UK, the study shows that convergences (or divergences) do not revolve around

one key discursive vision of democracy, such as civic universalism (as for instance, argued by Joppke 2010), but reflect a wider array of discourses and counter-discourses as well as contextual features.

Finally, I do not suggest that historic ideas of democracy that underpin various models of representative democracy (Favell 1998, Krook, Lovenduski and Squires 2009, Brunn 2012) do not play a crucial role in the realization of equality claims, nor do I deny that legal provisions or institutional settings set boundaries to democratic interaction and negotiation (Koopmans et al. 2005, Cinalli and Guigni 2013). However, this book additionally points to the interpretative scope and variable meaning attributed to legal norms, institutional frameworks and public values. For instance, whereas naturalization or anti-discrimination laws set certain limits for social interaction, their content differs according to the political objectives they are designed to address and depending on how they are adopted and interpreted by different courts. Or institutions, such as consultation bodies, can be labelled dialogical forums, whereas the power dynamics unfolding within them are more ambiguous and multilayered. The study thus indicates how political actors construct and re-adjust the meaning of concepts like democracy, secularity or equality and shows how institutions, laws or values thereby attain a spectrum of salient meanings at any given time; the book demonstrates how these constructions can contribute to challenging forms of exclusion, or disguise manifestations of structural disadvantage. Each empirical chapter identifies a key rationale or logic that plays a role in masking and thereby sustaining inequalities that have their roots in the current economic, cultural or political order of society. Thus, the book shifts the main focus of citizenship studies from accounting for national similarity or difference to problematizing how structural inequality is debated across Europe.

I now briefly outline the contents of each chapter. Chapter 1 brings Fraser's account of social justice into a dialogue with theoretical citizenship discourses. I apply Fraser's analytical and normative concerns to the specific case of post-migration minorities and critically discuss her concerns with one currently salient mode of claims-making, identity politics. Fraser's critique of the politics of identity, I suggest, suffers from a currently not uncommon tendency towards Orientalism among Western left-wing intellectuals, which excludes what is perceived as communitarian 'particularism' from what is constructed as progressive 'universalism'. However, her three-dimensional framework for the analysis of social justice claims can assist in extending the discursive resources that contemporary citizenship discourses currently offer. Fraser's analytical

distinction between recognition, redistribution and representation carries a critique of scholarship that theorizes social and democratic change by paying particular attention to either cultural, economic *or* political dynamics of social change; thereby, democratic theorists explicitly or implicitly prioritize claims for social justice that challenge the cultural, the economic or political order of society. I review four currently influential citizenship discourses that highlight various aspects of democratic change in diverse societies and explore their capacity to account for a spectrum of structural impediments to parity of participation. My review shows that some discourses offer more comprehensive resources to problematize institutionalized inequalities than others. None of those four, however, offers a comprehensive enough interpretative scheme to encompassingly problematize inequalities rooted within the cultural, political and economic order of society. To illustrate the four discourses' tendency to 'culturalize' or 'politicize' social relations, I have grouped them according to the sphere of social relations that they emphasize. I review two influential discourses that emphasize *cultural* dynamics of democracy, namely civic republican (Putnam 2007, Putnam and Campbell 2010) and multicultural citizenship (Modood 2007, 2012) and two viewpoints that stress the *political* domain of democratic relations, notably civic universal (Joppke 2007, 2010) and denationalized citizenship (Sassen 2008a, 2010). I show how interpretative schemes like civic republicanism, which highlights individual responsibility, or civic universalism, which focuses on representative elite politics, can ignore institutionalized misrecognition or maldistribution. Multiculturalism attends to cultural status inequalities, but leaves the structural inequalities that result from the hierarchical division of labour and the capitalist mode of production relatively unchallenged. Furthermore, the multicultural focus on shared cultural features offers explicit attention to injustices such as the denigration or the marginalization of specific cultural identities, but addresses the injustice of excessive ascription only partially, namely through positive affirmation. Finally, denationalized citizenship, which successfully deconstructs cultural generalizations, is more apprehensive about manifestations of cultural marginalization. Chapter 1 sketches and discusses the key arguments that constitute each of these four discourses and highlights their shortcomings from a three-dimensional angle on social justice. The following chapters then investigate whether and how social actors draw on these discursive rationales and which claims they make on their basis. The empirical sections furthermore examine the salience and the availability of the four discursive frames and analyse the legitimacy that is attributed to each of them in public debates.

Chapter 2 outlines the methodological approach. I sketch the process of data selection and collection, discuss ethical and access considerations, and offer reflections on data indexing and interpretation. I outline how I translated the theoretical considerations discussed in Chapter 1 into a discourse analytical framework and empirical research design, and briefly contextualize the empirical inquiry by drawing on previous studies of the German and British citizenship 'regimes'. The chapter also sketches the contours of the discourse analytical framework.

Chapter 3 discusses the institutionalized dialogue with Muslim representatives in Germany, the 'German Islam Conference' (Deutsche Islam Konferenz, DIK). I give an overview of the existing historical state-church relationship which has yet to include Islamic communities. I then explore the discursive framing of two main themes discussed during the conference proceedings, social integration and legal recognition. I show that minority actors drew on multicultural arguments to claim their individual entitlements to political, cultural and economic participation and their collective right to formal legal recognition as a religious community, while majority actors referred to civic republican and civic universal arguments which provided them with the means to construct these individual and collective rights as conditional upon further processes of adaptation on the part of the minority. I illustrate how the rationale of conditionality in this instance helps to sustain cultural status hierarchies, legitimates restricted access to political representation and is used to justify patterns of economic marginalization.

Chapter 4 examines institutionalized consultations with Muslim representatives in Great Britain. As in the previous chapter on Germany, I outline the historic church-state arrangement in the UK and then discuss the discursive framing of claims for recognition and social integration. I highlight the salience of civic republicanism and multiculturalism, both of which have a pronounced focus on social solidarity. The chapter shows how the particular accentuation of social identifications as *precondition* and *objective* of democratic politics serves a similar function as the rationale of 'conditionality' in Chapter 3; while British political representatives appear less inclined to put the blame for disadvantage onto the individual citizen, their accentuation of 'cognitive alienation', 'value based difference', and the ideological roots of political violence similarly reduced institutional responsibilities to the control of conduct and envisaged a re-orientation of social norms, as opposed to tackling status hierarchies and structural inequalities. In a distinct way, this discursive logic assists in maintaining or even reinforcing misrecognition, maldistribution and misrepresentation.

Remaining with Great Britain, Chapter 5 discusses the multi-levelled political process that led to the inclusion of religion into British legal anti-discrimination provisions. I begin with an overview of the historical approach to 'Race Relations' and then explore the contention about religious discrimination on the supranational and national levels of policymaking; I also discuss the interpretation of the new provisions in court (including the most recent rulings by the European Court of Human Rights). I highlight the salience of supranational human rights discourses and point to the influence of denationalized, civic universal and multicultural arguments during the negotiation and implementation of the new law. These discursive positions offer distinct responses to the ongoing decentralization of British citizenship, which accentuates the contribution of civil society (and faith-based organizations) in the delivery of public services. The key rationality I highlight in this case study is the understanding of competing claims as diverging interests of social groups, which presumes that social groups are bounded entities that embrace a fixed set of non-negotiable norms. I suggest that this rationale in this instance inhibits the contestation of barriers to parity of participation.

Returning, finally, to Germany, Chapter 6 traces the creation of the first German anti-discrimination law, passed in 2006. I start by sketching Germany's historical experiences with equal treatment and then highlight the salience of civic republican and civic universal arguments in public debates about religious diversity in general and the contention about protection from religious discrimination in particular. The key rationality I bring out in this case study is the inconsequential interpretation and application of human rights standards to what appear as 'familiar' and 'unfamiliar' religious groups. While public authorities' main concern was to inhibit *expressions* of the Islamic faith, such as the wearing of the hijab, as these were *associated* with *attitudes* that justify the violation of a woman's human right to non-discrimination, the German Churches were endowed with a legal privilege to adopt employment *practices* that do violate basic human rights to non-discrimination on grounds of religion and sexual identity. As a result, the new law and its enforcement agency prioritize the religious majority's interest to discriminate over minority rights to non-discrimination; the German Churches specific social position as the main semi-public health care provider and their reservations towards members of minority faith groups create particular barriers for Muslims to realize their rights to economic, cultural and political parity of participation.

The concluding chapter recaps the main comparative findings regarding the discursive framing of debates about social and political integration in Germany and Great Britain and elaborates on their implications for Fraser's critique of identity politics as a salient mode of mobilization. The comparison indicates that social actors who draw on discourses such as civic republicanism, civic universalism or multiculturalism arrive at a similar understanding of social problems and propose related solutions to them; the four case studies demonstrate how the salience of these interpretative schemes varies and how actors attribute different credibility to these discursive rationales in various contexts or stages of negotiation processes. I do not deny that distinct national institutional, legal and discursive opportunity structures shape the contours of integration policy and play a role in the realization of equality claims. However, I show currently circulating discourses themselves offer distinct opportunities and constraints for minority actors to challenge structural asymmetries. I summarize how empirical variants of each of the four discourses (civic republican, multicultural, civic universal and denationalized citizenship) have been found to problematize or mask various manifestations of structural inequality. I do not assume that the currently salient discursive emphasis on civic republican or civic liberal ideas embraces the entirety of the underlying theoretical concepts, or replaces more sophisticated understandings. Rather, I highlight how empirical debates about ethnic and religious diversity have added a layer of meaning to these concepts that, in their current empirical application, reflect certain discursive boundaries and logics which have implications for how structural inequalities are currently debated across Europe.

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