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NATIONALISM IN A LIBERAL REGISTER
Beyond the 'Paradox of Universalism' in Immigrant Integration Politics

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ABSTRACT: In recent years scholars have observed a restrictive turn in West European immigrant integration policies towards conditioning access to permanent residence and citizenship on language proficiency, knowledge of history, institutions, culture and political values, national loyalty and labour market integration. This has been accompanied by a strong reaction among European politicians and publics emphasizing that newcomers must take share in certain liberal-democratic values and virtues that characterize the national community. Yet, the influential scholar Christian Joppke argues, among others, that liberal values cannot define national particularity nor can cultural integration be enforced because legislation and policies are legally and normatively constrained by the very same liberal

values. Hence, prevalent liberal conceptions of national identity are paradoxical and inconsequential for the formulation of public policies. This article critically examines this argument in detail. We argue that the paradox of universalism does not exist and that we therefore should not dismiss nationalism as a central factor behind recent policy developments.

KEY WORDS: nationalism; national identity; liberalism; immigrant integration; liberal convergence; Christian Joppke

INTRODUCTION

Is nationalism disappearing as an ideational force motivating immigrant integration policy making and sustaining or causing policy differences? The comprehensive civic integration policies which have been adopted across Western Europe[2] no doubt reflect *identity* reactions – e.g., to stories of Islamic religious practice, radicalism, urban unrest and ethnic segregation – but of what kind? The 'shared values' discourse which dominates many national debates[3] does not primarily refer to ethnic or religious traditions. Social cohesion is increasingly associated with quite abstractly defined liberal-democratic values and virtues,[4] even within radical right-wing parties,[5] which newcomers are expected to respect and share.

However, these universal values and virtues are not just seen as indispensable, but as 'ours'. They are put at the service of defining a national 'we'. But for Christian Joppke, the influential comparative sociologist and migration studies scholar, the idea of defining

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[2] Goodman 2014; Jacobs and Rea 2007; Vink and de Groot 2010.

[3] Mouritsen et al. forthcoming.

[4] Mouritsen 2013; Joppke 2008b.

[5] Akkerman 2005; Betz and Meret 2009; Halikiopoulou, Mock, and Vasilopoulou 2013.

nationhood in liberal universalist terms is so self-defeating that it can only be inconsequential for policy-making. On the one hand, societies wish to insert immigrants into the value horizons of *particular* societies. On the other hand, what they ask for – and agree that it is legitimate to ask for – is adherence to liberal-democratic values which are *universal*, even if framed as English, German or Danish. This is a 'paradox of universalism' because universal values cannot by definition denote cultural particularity.[6] Commenting on the British case Joppke notes that 'it perceives the need to make immigrants and ethnic minorities parts of this and not of any society, but it cannot name and enforce any particulars that distinguish the "here" from "there".'[7] Hence, what is ultimately promoted in these national discussions is *liberalism* itself as an identity – an identity which transcends national borders and includes all who will only live as 'liberal people'.[8]

This is not just a conceptual point but also an empirical claim: Even if cultural distinctiveness exists – real or imaginary – it cannot be *named*, as Joppke puts it, by appeal to liberal-democratic values. An identity discourse which is incapable of singling out and narrating the particularity of a nation is inherently unpersuasive. Hence, it cannot nourish or capitalize on people's sense of belonging and hereby mobilize a majority behind a given policy. We term this the psychological form of the paradox to distinguish it from a second institutional manifestation of the paradox: Joppke also claims that cultural integration cannot be *enforced* because legislation and policies are legally and normatively constrained by the very same liberal values which have come to define contemporary nationhood: non-

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[6] This argument appears in much of Joppke's work. See for example Joppke 2005, 56–57; Joppke 2007a, 44–46; Joppke 2008b; Joppke 2009, 121; Joppke 2010a, 113–137; Joppke 2013, 599–601.

[7] Joppke 2008b, 538.

[8] Joppke 2005, 57; Joppke 2007a, 47; Joppke 2007b, 271; Joppke 2008a, 13.

discrimination, neutrality, tolerance and equality.[9] If politicians insist that the very essence of Englishness or Danishness is to treat everybody equally and allow them to live as they please, they cannot also introduce policies that further majority cultural agendas. And if they tried, anti-discrimination law and courts would increasingly strike down such attempts. Hence Jopkke's claim that civic integration policy 'leaves the ethical orientation of the migrant intact'.[10]

The article critically examines both claims, arguing that no paradox exists, and that we have good reasons to believe that nationalism[11] remains a central factor behind not just the turn to civic integration policies in Western Europe but also their varying designs. First, Jopkke's argument, in its inspiration from political theory – particularly the work of Will Kymlicka – conflates 'civic' and 'liberal' nationalism and ignores that the latter's acknowledgement of a liberal thinning of nationhood is a stepping stone for the opposite argument about the continuing potency, necessity, and legitimacy of national sentiment. Second, even the language of liberal universalism is quite capable of supplying national identity discourse with distinctiveness. Cross-state variation may ensue because of the particular prioritization of liberal values (e.g., freedom of speech, anti-discrimination, gender equality etc.), the way these values are interpreted, or the way they have been institutionalized historically. Finally, even when little particularity is left in terms of how liberal values are prioritized, understood or institutionalized, variation may be found in dominant assumptions

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[9] Joppke 2005, 54; Joppke 2007a, 39; Joppke 2007b, 254–56; Joppke 2008b, 541; Joppke 2013, 599.

[10] Joppke 2007c, 14.

[11] Following Smith (2000, 3), we understand 'nationalism' as ideological discourse having to do with 'the attainment and maintenance of autonomy, unity, and identity on behalf of a population deemed by some of its members to constitute an actual or potential "nation".' Our focus in this paper is on the latter aspects: the furthering and protection of national unity and identity.

about the social processes (e.g., the difficulty of required acculturation), whereby national belonging and social unity are reproduced.

Table 1 below summarizes the overall argument that is developed in the three sections following the next section, which first provides a brief overview of the empirical debate on the liberal convergence of integration policies and Joppke's claim of a retreat of nationalism.

Table 1: The structure of the overall argument.

Section	Claim (by Joppke)	Response
1. Naming: the psychological form of the paradox	Liberal-democratic values cannot name national particularity.	1. National particularity can be based on a sense of *particular* ownership to *some* liberal values. 2. Even a non-unique, poor and/or incoherent story about the nation can mobilize national sentiment.
2. Enforcement: the institutional form of the paradox	Anti-discrimination law and public neutrality norms preclude enforcing national particularity.	1. Such laws typically only apply to ethnicity and religion. 2. Such laws and norms differ between countries in ways which may reflect different conceptions of the nation.
3. Policy direction: the meaning of a liberal conception of nationhood	Contemporary liberal conceptions of nationhood are almost interchangeable.	Contemporary liberal conceptions of national identity vary *both* in their normative content *and/or* in how culturally taxing their reproduction are thought to be for immigrants and society.

LIBERAL CONVERGENCE AND CIVIC INTEGRATION POLICIES

During the last 15 to 20 years, West European states have converged upon the same *kind* of instruments of civic conditioning to expedite the integration of newcomers. Formal language, civic knowledge and employment requirements increasingly guard access to entry, permanent

residence, citizenship and even family reunification. The alleged paradox of universalism is a corollary of Joppke's influential diagnosis of this policy trend as a liberal convergence, whereby civic integration requirements are a consequence of welfare states, 'hollowed out by economic globalisation'[12], which try to improve the labour market functionality of newcomers, but also of supranational legal norms and EU policy[13] and more general 'Habermasian' processes of cultural de-traditionalization, which crowd out nationalism.[14] These factors move European states beyond national 'models', i.e. the various European *Sonderveg* developments of (Dutch, British) multicultural minority recognition, (German, Austrian, Danish) ethno-cultural segregation and preferentialism, and (French) civic assimilation, which underlie standard classifications in the field.[15]

However, Sara Wallace Goodman, who has documented these policies meticulously, finds strong variation in terms of scope (which legal statuses do policies cover?), sequencing (how early and how many times is the instrument used in the integration process?), and density (the difficulty of requirements).[16] To Joppke this observable variation, far from indicating nationalism and undermining convergence,[17] only reflects incoherent and hodge-podge decision making, coalition bargaining, government ideology and a successful radical right party,[18] explanations also emphasized by other sound work.[19] Even Goodman herself

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[12] Joppke 2007b, 268; Joppke 2007c, 16.

[13] Joppke 2007b, 246–47 and 256–59; Joppke 2007c, 3–5; Joppke 2010b.

[14] Joppke 2005, 48–49; Joppke 2008b; Joppke 2010a, 142–43.

[15] Koopmans et al. 2005; Castles and Miller 2009, 44–45.

[16] Goodman 2014, chapter 2.

[17] See Joppke 2007c, 14 and 19. Goodman addresses Joppke's response to this policy variation as strangely dismissive (2012, 660).

[18] Joppke 2008a, 37–41.

[19] See for instance Bale et al. 2009; Green-Pedersen and Odmalm 2008; Howard 2009.

argues that civic integration policies owe nothing to national identity.[20] Instead, national differences in their designs and uses are an effect of institutional and legal path dependencies.[21] She more or less confirms Joppke's basic claim that these policies only promote liberalism as identity – or a 'state identity' as Goodman terms it.

The thesis of a liberal convergence and a retreat of nationalism has received further support by, for example, Ines Michalowski's work on citizenship tests,[22] Yasemin N. Soysal, who argues that civic integration policies are about 'who can contribute and be productive' and are not concerned with 'confirming or furthering national collectivity and identity'[23], just as German *Leitkultur* debates eventually ensued in 'a retreat to a combination of the demand to endorse liberal democratic values and the demand to acquire the German language,' according to Jan-Werner Müller[24], as was also by and large the case in other 'shared values' debates.[25]

Other scholars maintain that national identities, traditions or models remain an effective causal force behind the markedly different ways countries actually design and use civic integration policies.[26] Where the liberal convergence thesis is contested critics often rely on

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[20] Goodman 2014, 30-35.

[21] Goodman 2014, 77-88.

[22] To Michalowski, 'just because a country has opted for a restrictive citizenship policy regime does not mean that it dictates social norms and values to be shared by all citizens, as the idea of cultural assimilation suggests. In this sense, the cases compared here have, with the exception of the Dutch test, confirmed Joppke's (2007, p. 1) thesis that "illiberal means" can go along with "liberal goals"' (2011, 765).

[23] Soysal 2012, 11.

[24] Müller 2007, 381.

[25] Mouritsen et al., forthcoming.

[26] See, for example, Bonjour and Lettinga 2012; Brochmann and Seland 2010; Hansen and Koehler 2005; Koopmans, Michalowski, and Waibel 2012; Mouritsen 2013.

beliefs that the traditional civic-ethnic dichotomy, coupled with pockets of European multiculturalism, still captures significant country variation in how politicians view and act on issues of integration of immigrants.[27]

 This response fails to acknowledge Joppke's valid diagnosis of how much traditional ethno-cultural nationalism is in fact discredited, normatively and politically, in countries such as Germany and even Denmark, and how liberal and civic 'multicultural' UK and Sweden really are.[28] In a non-trivial sense, Western European countries do converge, in that they all adopt 'French' republican and liberal universalist semantics thereby partaking in a broad 'civic turn' towards stronger state intervention in the making of good, liberal and self-sufficient citizens.[29] But the fact that all politicians trumpet the requirements of universal values precludes neither the continuing existence of different, still nationally specific, notions of liberalism and citizenship – that is, so many universalism*s* invested with identity – nor the remaining potency of nationalist sentiment, including where no or very little national particularity is left, as a determinant for policy formulation. We submit that more sustained attention to the theoretical assumptions behind the notion of a paradox of universalism may help to empirically assess the influential observation in empirical migration studies that civic integration policies bear the imprint of liberalism having 'replaced nationalism as the ideology of belonging in Europe'.[30]

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[27] See, for example, Borevi 2010; Vink and Bauböck 2013.

[28] Borevi 2014; Joppke 2005, 48; Joppke 2008b; Joppke 2009, 121; Joppke 2010a, 97–110 and 149; Hansen and Koehler 2005; Meer and Modood 2009.

[29] Mouritsen 2008.

[30] Adamson, Triadafilopoulos and Zolberg 2011, 844. The authors pose this as an open question in this introductory article to a special issue on the liberal state and migration.

The next three sections refute the paradox of universalism in its psychological and institutional form and discuss the ideational content of contemporary conceptions of national identity, clarifying how they might and in fact do vary, and how they might be channelled into civic integration policies. The conclusion asks how we might move beyond the paradox of universalism in a future research agenda with a more sustained empirical content than our limited space permits.

‘NAMING’: THE PSYCHOLOGICAL FORM OF THE PARADOX

The empirical claim that liberal values cannot inspire or mobilize a sense of national belonging can be criticized from two angles. First, one might accept the theoretical premise but argue that even though debates on national identity and integration in Western Europe converge around the same broad, universal values, these are still understood and institutionalized very differently. The semantic content and corresponding institutional practice of ‘equality’ in Britain could differ from Danish or Dutch politics. Moreover, *which* universal values are emphasized may vary significantly. National politicians and publics may in fact have, and appreciate that they have, *particular* ownerships to *some* liberal values, which provides an ample base to mobilize national sentiment. We return to this part of the argument in the section on policy direction.

Second, even granting – as we do – increasing similarity in how Western European states understand and prioritize liberal values does not render liberal nation-building a self-defeating endeavour. The idea that national identification is thinning as universal liberal values spread, while new to migration studies, is well known in political theory. Joppke refers approvingly to Will Kymlicka’s work:

The shortcoming of procedural liberalism has been neatly identified by a variety of ‘civic nationalists’, who point to its incapacity to motivate a preference for ‘this’

over 'that' collectivity. For instance, Will Kymlicka, advocate of the most concise

and influential theory of minority rights, admits that 'social unity' in a multiethnic

state is a 'valid concern' (1995, p. 173). (…) Kymlicka rightly concludes that social

unity must consist of more than 'shared political values'; it requires a 'shared

identity', a 'communality of history, language, and maybe religion', that is, 'the

things exactly not shared in a multination state' (p. 188f).[31]

But Kymlicka, here, is not saying that liberal states, because they must assume shared

political values, must also thereby do *without* social unity, nor give up on *all* expression of

nationhood in their institutions and policies. Kymlicka's point is just opposite to Joppke's

notion of a disenchanted and identity-decoupled 'citizenship lite'. He insists that the

liberalization of national cultures, and thereby the fact that they become 'both "thinner" and

less distinctive', has 'gone hand in hand with an increased sense of nationhood'.[32] He hereby

places himself in the category *not* of 'civic nationalists', as Joppke claims, but rather that

family of 'liberal nationalists' who criticize the former for failing to acknowledge that even

progressively thin identities generate strong separate solidarities with motivational force as

well as diverse policy directions – even as nations dilute their previously defining cultural

content.[33,34] Indeed, despite economic globalization, the rise of human rights and diversity-

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[31] Joppke 2010, 117; see also Bauböck 2002 for a similar argument.

[32] Kymlicka 1995, 87-88.

[33] For other authors providing similar arguments in the scholarly debates on particular Rawls' political liberalism and Habermas' constitutional patriotism, see Canovan 2000; Laborde 2002; Miller 1995. See also Uberoi and Modood 2013 (pp, 29-30) for a brief critique of the assumption that national identities must be distinct in order to cultivate national belonging.

[34] Incidentally, *civic nationalism* more aptly describes Joppke's own hard-nosed version of constitutional patriotism, which renders any expression of national identity conceptually and politically impossible and obsolete in a post-national world of levelling supranational legalism (Levey 2014). In it nationhood is conceived

friendly discourse, and the civic turn in integration politics, Eurobarometer data show high

and stable levels of positive response to questions of national pride and national attachment

since 1991 when data were first collected.[35] The sense of particularity which feeds emotion

and identity requires no clearly discernible differences. National identities, far from reflecting

consciousness of *actual* social and institutional contexts, are often 'cultural' in an

anthropological sense of difference being taken for granted, as in Will Kymlicka's

observation that 'what defines being Canadian, perhaps above all else, is precisely not being

an American' despite the two identities having much in common 'looked at objectively'.[36] If

Canada and USA after all differ in one having more of a welfare state than the other, Sweden

and Denmark do not. Both are small, social democratic, consensus-oriented democracies with

comprehensive redistribution and similar histories of class compromise, religious settlement

and immigration. Yet, politicians and commentators, while defining the nation in similar

liberal terms, still rhetorically position their national communities as worlds apart, also when

talking about minor differences in policies or practice, and routinely regard the contrast

between very restrictive Danish integration policies and permissive Swedish ones as reflective

of deep cultural differences.

Kymlicka speaks of a robust 'underlying national identity itself',[37] a sense of group

distinctness or peoplehood, which even survives attempts to destroy and supress languages

and institutions. As societies modernize, cultural distinctiveness remains at a cognitive level,

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as mere attachment to such states, which, in a global division of labour, are vehicles of cosmopolitan values and

rights for distinct peoples (thank you to Stephen Larin for pointing this out).

[35] Antonsich and Holland 2014.

[36] Kymlicka 2003, 363.

[37] Kymlicka 1995: 185.

in national languages, transmission of historical heritage (e.g., in schools), and knowledge of social practises and role repertoires of institutions.[38]

Consequently, the stories politicians tell and believe about the nation's (liberal or other) kind of uniqueness need neither be true nor culturally rich in detail to work. More often than not there is no need to specify what distinguishes 'here' from 'there' if both the audience(s) and the speaker(s) already believe that a difference exists. A country's integration policies may well be driven by a national ideology, which fails to coherently distinguish its identity – e.g., its brand of liberal values – from others. This point trades on a well-known ambiguity in what it means for national identity to 'work'. Nationalism presupposes *belief* that a nation is importantly different, not that it *actually is*. Indeed, the 'essence of the nation is not tangible. It is psychological, a matter of attitude rather than of fact.'[39] Benedict Anderson famously described the national community as imagined,[40] and Simon Harrison adds that this imagination often involves denial and disguise of cultural commonalities and a corresponding narcissism of minor differences.[41] Hence, changes in a country's integration policies, such as tightened rules, may well be caused by nationalist sentiment (rather than, say, party politics), without reflecting some discernibly different national tradition or 'model'. *Integration policies may well be nationalist without being very nationally distinct.*

Will not a nationalist discourse, which is not based on discernible differences, be so unstable that it is bound to lose out to or be co-opted by competing public discourses? Such instability only occurs if publics and decision makers begin to doubt the way the nation supposedly distinguishes itself. If they do not, universal values easily facilitate a socially

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[38] Kymlicka 1995, 83, 90-92.

[39] Connor 1972, 337.

[40] Anderson 1983.

[41] Harrison 2003. See also Ignatieff 1999 for an astute examination of this phenomenon.

effective distinction between 'us' and 'them'.[42] If politicians are hard pressed to define the national distinctiveness of liberal-democratic values and norms, they can always point to inevitably existing, historically contingent institutional and policy differences as expressions of this (tacit) underlying difference. The mere fact that 'we' do some things differently is more than enough.

These claims are backed by psychological research. In the early 1970s, psychologist Henri Tajfel began experiments to study the minimally necessary and sufficient conditions for intergroup discrimination.[43] Experiments within the 'minimal in-group paradigm' demonstrated how categorization according to meaningless and arbitrary criteria is enough to elicit intergroup discrimination. In one study, groups were allocated on the basis of their estimation of the number of dots on a page,[44] in another according to a flip of a coin.[45] Today such effects of simple categorization are well documented.[46] Categorization produces 'accentuation effects' whereby inter-category difference and intra-category homogeneity are overestimated.[47] What does this imply for our discussion of national identity based on universal values? Basically, it means that people do not need a compelling, rich and/or coherent story about the nation to have national sentiments. Being habituated to think of oneself as member of a nation suffices to reproduce a continuous sense of belonging which can be mobilized politically.[48]

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[42] Lægaard 2007.

[43] Tajfel 1970.

[44] Tajfel et al. 1971.

[45] Billig and Tajfel 1973.

[46] See Diehl 1990 and Hornsey 2008 for surveys of the research program.

[47] See also Brubaker, Loveman, and Stamatov 2004 for a discussion of the role of cognition in categorization.

[48] We are not implying that differentiation is a necessary step for a sense of connectedness to manifest itself. Only that it is a very powerful way of establishing such beliefs. On this point see Brewer 1999.

So we have good reasons to believe that national identity can be cultivated and mobilized even though politicians appeal to the same liberal-democratic values when asked to say what makes their country special. However, nationalism, to be an effective force, must also be enforceable. It cannot be if institutions, norms and laws block cultural integration policies.

'ENFORCEMENT': THE INSTITUTIONAL FORM OF THE PARADOX

The post-national membership thesis argues that a global process of human rights diffusion causes individuals to regard each other as moral equals, irrespective of nationality, ethnicity, class, race, and gender. Human rights norms in national and international law have reconfigured citizenship 'from a more particularistic one based on nationhood to a more universalistic one based on personhood'.[49] This diffusion, it is claimed, effectively decouples citizenship and nationhood through the decline 'of the notion of the state as property and instrument of self-realization of a particular group.'[50] To ask for more than respect for human rights and democracy amounts to 'the imposition of a particular culture or way of life that contemporary liberal-constitutional states are set to avoid.'[51] Assimilation, while possibly desired by politicians, cannot be imposed by the state. It can only happen through the voluntary actions of immigrants themselves.

Empirically, this argument no doubt goes some way towards explaining a certain long-term liberal convergence in, for example, citizenship acquisition policies, where administrative discretion and die-hard ethnic exclusion are a thing of the past – in the West at least. But there are at least two reasons not to place too much emphasis on this line of reasoning.

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[49] Soysal 1994, 137.

[50] Joppke 2008b, 543.

[51] Ibid., 541.

First, it is easy to exaggerate how much non-discrimination constitutes an obstacle to nation-building. Joppke notes the illegitimacy of nation-building projects in a liberal state 'that is obliged to be agnostic or at least impartial about religion'[52], and one might include ethnicity in the same vein. But this does not diminish the potency of such *liberal* nationalism whose cultural components do not rely on religion or ascriptive criteria. Membership in a civic cultural community may be achieved, in principle, by any individual who understands the values and norms structuring public interaction and state institutions. For example, the fact that Danish politicians think of this learning process as onerous and thus opt to implement civics courses, knowledge and language tests and long residence periods as criteria for permanent residence and citizenship[53] does not make such policies challengeable in the courts.

Tellingly, opposing trends may be observed in West European countries since the 1980s in the degree of willingness to accommodate cultural and religious claims respectively[54]: Along with a steady liberalization of religious rights, many countries increasingly seek to defend dominant public values and norms against Muslim claims-making. Many countries even retain preferential access criteria for 'culturally close' immigrants. In countries such as Greece, Ireland, Germany, Portugal and Spain, descendants of emigrants have easier access to citizenship, and many European countries also have more permissive rules for citizens of neighbouring states. Swedish and Norwegian citizens only need to reside two years in Denmark to obtain citizenship, and vice versa. Germany gives easy access for citizens from German-speaking countries, and France offers facilitated admission to citizens from

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[52] Ibid.

[53] Jensen 2014.

[54] Michalowski and Burchardt 2015.

francophone states.[55] Also, while states no longer *directly* enforce assimilation into a majority

culture, they may incentivize it by demanding language, knowledge and work skills that

require the immigrant to participate in arenas that are thought to promote a desired

socialization process.

None of this is problematic in terms of anti-discrimination law. While protecting the

individual liberties of cultural and religious practice, such law does not prevent the promotion

of cultural nationhood through mandatory courses and tests on the road to naturalization or

through preferential treatment of culturally close immigrants. In fact, the EU Racial Equality

Directive (RED) of 2000 only includes race and ethnicity as grounds of discrimination, not

nationality or religion, and provides no guidance on how to interpret ethnicity.[56] The minimal

character of RED has made it possible for member states to protect national traditions in the

transposition process as demonstrated by Givens and Case's analysis of Britain, France and

Germany.[57]

More generally, EU has had little influence on national integration legislation.[58] States

have not been forced to change their approach to the arenas and institutions where newcomers

encounter majority cultural bias. Schools, despite gestures towards intercultural classrooms,

emphasize national histories, favour majority religions, and blatantly promote the language

and cultural heritages of dominant groups.[59] Museums, media and public institutions reinforce

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[55] For a detailed inspection of preferential admission criteria in Europe see Dumbrava 2014, 47-58.

[56] Howard 2005; Bell 2008.

[57] Givens and Case 2014.

[58] Schain 2009.

[59] Faas 2011.

this, as do church establishments, which in most cases still disproportionally favour Christian denominations above new faiths.[60]

Second, non-discrimination when it comes to ethnicity, race, nationality and religion is still understood and codified differently in terms of its aim, scope and grounds, and whether it entails positive action, all in ways which are linked with different ideas of nation-building. Britain and France are often described as having two historically very different approaches to non-discrimination.[61] In Britain ethnic difference is publicly recognized and seen as important in the fight against indirect discrimination and institutional racism, whereas the French republican integration philosophy precludes public recognition of difference. In France nation-building reflects a republican idea of equality, based on a colour-blind and secular public sphere, while the British public sphere is more an arena where national identity is negotiated and challenged to be more inclusive. This again showed itself in the transposition of RED where Britain implemented it in its whole, while the French transposition failed to include a definition of indirect discrimination and provide organizational capacity to pursue cases of such indirect discrimination in the civil courts.[62]

By now it is fair to conclude that it is highly plausible that political actors can indeed mobilize the public around liberal conceptions of the nation *and* that existing institutions and laws do not necessarily block policies inspired by such a conception. So nationalism can still be a significant force in integration politics. Yet, as Huddy says in a critique of the 'minimal in-group paradigm', discussed above, 'it is the meaning of … identity, not its existence that

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[60] Carol and Koopmans 2013; Dolezal, Helbling, and Hutter 2010.

[61] Bleich 2003; Pala 2010.

[62] Givens and Case 2014.

determines its political consequences'.[63] In other words, for nationalism to push policies in *specific* directions, it must have a more substantial side to it.

However, liberal-democratic values and norms are not the only legitimate candidates for this ideational substance. As the next section demonstrates, talk about integration into a national community also draws on ideas about the formation of identity and social cohesion; or what we term the processual aspect of national identity.

'POLICY DIRECTION': THE MEANING OF A LIBERAL CONCEPTION OF NATIONHOOD

So far we have argued, first, that it is still plausible that politicians can mobilizenational sentiment despite restricting themselves to a cross-nationally similar liberal-democratic register of discourse, and second, that although neutrality norms and anti-discrimination law prevent blatantly exclusive assimilation and rights violations, they do not prevent countries from pursuing their own flavours of good citizenship and nationally distinct cultural cohesion agendas. In other words, the effective force of nationalism *does not depend* on a great degree of manifest cultural particularity.

The empirical question, on which we have been agnostic so far, is whether contemporary liberal national identities really are much the same or whether significantly different – particularistic – conceptions are projected, in this or that liberal nation-state, of what it means to belong and to be a good citizen. And also, as a necessary corollary of the former question, what are the core dimensions of national identity conceptions where we might find causally important, non-trivial ideational variation? According to Adrian Favell:

> Nation-states … universally conceive of their social unity and historical continuity in terms of a what might be called an 'amateur' public theory or philosophy of integration, that combines a

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[63] Huddy 2001, 130.

kind of functionalist social theory of what it is that holds nations together, with a normative political philosophy that expresses nationhood in terms of abstract civic values (usually citizenship).[64]

Favell's distinction between a (normative) content aspect and a (functionalist or sociological) process aspect to national identity conceptions is significant.[65] These two different analytical levels are typically conflated in the distinction between ethnic and civic nationalism.[66] On the one hand, even liberal and civic conceptions of the nation, over and beyond hard-to-disagree-with catchphrases, *do* differ. What is liberal and civic is multi-dimensional, and each dimension is contestable – even if the very point of national identity-oriented discourse is to *de*contest the semantics of good citizenship.[67] Although most Western countries have adopted a civic integration agenda, national varieties of good citizenship exist, which reflect path dependencies of state- and nation-building, welfare regimes, colonial pasts, immigration trajectories, democratic participatory traditions, or their absence, and much else besides. This is unsurprising to any student of the comparative sociology of citizenship.

On the other hand, ideational variation also emerges where the semantics of citizenship reflect quite similar normative visions – as in the deep, society-penetrating and egalitarian welfare state modernism of the Nordic countries – or where scholars simply emphasize not difference, but the family resemblances and structural convergence of integration discourse in globalized competition states. Even where nation-building discourses become conceptually indistinguishable in terms of end-goals, they may imagine the collective and individual

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[64] Favell 2006, 51.

[65] Favell's distinction also neatly corresponds to Oliver Zimmer's (2003) analytical distinction between symbolic resources (content) and boundary mechanisms (process), although Zimmer emphasizes boundary mechanisms as the important dimension.

[66] Jensen 2014; Zimmer 2003.

[67] Freeden 1998.

processes of such nation-building – that is, of how to reach the end-goal – quite differently. Behind the specific content of national identity ('abstract civic values') lies what Favell calls 'amateur' functionalistic social theories about how to reproduce social unity.

But what exactly does it require, from both the individual and the community, to instantiate successful national identity formation? Politicians conceive of this process very differently and in these ideational differences we may often find the true driving force behind differences in integration policies.[68] We distinguish between a basic collective and individual dimension of such social theorizing of the integration process. On the collective dimension, the main question is whether the reproduction of national identity is understood as organically fixed or as something policy-makers can intentionally steer towards certain conceptions. In other words, who changes – the immigrants, society, or both? This concerns the degree of negotiability of the national community. On the individual dimension, the main question regards the possibility of the individual intentionally changing his or her norms and sense of national identity. Does it take a short or long time, and is it a matter of effort and will or cultural predestination? In relation to these two dimensions of the integration process, we argue that nationalism in its more exclusionary variants increasingly play itself out, not so much, or at least not only, in the form of countries requiring some form of substantial acculturation into a comprehensively particular way of life, but rather as so many ways of insisting, first, that the nature of the country's national identity is rigid and non-negotiable, not only because it is 'ours', but also precisely because it seen as universal and liberal. Second, that it is very difficult for newcomers to fit into this particular liberal country, because to do so requires strenuous civic *Bildung*, which native populations have already been

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[68] At times Joppke does touch upon the existence of such ideational variation. For instance: 'Underneath this liberal framing of integration, which is standard across Europe and the West, there is considerable variation in how far, or rather how deep, the liberal imposition should go' (2013, 599).

through and indeed perfected (and which may be particularly difficult because of the *un*civic cultural origins of the newcomer).

The first of the following three sections discusses the normative aspect of national identity. It argues that normative variation, between nations, of liberal values and civic ideals, has *not* lost its relevance to the analysis of immigrant integration politics. There are, after all, different answers to the question of who the liberal 'we' is. The two subsequent sections discuss the process aspect of national identity. They argue that we should, nonetheless, be more attentive to how policy-makers theorize the collective and individual dimensions of the cultural integration process, respectively.

VARIETIES OF A LIBERAL 'WE'

Even within the terms of the old distinction, assumed by theorists of civic nationalism, between ethno-cultural (e.g., Germany) and civic state nations (e.g., USA, Sweden and France) one should remember the variety of *types* of liberal values – such as libertarian, egalitarian-social democratic, or civic-statist[69] – on which citizens disagree profoundly, also *within* nations. Yet, such disagreement, theorists of republican civic patriotism have argued, remains situated within narrative spaces of political history. Here thin, yet culturalized and particularistic identities emerge after all.[70]

A recent comparative qualitative analysis of civic integration discourse and policy (of Great Britain, Germany and Denmark) argues that 'liberalism is simply an inadequate vocabulary to describe diversities in required "civicness"' and found many dimensions and 'colours of citizenship'.[71] The recent onus on 'active citizenship' drinks from the semantic

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[69] Freeden 2005; Greenfield 1992, 10-12; Johansson and Hvinden 2007.

[70] Laborde 2002; Viroli 1997.

[71] Mouritsen 2013:, 87 and 100.

wells of republicanism rather than liberalism. But liberalism itself has many stripes denoting among other things capacity for economic self-support, democratic maturity and support of the constitutional state, or a deeper, more comprehensive social ethic – and it comes in different national varieties.

Even that most converging value of economic self-support carries different civic connotations. Britain's lean, residual welfare state merely requires immigrants, as formulated in the booklet to be studied to pass the citizenship test, to 'work to provide for yourself and your family'[72] and 'look after yourself and your family'[73]. In contrast, the Danish *Declaration on Integration and Active Citizenship* (signed when immigrants apply for permanent residence), tells immigrants 'to understand and accept that "both men and women shall contribute to society", "have the same rights – and in some cases obligations – to education and work" and not least that "both men and women have an obligation to pay taxes,"'[74] to reciprocate the social citizenship of the welfare state. Emphasis on women's work – mirrored in detailed activation and training initiatives for this group[75] – reflects a generously universalistic welfare state where each additional 'passive' recipient of benefits is a fiscal liability. In Germany, there is a strong emphasis on education and productive participation in the country's *Sociale Marktwirtshafft* but less emphasis on gender.[76]

Concerning political liberalism, the brief and solemn, yet vague list of 'responsibilities' at the beginning of the *Life in the United Kingdom* booklet – the first three being to 'respect and obey the law', 'respect the right of others', and 'treat others with fairness' – while certainly

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[72] Home Office 2014, 8.

[73] Ibid., 154.

[74] Ministry of Labour 2015.

[75] Breidahl 2015.

[76] Bundesregierung 2007; Bundesregierung 2008.

universal, also shares a distinctly British, Lockean onus on rule of law and group tolerance.[77] Compare this with Germany's emphasis in the citizenship test and almost civic religious pledge (*Bekenntniss* in German!) of allegiance to, and detailed knowledge of, *Grundgesetz* rights, the political architecture of the federal republic, and a post-war history of overcoming totalitarianism. In this self-consciously young democracy, liberal values are political, not social habits of the heart or an ancient tradition as in Britain, but a fragile civic culture, which requires nurture, *politische Billdung* of newcomers and zealous *Verfassungschutz*-screening of potentially radicalized citizenship applicants.[78]

In Denmark, in the *Declaration*, the *New in Denmark*[79] handbook and programmatic speeches by former Prime Minister Anders Fogh Rasmussen, the semantic thrust of liberal tropes is again different. The freedom and equality duplet stands for 'deep' anti-authoritarian (especially anti-religious) autonomy, aggressive freedom of speech assertion, and a social relations egalitarianism that penetrates and undermines traditional family, gender and parental structures and roles.[80] This comprehensive state modernism – alien to both Britain and the Catholic German *Länder* – wishes to liberate its citizens from the normative pressures of families and traditional communities, but also thereby induce them into a strong welfare societal culture with shared institutions – schools, kindergartens etc. – where strong and rigid norms of good parenting, gender and childhood ideals are transmitted and reinforced.[81]

The active citizenship trope involves similar contrasts. Stronger in both Britain and Denmark than in Germany, in each case it reflects national traditions of (conceptualizing)

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[77] See Meer and Modood 2009 for a demonstration of the ideational continuity of the British approach.

[78] Schiffauer 2006; Mouritsen 2013.

[79] The Ministry for Refugees, Immigration and Integration Affairs 2008.

[80] Berg-Sørensen 2010; Mouritsen and Olsen 2013.

[81] Mouritsen 2013, 99.

participatory citizenship – or the lack of it.[82] In Britain, for decades concerned with its own

civic deficit, it is less about politics, more about being a good neighbour, volunteering, and

taking responsibility for one's community ('look after the area where you live')[83]. Both

Germany and Denmark are more concerned with monitoring the reasonable, and reasonably

deliberating democratic citizen, and more fearful of 'religion in politics' than multicultural

Britain with its electoral passivity and weak popular sovereignty tradition.[84]

Interestingly, Joppke, the comparative sociologist, is well aware of differences such as

those sketched above. He usefully distinguishes between a 'soft' tolerance-and-equal-

treatment liberalism and a more perfectionist creation of 'liberal people', one British, the

other associated with French republicanism[85], and adds a Danish and Dutch, individualist and

modernist 'hyper liberalism'[86], as well as the idea that liberalism – of the second and third

kind – may be 'oppressive', when it is the mind that is targeted and not just the action.[87] But

he strangely dismisses the possibility that these different national relationships to liberalism

might substantiate stories of national particularity and explain at least some of the variation in

civic integration policies – such as why Denmark and the Netherlands have developed

especially restrictive policy regimes.

In one further way, these particular universalisms are certainly nationally particular. It is

increasingly the case that the nationalization of liberal values, whatever their flavour, is

substantiated by association with a thicker national culture, which either situates liberal values

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[82] Ibid.

[83] Home Office 2014, 8.

[84] Mouritsen 2013.

[85] Joppke 2008b, 544; Joppke 2009, 2 and 21–23; Joppke 2010a, 130.

[86] Joppke 2010a, 139–140.

[87] Joppke 2010a, 140.

within particular historical traditions and achievements, e.g. of democracy and welfare state arrangements, or within 'post-secular' appeals to Christian religion either as indispensable means of social cohesion or as unique cradles and transmitters of specific civic and moral values, or both. Such culturalization of civic integration overlaps with another set of particularizing tendencies, which often escape the nationalism detector. These are the sociological assumptions about national identity formation on both the collective and the individual level. National identity conceptions might be difficult to tell apart in terms of normative content but still vary in terms of the perceived possibilities of politically steering the reproduction of the collective self-understanding and the possibilities (and necessity) of immigrants to change themselves and integrate into the national community. We now turn to these tendencies.

CAN THE COLLECTIVE SELF-UNDERSTANDING BE INTENTIONALLY RECONSTRUCTED?

In November 2004, the European Council agreed on a set of 'common basic principles' of immigrant integration policies, the first of which says that 'Integration is a dynamic, two-way process of mutual accommodation by all immigrants and residents of the Member states'.[88] But we should not expect all governments to interpret this principle in the same way. Some may accept that the majority must change their view of the nation to accommodate a more multicultural society, but disagree on how much, on the speed of the process, and on what the state can or should do to facilitate the change. Others might see some form of institutional accommodation as enough to comply with the principle, yet disagree on the policy areas to cover. Some might disregard the principle altogether. What is accepted by everybody, though, is that the newcomer is always expected to change in some respect.

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[88] Council of the European Union 2004.

The perception of the very nature of cultural integration is often at play in the way such a principle is approached. Typically, the boundary construction taking place in ethnic conceptions of nationhood is described as organic or deterministic while civic conceptions are said to subscribe to a voluntaristic notion of nationhood.[89] Yet, as demonstrated by Oliver Zimmer, Sune Lægaard and Kristian K. Jensen[90], civic conceptions of nationhood can also incorporate highly deterministic perceptions of cultural integration – on both an individual and a collective level. Here organic or deterministic refers to the idea that national identity and its reproduction is outside the reach of intentional human action, while voluntaristic means that it is something individuals and societies can decide upon intentionally.

Semin Suvarierol uses the concept 'nation-freezing' to describe a discursive construction of national identity as fixed and stable, leaving no room for change in its content.[91] National identity from this perspective exists outside the boundaries of political action and, thus, instead becomes something political action must respect and conform to. Analysing the official material given by states to immigrants to assist them in their integration, she finds that the nation, in the Dutch and French material, is 'frozen' and, thus, designates a fixed end-point of individual change, while the English material has a highly reflexive approach, which recognizes the constructedness of national identity.[92] Another analysis of the Dutch case distinguishes between restorative and constructive culturalizations of citizenship, offering the same diagnosis of the progressive self-understanding of the Netherlands as Suvarierol's.[93] Kristian K. Jensen uses the term 'deterministic' to describe such a fixed discursive

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[89] Smith 2000, chap. 1.

[90] Jensen 2014; Lægaard 2007; Zimmer 2003.

[91] Suvarierol 2012.

[92] Ibid.

[93] Duyvendak, Hurenkamp, and Tonkens 2010.

construction of collective self-understandings and also finds it dominant in the Danish integration debate.[94] Here nothing is expected of the majority community except being patient and offering whatever assistance required to make newcomers understand – indeed internalize – the national way of life and act accordingly.

When collective self-understandings are presented as something that the community cannot intentionally reconstruct, only newcomers are expected to change. The question politicians and authorities then face is which policies best accommodate this one-sided transformation process. This naturally leads to a strong focus on how to arrange the different steps of the naturalization trajectory.

The opposite construction – which Suvarierol finds in the English material – Jensen terms 'voluntaristic'. Here '[n]ational identity is seen as constructed through intentional collective action, and political actors are seen as capable of intentionally affecting what it entails to be and become a member of the nation'.[95] Jensen finds such a construction in a central Norwegian government white paper from 2004, *Diversity through inclusion and participation*, which straightforwardly states the political goal 'of [developing] a new and more including understanding of what it means to be Norwegian.'[96] Conversely, such a conception would lead attention away from the naturalization trajectory to how to facilitate such a process through re-arranging other areas of social life such as schools, the labour market and politics.

Underpinning a deterministic conception of the collective self-understanding is often the idea that a society's institutional trust, interpersonal trust and national identification are closely related. Some see trust developing more easily when actors resemble each other. If

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[94] Jensen 2014.

[95] Jensen 2014, 568.

[96] Norwegian Government 2004, 18.

cultural resemblance and trust are the result of slow organic processes of consecutive generations living together, the state can do very little but protect what is there already. Such a discourse of national culture as instrumentally necessary has migrated from social science into public policy. Here, integration, in neo-Rousseauian fashion, is about homogeneity and losing one's difference *per se*, and about participating in society in the same way as others to foster social capital. This, in turn, facilitates democratic deliberation, strong welfare distribution, growth, flexicurity-based labour markets, and other agreeable things.[97]

Summing up, the answer to the key question of 'who changes' – the immigrant, the receiving society, or both – designates where to direct government action to facilitate integration. However, another issue is how to perceive the possible impact on individuals that such government action can actually have, as the following question addresses.

WHAT DOES IT TAKE FOR THE INDIVIDUAL TO CHANGE?

Besides its collective dimension, national identity formation is also an individual process. Answering whether an individual is able to freely choose his or her identity is different from answering whether a nation can intentionally reconstruct its identity. The individual dimension concerns the degree to which individuals control their own (national) identity formation, and what the individual is seen to be able to do affects which instruments are deemed necessary. If losing one's cultural baggage requires a lot of effort, demands and incentives to participate in relevant arenas of socialization will be tougher and more comprehensive.

From a deterministic viewpoint, national culture is so deeply rooted that to acquire a new one is an onerous project for anyone not raised within the institutional and cultural confines of a given state. To the extent that personal change is even seen to be possible, it involves

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[97] Miller 1995.

extensive socialization. Understanding and belonging only evolve gradually as a person internalizes national life through lived experience. A voluntaristic perspective by contrast assumes that people can rework their identity creatively and that it is thereby easy to insert oneself in a new nation.[98]

Writing about debates on civic integration from abroad and Islamic headscarves in France and the Netherlands, Saskia Bonjour and Doutje Lettinga note two very different ways of thinking about individual-level national identity: 'While the French have confidence in state institutions' capacity to create French citizens (with French colonialism representing an extreme form of cultural imperialism), the Dutch are inclined to see group differences as lasting and irremediable.'[99] Dutch political debates display an essentialist conception of culture where it is very difficult to detach oneself from one's cultural background and take part in a new, culturally different community. Kristian K. Jensen finds the same conception of culture in Danish and Norwegian integration debates.[100] By contrast, French debates reflect a conviction 'that any foreigner regardless of his or her background can be educated to be a French citizen, as well as the belief in the universal attraction exercised by Republican values.'[101] In the French integration philosophy, newcomers are not determined by their cultural upbringing; the republican values are so persuasive that they can easily induce anybody to be part of the national community.

This deterministic notion of national identity where individuals, so to speak, are thrown into and caught by a certain web of narratives and codes by being born within a specific

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[98] Jensen 2014, 568.

[99] Bonjour and Lettinga 2012, 269.

[100] Jensen 2014.

[101] Bonjour and Lettinga 2012, 268.

cultural group[102] has also informed anthropological work on contemporary, culturalized forms of racism. According to this literature, much talk about cultural differences in immigration politics is covertly racist when functionally equivalent to a biological racist discourse. When cultural differences are pictured as insurmountable and incompatible, they can legitimate the same policies of exclusion and segregation as biological notions of difference.[103] Yet, as noted above, countries may differ in how their politicians tend to think of the possibilities for voluntary self-ascription. Not all European politicians consider cultural differences insurmountable. But some think that the socialization process, which newcomers face as they try to become part of the nation, is so demanding that it strictly limits the number of immigrants it is feasible to accept.

CONCLUSION

Joppke asks us to consider how 'something that is deemed "undefinable" [can] become a matter of policy in the first place?'[104] We have argued that there really is no need for politicians to define the nation or elaborate on the seeming paradox of using universal liberal-democratic values to define a national community. Most politicians and citizens are more than ready to accept national particularity as the premise of debates – even on the basis of this apparent paradox. Consequently, it stops being a paradox, in the sense of something inherently self-defeating or inconsequential, and we cannot use such *discursive* convergence as evidence that nationalism is losing explanatory power. Even *policy* convergence tells us nothing about the causal significance of nationalism. Nationalism may even be a factor of convergence. Why? As substantial differences are not required for either national

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[102] Benhabib 2002, 15–16.

[103] Balibar and Wallerstein 1991; Gingrich and Banks 2006.

[104] Joppke 2008b, 540.

distinctiveness or functioning nationalism, diverse national identities are easily invested with the same ideational material. Hence, if similar policies are being adopted across countries, such convergence does not necessarily reflect the weakening of nationalism. It *could* instead be a consequence of increasingly similar ways of imagining the nation. Indeed, the problem of even minimal differentiation does not arise at all where different countries' defining other is not another nation-state, but Islam and Muslims; as is the case in the widespread backlash against multiculturalism in European debates.[105]

Now, we have to be clear. We do not wish to imply that we have shown that nationalism is *the* most important factor behind European integration policies. More modestly, we have argued that we cannot discard it as an important explanation on the basis of discursive or policy convergence or existing anti-discrimination law. Nor can we dismiss the nationalization of universal values as an effective strategy to mobilize national sentiment. Moving beyond the paradox of universalism requires taking nationalist claims couched in a liberal universalist vocabulary seriously and trying to capture their ideational variance. The ethnic-civic dichotomy is inadequate for this task. A more fruitful analytical approach must include the sociological assumptions of national identity formation and seek to test which national settings are more susceptible to nationalist claims. In all likelihood the question is not if national identity is important in Western European politics, but in which national contexts identities more strongly condition policy making.

In conclusion, civic integration policies leave a place for the causal imprint of national identity. To trace this imprint we must investigate the concern policy makers show for a, more or less thick, national culture, which flies under the radar of anti-discrimination, in the form of diverse, more or less particularized, conceptions of liberalism and civic 'we-ness', *and*, perhaps most profoundly, different processual semantics of national belonging.

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[105] See the different contributions in Vertovec and Wessendorf 2010.

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