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The blind spots of liberal citizenship and integration policy

ALEKSANDRA LEWICKI

ABSTRACT Governments across Europe have stepped up their efforts to manage social diversity politically, often specifically targeting Muslim populations. Lewicki interrogates the policy tools that the British and German governments deploy to ‘integrate’ an increasingly stigmatized and racialized population, zooming in on whether and how they problematize patterns of inequality. Complicating the ‘one country, one citizenship’ rationale of the citizenship regime literature that assumes a one-dimensional interpretation of history, cultural identity, political institutions or legal norms, she points to four salient liberal citizenship discourses that currently frame policies of diversity management. These are civic republicanism, multiculturalism, civic universalism and cosmopolitanism. Her analysis demonstrates that all four liberal citizenship discourses have blind spots when it comes to problematizing structural hierarchies and the logics of racism. Over the last two decades, liberal citizenship and integration policy frameworks have thus contributed to the retention of binary distinctions between superior citizens and inferior Others, distinctions that can now easily be exacerbated and used for mobilization by right-wing populist movements.

KEYWORDS citizenship, integration policy, Islamophobia, Muslims in Europe, social diversity, structural inequalities

Regardless of their stance on immigration, there seems to be an agreement among European governments that the management of social diversity is in dire need of political attention. Many initiatives in this area figure as ‘integration measures’ and specifically target Muslim populations. This article interrogates the policy tools that liberal European governments deploy to ‘integrate’ an increasingly racialized population. It examines and compares the discursive framing of policies adopted in two national settings, Britain and Germany, over the course of the last decade, and scrutinizes their capacity to problematize inequalities that affect individuals who self-describe as Muslim or are perceived as such by others.

The analysis draws on and contributes to the literature that investigates how governments manage and regulate immigration and diversity. A growing body of works analyse such policy frameworks as part of a polity’s conceptual

2 *Patterns of Prejudice*

approach to citizenship.¹ This literature has offered a typology of citizenship regimes, distinguishing for instance 'monist', 'assimilationist', 'pluralist' and 'multicultural' incorporation models.² Germany, for example, is often referred to as an ethnocentric assimilatory-restrictive citizenship regime, while the United Kingdom is seen to epitomize a multicultural state. This perspective stresses the significance of the nation-state in determining the contours of citizenship and emphasizes the continuing differences of European citizenship models. Another stream within this literature, prominently represented by Yasemin Soysal or Christian Joppke,³ argues that European models converge around supranational commitments to basic rights and political inclusiveness.

Whether scholars in this field conclude that the German and British approaches to citizenship converge or continue to differ, they tend to describe convergence or divergence as revolving around one specific and seemingly one-directional (national or supranational) 'model', 'regime' or discursive rationale, such as, for instance, community cohesion, postnationalism or civic universalism. They thereby implicitly or explicitly presume that laws, institutions and public values are underpinned by a monolithic account of history, identity and 'dominant culture'. The 'modelling' of citizenship has thus been subject to critique from diverse angles,⁴ as the assumed neatness of regimes renders these more stable than they actually are.⁵

- 1 Rogers Brubaker, *Citizenship and Nationhood in France and Germany* (Cambridge, MA: Harvard University Press 1992); Adrian Favell, *Philosophies of Integration: Immigration and the Idea of Citizenship in France and Britain* (Basingstoke: Macmillan 1998); Yasemin Soysal, *Limits of Citizenship: Migrants and Postnational Membership in Europe* (Chicago and London: University of Chicago Press 1994); Ruud Koopmans, Paul Statham, Marco Guigni and Florence Passy, *Contested Citizenship: Immigration and Cultural Diversity in Europe* (Minneapolis: University of Minnesota Press 2005); Tariq Modood, *Post-Immigration 'Difference' and Integration: The Case of Muslims in Western Europe* (London: British Academy Policy Centre 2012); Marc Helbling (ed.), *Islamophobia in the West: Measuring and Explaining Individual Attitudes* (London and New York: Routledge 2012); Manlio Cinalli and Marco Guigni, 'Public discourses about Muslims and Islam in Europe', *Ethnicities*, vol. 13, no. 2, 2013, 131–46.
- 2 See, for example, Koopmans, Statham, Guigni and Passy, *Contested Citizenship*, 10.
- 3 Soysal, *Limits of Citizenship*; Christian Joppke, *Citizenship and Immigration* (Cambridge and Malden, MA: Polity Press 2010).
- 4 Hassan Bousetta, 'Institutional theories of immigrant ethnic mobilisation: relevance and limitations', *Journal of Ethnic and Migration Studies*, vol. 26, no. 2, 2000, 229–45; Davide Però and John Solomos, 'Introduction: Migration politics and mobilization: exclusion, engagements, incorporation', *Ethnic and Racial Studies*, vol. 33, no. 1, 2010, 1–18; Rogier van Reekum, Jan Willem Duyvendak and Christophe Bertossi, 'National models of integration and the crisis of multiculturalism: a critical comparative perspective', *Patterns of Prejudice*, vol. 46, no. 5, 2012, 417–26; Peter Scholten, 'Between national models and multi-level decoupling: the pursuit of multi-level governance in Dutch and UK policies towards migrant incorporation', *International Migration and Integration*, vol. 17, no. 4, 2016, 973–94.
- 5 Veit Bader, 'The governance of Islam in Europe: the perils of modelling', *Journal of Ethnic and Migration Studies*, vol. 33, no. 6, 2007, 871–86.

Departing from a research agenda that understands citizenship as a fixed set of rules, procedures and values, this article seeks to account explicitly for its contested features. I propose to analyse citizenship as continuously subject to hegemonic struggles over distinct viewpoints and competing interpretations of institutional arrangements. The contention that this approach implies for citizenship regime studies is that laws, political institutions, history, cultural values and ideas of democracy do not have the same meaning for all discussants. Rather, different social actors fill these concepts with distinct discursive content. The analysis of policy frameworks thus needs to account more explicitly for how laws, institutions or social norms are continuously amenable to different interpretations.

As I will show in greater detail below, four salient citizenship discourses predominantly frame policies of diversity management at present. These are civic republicanism, multiculturalism, civic universalism and cosmopolitanism. While these four discourses are made use of in distinct European settings, they also share common features. This article traces the discursive resources the four schemes offer to challenge patterns of inequality.⁶

There is considerable comparative evidence to suggest that Islamophobia currently constitutes a highly salient form of racism in Britain and Germany.⁷ Those perceived or self-describing as Muslims, across several generations, have been disproportionately disadvantaged in key areas of social life, including the German and British labour and housing markets,⁸ and the education and criminal justice systems.⁹ Islamic practices are furthermore frequently subject to regulatory restrictions across Europe.¹⁰ These patterns of inequality can be traced to the persistence of colonial distinctions between superior Europeans and inferior ‘non-Europeans’ that are part of both countries’ histories, to the unequal global distribution of resources, and to capitalism’s pull for cheap migrant labour; they can further be related to

6 I assume that manifestations of domination, oppression or exploitation can be challenged more easily if mainstream discourses allow individuals to categorize and assess their social position as unjust rather than simply as unfortunate. If interpretative schemes that specify asymmetries are more difficult to access or are discredited, individuals are more likely to perceive an inferior status as deserved or justified: see, for example, Nancy Fraser, ‘On justice: lessons from Plato, Rawls and Ishiguro’, *New Left Review*, vol. 74, March–April 2012, 41–51 (46).

7 Nasar Meer and Tariq Modood, ‘Refutations of racism in the “Muslim question”’, *Patterns of Prejudice*, vol. 43, no. 3–4, 2009, 335–54; Yasemin Shooman, ‘... weil ihre Kultur so ist’: *Narrative des antimuslimischen Rassismus* (Bielefeld: Transcript 2014).

8 Pamela Irving Jackson and Peter Doerschler, *Benchmarking Muslim Well-Being in Europe: Reducing Disparities and Polarizations* (Bristol: Policy Press 2012).

9 Enes Bayraklı and Farid Hafez (eds), *European Islamophobia Report 2016* (Istanbul: SETA 2017).

10 Ibid. See also Schirin Amir-Moazami, ‘Framing Muslims or reframing the questions: notes on the “Muslim question” in Europe’, in Omar Kasmani and Stefan Maneval (eds), *Muslim Matter* (Berlin: Revolver Publishing 2016), 21–6.

some of the logics of liberal representative democracy, as well as to widespread perception that Muslim norms are distinct from or even in opposition to what are framed as secular Christian practices.¹¹ In summary, these asymmetries are related to what Nancy Fraser described as economic, political and cultural structural inequalities.¹² While these forms of asymmetry of course significantly overlap and impact on each other, her distinction broadens our notion of inequality by pointing to its *structural* anchoring within the cultural, political or economic orders of society.¹³

Bringing these considerations together, I argue that citizenship is shaped by competing discourses that provide distinct means to problematize contemporary structural inequalities. The contention this approach implies for citizenship studies is twofold. First, my intervention complicates the 'one country, one citizenship' rationale of the citizenship regime literature that assumes a one-dimensional interpretation of history, cultural identity, political institutions and legal norms by identifying four salient citizenship discourses that offer varying perspectives on diversity management. Second, the analysis demonstrates that all four influential citizenship discourses have blind spots when it comes to problematizing structural asymmetries in diverse societies. While scholarship has shown how policies of immigration control sustain binary distinctions between the rights of 'insiders' and 'others',¹⁴ this article illustrates how integration policy frameworks, despite their intention to improve democratic relations, also perpetuate structural hierarchies, and thus uphold the logics and rationalities of racism. It becomes evident that liberal citizenship and integration policy frameworks have contributed to the retention of binary distinctions between superior citizens and inferior Others that can now easily be exacerbated and used for mobilization by right-wing populist movements, as exemplified by the Brexit campaign conducted by the United Kingdom Independence Party (UKIP),¹⁵ or the political programme of Germany's right-wing populist party Alternative für Deutschland (AFD).¹⁶

11 For a detailed elaboration, see Aleksandra Lewicki, 'Race, religion and social justice', in Gary Craig (ed.), *Global Handbook of Social Justice* (Cheltenham: Edward Elgar 2017 forthcoming).

12 Nancy Fraser, *Scales of Justice: Reimagining Political Space in a Globalizing World* (Cambridge: Polity Press 2008).

13 Lewicki, 'Race, religion and social justice'.

14 Bridget Anderson, *Us and Them? The Dangerous Politics of Immigration Control* (Oxford: Oxford University Press 2013).

15 Aaron Winter, 'Brexit and Trump: racism, the far-right and violence', 3 April 2017, available on the *University of Bath Blogs* website at <http://blogs.bath.ac.uk/iprblog/2017/04/03/brexit-and-trump-on-racism-the-far-right-and-violence> (viewed 4 October 2017).

16 Alternative für Deutschland, *Programm für Deutschland*, 30 April–1 May 2016, available on the *Alternative für Deutschland* website at https://alternativefuer.de/wp-content/uploads/sites/7/2016/05/2016-06-27_afd-grundsatzprogramm_web-version.pdf (viewed 4 October 2016).

Methodology

While an exploration of the conditions of possibility for current policy frameworks would require in-depth analysis of both countries' colonial and immigration histories, this analysis pursues a more modest aim in that it merely zooms in on the discursive resources that frame contemporary policies.

In the citizenship literature, Britain and Germany figure as the 'most distinct' cases in terms of their approaches to diversity management. Their varying policy frameworks originate in the two countries' specific histories of colonialism, their experiences with post-war immigration,¹⁷ and their most recent attempts to regulate access to rights and integration.

While Germany was forced to give up its colonial aspirations following the First World War, the legacy of the British Empire was most notably shaped by post-Second World War immigration to the United Kingdom. Immigrants from the British Commonwealth, including India, Pakistan and Bangladesh, figured as 'subjects of the Crown' and thus held the right to vote in British elections. Germany's post-First World War immigration, in contrast, served to fill gaps in the labour market in order to enable economic prosperity, and involved targeted recruitment programmes for 'guestworkers' from low-waged countries such as Turkey, Italy, Greece and so on. Those new arrivals who later settled permanently in Germany were, until recently, barred from voting. As a result of such divergent access rules, UK-based minority representative bodies tend to speak on behalf of an electorate, and thus to form more professionalized lobby organizations.

More recent policies of immigration management have also followed varying trajectories. While Germany insisted on a transitional closure of its labour market for citizens from new European Union (EU) member states, the British New Labour government immediately received EU migrants from Eastern Europe. And whereas Britain responded to the humanitarian crisis in Syria by refusing to take in adult refugees, Germany accepted a significant number of asylum applicants from this region.

While these histories shape the terms and scope of diversity management strategies, this article also identifies certain analogies in relation to how social problems are currently narrated, and policy solutions deployed across European settings. One reason may be that diversity management is increasingly negotiated among the local, national and European levels of policymaking.¹⁸ Another focal point, I suggest in this article, is the heightened attention given to the 'Muslim question' in Europe, thus the assumption that the presence of Muslim populations calls for novel,

17 Brubaker, *Citizenship and Nationhood in France and Germany*; Favell, *Philosophies of Integration*; Sarah Hackett, *Foreigners, Minorities and Integration: The Muslim Immigrant Experience in Britain and Germany* (Manchester and New York: Manchester University Press 2013).

18 Scholten, 'Between national models and multi-level decoupling'.

mostly restrictive, regulatory responses.¹⁹ European governments have stepped up their efforts to engage with Muslim organizations over the last fifteen years. While this has enabled community representatives to enter decision-making circles and raise awareness of their political claims,²⁰ the initiatives are largely driven by a securitized agenda,²¹ intervening in Muslim organizational structures and activities,²² and thus limiting the possibilities of real dialogue.

The data on which this article draws originate from such interactions. The information is based on an analysis of policy documents and semi-structured qualitative interviews with policymakers and representatives of Muslim organizations who have been involved in the 'making' of integration policy in Britain and Germany. The material includes political speeches, strategy papers, commission reports, research conducted by government departments and enquiries published by British and German governments or voluntary organizations between 2001 and 2016. These include, for instance, the *Casey Review*,²³ commissioned by the British government, and the policy recommendations passed by the Deutsche Islam Konferenz (German Islam Conference), a consultation body that aims to advance the integration of Muslims. Fifty-four research interviews were conducted over the course of two research projects between 2007 and 2014. Respondents were approached when their names appeared in policy reports, via government departments in charge of specific consultations, as well as by means of snowballing techniques. Interview questions mainly prompted engagement with the negotiation of specific policy measures, while data analysis focused on how actors defined social problems and policy solutions.

Based on this material, I identified the four most salient discursive formations. To sketch the contours of their ideas of citizenship and integration, I draw on scholarly contributions by Robert Putnam to shed light

19 As an analogy to the 'Jewish question' in the twentieth century, scholarship has noted the emergence of a 'Muslim question' in academic and public debates in the twenty-first century; see Meer and Modood, 'Refutations of racism in the "Muslim question"'; and Amir-Moazami, 'Framing Muslims or reframing the questions'. The term accounts for the problematization and racialization of Muslims in Europe.

20 Aleksandra Lewicki and Therese O'Toole, 'Acts and practices of citizenship: Muslim women's activism in the UK', *Ethnic and Racial Studies*, vol. 40, no. 1, 2017, 152–71.

21 Jonathan Laurence, *The Emancipation of Europe's Muslims. The State's Role in Minority Integration* (Princeton, NJ and Woodstock, Oxon.: Princeton University Press 2012).

22 Kerstin Rosenow-Williams, 'Lobbying for civil and religious rights of immigrants and Muslims: desecuritization strategies of Islamic umbrella organizations in Germany', *International Migration and Integration*, vol. 15, no. 3, 2014, 411–30.

23 Louise Casey, *The Casey Review: A Review into Opportunity and Integration* (London: Department for Communities and Local Government 2016), available on *gov.uk* at www.gov.uk/government/uploads/system/uploads/attachment_data/file/575973/The_Casey_Review_Report.pdf (viewed 5 September 2017).

on *civic republicanism*,²⁴ Tariq Modood's work to flesh out *multicultural* concerns,²⁵ Christian Joppke's writings to sketch *civic universal* arguments,²⁶ and Saskia Sassen's ideas to outline *cosmopolitanism*.²⁷ I do not suggest that these four scholars are responsible for the way their arguments are adopted in public debates. Rather, I highlight certain analogies of reasoning within academic and empirical debates to illustrate how the four interpretative schemes frame discussion of the 'Muslim question' in Europe. The following sections discuss the conceptual and empirical insights that resulted from this analysis.

Civic republicanism

The concept of social capital as it has been used by Robert Putnam has gained high salience in scholarly debates on the quality of democracy in diverse societies.²⁸ His work is focused on the micro-level of interpersonal relationships, as well as individuals' mutual perceptions of each other and their collective self-understanding.

From this point of view, the quality of democracy stands and falls with citizens' self-identification as members of the political community. Democratic subjectivity unfolds through the interpersonal mingling and mixing that creates solidarity, a necessary precondition for democracy. Putnam finds a higher level of social disconnectedness and lower levels of community attachment in ethnically diversified localities.²⁹ The crucial instrument against the erosion of community ties is a sense of social unity, defined in terms of social capital as 'networks and the associated norms of reciprocity and trustworthiness'.³⁰ Putnam suggests that civil associations transform self-seeking, private or isolated individuals into a public-spirited collectivity capable of acting for the common good. To facilitate integration, governments need to generate networks and norms of reciprocity and foster a sense of shared citizenship by encouraging socializing and volunteering.

The civic republican lens has become popular among governments across Europe. Key expert enquiries—such as the study by the Bundesamt für Migration und Flüchtlinge (Federal Office for Migration and Refugee),

24 Robert D. Putnam, 'E pluribus unum: diversity and community in the twenty-first century', *Scandinavian Political Studies*, vol. 30, no. 2, 2007, 137–74.

25 Modood, *Post-Immigration 'Difference' and Integration*.

26 Joppke, *Citizenship and Immigration*.

27 Saskia Sassen, *Territory, Authority, Rights: From Medieval to Global Assemblages* [2006], 2nd edn (Princeton, NJ and Woodstock, Oxon.: Princeton University Press 2008).

28 Putnam, 'E pluribus unum'.

29 *Ibid.*, 149.

30 *Ibid.*, 137.

Muslimisches Leben in Deutschland (Muslim Life in Germany),³¹ or the British report initiated in response to the 7/7 terrorist attack in London by the Commission on Integration and Cohesion, *Our Shared Future*³²—use social capital as the chief indicator of integration. Both documents, as well as the integration strategy paper issued by David Cameron’s coalition government,³³ and the *Casey Review*,³⁴ commissioned by the succeeding Conservative government, assess whether people ‘get on well together’ and highlight the frequency of contact between individuals from different backgrounds.

Former German Home Secretary Wolfgang Schäuble, who currently holds the post of Finance Minister, initiated a formal dialogue with Muslim community representatives in the German Islam Conference. In his speeches, he explicitly establishes a link between cultural diversity and the decline of traditional values that, in his view, threatens social unity and leads to as diverse phenomena as heightened youth crime, anti-social behaviour and violent extremism.³⁵ He reasons that faith communities provide the type of ties that bind, namely value-based identification with a wider collective. However, in Schäuble’s view, Muslim communities generally fail to deliver these social goods.

Unfortunately, according to many studies and opinion polls, in many European countries Muslim communities are far from being seen as valuable contributors to our common good. That is, of course, partly fallout from the horrendous terror and repeated threats against our liberties that are being brought forward by extremist Muslims claiming to act on behalf of Islam. But it is, unfortunately, also in part a reflection on missing or at least not so visible contributions Islamic organizations make to advance social cohesion and closely knitted community life of all people of all faiths.³⁶

To Schäuble, the ‘failure to contribute’ is manifested in what he perceives as cultural difference: immigrants’ ‘clinging to traditional values’.³⁷ In this instance, the civic republican lens informs generalizing perceptions of a homogeneous value-based collective whose coherent value-set is perceived as an obstacle to its ability to contribute to society.

31 Sonja Haug, Stephanie Müssig and Anja Stichs, *Muslimisches Leben in Deutschland: Im Auftrag der Deutschen Islam Konferenz* (Nuremberg: Bundesamt für Migration und Flüchtlinge 2009).

32 Commission on Integration and Cohesion, *Our Shared Future* (Wetherby, Yorks: Commission on Integration and Cohesion 2007).

33 Communities and Local Government, *Creating the Conditions for Integration* (London: Department for Communities and Local Government 2012).

34 Casey, *The Casey Review*.

35 Wolfgang Schäuble, ‘Was uns verbindet’, *Frankfurter Allgemeine Zeitung*, 22 May 2009.

36 Wolfgang Schäuble, ‘Integration and diversity: state and religion in the pluralistic society’, *Leo Baeck Institute London Annual Report of Activities 2009* (London: Leo Baeck Institute 2009), 9–17 (16).

37 *Ibid.*

In the United Kingdom, the so-called 'Cantle Report', commissioned to evaluate a series of escalating tensions in the North of England in 2001, describes the 'complete separation of communities based on religion, education, housing, culture, employment etc.', manifested in a 'lack of contact with, and absence of knowledge about, each other's communities' that 'lead to the growth of fear and conflict'.³⁸ It offers a depoliticized cultural explanation for tensions in an area that is affected by de-industrialization and socio-economic deprivation. Although the report notes disadvantages in housing and employment, it argues that

many of the present problems seem to owe a great deal to the failure to communicate and agree on a set of clear values that can govern behaviour. This failure is evident at both the national and local levels, and it has led to community breakdown in some parts of the country.³⁹

Similar to Putnam's diagnosis that people trust each other less in diverse neighbourhoods, the report finds a decline of shared 'cognitive-affective' identifications. The implication is that lack of contact and interaction in itself creates violent social tensions. Diversity is constructed as a source of cognitive alienation and social 'disharmony'. A related diagnosis can be found in the more recent British integration strategy paper, which refers to those involved in the August 2011 riots as lacking in 'social responsibility'.⁴⁰ To foster shared 'core values and experience', the strategy paper encourages higher levels of volunteering and dialogue between people from different faith and cultural backgrounds.⁴¹ Releasing funding to youth organizations such as 'The Scouts Association, Girlguiding UK, Army Cadets, Volunteer Police Cadets and St John Ambulance',⁴² the strategy puts the onus of this task on the voluntary sector. The *Casey Review* of December 2016, also structured by civic republican discursive logic, initially explicitly acknowledges that the recession had aggravated socio-economic inequalities, and accounts for the disproportionate disadvantage experienced by Pakistani and Bangladeshi populations in Britain. The report relates these, however, to patterns of 'ethnic concentration' and segregation that 'limit labour market opportunities' and 'reduce opportunities for social ties' and 'trust'.⁴³ 'Social mixing and interaction between people from a wider range of backgrounds', the report suggests, can 'have positive impacts; not just in reducing anxiety and prejudice, but also in enabling people to get on better in employment and

38 Ted Cantle, *Community Cohesion: Report by the Independent Review Team* (London: Home Office 2001), 30.

39 *Ibid.*, 18.

40 Communities and Local Government, *Creating the Conditions for Integration*, 4.

41 *Ibid.*, 4, 10.

42 *Ibid.*, 12.

43 Casey, *The Casey Review*, 12.

social mobility'.⁴⁴ The policy toolkit recommended by the report, unsurprisingly, involves the creation of opportunities for pupils to 'mix with others from different backgrounds' or help with the removal of 'cultural barriers to employment'.⁴⁵

These narratives juxtapose the ideal of the citizen who is surrounded by reciprocal relationships and spends his/her free time in voluntary work with alienated ethnic minorities who isolate themselves, do not know how to behave and hence turn to violence. They project a coherent cultural behavioural script on to what are perceived as 'cultural collectives', thereby reproducing the logic of racist generalizations and distinctions. Ethnically homogeneous societies are constructed as uncontested spaces of behavioural conformity, whereas immigrant societies grapple with inherently aggressive citizens who riot and/or plot terrorist activities. Policies deduced from this understanding reflect a preference for political interventions that seek to alter and reorient minority populations' cognitive-affective predispositions as opposed to challenging cultural, economic or political status hierarchies in society. Rather than redistributing resources and offering substantial support to disadvantaged groups, these frameworks relate inequality to community practices, and hence seek to 'help' Muslim populations to adjust their 'ways of doing things' by heightening exposure to what are suggested to be superior lifestyles. While I do not dispute that solidarity impacts positively on democracy, my analysis suggests that the focus on engaging young people in voluntary work, or faith-based organizations in interfaith dialogue, is unlikely to address deep-seated political, economic and cultural inequalities. On the contrary, the civic republican focus on 'value aberrance' masks rather than confronts these forms of disadvantage.

Multiculturalism

A comprehensive self-identification by citizens as 'we' is as significant for multiculturalism as it is for civic republicanism. However, multiculturalism offers a counter-discourse in that it envisages the recognition of minority identities within such shared imaginaries. I draw on Tariq Modood's work as he highlights the significance of religion in this context.⁴⁶

Multiculturalism's main concern is that citizenship cannot be negotiated on the majority's terms *only*. It promotes the accommodation of minority practices and their visibility in the public sphere. Integration requires a proportionate representation of minorities in political institutions and key sectors of society, including the labour and housing market. A multicultural understanding of integration stresses the institutional side of politics: 'The need for integration

44 *Ibid.*, 8.

45 *Ibid.*, 17.

46 Modood, *Post-Immigration 'Difference' and Integration*.

arises when an established society is faced by people whom it perceives, and therefore treats, unfavourably by comparison with other members.⁴⁷

Multiculturalism has recently faced criticism from high-level politicians and in key policy reports.⁴⁸ While this impacts on its perceived legitimacy, political actors continue to draw on its key arguments to problematize the disproportionate representation of post-migration populations in low-skilled jobs or social housing, to enhance representation in political commissions or institutions, or to challenge the exclusion of Islam from collective self-descriptions such as 'Judaean-Christian' or 'Christian', which are prominent in both the United Kingdom and Germany.⁴⁹

Muslim representatives participating in the German Islam Conference, for instance, call for the recognition of Muslim organizations as 'corporations of public law' (the official status held by Christian and Jewish denominations), which, among other things, implies representation in key political bodies and the ability to provide tax-subsidized welfare services.⁵⁰ Although the key claim for the status of 'corporation of public law' has so far only been granted to a few Muslim organizations in a limited number of federal states, negotiations at the Conference led to an endorsement of special burial facilities for Muslims, the introduction of university institutes in Islamic theology and state-funded Islamic instruction in German schools. The Conference furthermore recommended that school curricula need to include the history of Islam in an explicit manner, promote multilingual proficiency and offer special support to children with immigrant backgrounds.⁵¹

A well-known national umbrella organization in the United Kingdom is the Muslim Council of Britain (MCB). In recent years, the MCB's lobbying activities have focused on obtaining statistical data on religious affiliation, as well as on improving legal instruments to combat religious discrimination. The campaign for better data, conducted in collaboration with other faith groups, was aimed at highlighting public service gaps in areas such as education, health, housing or employment, while amended equality laws were to assist in closing these gaps. A question on religion was subsequently included in the Census in 2001 and 2011, and religion was made equivalent to other protected characteristics in the Equality Act 2006 and subsequently the Equality Act

47 Ibid., 23.

48 Casey, *The Casey Review*, 16.

49 See, for example, 'Kanzlerin Merkel erklärt Multikulti für gescheitert', 16 October 2010, available on the *Welt N24* website at www.welt.de/politik/deutschland/article103375751/Kanzlerin-Merkel-erklaert-Multikulti-fuer-gescheitert.html (viewed 13 September 2017); and 'Prime Minister's King James Bible speech', 16 December 2011, available on the *gov.uk* website at www.number10.gov.uk/news/king-james-bible (viewed 13 September 2017).

50 Rosenow-Williams, 'Lobbying for civil and religious rights of immigrants and Muslims', 420.

51 Deutsche Islam Konferenz, *Drei Jahre Deutsche Islam Konferenz (DIK) 2006–2009: Muslime in Deutschland–deutsche Muslime* (Berlin: Bundesministerium des Inneren 2009).

2010. To assist public policy, the MCB recently published a comprehensive analysis of the demographic and socio-economic profile of Muslims in Britain.⁵² It is, however, not only minority actors who advocate multicultural ideas in British society. Even the former Prime Minister David Cameron, who distanced himself from state-supported multiculturalism, highlighted the significance of increasing Muslims' political presence in his 2015 speech on extremism: 'And it's not just about representation—it's about being in positions of influence, leadership and political power. That also means more magistrates, more school governors, more Members of Parliament, more councillors, and yes, Cabinet Ministers too.'⁵³

Key differences in the mobilization of minority actors in both countries are not only related to the fact that British Muslims have better access to government than their German counterparts, and can use varied channels to articulate political demands, but also that German debates continue to be preoccupied with 'softer' issues of cultural accommodation, while socio-economic differentials are more neglected. German authorities and experts often relate economic inequalities to a lack of social and human capital or 'educational underachievement', a reading that places the responsibility for social mobility on minorities themselves. There is a higher awareness of the relevance of discrimination in accounting for such patterns among British Muslim representatives and high-ranking politicians in Britain.⁵⁴

Multiculturalism thus offers a contestation of the effects of racism on the division of labour, and on the exclusion of minorities from processes of decision-making or collective narratives of belonging. While multiculturalism, in contrast to civic republicanism, stresses institutional responsibilities and does not deny cultural, political and economic disadvantages, it is mainly concerned with the *cultural* roots of socio-economic or political exclusion. Seeking the inclusion of minority voices in national narratives and institutions, the discourse offers less of a challenge to inequalities that can be traced to the post-colonial world order, that have their roots in the global distribution of resources or that emerge from the national framing of rights. The discourse hence does little to eradicate key mechanisms that structurally reproduce and maintain social hierarchies that align with the logics of race. Even if anti-Muslim racism lost its current salience in Europe, and Muslims became a highly valued social group, other collectives would instantly move into the disadvantaged position vacated by Muslim populations. Furthermore,

52 MCB, *British Muslims in Numbers: A Demographic, Socio-Economic and Health Profile of Muslims in Britain Drawing on the 2011 Census* (London: Muslim Council of Britain 2015).

53 'Extremism: PM speech', 20 July 2015, available on the *gov.uk* website at www.gov.uk/government/speeches/extremism-pm-speech (viewed 13 September 2017).

54 See, for example, MCB, *British Muslims in Numbers*; Tony Blair, 'The duty to integrate: shared British values', 8 December 2006, available on the *Vigile.québec* website at <https://vigile.quebec/articles/the-duty-to-integrate-shared-british-values> (viewed 12 October 2017); and 'Prime Minister's King James Bible speech'.

multiculturalism attends to the non-recognition of minority identity, but has less to say about excessive ascription, a currently highly salient expression of racism. British and German minority activists feel that religiosity has become a disproportionately salient category in the 'war on terror' and in public debates, and that people on the street 'turn them into Muslims' whether they are religious or not, happy to be labelled as 'Muslim' or not. Multiculturalism, however, prioritizes those who seek equal treatment and institutional representation for precisely what they perceive as a specific identity, as opposed to those who might feel the burden of ascription. While offering the most comprehensive challenge to inequalities among liberal citizenship discourses, multiculturalism's main achievement is that it amends civic republicanism's cultural lens with a positive valorization of minority identity.

Civic universalism

Christian Joppke describes and endorses a notion of citizenship in which integration is achieved via civic rights and the citizenry's collective identification with them.⁵⁵ The main task of public institutions is to uphold institutional neutrality towards any conception of the good, and provide a shield against oppression through particular moral norms, such as those provided by religious outlooks. Citizenship is increasingly influenced by international agreements and institutions, such as, for instance, the human rights regime.

Civic universalism is inspired by a Rawlsian contractual logic. It presupposes citizens who have delegated decision-making power to political elites who have responded to globalization by changing the conditions of the social contract from redistribution to free market competition. The response of this discourse to growing ethnic and religious diversity in Europe is an expansion of political rights that is accompanied by the diminishing relevance of policies of cultural accommodation and economic redistribution.

Variants of this discourse have been salient across Europe, including Britain and Germany. In both contexts, civic universal arguments reproduce binary distinctions between what is constructed as a 'cultural value set' embraced by inherently liberal Europe, and 'illiberal' norms upheld by Muslim communities. As Alana Lentin observed, such an opposition between the realm of human rights, intrinsic to the West, and that of natural justice beyond, plays into a division into two humanities and the rationale of the 'clash of civilizations'.⁵⁶

55 Joppke, *Citizenship and Immigration*.

56 Alana Lentin, 'Postracial silences: the othering of race in Europe', in Wulf D. Hund and Alana Lentin (eds), *Racism and Sociology* (Berlin and Zurich: Lit Verlag 2014), 69–104 (73).

Key individuals involved in the German Islam Conference, for instance, demonstrated civic universal concerns in positioning Muslims outside the constitutional consensus. The solicitor Seyran Ateş, who participated in the conference's first round and contributes to public debates about a German Islam, distinguishes between liberal 'German' and illiberal 'Islamic' values.⁵⁷ Ateş sees the German Islam Conference, as does its initiator Schäuble, as an opportunity to confront Muslim representatives with the binding nature of German legal norms, and to get them to make a public commitment to upholding them. The plenary asked Muslim participants to sign a document endorsing the 'values of the German constitutional order', celebrating their compliance as if it constituted a major break with the past.⁵⁸ Frank Peter observed that this logic presumed a paradoxical conditionality of universalism, in that Muslims are seen as unfit to exercise their universal rights unless they publicly affirm their commitment to them.⁵⁹ The expectation of an affirmation of constitutional principles reinforces stereotypes of a community that embraces illiberal practices. Related perceptions are also produced on a more recent online platform that the state-funded television station ARD launched in 2015 to offer first-hand advice to Syrian refugees. The 'guide' is very informative as to what the public services think new arrivals need to know in order 'to understand this country and its people'.⁶⁰ People who have just survived the hardship of making it to Europe alive are told, in the first instance: 'Always look the person they are talking to in the eyes.' They are advised that women 'are to be respected, no matter what they wear', and instructed that, in Germany, 'conflicts must not be solved with violence'.⁶¹ These guidelines are highly indicative of the prevalent stereotypes with which refugees from predominantly Muslim countries are received. This civic universal lens also informed the invitation to Navid Kermani to mark the fiftieth anniversary of the *Grundgesetz für die Bundesrepublik Deutschland* (German Basic Law) in 2014 in the Bundestag. Kermani, a novelist and participant in the German Islam Conference, is known for advocating a 'secular' understanding of Islam. In his speech, he praised the integrative force of the German Basic Law. While the invitation to a state ceremony signified a relatively new preparedness to include Muslim voices, it also celebrated 'role models' who, supposedly 'in contrast to many Muslims', publicly embraced German constitutional principles.

57 Seyran Ateş, *Der Multikulti-Irrtum: Wie wir in Deutschland besser zusammenleben können* (Berlin: Ullstein 2008).

58 Deutsche Islam Konferenz, *Drei Jahre Deutsche Islam Konferenz (DIK) 2006–2009*.

59 Frank Peter, 'Welcoming Muslims into the nation: tolerance, politics and integration in Germany', in Jocelyne Cesari (ed.), *Muslims in Europe and the United States since 9/11* (London and New York: Routledge 2010), 119–44.

60 ARD-Alpha, 'Germany and its people', 9 October 2015, available on the *Bayerischer Rundfunk* website at www.br.de/fernsehen/ard-alpha/sendungen/punkt/germany-understand-country-people-100.html (viewed 14 September 2017).

61 *Ibid.*

In Britain Prime Minister Tony Blair argued in his post-7/7 speech that the suicide bombers had 'received all ... the advantages' of being brought up in the United Kingdom yet had taken their own and other peoples' lives in the name of an ideology 'alien to everything this country stands for'.⁶² Drawing on a civic universal argument, he contrasted the 'particular ideology that arises within one religion at this one time' to essential British values such as 'belief in democracy, the rule of law, tolerance, equal treatment for all, respect for this country and its shared heritage'.⁶³ Political instruments called for in the speech included measures against forced marriage, regulations for Muslim schools, and the proliferation of the English language. Prime Minister Cameron's extremism speech, delivered nine years later, shortly after the tenth anniversary of 7/7, reads very similarly. He too is concerned about individuals who 'don't really identify with Britain'; he sees extremist ideology that is part of 'a particular faith' as a root cause of terrorism, and describes 'our own liberal values' as the 'strongest weapon' against extremism.⁶⁴ Cameron's list of British values, just like Blair's or the one in the coalition government's integration strategy paper,⁶⁵ refers exclusively to constitutional principles. Cameron, like Blair, suggests that British values should be enforced with greater confidence, by ensuring people learn English, and confronting 'the horrors' of forced marriage, female genital mutilation and domestic violence.⁶⁶ Contrasting 'intrinsically British liberal values' to what is generalized as 'alien violent practices', both speakers reinforce perceptions of Islam as a mediaeval and deviant culture of oppression.

The implied connection between faith-based values and a fixed behavioural repertoire reinforces hierarchical distinctions between European supremacy and inferior Others. In both countries, civic universal arguments 'thicken' the identification with constitutional principles into a lifestyle that is allegedly yet to be embraced by Muslim communities in Europe. Highly diverse phenomena, such as political terrorism or violence against women, are thereby 'packaged' as rooted in a set of illiberal values, and contrasted to what is constructed as views universally embodied across Britain and Germany, respectively, as if political or other expressions of violence were absent in Europe.

Civic universal policies accordingly seek to strengthen the 'democratic' orientation of Muslim citizens. Both governments, for instance, have introduced obligatory citizenship tests that require the acquisition of knowledge about British and German history, public norms and democratic institutions. In both settings, the Muslim consultants on the project were chosen among those categorized as 'moderate', 'liberal' and 'secular', labels seen as

62 Blair, 'The duty to integrate'.

63 Ibid.

64 'Extremism: PM speech'.

65 Communities and Local Government, *Creating the Conditions for Integration*, 4.

66 'Extremism: PM speech'.

compatible with universal values. Civic universalism's mandate for public institutions is limited to the promotion of political rights and the identification with civic values, and thus creates little space to address economic, political or cultural asymmetries. The discourse operates with generalizations and dichotomies that align with the logic of racial distinctions, and thus contributes to sustaining and masking various manifestations of inequality.

Cosmopolitanism

The influence of global capitalism on political processes is at the centre of cosmopolitan citizenship. Saskia Sassen's work is concerned with a reconfiguration of normative orders such as territory, authority and rights.⁶⁷ I draw on her ideas, admittedly reductively, to include what has gained prominence as the 'cosmopolitan' or 'postnational' argument in citizenship debates. In Sassen's view, the mechanism at the heart of the argument, namely supranational interventions to enforce human rights standards, is best characterized as an aspect of wider processes of a 'denationalization', that is, as a qualitative rearrangement of power constellations rather than as a 'decline' of the nation-state.⁶⁸

This discourse highlights how global markets, the digitalization of information and neoliberal policies have altered the relationship between citizens and political institutions. Cosmopolitan citizenship unfolds among transnational elites who advance the maintenance of their class and political interests, but also among social movements that mobilize internationally against various forms of exclusion. The discourse describes the ongoing reallocation of processes of decision-making to supranational levels of policymaking, and points to a loss of steering power on the part of governments. From this point of view, citizenship's integrative capacity unfolds via the enforcement of the human rights regime, which enters national domains through supranational courts. The lobbying process that preceded the creation of novel anti-discrimination legislation across Europe and its enforcement through supranational courts is illustrative of these dynamics.

Faced with the British government's initial resistance to addressing the longstanding demand by British Muslims for better legal protection from religious discrimination, Muslim organizations and antidiscrimination NGOs successfully lobbied European institutions to advance the desired legal changes. A group of experts and organizations from a range of European countries, the so-called Starting Line Group (SLG), drafted a proposal for a pan-European equality law that was obligatory for all member states.

67 Sassen, *Territory, Authority, Rights*.

68 Soysal, *Limits of Citizenship*.

Anti-Muslim racism was the primary target of this initiative. The SLG's rhetoric combined an individualist human rights discourse with group-based accommodation:

any distinction, exclusion, restriction or preference which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise of human rights and fundamental freedoms or participation in the political, economic, social, cultural, religious life or any other public field on grounds of racial or ethnic origin or religion or belief.⁶⁹

Following the passing of two European directives, the British government acted on its obligation to transpose EU-legislation into national law. Once included in the British legal framework in 2003, the new Equalities Acts 2006/2010 brought antidiscrimination and human rights legislations together and substantially expanded legal protection from religious discrimination, extending it to all areas of social life and introducing a 'public sector duty'. This duty requires public authorities to be proactive in guaranteeing equal treatment in all protected strands of their employment policies and the provision of their services; it also requires systematic monitoring of how public institutions exercise their powers and ensure that all protected groups access their services. Muslim organizations in Britain had enthusiastically lobbied in favour of these legal reforms.

The German Equal Treatment Law (*Allgemeines Gleichbehandlungsgesetz*, known as the AGG) was passed in 2006, and its scope with regard to discrimination on grounds of religion was significantly influenced by the lobbying efforts of the Protestant and Catholic churches in Germany, rather than by affected constituencies.⁷⁰ The churches made use of their extensive political networks on both the supranational and national levels of government to uphold their constitutional privilege to discriminate in their organizations, which include a substantial proportion of German welfare providers. The European legislator limited the exemptions granted to the churches to roles that involved the propagation of faith, while the German legislation deviated from the directive's intention and reintroduced the churches' exceptional rights granted by the German Basic Law. Currently, civil society organizations are seeking to challenge Germany's inadequate transposition of European legislation via supranational institutions such as the European Commission, the European Court of Justice, the European Agency of Fundamental Rights and the European Court of Human Rights, which is to rule on this matter this year.

69 Article 1.1 of the Starting Line proposal (1999), quoted in Isabelle Chopin, *Campaigning against Racism and Xenophobia: From a Legislative Perspective at European Level* (Brussels: European Network against Racism 1999), 5.

70 Aleksandra Lewicki, *Social Justice through Citizenship? The Politics of Muslim Integration in Germany and Great Britain* (Basingstoke: Palgrave Macmillan 2014).

Thus, cosmopolitanism pairs up with multiculturalism as a minority counter-discourse. Particularly in Germany, where multiculturalism is less established, the human rights discourse offers arguments that are considered more legitimate. While British minorities successfully used European organizations to advance claims for legal protection from religious discrimination, the lower levels of involvement of German Muslims in national politics also impact on their ability to mobilize supranationally. Whereas the British Equalities Act was passed in response to claims articulated by affected lobby groups, the German Equal Treatment Law's provisions on religion were shaped by the lobbying of the Christian churches, which preserved their privileges to discriminate when offering a public service. Contrary to Joppke's observation that Germany has now introduced the same 'anti-discrimination policies that are currently taking hold in the rest of Europe',⁷¹ the German equalities framework offers, especially in comparison to the British equivalent, limited means to challenge discrimination. Supranational institutions constitute a key arena from which potentially to challenge deviations from the European legal source. Cosmopolitanism thus highlights how minorities draw on international arrangements to advance their political claims.⁷² Cosmopolitanism thus invites engagement with structural barriers to political or judicial decision-making on the national and supranational levels of governance. It potentially also offers a global perspective on socio-economic differentials. This discourse, however, is currently the least influential in national policy debates on diversity.

The dynamics, blind spots and silences of citizenship

Each of the four salient citizenship discourses—civic republicanism, multiculturalism, civic universalism and cosmopolitanism—offers a distinct perspective on social diversity and inequality in Europe. While these discourses have their roots in European thought, reflecting communitarian, pluralist, liberal and Kantian ideas, they have evolved to a point where they provide specific interpretations for current social problems and their political solutions, notably in relation to the so-called 'Muslim question' in Europe. Each of the four discourses engages with specific mechanisms of diversity management, accentuating, for example, the need to increase social cohesion, advance cultural diversity, promote civic identification or apply human rights standards. While multiculturalism and civic republicanism stress the 'cultural' dynamics of collective narratives and citizen's perceptions of each other within the national realm, civic universalism and cosmopolitanism emphasize the 'political' sphere of rights that is enforced within and beyond the nation-state. The capacity of these interpretative schemes to account for a spectrum

71 Joppke, *Citizenship and Immigration*, 149.

72 June Edmunds, 'The limits of post-national citizenship: European Muslims, human rights and the *hijab*', *Ethnic and Racial Studies*, vol. 35, no. 7, 2012, 1181–199.

of structural inequalities is influenced by their respective focus on *individual* or *institutional* responsibilities. Civic republicanism and civic universalism, for instance, see institutional responsibility limited to guaranteeing civic rights and shaping an identification with them (and disagree on their respective communitarian thick or liberal thin 'content'); they tend to blame migrants' cognitive-affective orientations or individual behaviour, and reject public interventions that challenge cultural, political and socio-economic hierarchies. Multiculturalism and cosmopolitanism, in contrast, put public institutions in charge of the removal of barriers to individuals' equal standing. Policies incorporating multicultural arguments focus on socio-economic, political and cultural asymmetries anchored in the cultural order of society. The multicultural vision of democracy is thereby limited to national narratives and institutions, and reinforces cultural ascriptions. Cosmopolitanism, finally, overcomes the national boundedness of citizenship, and problematizes global political and socio-economic inequalities, but is currently the least influential discourse in debates on diversity.

Each of the four discourses offers a limited or partial challenge to structural inequalities affecting post-migration communities in Europe. They also largely remain silent on the ways in which ideas of race continue to structure social relations,⁷³ or only offer partial challenges to the structural anchoring of race in the social order. Structural asymmetries thus remain rooted in our current understanding of democratic citizenship.

While cosmopolitanism's problematization of global asymmetries currently shapes policy debates on integration only marginally, multiculturalism is, especially in Britain, more established. Its salience and legitimacy, however, is increasingly jeopardized by sceptical statements from high-level politicians, which also limit the ability to advance the type of claims it entails. The most influential discursive formations in both Britain and Germany currently are civic republicanism and civic universalism, whose focus on cognitive orientations and values informs many policy initiatives in this area.

Citizenship is continuously subject to hegemonic struggles between competing discourses that impact on the scope and content of political initiatives. Although I find similarities (and key differences) between the use of the four discourses in Britain and Germany, convergences (or divergences) do not revolve around one key discursive vision of democracy, such as civic universalism,⁷⁴ but reflect a wider array of discourses and counter-discourses. While some influential sources discussed above, such as the 'Cantle Report', are exclusively shaped by a civic republican reading—although they coexist alongside other documents that reflect alternative visions of democracy—most of the analysed initiatives are influenced by a combination of different discursive repertoires. For instance, perceived problems and political remedies negotiated at the German Islam Conference or codified in the 2012

73 Lentin, 'Postracial silences: the othering of race in Europe'.

74 As argued, for instance, in Joppke, *Citizenship and Immigration*.

British integration strategy paper, *Creating the Conditions for Integration*, reflect a mix of policy tools inspired by civic republican, civic universal and multicultural narratives. The evidence discussed here, I should add, is only indicative of the complex coexistence of and competition among the four discursive repertoires at different stages of the emergence, negotiation and implementation of policies of diversity management.⁷⁵

The comparison of consultations and lobbying processes in Britain and Germany has thus demonstrated that Muslim populations in Germany struggle more to access circles of decision-making and face greater barriers to tackling structural socio-economic differentials, and that most German Muslim organizations have yet to gain formal inclusion into what is constructed as the Judaeo-Christian public space. Policies targeting Muslim communities differ in nuances, many of which can be explained by the two countries' histories of immigration, as well as distinct legal and institutional arrangements. The fact that British governments have embraced multicultural accommodation and equalities legislation since the 1960s, while Germany spent most of the twentieth century encouraging return migration, certainly has had considerable impact on these asymmetries. This analysis has, however, also indicated that it matters which contemporary discursive understanding of citizenship is prevalent among actors who design a political initiative. 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. It can make a difference which discursive understanding of diversity management prevails in the negotiation, implementation or adoption of policy. Most notably, the scope of policy depends on whether asymmetries or disadvantages are legitimately discussed as structural, and whether their eradication is considered as institutional responsibility.

Rather than foregrounding the superiority and entitlement of those marked as 'natives', political approaches to diversity management should explicitly acknowledge that society, economic progress and political deliberation are shared endeavours that involve all positionalities. Beyond 'noting' the persistence of pervasive patterns of political under-representation and systematic socio-economic disadvantage, political strategies need to allow the sharing of resources and privileges.

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75 See Lewicki, *Social Justice through Citizenship?*.

forms of cultural racism, such as Orientalism or Islamophobia, and the ways in which they manifest themselves in public institutions. She is the author of the monographs *Souveränität im Wandel* (Lit Verlag 2005), and *Social Justice through Citizenship? The Politics of Muslim Integration in Germany and Great Britain* (Palgrave Macmillan 2014), the editor of several volumes and journal special issues, and a member of the editorial teams of the academic journals *Ethnicities* (London) and *Forschungsjournal Soziale Bewegungen* (Berlin). Email: Aleksandra.Lewicki@fu-berlin.de