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## 1

## Shifting Landscapes of Citizenship

*Christina Slade***Introduction**

What it is to be a citizen is not a simple matter. For an individual to be a citizen is for that person to belong in a particular way to a community, be it a 'city' (as in the origins of the term), a nation state or some other broad grouping such as the European Union (EU). That an individual *is* a citizen of a community is a matter of law. However, the relationship also carries cultural connotations. Being a citizen implies that an individual shares certain beliefs with, and behaves as a member of, the community. The beginning of the twenty-first century has seen a number of nation states impose – or refine – tests to ensure that citizens to whom they grant the formal legal status have appropriate cultural attributes. Not only have the classical countries of immigration, such as Australia, Canada and the United States, strengthened or reintroduced stringent tests for migrants to become citizens, but the countries of Western Europe have, for the first time, also turned to testing regimes. Since the beginning of the century, the Netherlands and Germany have imposed tests of cultural knowledge for new citizens; the Netherlands has developed a civic integration regime which prospective migrants take before arrival; and the United Kingdom has revised its requirements of cultural knowledge and toughened its stance on visas and migration (Chapter 6). In a time of globalisation, it is remarkable that so many nations are insisting on nationally based cultural attributes for would-be citizens.

This chapter outlines the issues which underpin discussions of migration and citizenship in the early twenty-first century. Part I deals briefly with the historical and philosophical origins of the concept. Part II focuses on aspects of citizenship, ranging from the legal and political

understanding of the relationship at one extreme, to notions of cultural belonging on the other. Part III discusses the impact of new media on citizenship, followed by a case study contrasting assimilationist and multicultural approaches to those seeking citizenship. The penultimate part argues that models of citizenship testing are flawed. The conclusion deals with the pressing need to bring the varied discourses of citizenship together in discussions of citizenship-testing.

Globalisation has altered our understanding of citizenship. The power of the nation has been undermined by the rise of transnational entities such as the EU, of trading blocs such as the North American Free Trade Association, and by the increasing pace of globalisation of trade and information, especially with the Internet.<sup>1</sup> Yet legal citizenship remains a national affair. The fact that citizenship-testing regimes have been introduced in Western European nations since the beginning of this century shows how strongly states and their citizens still fear the loss of national identity. Sue Wright asks in her introduction to a recent volume of the *International Journal of Multicultural Studies*:

Why at this precise point in time are so many states requiring would-be citizens to pass entrance tests? (2008, 1)

Wright considers two explanations for the rise of citizenship tests in Europe: fears for security and what she calls the issue of 'critical mass'. In the wake of 9/11 and the moral panic and fear of Islam following the attack on New York, security has dominated national agendas. This has certainly been a factor in the rise of citizenship testing. Debate has been framed in terms of what Huntington (1996) called a 'clash of civilizations'.<sup>2</sup> However, as is pointed out in the chapter dealing with the Netherlands (Chapter 7) in this book, the introduction of more rigorous tests for migrants predated 9/11 and, while certainly fuelled by fear, had deeper roots in the fear of loss of national identity. The nation state (with its concomitant national identity) is a relatively recent construct even in Western Europe, where the 1648 Treaty of Westphalia is often cited as the crucial starting point (cf. e.g. Held, 2003). In the New World, national identities were self-conscious creations of the last two centuries. While all national identities are to some extent social constructions, the recent scale of migration has led to concerns that new waves of migrants will undermine the practices and values of the West. There is a fear that a massive intake of migrants, or *newer* migrants in the case of Australia and the New World, will dilute traditional or hard-won

identities, which will no longer have the critical mass necessary to maintain their culture. Citizenship-testing regimes are a response to those concerns.

This book focuses on the debate around the introduction of a test for citizenship in Australia, putting it into its international context. The Australian test was introduced by the Howard Government, following little more than a year of consultation, in October 2007. It was seen as a potential vote winner in the elections due that year. It was widely criticised at the time, in particular for its focus on a traditional construction of Australian culture (Chapter 9). It included questions about figures such as Donald Bradman, a cricketer now long dead. The new Rudd Government appointed Richard Woolcott to review the test in April 2008. His report, handed to the Government in August, was made public on 22 November 2008. The report, entitled *Moving Forward...Improving Pathways to Citizenship*, is broad ranging, considered and, with minor exceptions, has been accepted by the Government. The major change is that the test will no longer concentrate on questions of cultural knowledge such as the identity of cricketers, but will concentrate on an understanding of the Pledge of Allegiance.<sup>3</sup> The Pledge is key to the review committee's recommendations about the requirements for Australian citizenship. As the Minister for Immigration and Culture, Chris Evans, said in presenting the report to Parliament on 24 November:

If there is any clear definition of what it means to be an Australian citizen then surely it lies in the very nature and content of this contract. [...] The establishment of the Pledge at the core of citizenship will give the test process a coherence and rationale it currently lacks. It is the missing link. (2008, 3)

It is in this spirit that the report called for greater clarity about the levels of English both used in the test and required for citizens, suggesting that the level of language skills should be that sufficient for understanding of the Pledge (Chapter 12).

The fact that some version of Australian test will be maintained, even after a critical review, is an example of the ubiquity of forms of testing. In the Australian, North American and European cases apparently disparate local debates led to broad similar approaches. While this *may* be a consequence of direct modelling, it reflects a profoundly important shift in the political, philosophical, linguistic and cultural understanding of citizenship itself.

## Ideals and contexts of citizenship

Citizenship-testing regimes are not new; nor are they uniquely tied to nation states. Indeed, language barriers were used in the British Empire as exclusionary devices for British colonies from the beginning of the twentieth century (Chapter 2). Citizenship as a political relation between the public and the private, the state and the individual, has been constantly reconstituted as the shifting and philosophically charged conceptions of public, private, state and individual alter; and with those changes, the requirements to be a citizen have altered. While there is a strong continuity in the philosophical understandings of citizenship, contemporary globalisation and media have created a new context for regimes of citizenship, and of citizenship testing.

Normative and descriptive theories of citizenship draw on models from widely different social and political contexts. The Athenian citizen, as described by Aristotle, was required to be engaged in the activities and practices of the state. The ideal of the active citizen and of the public sphere continue to be influential in modern theory particularly in the twentieth-century Habermasian form. Yet the Athenian citizen was very different from the modern counterpart, even in principle. For Aristotle, even Plato's ideal state of just 5000 citizens was too large. As Heater puts it:

Aristotle was quite dogmatic that in order to discharge their functions effectively citizens must inhabit a city-state that is exceedingly compact and close-knit. (1990, 3)

Aristotelian citizenship was highly exclusive – there was even doubt as to whether working men should be included. Modern forms of republicanism, drawing on the Athenian model, while differing markedly in scale, insist on the participatory ('active') aspects of citizenship. Maynor (2003, ch. 1) includes such thinkers as Hannah Arendt, Rawls and Sandel as inheritors of the Athenian view of citizenship.

In this volume (Chapter 4), Ian Tregenza traces the transformations of ideals of active citizenship in Australia. Tregenza draws on what Judith Brett calls a 'virtue' model of citizenship as the underlying form of the understanding of citizenship in the creation of the Australian state, and contrasts it strongly with the 'value' conception characteristic of recent approaches to citizenship. For Tregenza, the shift from active to passive forms of citizenship reflects the rise of a liberal tradition focusing on rights. He distinguishes forms of liberalism of the mid-twentieth

century, in which 'rights were understood as deriving from duties which stemmed from membership of a political community', from neo-liberal conceptions of rights. For Tregenza, neo-liberal conceptions of citizenship emphasise the individual citizen as consumer. They then fail to incorporate the insights of political commitment to the group that earlier liberal conceptions were founded on. Tregenza makes a subdued call for the revival of active citizenship. This concern with the model of an individual citizen-consumer arises again in the next section, in the context of our understanding of cosmopolitan citizens. An active citizen proves citizenship through activities of participation in a political community.

In a quite different sense, the Athenian model of active citizenship has been taken up in Habermas' *The Structural Transformation of the Ideal Public Sphere* (1993). Habermas traces the transformations of the modern world and incorporates them into a model in which the *ideal* of reasoned debate among the citizenry maintains the function of legitimating democratic leadership. Writing in the aftermath of the Second World War, he was concerned to ensure that nation states maintained spaces of strong reflective debate about national actions. In the 40 years since he first published his work in German, the European and global context has been transformed again, into a genuinely transnational space.

The Roman Republic has likewise served as a model for accounts of citizenship from Machiavelli to theorists in recent years (Pettit, 1997, 2001; Skinner and Strath, 2003). In the current context, the transnational flavour of Roman citizenship is striking. While based on a city state, Roman citizenship evolved with the empire, culminating with the formal extension of Roman citizenship to all those in the empire, under the *Constitutio Antoniniana* in AD 212. Mathison (2006, 1015) argues that, in spite of some scepticism amongst scholars, citizenship in the later Roman Empire was genuinely transnational. As he says:

during the later Roman Empire, the Roman government [...] created a functional equivalent of universal citizenship. This was done largely for purposes of administrative streamlining, but even the streamlining could not have happened if there had not been a pervasive belief in the world of Roman officialdom that people living under Roman authority ought to have access to Roman law. (2006, 1040)

Mathison contrasts this model with that based on the nation state and specifically questions whether the Roman model might not be

appropriate to the modern globalised world. The question is one which has exercised many scholars (e.g. Habermas, 2001; Peters, 2005). There is no doubt that globalisation has undermined the ability of the nation state to manage independently of other nations. While normative accounts of the ideal global citizen exist in the literature (e.g. Held, 2003), philosophical debates surrounding notions of citizenship overwhelmingly continue to be framed in terms of the state.

### **Between passport and belonging**

Citizenship-testing regimes exist under the control of individual nation states, and are essentially mechanisms of exclusion. They are generally imposed by nations where conditions of life are preferable to those in other countries (or perceived to be so), and aim to limit migrant influx into the preferred destinations, ostensibly to preserve those conditions that make the country desirable to live in. Citizenship tests also have an internal political role: to reassure voters that governments are keeping watch. (The political message may of course be cosmetic. Lloyd Cox in Chapter 5 points out that in the Australian case, a government rhetoric of exclusion during the Howard years was accompanied by increasing levels of immigration.) The mechanisms for citizenship testing are framed in international legislation and are hedged about with domestic and international structures. Only citizens can access consular protection, for instance, and the level of protection varies widely depending on the financial strength of the nation to which a citizen belongs. Australians, along with US and European citizens, have well-funded consulates to assist them if working or travelling in other countries; others, such as Pakistani and Indian workers in the Gulf, receive less assistance.

Possession of a passport is the minimal 'barest' form of citizenship, but there are other forms which are equally powerful. In his book *Cultural Citizenship*, Toby Miller distinguishes political, economic and cultural aspects of citizenship: the political, consisting of the politico-legal rights of citizenship; the economic, of rights 'to work and prosper'; and the cultural, which he defines as 'the right to know and speak' (2007, 35). He charts a web of political, sociological, philosophical, historical and legal arguments based on notions of cultural citizenship. The formal political and legal aspects of citizenship which define the rights of 'bare' citizenship lie at the far end of the spectrum from those forms of belonging which derive from economic and cultural activity. The conceptual space of citizenship debates could be modelled as a topological space. At one extreme of such space lies bare citizenship – the formal or political

rights entailed by having a passport. At the other extreme lie cultural practices by which citizens define their identity and sense of belonging to a community, ranging from use of language, food, clothing and work habits, to sport and intellectual style. Between bare and cultural citizenship there lies an interconnecting web of concepts. The nature of these interconnections is much debated. This discussion draws on a range of sources, from Isin and Turner's (2007) exploration of the complex and shifting practices of citizenship, to traditional philosophical debate, focused on the normative underpinnings of our concepts of *good citizenship*.

The relation between the state, its citizens and their cultural identity is highly contested. Liberal conceptions of the state, for instance, see the role of the state as the guarantor of individual's choice as to their cultural practices. Somewhat paradoxically, versions of this liberal conception have led to a normative requirement of cultural uniformity among *would-be* citizens, in terms of citizenship testing.<sup>4</sup> To take a second example, much of the debate about diversity has been framed in terms of cultural citizenship as if cultural citizenship only exists where there is cultural diversity. Thus, when Pakulski writes:

claims for cultural citizenship involve not only tolerance of diverse identities but also – and increasingly – claims to dignified representation, normative accommodation, and active cultivation of these identities and their symbolic correlates (1997, 77),

he is assuming that claims for cultural citizenship arise only when one is *not* associated with the dominant culture. Citizenship tests prove otherwise. In such tests, the dominant culture lays out its claims for cultural citizenship.

The complexities in conceptual discussions of citizenship derive from implicit assumptions about the connections between different aspects of the network of political, cultural and economic citizenship. The widespread assumption that citizenship constitutes a one-to-one relationship between a state and an individual often slides to a stronger claim that a citizen should have a unique *cultural* relationship to the nation state. The stronger claim is then read as the view that citizens owe allegiance and loyalty to the state to which they belong and to that state alone. Pledges of Allegiance, willingness to go to war and identification with national sports teams have strong emotional overtones which draw on this stronger view. Behind much of the rhetoric of national identity is the view that citizens should belong to and fight for the nation to

which they belong, and also identify with the relevant national icons and symbols. A sense of national identity is assumed to be manifest in pride in sporting achievements or cultural achievement. Yet, the sense national identity is no longer so simple, if it ever was. To use the much-quoted phrase of Anderson (1983), 'imagined identities' are no longer bounded by the physical borders of the nation state. The one-to-one connection between nation and cultural identity is mythical, however potent that myth may be.

The view that each person should have one and only one national citizenship is best read as a *normative* claim about the relation between cultural and bare citizenship. It is striking that it was only really in the second part of the twentieth century that the idea of a unique (one-to-one) relationship between the state and its members really took purchase. In Australia, as pointed out by Alison Holland in Chapter 3, while there were strong legal conditions restricting entry to the country, Australian citizenship *per se* did not come into existence until after the Second World War. Until that time all Australians were British subjects. Nor did Australia have independent diplomatic relations until after that war and, even after the introduction of specifically Australian forms of citizenship, British citizens were permitted to vote and work permanently in the Australian Public Service. This did not at all prevent the self-conscious development of an Australian identity, begun well before Federation in 1901.

As immigration from Europe and the Middle East to Australia accelerated in the post-war years, the popular sentiment was that new Australians should take up citizenship and, with it, loyalty to Australia. Putting aside for the moment the assimilation/multicultural debate, at the level of bare citizenship the assumption was that migrants, the British excluded, in taking up Australian citizenship, should renounce former loyalties. Some countries of immigration, such as Italy, Lebanon and Iran, did not accept that their citizenship *could* be revoked; but in all other cases, Australian law was clear – choosing dual nationality was unacceptable. Those who took up alternative citizenships automatically lost their Australian citizenship (Rubinstein, 2008).

Australian law on dual citizenship changed in 2002, as it had earlier in the United States and in many European countries such as the Netherlands.<sup>5</sup> (Italy is so broad-minded on such issues that its parliament elects members representing the diaspora – an Australian citizen from Melbourne represents Australia and the Pacific in Rome.) In the case of Australia, as in the United States, acceptance of dual citizenship was driven by the need to attract economically successful citizens. In a

globalised world, many live and work in places other than their nations of birth, and in doing so, contribute to the economic and social life of their new countries. However, as soon as dual citizenship is allowed, citizens can no longer be uniquely loyal to their country of citizenship. Dual citizens presumably have at least dual loyalties. The case is even more complex with the EU. By virtue of citizenship in any EU country, citizens automatically acquire transnational citizenship in the Union and thereby what is tantamount to multiple citizenships, increasing in number as membership expands. EU citizenship has been hedged about with constraints, for instance on the rights of citizens of more recent accession states to work in the states of 'Old Europe'; nevertheless such rights exist. Attempts to develop a notion of cultural citizenship for EU members (Weiner, 1998) have not been successful; but the notion that there *should* be such cultural citizenship remains a driving element in EU policy. The ideal EU citizen should exhibit multiple loyalties.

The developed nations of the West have come to a position which is, apparently, inconsistent: that some *must* and others *need not* develop cultural knowledge in order to be granted citizenship. Dual or multiple citizenship is offered to those who enter with economic benefit to the country without any test of cultural knowledge. A wealthy investor, a scientist or skilled tradesperson can take up citizenship without abandoning pre-existing cultural affiliations. British, Dutch, Australian, US and Canadian entrepreneurs, academics, knowledge workers, teachers and tradespersons have little difficulty with cultural hurdles: they are permitted to maintain the mother culture. By way of contrast, many immigrants, in particular those who come for family reunion, are subjected to rigorous and culturally specific testing and are expected to assimilate on their arrival. This is particularly evident in the Netherlands, where the pre-entry testing in Dutch does not apply to such 'Westerners' as Australians and New Zealanders (Chapter 7). To put it in controversial terms, those who are suitably cosmopolitan or transnational in their outlook are permitted diverse cultural attitudes, while those most in need are forced into cultural straightjackets.

Of course, governments have a right to vet prospective migrants in order to maintain economic well-being and the civil society of their nations. Governments argue (perhaps with good reason) that suitably cosmopolitan employees add to economic well-being and share a commitment to the core practices of a modern state. Less-educated migrants, in particular those from Islamic countries, may not share those values and could undermine the fabric of society. The consequence is that

the new landscape of citizenship divides the world into those who are citizenship-rich, and those who are citizenship-poor. Those who are citizenship-rich possess passports or the right to live and work in at least one prosperous country (and potentially more). Others are citizenship-poor: refugees or those whose country of birth does not give great opportunity. Possession of a suitable passport is essential to a prosperous life. In the conceptual space that ranges from bare formal citizenship to cultural citizenship, bare citizenship is presupposed by all other forms of cultural engagement. And passports remain (except in highly unusual circumstances) in the gift of the nation state.

### **New media: New citizenship**

In the twenty-first century, new technologies have put further pressure on the nation state. Global media networks and, to an even greater extent, Internet access have fractured national public spheres, introducing not just global information, but new types of allegiance and forms of political action – in effect new citizenships. In the last Part, I argued that notwithstanding globalisation, the nation state has emphatically reimposed control over bare, formal citizenship. Cultural citizenship is at the same time unprecedentedly globalised.

The immediacy of global news has altered the notions of time and geographical place (Giddens, 1990; Price, 2002). As media consumers we are part of a global space, in which distant events play out in real time via satellite feed. First CNN and now a range of satellite transnational media outlets, and critically the Arabic transnational media, have altered the state-based and local control of news creating mediated spaces independent of the nation (Chalaby, 2005; Miladi, 2003; Miles, 2005; Sakr, 2002). Technologies such as the Internet and the mobile telephone have altered patterns of social and political relations from a linear hierarchical model to a networked and associative style (Castells, 2001). The traditional model of public broadcasting as setting the agenda, at least in Europe and the former British Empire, is completely outdated. The public sphere of debate has become a *mélange* of transnational public spaces, fostered by proliferating transnational media access, and what Gitlin (1998) called ‘public sphericules’, sub-national spaces in which debate on public affairs occurs in groups.

In the case of Europe, the media environment has been utterly transformed from its past as separate nations dominated by separate state run public media. These days the media are no longer only available in national languages. What has emerged is not the hoped-for

pan-European public sphere, but rather a multi-channeled, multi-lingual free-for-all; a fragmented set of sub- and super-national public spheres (Volkmer, 2007). Even where there is an assumption of shared political and social *mores*, national and sectarian differences emerge in the media space. The case is acute with diasporic groups. Diasporic media include the long-standing forms of newspaper, magazines, radio and television, all of which in principle were governed by state regulations. Newer technologies, in particular satellite television, cannot be so regulated. Indeed in Europe, regulation of satellite is possible only in the country of upload. This means that what is broadcast in France is not regulated, even in principle, by the French government.

The loss of control of media by the state has undermined the ability of the nation state to set the agenda of news and the civil society. For instance, Arabic language media have opened a pan-Arabic transnational space of debate. Thousands of Arabic language television channels are available on satellite. They include not just channels aimed at a transnational audience, such as *Al Jazeera* or *Al Manar*, but also the domestic Egyptian, Moroccan, Tunisian, Iraqi, Yemeni, Saudi and Syrian stations. In Europe, nine different satellites offer a selection of several hundred Arabic language channels. In Australia, apart from a short period when the major provider TARBS TV went into receivership, the landscape is equally densely inhabited. The newer space of Arabic language and Islamic media has fundamentally recast the world of the Arabic-speaking diaspora. Where once diasporic communities gathered and shared news of the birth country in *cafés* or read local diasporic media, they now can share the mediated public sphere of the birth country as well as other transnational media worlds in their mother tongue. The Arabic language media world cuts across the other linguistic and political boundaries of nation states, creating a new cross-national diasporic public.

The 'ideal public sphere' of Habermasian theory describes a nation state within which democratic processes are theorised as questioned and legitimated by a process of deliberation among citizens. Some argue that new forms of media give rise to a *transnational* public sphere (Bredt, 2006). Is the new landscape defined by mediated citizenship an *ideal* transnational public sphere? Nancy Fraser (2007) reminds us that what characterised the ideal public sphere was normative legitimacy and political effectiveness. Both are lacking in the new mediated transnational public sphere, which is neither democratically appointed, nor able to legislate. The issuing of passports is a clear case in point: however important global media may be for cultural citizenship, the nation

decides formal citizenship. This is so even in the EU which *is* a genuine transnational public sphere, with legislative power and political legitimacy. Passports in the EU are awarded by the member nation, not by the Union. In any case, the EU is distinctly exclusionary, as the proposed EU common immigration policy shows (Chapter 7).

Transnational forms of political allegiance are not new. It is the mediated landscape of citizenship that has changed, divorcing control of the cultural agenda from the seat of political power. If citizenship testing shows the strength of the nation state in terms of bare citizenship, the new mediated environment shows its powerlessness when it comes to cultural citizenship.

### **Acquiring cultural citizenship: Multicultural or assimilationist?**

Cultural citizenship for those who are already citizens is a complex matter. For migrants or would-be migrants, it is even more complex. Two models of incoming cultural citizenship dominated debate in the late twentieth century: assimilation, as in the French model, and multiculturalism, a version of which became the proud achievement of Australia, along with other nations of immigration, such as Canada. The literature on multiculturalism is extensive; and the issues are philosophically and politically challenging. Yet 'multiculturalism' as a label and as a strategy has fallen into disfavour. A brief case study of France and Australia illuminate the contrasts drawn in the book between regimes in the EU and those in classical countries of immigration.

The scale of Australia's post-war immigration is of a different order of magnitude from anything in Europe: almost one in four of Australia's 2000 population was a post-war migrant. Even in the period in which Europeans became exercised about the inflow of migrants, the net intake of immigrants as a percentage of population in Australia from 1950 to 2000 was 23.1 per cent; whereas in France the figure was only 7.9 per cent (Tiffen and Gittens, 2004, 10–11). Australia gave citizenship to 610 migrants per 100,000 population in the 1990s, while France to 173. There are other differences. Unlike in France, employment rates among recent Australian immigrants (with a few exceptions such as in the Lebanese Muslim Lakemba area of Sydney), equal those of longer-term residents of the country. The difference between Australia's multiculturalism and the French assimilationist attitude to immigrants is profound.

In France, since the Revolution, the model of citizenship that has underpinned migration has been assimilationist. As a member of the EU, France has now adopted the layer of transnational citizenship of the EU. But the myths and metaphors of an essentially eighteenth-century revolutionary *patrie* continue to underpin the understanding of what it is to be a citizen. This is true of Islamic French citizens as well. As Olivier Roy puts it, while British multiculturalism

traditionally celebrated distinct ethnic or religious groups, French Islamists “brandished the tricolour”. (2004, 245)

As with many in the new transnational entity of the European Union, the primary focus of loyalty is still to the nation state and its traditions.

The Australian model became self-consciously multicultural after the Second World War. Alison Holland explains in Chapter 3 how Australia moved beyond the White Australia Policy to disallow race as the basis of migration policy in the late 1960s and early 1970s. For instance, until the 1970s, while Lebanese Christians had been judged ‘white’ and hence eligible for immigration under the White Australia Policy, it was only after the Civil War that ‘non-white’ Lebanese Muslims were able to come to Australia in numbers. For the last 30 years, the policy of multiculturalism has allowed for different ethnicities, different languages and different social and cultural models to be accepted within the overarching community. Public policy and practice were synchronised over a long period, and even when the rhetoric of multiculturalism became unfashionable, attitudes towards those born outside Australia continued to be broadly positive.

Both assimilationist and multicultural models are increasingly under pressure. Habermas, in his discussion of the question of a European constitution (2001), distinguishes between citizens held together by ethnic identity and nations held together in the juristically neutral sense of ‘state-constituting peoples’ – what is here called ‘bare’ citizenship. He argues that modern democracy requires a more abstract neutral form of political participation and suggests that

the multicultural self-understanding of the nations of citizens formed in classical countries of immigration [...] is more instructive [...] than that derived from the culturally assimilationist French model. (2001, 159–60)

At the same time, multiculturalism is under attack. In the Australian case, the rhetoric became heated in the wake of conflict on the beach of Cronulla in the Sutherland Shire of Sydney in December 2005. The fighting was between what were called ‘Lebs’, denoting the Muslims accused of inappropriate behaviour (in particular towards women on the beaches), and those who identified themselves as true (‘native’) Australians. The conflict was embodied in an image, which has since become iconic, of a young man who had painted on his chest:

We grew here! You flew here!

The underlying fear of those not born in Australia, discussed in Chapter 11 as ‘nativism’, is a potent force in Australian political life. By February 2006, both the then Prime Minister of Australia and Treasurer began to talk of the need for migrants to Australia to accept Australian laws and *mores*. Mr Howard, the then Prime Minister, marked his 10th year in power with a speech reported in the *Sydney Morning Herald* (25–26/2/06) in which he said: ‘When you come to Australia you become Australian’. In the same article, Mr Costello, the then Treasurer, is quoted saying even more forcefully: ‘Before becoming an Australian, you will be asked to subscribe to certain values. If you have strong objections to those values, don’t come to Australia’. Similar remarks can be found readily in the British and Dutch press. The right wing Australian historian Keith Windshuttle argued even more trenchantly:

Multiculturalism is a reversion to tribalism that is anachronistic in a modern liberal urban society [...]. [It] has bred ethnic ghettos characterized by high levels of unemployment, welfare dependency, welfare abuse, crime and violence. (2005)

The new Rudd Government, while committed to reviewing citizenship testing, has been wary of returning to multiculturalism. Howard had removed the word ‘multicultural’ from the title of the federal government department concerned with immigration; the Rudd Government accepted the new name. Likewise the citizenship test signals a turn back in the direction of assimilationist models of citizenship, however carefully phrased. By testing language skills and shared values the test asks would-be citizens to conform.

### Testing would-be citizens

What is it that would-be citizens should acquire? Is it a set of skills, such as speaking a language, or is it knowledge of cultural practices? Is it the

disposition to obey the law? Is it a quality, or set of qualities, those who are already citizens should have? Or is it rather, as Minister Evans put it in the Australian case, an understanding of the Pledge of Allegiance? These are vexed questions which arise whenever citizenship tests are devised. The intense national and philosophical debates on these issues are the subject matter of Chapters 6–10 and Chapter 12.

There are two critical assumptions in the adoption of citizenship-testing regimes. The first assumption is that the dispositions which characterise a good citizen can be defined in a way which uniquely describes the desirable would-be citizen. But, as we have argued, there is no unproblematic form of citizenship to which aliens or immigrants can either assimilate or offer multicultural alternatives. From the time of the Roman Empire, the complexities of joint and multiple loyalties have been part and parcel of the notion of citizenship itself. To use the language of recent scholarship, tests must admit the existence of hybrid identities (Kraidy, 2005). Tests require of would-be citizens a special relationship to a nation, yet the sense of belonging to many communities is commonplace in the globalised world. As Beck argues, globalisation heralds a move from a ‘monologic’ nationalistic perspectives to a newer ‘dialogic imagination’ which involves ‘the coexistence of rival ways of life in the individual experience’ (Beck, 2002, 18). While governments seek to encourage their own citizens to learn languages and become cosmopolitans, the multiple loyalties, languages and ‘rival ways of life’ of would-be citizens are perceived as a problem. Of course, there *are* genuine concerns about multiple loyalties and belief systems. In Chapter 10, Catriona Mackenzie examines in some depth the philosophical basis of a liberal multicultural state and offers her reflections on the limits of toleration in such a state. Her concern is whether citizenship tests, even in principle, could serve the ends of such an ideal state.

The second assumption is that the dispositions which distinguish the good from the bad would-be citizen can be tested by the sorts of individual tests the regimes impose. Surely the test should focus on behaviour in groups, rather than individual knowledge? The issue parallels a question raised by Tregenza, as to whether modern neo-liberal accounts of citizenship, by focussing on an individual citizen-consumer, detach the individual from the activities and practices that define the community. In the Australian case, the Woolcott Report calls for citizens to understand the Pledge of Allegiance. Whether citizens do understand the Pledge can only be seen in their behaviour. Yet the test assumes that, by asking whether prospective citizens understand and know the Pledge, we can predict whether they will behave appropriately. The test resembles a consumer attitude survey, with the dispositions of each

citizen-consumer measured by market research techniques and attitude surveys. But appropriate behaviour – and indeed cultural citizenship more generally – consists in practices, not attitudes reflected in surveys or tests.

Citizenship tests assume, as do most surveys, that each individual tells the truth about their beliefs and acts on those beliefs in predictable ways. Yet in answering questions on a test, any reasonable candidate will be able to predict the desired answer. Even those who sincerely ascribe to beliefs do not always act in accordance with those beliefs. To take an example: a person may believe that it is wrong to drive fast and when asked in a test would agree that they intend to obey the law. In a country where excessive speed is penalised they stay within the limits. When there is no penalty, they tend to speed, whatever the legal limit. It is the social and communal context – and in particular the penalties – that best predict drivers' speeding behaviour.

It is the *practices* of immigrant groups, as much as their beliefs, which cause concern and have led to civic integration and citizenship tests. Those tests are based on linguistic and cultural knowledge. However, linguistic or cultural knowledge does not stop undesirable behaviour. There is no good reason to associate undesirable behaviour with lack of cultural knowledge. Take the case of Mohammed Bouyeri (Chapter 7), who murdered Theo van Gogh in 2004 for his anti-Islamic views. He had been educated in the Netherlands and was fully acculturated. He was aware of cultural norms in Dutch society, and could have answered questions about those norms, yet his behaviour was precisely what the tests intended to screen out. Mohammed Bouyeri would have passed the strongest assimilationist test of cultural knowledge.

The revised Australian citizenship test was designed to be more sensitive to a multicultural model of citizenship than the earlier test. It takes the Pledge of Allegiance to be the 'missing link', knowledge of which should be at the core of the test. It is certainly a better test than one asking questions about obscure cultural icons. Moreover understanding and (sincerely) making the Pledge of Allegiance may be desirable among new citizens. But such pledges in no way guarantee that those who pass the test will behave as good citizens.

## Conclusion

The discourses of citizenship themselves often seem to be incommensurable, untranslatable across theoretical and disciplinary divides. The discussion here touches on just a few of the extended and sophisticated

debates relating to citizenship. The landscape of citizenship is difficult to map. Even where the topics are shared, the conceptual territory is so differently described as to be mutually incomprehensible. The rise of citizenship-testing regimes has made it acutely important to piece together the fragmented discourses relating to citizenship.

This chapter has focused on the fundamental tension between the impact of globalisation in a much-heralded post-national era, and the resurgence of discourses of nationalism evident in citizenship tests. Traditional accounts of citizenship are under pressure from new political circumstances, and the rise of the new media. The long-standing debate between proponents of multicultural and assimilationist models of citizenship plays out in the globalised domain in new languages of hybridity, cosmopolitanism and mobility. Soysal (1994) talks of new forms of post-national belonging emerging in Europe, based on culture not territory. Optimistic utopian visions tell of modern hybrid citizens who negotiate their identities between countries of residence, of passport and of ethnic and religious links. This chapter argues that while this may be true for the citizenship-rich, there is a dark dystopian world of those who cannot access passports. Those citizenship-poor are caught up in the world of national immigration regimes.

The image of a culturally unified nation state is implicit in the rhetoric which informs legislation and immigration policy on citizenship testing. The complex relationships between cultural and national identity, charted in Part II, underlie much debate. Fears have been reignited in the beginning of this century among wealthy populations following 9/11. Xenophobia is only likely to increase as the economic crisis bites. National identities are on the rise. Identity, emotion and territory are, as Berezin (2003) reminds us, closely interwoven. As she says:

Territory is congealed identity that embeds relations of social, political cultural and political power in physical space. [...] Citizenship is more than simply a juridical relationship. It also signals an emotional bond that arouses feelings of national loyalty and belonging in a politically bounded geographical space. (2003, 10, 13)

There is no doubt that there is a powerful emotional component in the populist discourses that dominate citizenship debates in Europe, as there is in Australia. Nations and their peoples have a right to seek to ensure that society is secure and that the practices of citizens fit within the rule of law. Yet in adopting citizenship-testing regimes, nations fail

to recognise the complexities of a post-national mediated world. The nation state is unlikely to relinquish its power to grant citizenship. Nor, in the present circumstances, should we expect that more complex notions of cultural belonging to inform debate. However it *is* worth asking whether present models of citizenship testing work. Testing prospective new citizens by enquiring of their values and language skills is not an effective way to ensure security or appropriate behaviour. The assumption is that by filtering migrants for citizenship the state can achieve a secure and law-abiding populace. That assumption remains in doubt.

## Notes

1. For just some of the utopian and dystopian accounts of the transformations of citizenship, see Barbrook and Cameron, 1995; Barlow, 1998; Boeder, 2005; Boyle, 1997; Castells, 2001; Couldry, 2004; Gillespie, 1995; Gray, 2001; Grove, 2007; Miller, 1993; Poster, 1995; Vandenberg, 2000. For debate on the end of the nation state, see Castells, 2001; Giddens, 1990; Held, 2003; Miller, 2007; Price, 2002.
2. The phrase 'clash of civilizations' was first in fact used by the Princeton-based British political theorist Bernard Lewis at a meeting in Washington in 1957 where it was recorded in the transcript.
3. The Pledge of Allegiance runs as follows:

From this time forward, under God\*  
I pledge my loyalty to Australia and its people  
Whose democratic beliefs I share,  
Whose rights and liberties I respect, and  
Whose laws I will uphold and obey.

\* A person may choose whether or not to use the words 'under God'.

4. cf. Kukathas (2008: 35) who charts a variety of liberal responses to the dual issues of integration and membership in the state
5. Although in recent years dual citizenship has again become a matter of debate in the Netherlands.

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Unlike the United States, Canada, Australia, or New Zealand, modern Europe never produced melting pot societies. Though French Protestants and Jews, for example, played important roles over the centuries in the development of contemporary financial centers—first in Amsterdam and later in London—immigrants still were relatively marginal in most of the continent’s economic advancement. Europeans are reconsidering, with good reason, the multicultural future being thrust on them. The disparity between Europe, even in its present weakened state, and its neighbors to the south seems certain to boost migration. Sub-Saharan Africa, according to a Gates Foundation study, will be home to 86 percent of the world’s population living in extreme poverty by 2050.