

**Linköping University Electronic Press**

**Book Chapter**

**Introduction: The Limits of Gendered Citizenship**

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Part of: The Limits of Gendered Citizenship: Contexts and Complexities, ed. Hearn, Jeff,  
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ISBN: 978-0-415-85126-8 (Paperback), 978-0-415-88706-9 (Hardback)

Series: Routledge Advances in Feminist Studies and Intersectionality

Available at: Linköping University Electronic Press  
<http://urn.kb.se/resolve?urn=urn:nbn:se:liu:diva-109497>

## CHAPTER 1

### **Introduction: The Limits of Gendered Citizenship**

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The central theme of this book is gendered citizenship, and the challenges and limits that confront the gendering of citizenship. The possibilities for citizenship are severely limited by gender, but there are also limitations in considering citizenship only through the lens of gender. Thus the notion of the genderless nation-state citizen is critiqued—in both analytical and policy terms—and the complexities and contradictions of citizenship are necessarily engaged with throughout. More specifically, there are at least three major sets of tensions addressed, between:

- academic analyses of gendered citizenship, and political, policy and practical interventions on gendered citizenship, along with the limitations of playing down either theory or practice;
- limitations on achieving gender equal or gender equitable citizenship, and the limitations of a focus on citizenship solely through gender rather than an approach informed by intersectionality; and

- equal opportunities policy, gender equality policy, gender mainstreaming, and diversity policy, and the limitations, and advantages, of each approach. For example, in policy terms strategies of gender mainstreaming may highlight gender, at least in the short term, but these may also dilute attention to gender power relations in gendered citizenship, in the longer term.

### **Focus and Rationale**

In the authoritative body of theoretical work citizenship is typically conceptualized in a universal and, at the same time, often abstract manner, which leads to a very general and supposedly “objective” construal of this notion. Its decontextualized nature tends to locate the concept of citizenship within the nation-state and, simultaneously, signifies a lack of attention to the actual and diversified contexts in which citizenship in general, and gendered citizenship in particular, is practiced, articulated, and experienced.

Citizenship has historically been framed by the nation-state and its supposedly gender-neutral, in practice often male, citizens. The concept not only includes formal political representation but also social and cultural rights, and rights of access to state machinery, in the shape of public sector services. The nation-state itself has often been characteristically gendered, at least in the sense that its “making” has usually been a project historically led by men, and at least initially for men or at least certain classes of men. This is often implicit or explicit in the dominant symbolism of the nation-state: the motherland which is in turn “protected” by men. It is onto this political base that women’s political participation has been grafted in most, though not all, countries.

Having said this, it is important to immediately acknowledge that there are considerable variations in how the gendering of citizenship operates at the level of the nation-state. For example, Finland was the first country, in 1906, to give full political rights to all adults, with citizenship for the mass of women and men being more closely associated with the relatively recent nationalisms for all citizens (Moring 2006). This is not to say that such “nationalistic” citizenship is non-gendered, far from it. Indeed supposedly non-gendered citizenship may indeed remain patriarchal in form, not least through the continuation of pre-nationalistic discourses and practices, sometimes around particular notions of “equality,” as in the Soviet regimes, or more generally in the lack of freedom from gender-based violence, surely one of the most obvious and least recognized negations of citizenship. More generally, it might be argued that some forms of (male) citizenship, based on notions of male individualism, are often in tension with those forms of male-dominated nationalism that are based on notions of collective, often homogenizing, lineage, culture, language, and exclusion of individuality and difference.

In the light of these various historical marginalizations and exclusions of women, full inclusion of female citizens requires addressing basic structures of gender inequality in society and societies. In sociological terms, citizenship is usually conceived of as rights-based or, alternatively, as responsibility-based. The concept is inclusive of political and economic entitlements, access, and belonging and encompasses a number of rights and obligations (see, for instance, Marshall 1950, Wiener 1996, 1997, 1998).

Accordingly, women's gendered, and indeed men's, citizenship is mediated by a broad range of rights and responsibilities (social, political, or economic) that might enable them to possess the status of "full members" of a political community, in the widest sense of the words. One example of this is in the attention by some feminists to questions of care, emotionality, dependency and interdependency in redefining citizenship in public and private spheres, and their interrelations (Sevenhuijsen 1998, Hobson 2000, Lynch et al. 2009). In this process, or struggle, gender equality policies should obviously be seen as important tools in enhancing women's rights and participation, yet that process of achieving more gender equal citizenship is by no means unproblematic.

This collection responds to the need to re-evaluate the very important concept of citizenship from different and recent theoretical, practical, critical, and in particular feminist perspectives. The aim of this volume is to challenge simplistic political applications of the concept and discusses different spaces, areas, and contexts to which citizenship can refer. In contrast to the dominant universalizing renditions of the concept, the volume argues that citizenship can, and in fact should, be theorized and debated on many different levels and in reference to diverse both public and private contexts and experiences. Thus in this book we seek to demonstrate that the concept of citizenship needs to be understood from a gendered intersectional perspective and argue, following Ruth Lister (this volume), that though it is often constructed in a universal way, it is not possible to interpret and indeed understand citizenship without situating it within a specific political, legal, cultural, social, or historical context: lived experiences of citizenship should not be objectified or universalized. This matches,

albeit in an explicitly gendered intersectional way, what Engin Isin (2008) proposes, namely the need for more complex analyses of differential subjects, sites, acts, responsibilities and answerabilities in relation to citizenship.

Moreover, in this situation, differential context becomes crucial, and in our case the primary context is European. The relations of gender, equality, and migration, and the implications of each for the others, are complex contemporary issues, and no more so than in the context of European debates on citizenship, national and beyond. The book thus focuses on the interrelations between concepts and structures of citizenship and European multicultural contexts. While this could be said to be a Eurocentric focus, we would argue that there is a need for explicit contextualization and specification of these debates and discussions. Indeed the European Union (EU),<sup>1</sup> with its supposedly free movement of capital, goods, persons, and services, provides a unique social and societal laboratory to assess the implications of the evolution of gender equality policies for women's European citizenship. It prompts such questions as: How do the current gender equality policies address the core issues of gender inequality which present obstacles on the way to an equal citizenship? What underlying concepts of citizenship do the EU policies reveal? And to what extent do gender equality policies deliver on a European citizenship for women?

Despite all these complications, political debates on citizenship have often continued to be couched in strangely gender-neutral terms—or more precisely “the citizen” has frequently been both genderless and male. such obscuring of gender is challenged by feminist scholarship and critical gender commentaries, as well as increasingly also intersectional analyses. In sum, this book constitutes a voice in current

theorizing on the concept of citizenship through a gendered intersectional approach, paying attention to the specific political contexts in which citizenship is played out. By doing so, this collection seeks to contribute to debates on the preconditions for gender equitable citizenship. This includes attention to the possible consequences that enhancing the notion of human rights as women's rights (or seeing women's rights as human rights) might have for transnational networking in feminist social movements and transnational feminist theory. Feminist struggles for the definition of women's rights can be seen as the characteristic example of general aims to articulate the normative content of human rights that would be based on a multicultural global consensus. Together, the following chapters, in different ways, engage with feminist contestations on the idea of human rights and its adequacy for feminist purposes of gender equity.

### **Gendered Intersectionalities**

As noted, gender and gender relations operate intersectionally. The volume seeks to stress the fact that despite the multitude of contexts within which different understandings and articulations of citizenship are formulated, expressed, and experienced, the concept itself is broad enough to encompass simultaneously the claims to equality (i.e. the universal) and the demand for recognition of various differences (i.e. the particular) (Lister 2002a). The collection is also grounded in the conviction that there is a need for theoretical, critical, and political re-evaluation of citizenship politics in an age of globalization and transnationalization. Its main focus is on the interrelations between concepts and structures of citizenship and European

multicultural contexts, defined in terms of complex intersections of diverse and overlapping axes of social, economic, cultural, and political differentials. For example, and topically, the current economic and financial crisis is important in constructing gendered citizenship, and its limits, in both senses, as seen clearly in the gendered effects of neo-liberalism as both precursor of the crisis and a widespread response to it.<sup>2</sup>

While our prime focus is on gender relations, this is amplified and informed by debates on intersectionality that also attend to questions of *inter alia* locationality, migration, ethnicity, racialization, and religion. The collection takes a gendered intersectional approach, which has become very influential in feminist and postcolonial theory in the recent years. Gender relations, and thus the politics and policies of gender equality, intersect with other social divisions. A special focus is on the intersections of gender, race, ethnicity, religion, and class, as central in many of the contributions, though other major divisions, especially disability, generation, sexuality, and violence are also key in developing more comprehensive approaches to citizenship, both analytically and politically. However, while the theoretical underpinnings of the book revolve around the interface between citizenship theories and theories regarding intersectionality, there are differences in to what extent this has been applied in the methodologies adopted in different chapters.

A gendered intersectional analysis is confronted with a set of challenges due to the inherent complexity of the concept, for example, whether it is invoking an intra-categorical, anti-categorical or inter-categorical approach (McCall 2005). These gendered intersectionalities challenge and change what are in effect dominant understandings of citizenship from the context of the nation-state to supranational and

transnational contexts. The specificity of political settings has been central to understandings of intersectionality since the concept has initially been conceived. As Leslie McCall aptly states, intersectionality for most of the time figures as a future project of analysis. She argues that “despite the emergence of intersectionality as a major paradigm of research in women’s studies and elsewhere, there has been little discussion of how to study intersectionality; that is, of its methodology.” (McCall 2005: 1771).

It must be emphasized that the most important characteristic of this approach is in understanding the complexities of social hierarchization. The chapters that follow attempt to apply such an intersectional perspective to the analysis of current theoretical and empirical understandings and practices of citizenship. The application of this approach to what are mostly empirical analyses seeks to contribute to advancing current debates on the complex issue of citizenship as applied to different realms of human experience. Building on feminist critiques of the politics of citizenship, the contributors make it clear how necessary it is to become aware that citizenship has to be understood in context and as intersections of many axes of social, political, economic, and cultural stratification.

However, a distinction should be made between the analytical power of intersectionality, in this case, gendered intersectionality, and the substantive policy interventions that engage with diverse social divisions. Thus intersectional analytical approaches are mirrored to some extent in developments in institutional policy-making. Bureaucratic conceptions of equality have not eliminated discrimination of women and other excluded groups, following the installation of various forms of equal opportunity

policies. Within the Europe there has been a powerful policy debate, now enshrined in general EU directives in 2000, on anti-discrimination on other dimensions beyond gender. This has led to a variety of legal and policy reforms, especially in countries within the EU. For example, in Finland the 2004 Equality Act translated relevant EU directives on equal treatment into national law. This covers such grounds as age, disability, health, religion, belief, ethnic and national origin, nationality, and sexual orientation, as well as the list of possible discrimination grounds being open-ended. In the UK the Equal Opportunities Commission which formerly dealt with cases of alleged gender discrimination has, under the 2006 Equality Act, been incorporated into a 'more inclusive' Equality and Human Rights Commission dealing with the range of discriminations.

With the shift of equal opportunities policy (directed towards improving the position of women) to policies around diversity, it is necessary to examine what kind of "equality" or "diversity" the state is addressing, and what kind of "agenda" is behind this shift in discourse and/or policy. For example, diversity management tends to focus, at least in theory, on individuals, whereas equal opportunity policies tend to focus more on groups of people who are seen as nominal equals, as they share certain characteristics, for example, as migrant women.

In post-communist societies, there has been a rather short span of time to develop a highly sophisticated understandings of gender equality policies and gender-sensitive policy instruments, and this has led to the marginalization, diversification, and segregation for different social groups of women. As Huland (2001) proclaimed, "Western standards for post-communist women," as tools to fight for human rights and improve their standards of gender equality by transposition of EU legislation into

national law have in fact produced acute gender inequalities in transnational labor migration and welfare services, and pushed acceding countries into trans-European competition. Gender hierarchies are maintained in transnational circuits of labor mobilization and capital accumulation, which confront welfare regime policies that have been the contexts for promoting the gender equality policies and gender mainstreaming within the national and supranational agendas of Europe and the EU (Novikova 2004, Novikova et al. 2005).

The empirical evidence in the chapters by, for example, Thorgerdur Thorvaldsdóttir and Thorgerdur Einarisdóttir, and Noemi Kakucs indicates that such an expanded notion of equal opportunities and/or gender mainstreaming approaches as applied by national governments or the European Commission do not necessarily produce more equal outcomes, in gender or other terms. They are indeed very critical, and pessimistic, of such innovations, presenting them as failed experiments. It is important to confront tensions that arise between a more narrowly defined gender perspective as the sole focus, and more (gender) intersectional approaches, with the strategies of gender mainstreaming they may imply (see Jahan 1995), including possible obscuring and diluting of attention to specific gender power relations in gendered citizenship. This contradiction is at the heart of this book.

### **Gender and Sexuality**

Gendered dimensions of citizenship may be analytically separate from sexual dimensions, but they are also intertwined intimately, indeed definitionally, with each other (Bondi 1998: 186). As gender occurs along with sexuality, and vice versa, it is

rather difficult to conceive of one without the other. As Eve Kosofsky Sedgwick notes, "... without a concept of gender there could be, quite simply, no concept of homo- or hetero-sexuality" (1991: 31). On the other hand, while sexuality and gender are clearly far from co-extensive and should not be conflated with each other, we cannot know in advance how they will be different nor their exact relation to each other (Sedgwick 1991: 27). For example, one cannot assume that female or male subjects are necessarily concerned with traditional heterosexual family forms. "Gender" does not only refer to "male" and "female," and similarly "female" and "male" are not necessarily discrete subjects. There are also in-between, transgender, and migrant sexed/gendered subjectivities. Gender diversity is increasingly being recognized (Grabham et al. 2009), including transgender citizenship (Monro 2003, 2005, Monro and Warren 2004).

In recent years there has been growing interest in the place of sexuality in debates on gendered citizenship. There is now a rather large body of work on sexual citizenship (for example, Weeks 1998, Richardson 2000a, 2000b) and intimate citizenship (Plummer 2001, 2003). Sexual citizenship, as citizenship generically, is not amenable to one single definition (Evans 1993, Brown 1997, Weeks 1998, Bell and Binnie 2000, Lister 2002a, 2002b); it refers to various "(sexual) claims of belonging," and associated sexual rights and sexual responsibilities that are sought. Hekma explains:

Citizens have been defined in classical liberal theory as adult males operating in a free market. These men [sic.] were seen abstractly, without sexuality or body. Using a broader concept of citizenship, however, its cultural, ethnic, gendered, and sexual facets can be emphasized. Citizens have genders, sexualities, and bodies

that matter in politics. The rights of free expression, bodily autonomy, institutional inclusion, and spatial themes are all pertinent to the concept of sexual citizenship (2004: 1).

Sexual citizenship refers to gendered, embodied, spatialized claims to sexual entitlements (including free expression, bodily autonomy, institutional inclusion) and sexual responsibilities (non-exploitation and non-oppression of others) (Brown 1997: 5). The concept of sexual citizenship crosses the private and the public, and directs attention to cultural, political, and legal aspects of sexual activities and expression. While sexual activities tend to take place mainly in private spaces, actual and potential sexual contacts and partners are often found in public spaces—workplaces, educational institutions, the street, pubs and clubs, and increasingly via virtual public spaces, such as the Internet—as well as ambiguous private-public spaces, like domestic parties, and various virtual private-public spaces, like chatrooms (Hearn 1992, 2006). This connecting of the public and private domains is socio-spatial in character. Sexual citizenship, like citizenship generally, is partly about movement, in several ways, beyond various private domains: whether movement of women from domestic realms or of lesbians and gay men from specific urban locales. In both such cases civil rights of freedom from abuse and violence, including sexual violence, may be insecure. Reformulation of safe public spaces, again in several senses, with full, protected civil rights, is a central part of struggles for sexual citizenship, which grant people sexual entitlements and sexual responsibilities.

Furthermore, the concept of sexual citizenship interlinks with a wide range of other contemporary formulations, not only in terms of sexual politics and sexuality politics, but also more generally intimate citizenship (Plummer 1995, 2001, 2003), relational rights (Weeks et al. 2001), and even life politics (Giddens 1991) or emotional democracy (Giddens 1999). This latter set of concepts broadens conventional notions of citizenship to less formalized arenas that are by their very nature qualitative, and even elusive, in character. As such, they represent special challenges for both analysis and policy development, even though they may well be crucial to individuals' and communities' senses of well-being.

This concern with the intersections of gender and sexuality, and important though they are, does not mean that they are prioritized over intersections of gender with other social divisions, such as race, ethnicity, and religion. The question of sexual citizenship, including non-heterosexual subjectivities and citizenships, is raised in some of the contributions, but this is not the primary focus of analysis throughout. The question of intimate citizenship and sexual citizenship are discussed in three chapters: the next chapter by Ruth Lister on global citizenship; Surya Monro's chapter on transgender citizenship; and the final chapter by Rasa Erentaite on Lithuanian migrant women in London, and the intersections of sexuality, gender, nationality, and migration. Indeed, somewhat paradoxically, one of the implications of a thoroughgoing intersectional approach is that it should not be assumed, at least analytically, that sexuality is a more important social division in relation to gender than other major social divisions.

A focus on sexual citizenship and intimate citizenship is the central concern of the Routledge volume *Intimate Citizenships: Gender, Sexualities, Politics* (Oleksy 2009), which can be read in conjunction as a companion volume, and the idea for which also arose initially from the 6th European Gender Research Conference, held in Łódź, Poland, August 2006.

### **Limits and Contexts**

The central theme of this book is the limits of gendered citizenship. The term, “limits”, is used here in a double sense. On one hand, it considers the social and political forces that limit and restrict gendered citizenship, in both practice and in analysis; on the other, it addresses the problem of analyzing and developing gendered citizenship in isolation from other social dimensions. Thus, in the first sense gender is constrained; in the second, gender is itself constraining, if considered alone and in isolation. These contradictory limits are interrogated in three sections, each with a distinctive focus on different levels or contexts: the supranational and the European; the national and the regional; and the transnational and the migratory.

These three partially overlapping sections correspond to three arenas within which contemporary citizenship needs to be discussed. Necessarily, gendered citizenship is contextualized within specific political settings, in different “spaces and places” (see Lister, this volume), as is crucial to an intersectional approach. These contradictory limits are pursued through a number of empirical case studies that apply this theoretical approach to citizenship in varying and complex ways, and, in so doing, together

contribute to innovative reformulations of the citizenship debate, seeking to combine theoretical and applied approaches.

This first of these three sections is concerned with contexts of gendered citizenship, that is, institutions and perspectives on citizenship that operate above the national level, whether global or European. The initial chapter considers the intersections of the European and global contexts, and is followed by two chapters more focused on the European Union (EU) as a policy-making institution. European multicultural contexts in the countries covered in the following two sections are not confined to EU members.

The second section looks at gendered citizenship that operates at the nation-state level within regional contexts, for example, European Union, Nordic, or post-Soviet. In these contexts, national citizenship is partly contingent on extra-national regional social forces and changes. This section comprises more focused studies on Hungary, Iceland, the UK, and Denmark and Sweden at the level of the nation-state within their regional contexts, partly in comparative perspective, and the new contradictions that thus arise in the development of gendered citizenships in these countries. These contradictions arise for a number of rather different reasons: transition from Soviet to capitalist economy; the interrelations and divergences of policies on gender equality, equal opportunity and diversity; intersections of citizenship and transgender; and the intersections of Nordic welfare state societies and questions of migration, race, ethnicity, and violence.

In the third section, the transnational and migratory issues refer to contexts of gendered citizenship that arise from movement and migrations between countries, the

challenges posed by the contemporary politics of migration, and hence the new social and cultural spaces which arise. The impact of, and indeed the focus on, migration is probably one of increasing importance. The third section deals more specifically with gendered citizenships across and between nation-states, through migration and the creation of new social and cultural transnational spaces of citizenship. This last cluster of chapters considers how the issue of migration relates to and illustrates problems of gender equality, diversity, and intersectional inequalities. The chapters are now introduced in some more detail.

### **Part 1: Supranational and European Contexts: New Political Agendas for Citizenship**

The chapters in this cluster are organized around the issue of citizenship in its global and supranational understandings. Recently, there has been growing evidence that the appropriate framework for addressing the goals of gender equity is the global context. As the critical theorist Nancy Fraser suggests, the political dimension understood as transnational forces causing gender injustices must be integrated with cultural and economic dimensions of gender justice represented by struggles against maldistribution and misrecognition (Fraser 1991, 1997, also see Hrubec 2004). Nevertheless, transnational feminist movements and feminist theories face the problem of how to set a normative construction of gender equity that would respect both universal human rights and particular social contexts marked by cultural, economic, and political diversity. In other words, they have to find a balanced way to combine the claims of multiculturalism, in its various meanings (McLaren 1998), with feminist concerns.

Some chapters in this part relate to the policy of the European Union which itself has developed as an important arena for the development of gendered citizenship. The changing global and supranational contexts encourage thinking and rethinking the linkages between citizenship and human rights or equality discourses within the “United Europe” (including the questions of so-called “New Europeans”) and the world. The changes connected to globalization have had huge impacts on new understandings, and indeed misunderstandings, of citizenships. Although discussed on a seemingly general level, the issues approached in this part are situated in well-defined contexts. Particularly important are discussions on the efficiency of European equality politics and the evaluation of the EU instruments in the field.

Ruth Lister in “From the Intimate to the Global: Reflections on Gendered Citizenship” provides an extensive overview of how citizenship can be thought of. She also presents feminist and postcolonial contributions to the debate. This chapter provides an excellent synthesizing discussion of feminist scholarship on citizenship, in which she makes convincing arguments for the necessity of developing theories that can encompass intimate citizenship as well as notions of “European” or “global” citizenship. As she claims, both feminist critiques and activism have contributed vastly to the multi-tiered and multi-layered analysis of the concept so that today citizenship can be theorized at a number of levels, embracing the intimate at one end and the global at the other. Feminist contributions have helped to expose the exclusionary side of citizenship at every level and in some cases to strengthen its inclusionary possibilities. Lister’s aim is to ground citizenship in “spaces and places,” seeing it as a tool which is useful in thinking about the ways in which gendered citizenship practice bridges the

public-private divide. The chapter is structured in relation to the differing scales on which citizenship claims are contested, from the intimate, to the national, to the supra-national/European, and the global. She argues that the global and the local must remain closely connected in the struggle for “genuinely gender-inclusive citizenship.” A specific perspective developed in the chapter is the claim that actual citizenship must be located in everyday experiences.

The next two chapters are focused on the European Union. In their chapter “Towards Feminist Citizenship: Contentious Practices and European Challenges,” Emanuela Lombardo and Mieke Verloo take the argumentation one step further. They begin by stating that “[c]itizenship is conceptually problematic, in that it necessarily involves drawing borders of inclusion and exclusion, thereby determining which rights, duties, and opportunities will be reserved for those in the citizenship position.” Through the drawing of boundaries and borders and the creating of rights, duties, and opportunities linked thereto, not everyone can be satisfied; rather these articulations of gendered citizenships are the result of struggle. In this way, they provide a clear elaboration of feminist challenges to citizenship theory, defining feminist practices as focused on social and political change, and seeing “feminism as theory and practice in movement,” and as both constructionist and deconstructionist. They elaborate three approaches to gender equality, based on: equality as sameness, producing a strategy of equal opportunities, and linked to the liberal feminist tradition; on gender difference, producing a strategy of positive action, and originating from work of cultural and radical feminists; and, transcending both approaches, the idea of transformation or transcendence of the equality versus difference debate to a politics of diversity,

reflected in gender mainstreaming as a strategy. In reprising these debates, they acknowledge feminist concerns that widening the focus to a more general diversity or equal opportunities approach can risk depoliticizing the issue of gender, and/or diverting resources and attention from ongoing gender inequalities of power.

These feminist debates, struggles, and practices are relevant to understanding a wider set of challenges that face the European Union. They are considered as possible assets, both to the democratization and integration of the EU, and to the development of a differentiated and inclusive European citizenship. This also highlights the potential contribution of feminist reflections on the interdependence of the public and private, and of productive and reproductive labor, to changing what actually counts as value—moving from the centrality of money in the neo-liberal market-based paradigm to a focus on a quality of life approach facilitating inclusion of an economy of care, and consideration of the environment. They also consider the limitations of such contributions. This chapter, like the next, draws on joint work on EU-funded projects such as MAGEEQ on mainstreaming gender equality.

In “EU Gender Equality Policy: Citizens’ Rights and Women’s Duties,” Emanuela Lombardo and Petra Meier assess the implications of the development of gender equality policies for women’s European citizenship. They begin by setting out different approaches to conceptualizing citizenship. They contrast approaches that highlight rights versus those concentrating on responsibilities, stimulating gender-neutral, as opposed to gender-differentiated, strategies. They go on to analyze concepts used in EU gender equality policy and point out that the policy frames used there are internally contradictory, with ostensibly gender-neutral approaches on closer scrutiny being

gender-differentiated. The EU founding treaties, legislation, and policies have all been criticized for not delivering gender equal citizenship (Hoskyns 1996, Vogel-Polsky 1997). The last decade has seen significant shifts in EU gender concepts and agendas—the emergence of the concepts of equal opportunities, positive actions, and gender mainstreaming, and the broadening of the scope of the EU gender equality agenda to include new issues, such as family policies, domestic violence, and the position of men and women in political decision-making processes, as compared to labor market policies alone.

More specifically, they find that in spite of the progressive elements present, none of the policies focus on family policies, domestic violence, and gender inequality in politics delivers on a substantially gender equal European citizenship. Their focus is primarily on women rather than on gender as signifying relations of unequal power, and this can place the onus on women to rectify the power imbalances. Given that the approach of EU instruments is generally individualized and juridical rather than societal or structural, the perhaps unintended outcome of EU policy initiatives, in the context of family policies, is that the focus on women paradoxically confirms the gendered division of domestic labor. To put this another way, ultimately “while citizens have rights, women have duties.”

In this chapter European citizenship is interpreted in a broad sense, not only by strict reference to citizenship rights formulated in Articles 8-8e of the Treaty of the European Union (EU) or solely in terms of the existing legal and political provisions that enable citizens to fully participate in the life of a political community. Overall, such studies on implementation problems of gender mainstreaming strategies suggest

that they might be based on non-recognized and under-explored interpretations and representations of the concept of gender (in)equality. This problematic is addressed in more detail, and in national and regional contexts, in the next section.

## **Part 2: The Nation-State in Regional Contexts: New Contradictions in Citizenship**

The chapters in this section look at different national and other contexts of citizenship, partly in a comparative perspective. Some of the chapters present and challenge the theoretical models that have been designed to respond to the changes that the contemporary welfare state has to face in the age of globalization. The perspective taken by the authors is intersectional and focuses on the many axes that structure current notions of citizenship in different social, cultural, and national contexts. The focus is also on the transitional nature of contemporary changes in both established European welfare states and countries newly acceding to the EU, and specifically new gendered contradictions arising in citizenship. As noted, these contradictions stem from different reasons: post-Soviet transition; relations of gender equality, equal opportunity, and diversity; relations of gender and transgender; and intersections of welfare state and questions of migration, race, ethnicity, and violence. Thus an important issue considered by the authors in this section is the extent to which the politics of multiculturalism and diversity have had an impact on state policy and the structure of state bureaucracy. The re-examination of the notion of identity politics as approached from an intersectional perspective and confronted with the different understandings and levels of citizenship(s) is a leading theme of the chapters in this cluster. Moreover, individual, lived human experience is a very important point of reference for the

authors and a diversifying factor for the politics of citizenship in different national and European contexts.

The first chapter in this section continues the theme of EU contextualization, but now in relation to a specific nation-state. Noemi Kakucs points out in “Citizenship in the Newly Enlarged Europe: Contested Strategies of Achieving Gender Equality” that the European Union has put great effort in promoting gender equality in its member states, in the second half of the twentieth century. However, the process through which equal opportunities became an EU policy issue developed only gradually and conditioned by various pressure groups. Furthermore, the success of mainstreaming gender equality has been contested in the newly enlarged European Union due to the various social contexts of the newly joined countries. She presents empirical case study evidence from Hungary on the pitfalls of the gender mainstreaming approach. The adoption of gender equality norms took place in the process of preparation for EU accession, thus as a result of international norms and pressures, rather than from internal societal demands. Whilst she identifies the positive potential of gender mainstreaming, for it to work and be implemented effectively requires various elements, depending on the theoretical approach applied, the implementation model adopted, and level of communication between actors at different levels of governance. Kakucs’ contribution highlights reasons for the faltering implementation of gender mainstreaming in Hungary since the accession in 2004.

The chapter examines the nature of the theoretical framework and the model of implementation the national governance adopted, and the possible consequences they have on the efficiency of gender mainstreaming. The argument aims to identify what

equality perspectives are included in mainstreaming strategy and how they are interpreted at various levels of national governance involved in implementation. It examines the reasons of partial success/failure, namely how visible gender equality is on the political agenda on the different levels of national government and the influences that determine the efficiency of national institutional bodies specialized in gender equality. Internalization of gender equality goals has been limited and formal. Institutional implementation has remained patchy due to lack of financial support and human resources devoted to the agenda, and constant changes in the location—and the status—of the gender equality agency. This has severely limited both its legitimacy and its capacity to be effective. She refers to “the dissolution of women’s movements” and/or their relative weakness, and the contradictory interpretation of gender mainstreaming as set out in EU documents, and the lack of development of Hungarian directives or legislation. Further, the definition of the problem, with a focus on women rather than gender, a focus confined even further to some socially excluded, for example, the Roma, or particularly “needy” groups of women, limits the scope of the agency’s equality work.

The overall focus is identified as concerned solely with the labor market; this is a critique that is still often leveled at the EU’s gender equality agenda itself, despite the debates in some of the chapters in this volume regarding the growth of an expanded EU agenda. The author’s examination of implementation of the agenda in Hungary reveals a lack of political will, as well as lack of relevant gender expertise, and a lack of state-NGO cooperation. She concludes that gender mainstreaming has been reduced to a narrow equal opportunities agenda, subjected to a bureaucratic and technocratic

approach to implementation, and as such has been robbed of its transformative substance. It is, in effect, a failed project.

The next two chapters in this part link emerging new contradictions around citizenship, in particular national and regional contexts, to the wider theoretical debates, specifically those around intersectionality. The focus of Thorgerdur Thorvaldsdóttir and Thorgerdur Einarsdóttir's chapter on "Equality Discourses at Cross Roads: Gender Equality vs. Diversity" is the growing tension in equal opportunity work between gender equality issues and issues of diversity. The chapter addresses the strategic impact of an expansion of equal opportunities work from a gender focus to a broader human rights or diversity approach. The questions raised are whether and how it is possible to take up feminist theories of intersectionality and make them applicable in specific current equal opportunity work at both state and municipal level. It examines the record of Iceland in implementing gender equality policies, contrasting the discourse of official policies with the views of equal rights workers and minority groups. The authors present two more focused case studies, examining the records of the city of Reykjavik and the University of Iceland. In the case of the city, the authors argue that mainstreaming a human rights approach without additional resources has led to a "rather formal or legal perspective on the issue" which erodes earlier gender concerns and undermines gender expertise as the basis for equalities work. In the case of the university, the authors conclude that a gender mainstreaming approach in fact threatens to blunt and dilute the agenda, so that expansion "has resulted in a disregard, if not omission, of the gender dimension of the structural inequalities". The discourse on the need for the expansion of the notion of equal rights to include not only women

but also minority groups, such as migrants, lesbians and gays, older people, and people with disabilities, has just been emerging in Iceland but it has already created conflicts. These conflicts touch upon some fundamental questions regarding the nature of equality work and the usefulness of different equal rights strategies. Can (gender) mainstreaming, for example, be expanded to include other diversity issues or would “diversity mainstreaming” just be a watered down version?

More specifically, the chapter is based on interviews with equal rights workers in Iceland and their views on the potentials and shortcomings of such “expansion.” Some expressed their concerns that if already limited funding and human resources devoted to equality work would be split between various minority groups, not only would no progress be made at any level but also gender equality issues would be set aside as something that has already been dealt with. “Expansion” could also end up with an old fashioned “departmental thinking” where each minority status would be dealt with in isolation and with no recognition of how different socio-cultural hierarchies and power differentials interact or intra-act. The authors debate whether feminist theories of intersectionality appear to be a promising tool for rethinking and reorganizing equal rights work in such contexts. Their findings reinforce the argument that an intersectionality approach can produce a hierarchy of competing inequalities that reduces or can even completely occlude the concern for gender equality. The chapter thus throws doubt on intersectionality as an approach that can produce gender equitable citizenship.

The following chapter, “Transgendering Citizenship: The UK Case” by Surya Monro, complicates the picture further. Here, in considering the relations of gender,

diversity and intersectionality, the very notion of gender becomes more complex. “Transgender” is an umbrella term covering a very wide range of social positions and identities, including cross-dressers, transsexuals, androgynes, intersexes (people born with a mixture of male and female physiological characteristics), drag queens and kings, third gender people, and other “gender-complex” people (see Nataf 1996, Monro 2005). However, the term “transgender” is also contested within the transgender communities. Initially developed to include and foreground people who transgress gender binaries without necessarily having surgery, some transsexuals now claim it as a term for transsexuality, because transsexuality primarily concerns gender rather than sexuality. In addition, intersex people do not necessarily change sex or gender, so that including them under the “transgender” banner is problematic. Drawing on the findings of in-depth research carried out in collaboration with a number of transgender people and groups identifying as transgender, the chapter explores notions of transgender citizenship in relation to mainstream, feminist, and sexual models of citizenship. This is examined through the case of the UK, operating within the context of the EU, and where transgender people are currently excluded from full citizenship. However, this is being challenged by a number of transgender groups. Sexual and feminist models of citizenship provide useful alternatives to mainstream models of citizenship, sharing a considerable amount of ground with transgender citizenship. However, transgender citizenship differs from sexual and feminist models in various ways. Transgender citizenships complement and possibly problematize these approaches as well as mainstream discourses of citizenship, to which they developed as an alternative. The chapter examines commonalities and divergences between transgender citizenship and sexual and feminist approaches to citizenship, and explores some of the current issues

emerging in the area of transgender citizenship. It argues that a robust participatory democracy is necessary for ensuring transgender political participation and social inclusion. Full transgender citizenship would lead to fundamental changes in both the social organization of gender and policy positions concerning gender.

More generally, identity politics and the meaning of identities in encouraging the recognition of difference and different identities continue to provide the grounds for complex, ongoing discussion. As Nancy Fraser (1997) skillfully formulated, the struggle for cultural recognition has become paradigmatic, and demands for recognition of cultural difference fuel struggles of groups whether they concern nationality, ethnicity, or gender; group identities supplant class interests and cultural domination supplants exploitation as the apparently fundamental injustice. The remedy for injustice then becomes cultural recognition. And a new notion of the social world is centered on identity difference, cultural domination and recognition, while questions concerning exploitation and redistribution tend to be obscured or even disappear. This means that official national citizenship does not guarantee full social status as a citizen with all the cultural and social possibilities connected to it. However, it may be that the connections between class, gender, sexuality, place, and ethnicity *inter alia* strengthen each other at the bottom of the social hierarchy but not at the top where gender is more dominant.

The last chapter in this section also analyses questions of intersectionality, but now by adopting a more explicitly comparative approach. Keith Pringle in “Comparative Studies of Well-Being in Terms of Gender, Ethnicity and the Concept of ‘Bodily Integrity:’ Turning Esping-Andersen on his Head?” reconsiders what aspects of human existence are important in assessing the extent of citizenship, when thinking about

economic rights and economic access, political representation, and legal entitlements. His chapter reflects on the necessity to analyze not merely access to the market or political representation, but issues of well-being associated with “intimate citizenship” and the concept of “bodily citizenship.” The main focus of the chapter is, however, on the issue of how far aspects of life other than the more narrowly economic or political are also seen as essential for effective citizenship. These include, for instance, the absence or presence of violence in a person’s life; the extent to which a person is subject to ageism in any given society—not only older persons but also younger ones; the extent to which the experience of racism in a person’s daily life is understood as relevant; and, most of all, how far the way all these kinds of factors impact upon one another over time and space in people’s lived experiences. Pringle argues that such issues are still often not included as relevant and germane to citizenship, and thus he seeks to interrogate what factors are considered important when assessing human well-being, and why.

The chapter is based on the re-examination of the social record of some of those European countries that continue to be viewed as among the most welfare-oriented in the world, namely the Nordic states, drawing on studies of child welfare systems in Sweden and Denmark, and comparative European study of men’s practices across Europe. It claims that the studies on which it is based necessitate turning Esping-Anderson’s model of citizenship on its head. The chapter focuses on the dimensions of oppression associated with gender and ethnicity, and to an extent age. Pringle criticizes his “professional” respondents, which it seems refers to social workers, as being unwilling to internalize research findings that question the benign—or non-

discriminatory—nature of Nordic societies. An interesting finding that reinforces this point, emphasizing blinkered views in social workers that refuse to take on board negative aspects of their own society, is that contrary to general public and media assumptions, research suggests that there appears to be little correlation between physical abuse by men and the ethnicity of the men concerned. The chapter reflects on possible explanations for the relatively greater attention to and advances in addressing issues of gender-based violence, bodily citizenship, and racism in UK social services and society more generally than in Denmark or Sweden.

### **Part 3: Transnational and Migratory Contexts: New Cultural Spaces of Citizenship**

It goes without saying that the contemporary debates on “multiculturalism”, with its diverse meanings, have had a range of social, economic, political, legal, and cultural impacts in many, perhaps most, European countries. This is especially so in the context of increasing migrations within Central and Eastern Europe, the European Union (including between so-called “Old” and “New” EU countries), and Europe generally, as well as between Europe and other continents. These migrations are complex and include movements, in the form of successive waves of migration, and various chain, “carousel” or “revolving door” migrations. Such composite or consequent migrations seem to be especially important in the case of care work and health work (for example, Wiskow, 2006; also see Hochschild 2000, Ehrenreich and Hochschild 2003, Yeates 2004). In such situations more static nation-state based definitions of citizenship,

founded in supposedly parallel relations of national law, social rights, and contiguous territory, are no longer so clear analytically or applicable policy-wise.

As the chapters in this section show, the national and transnational political tools aiming at integration of immigrants often can be used as an example of the inherently contradictory constructions of citizenship: emancipatory/inclusionary, on the one hand, and disciplinary/constraining, on the other one. The analysis of the situation of so-called “others” offers an example of the politics of marginalization and discrimination based on conceptual schemes of thinking and stereotypes concerning the notion of “difference” which has often carried pejorative connotations within mainstream discourses. At the same time, however, the challenges posed by the intensive processes of migration and transnational or transcontinental mobility can be interpreted as an opportunity to redraw the traditional ethnicized/racialized understandings of citizenship, in this context specifically European citizenship.

The overlapping themes of the chapters in this section, such as the politics of identity, subjectivity, and resistance should be considered as very important points of reference in these debates on a multicultural and socially diversified Europe. The issue is also crucial for the development of a more comprehensive and inclusive notion of European citizenship. These final five chapters in different ways examine the detailed and contradictory practices, policies, and challenges for gendered citizenship that arise from and through these transnational and migratory contexts. In these processes new cultural spaces of gendered intersectionality citizenship are created and indeed resisted.

We begin this section with attention to a topic that has almost become rather strangely a trope for debates on multiculturalism and gendered citizenship in recent

years. Over the last ten years or more the headscarves of (some) Muslim women have become a highly contested issue in several European countries. Discussions have evolved around the right to wear the headscarf in public institutions. The intense debates on the religious and/or cultural symbol of the headscarf, involving and using values and democratic principles refer to broader social and political conflicts about citizenship and migration, equality, difference and justice between women and men. In these conflicts women and women's rights are used to either reinforce the patriarchal and allegedly “pre-modern” character of Islam (in implicit contrast to “more modern” Christianity) or as representations of modernity and the egalitarian structures of the West. In “Values, Equality and Differences in Liberal Democracies. Debates about Female Muslim Headscarves in Europe,” Sieglinde Rosenberger and Birgit Sauer point out that there are huge differences in the regulations of wearing headscarves in European countries. Their chapter analyses policy debates on Muslim headscarves in Austria, France, Germany, and the United Kingdom, along comments on the situation in Denmark, Greece, the Netherlands, and Turkey. The authors shed light on differences and similarities in regulations of wearing a Muslim headscarf by identifying the actors involved in the policy debates and their framing of the issue, by analyzing the migration and citizenship regimes, gender regimes, and the state/church relations in the respective countries. In doing so, the chapter shows the interconnectedness of religion, culture, and gender in these policy debates.

There is a strong and widespread tendency in debates on multiculturalism to prioritize “the cultural,” whether in mainstream analysis, media commentary, or policy intervention. Importantly, gendered citizenship seen in relation to transnationalism and

migration also concerns economic realities and life chances. Nadia Baghdadi and Yvonne Riaño's chapter "Negotiating Spaces of Participation: Experiences and Strategies of Skilled Immigrant Women to Achieve Professional Integration" address these very questions. Examining these issues in the Swiss context,<sup>3</sup> they focus on labor market participation as an important aspect of citizenship, as economic participation is central for the entitlement of social rights. They address crucial factors that enable or constrain ethnic minority or "immigrant" women's professional participation. From a human agency perspective, the authors examine the strategies that such women develop and the resources they mobilize to overcome possible difficulties and access a skilled labor market. The empirical study focuses on two groups of skilled women differentiated by place of origin and by religious background. One group includes Latin American women, who are primarily Christian, and the other includes women from Turkey, the Balkans, and Arab countries who are primarily Muslim. The chapter shows that prevalent gender representations (for example, ideas about masculinity and femininity and appropriate gender roles) and ethnic valuations (for example, ideas on the characteristics and value of specific ethnic groups) significantly influence the possibilities of skilled ethnic minority migrants to participate in the labor market. Baghdadi and Riaño argue that studying the intersection of gender, ethnic, and religious representations in relation to issues of citizenship is critical for understanding the nature and possibilities of the professional integration of ethnic minority women.

In the next chapter we shift to the equally important arena of political power, representation, and participation. Line Nyhagen Predelli explores in "Ethnic Minority Women and Political Influence in Norway" how organizations representing ethnic

minority women in Norway work towards gaining influence on national public policies, and the extent to which such organizations actually manage to exercise political influence. As she points out, ethnic minority women are almost absent from formal positions of political power in Norway but research has found that women with “non-Western” backgrounds actually participate as much in local elections as do men with similar backgrounds. Organizations that represent the interests of ethnic minority women generally have few opportunities (through public hearings and representation on advisory bodies and government committees) to influence public policy. This chapter shows, however, that while ethnic minority women and their organizations lack formal political power, the organizations that represent them at a national level actually manage to exert significant political influence through more informal channels, such as active lobbying through one-off meetings with government ministers, political parties, parliamentary committees, and individual representatives of parliament. The author argues that politicians at the national level actively create “room for influence” by engaging the organizations in political dialogue. Access to this arena is, however, dependent on the extents to which the organizations possess knowledge about the political systems, and politicians and bureaucrats choose to invite organizations and individuals representing ethnic minority women in the political arena.

This is followed by Rasa Erentaite’s chapter “‘We Are Simply More Beautiful’: Counterstories of Lithuanian Migrant Women in London.” This focuses on counterstories constructed by migrant women in response to the sexualization of their identities in public discourses, which works to maintain marginalization and control over migrant groups. Making use of the concept of counter-story, she explores the ways Lithuanian

migrant women negotiate their identities, agency and citizenship in the multicultural and multi-hierarchical space of London. The results of Erentaite's research indicate that encounters with stigmatizing sexualized constructions based on sexual availability, vulnerability, and commercialized female sexuality are very present in the daily lives of the migrant women. In response, Lithuanian women in London create their own counter-stories to reclaim their agency and reconstruct their identities in less oppressive ways. Analysis of counter-stories demonstrates that migrant women interiorize some elements of the commercialized sexuality construct applied to them from the outside, while simultaneously modifying other parts of these constructions, thus transforming the image of "Lithuanian prostitute" (or "Eastern European prostitute") into the myth of "Lithuanian beauty." The counter-stories also include gendered, ethnicized, and racialized constructions of sexuality and even explicit racism vis-à-vis other ethnic groups in London. Erentaite argues that gendered and racialized constructions of the counter-stories should be read as an attempt of to reconstruct and re-affirm Lithuanian women's European citizenship "proper." However, the potential for reclaiming the agency and citizenship of the migrant women is restrained by the traps of patriarchy and racism reproduced in their counter-stories. Overall, practices of engendering in society, culture and systems of knowledge have been widespread and very varied over time and space. The societal divisions of various human activities such as labor, education, representation were fundamentally sexualized, and these divisions have had serious implications with regard to the status and power relations of men and women, as well as questions of justice in social systems as a whole.

These cultural, economic and political realms are brought together in the final chapter by Jana Sverdljuk, “Russian Women-Immigrants in the Nordic Countries: Finland, Norway, Sweden—Gender Perspective on Social Justice.” This chapter analyzes processes of integration of Russian immigrant women into the Nordic (Finnish, Swedish, and Norwegian) labor markets and welfare institutions. She develops the argumentation from the concept of social justice as a necessary condition to enjoy social and economic rights by all members of a society, and relates this to current Nordic debates concerning welfare and justice in the era of globalization. Exploring problems and difficulties encountered by immigrant woman of Russian origin in their everyday lives within local social structures, the chapter draws attention to so-called “grey zones” and shortcomings of the Nordic systems of integration/justice and equality politics. The argument is developed in line with the critiques formulated by Nancy Fraser and taken up by some Nordic gender studies scholars, who call for institutional transformation of Western and Nordic systems of social welfare so they embrace both economic redistribution, providing migrants with necessary means for economic survival, and cultural recognition, allowing immigrant women to gain worthy and valued social positions within the new societies where they live.

### **This Volume**

While the authors gathered in the volume represent different scientific disciplines and academic backgrounds, the general approach is interdisciplinary and seeks to transcend the strict confines of specific academic disciplines. Thus we speak to scholars and students within and between a wide range of disciplinary locations, including

international relations, policy studies, political science, public administration, social policy, sociology, gender and women's studies, and especially those with an interest in European perspectives.

In particular, we hope that this volume contributes to the growing body of literature on citizenship that acknowledges more fully the transitional nature of changes connected to globalization, migration, and developments of and between nation-states. The new theoretical approaches, especially around gendered intersectionalities, that are applied to and in these empirical studies can be understood as responses to the complex contemporary social, economic, political and cultural changes that are in process. These approaches also seek to provide a better understanding of the challenges that societies within Europe and elsewhere face vis-à-vis diversity, regionalism, transnationalism, and migration.

This collection will also be of interest to national and international policy makers, especially those responsible for implementation of strategies of equality, diversity, and politics of multiculturalism. As several chapters discuss the results of many European projects carried out under auspices of the European Union, their findings are of high relevance to governmental and EU experts, commentators, and consultants. This entails bringing intersectionalities to the fore, yet in ways that do not diffuse attention to the embeddedness and entrenchment of gender power relations.

The notion of “gendered citizenship” may have its limitations, but meanwhile its achievement remains subject to severe limits in practice, policy and politics. This volume seeks to contribute to the investigation of this problematic and urgent challenge.

## **Acknowledgement**

We are grateful to Tricia Cleland for comments on an earlier version of this chapter.

## **Notes**

1. The European Union (EU) grew from the European Coal and Steel Community (ECSC), established through the 1951 Treaty of Paris, and was effectively founded in 1958 by six member states through the 1957 Treaties of Rome. It now comprises Austria (acceded 1995), Belgium (1958), Bulgaria (2007), Cyprus (2004), Czech Republic (2004), Denmark (1973), Estonia (2004), Finland (1995), France (1958), Germany (1958), Greece (1981), Hungary (2004), Ireland (1973), Italy (1958), Latvia (2004), Lithuania (2004), Luxembourg (1958), Malta (2004), the Netherlands (1958), Poland (2004), Portugal (1986), Romania (2007), Slovakia (2004), Slovenia (2004), Spain (1986), Sweden (1995), and the United Kingdom (1973). The candidate countries are: Croatia, Iceland, and Turkey, and the former Yugoslav Republic of Macedonia. The potential candidate countries are: Albania, Bosnia and Herzegovina, Kosovo (under UN Security Council Resolution 1244), Montenegro, and Serbia.
2. A recent example, as we complete this text, is the UK Conservative/Liberal Democrat governmental budget in June 2010. This imposed large tax increases along with cuts in welfare benefits and services that have been estimated to translate to more than a 20% reduction of income for the poorest decile of the population, as against a 3.6% reduction for the richest decile (Horton and Reed 2010). The feminization of poverty is such that this will especially affect women and children in low income households.

3. Switzerland adopted the Asylum Act in 1981, and has been tightened several times since, particularly in 2007 and 2008. In June 2010 there are further proposals to restrict political activism by refugees (Smith 2010).

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