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Intersections of gender with ethnicity and religion

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Citizenship, Diversity and Gender Equality[1]
- National belongings and intersections of gender, ethnicity and religion.

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Introduction

There is presently a 'turn to diversity' in political and sociological research and a growing emphasis on the relation between diversity and equality/inequality in gender theory and research. The paper aims to contribute to academic debates about the interrelations between gender and diversity from a citizenship framework focusing on the national belongings and situated framings of the intersections of gender with ethnicity and religion. Another objective is to reflect on the findings from the European VEIL- project: "*Values, Equality and Differences in Liberal Democracies: Debates about Muslim women's headscarves in Europe*" from an intersectionality perspective and to discuss potentials and limitations with the notion of intersectionality in European gender projects[2].

Intersectionality is a travelling concept, which has been an inspiration for many feminist scholars, and has recently become the new buzz-word in gender research. It is a contested concept and there is a struggle in feminist theory about the meanings of the notion in theory and research (Verloo 2006). The academic debate illustrates that intersectionality is a perspective, which can be framed in different ways, and that framings of intersectionality have been attached to different theoretical positions (see EJWS 2006). One of the most challenging implications for

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[1] This paper is based upon a further elaboration of ideas from two papers: Birte Siim "Gender and Diversity in the European Public Spheres" paper to 4th Pan-European Conference on EU Politics 25th-27th 2008 / Riga, Latvia, Panel: Gender and Intersectionality in the European Public Sphere and Ann-Dorte Christensen and Birte Siim (2009) "Citizenship and the politics of belonging – exclusionary and inclusionary framings of gender, ethnicity and religion" unpublished paper.

[2] The VEIL-project is a 6. Framework project (2006-2009), which analyses the headscarf issue in eight European countries: Austria, Denmark, France, Germany, Greece, The Netherlands, Turkey and the UK. The objective is to compare the similarities and differences in the national framings of debates and regulations of the headscarf issue in these countries, and further to study the transversal debates and regulations (see: http://www.veil-project.eu/). The Danish case is based on upon reports by the Danish team, see Andreassen with Siim 2007 and Andreassen, Lund Pedersen and Siim 2008.

feminist scholars is probably the claim that gender should no longer automatically be privileged as the primary category in intersectional gender analysis (Christensen & Siim, 2006; 2009).

I find that intersectionality could be a renewal of gender research but there are many unsolved problems. Feminist research should reflect both upon the potentials and limitations of the intersectionality perspective from different theoretical frames. Cross-national research has studied the intersection of gender and diversity (Siim & Squires 2008) and one challenge is to contextualize the concept. Arguably the concept itself as well as the different social categories to be included in the specific analysis has different histories, meanings and ontology (Knapp 2005, Yuval-Davis 2006). There is no predefined meanings attached to intersectionality and the framings[3] of intersecting categories may have both inclusionary and exclusionary meanings and effects. The paper discuss these conceptional points on the basis of results from the European VEIL-project

The paper is divided in two parts. The first part gives a brief presentation of key issues in the rethinking of the citizenship approach focusing on the tensions between equality and diversity, between nation belongings and transnational contexts, and on a multilayered citizenship. It discusses two main issues in relation to developing a contextual intersectionality perspective: (a) the different nature of the social categories, e.g. of the triad race/ethnicity-gender and class, (b) the interrelations between different levels of analysis, i.e. structure, institutions and identities. This methodological point is illustrated by a model for intersectionality analysis of citizenship linking macro- meso- and micro relations.

The next section revisits the academic debate about multiculturalism and gender equality within political theory and gender theory focusing on competing models presented by Will Kymlicka, Susan Moller Okin, Anne Phillips and Rainer Bauböck. It discusses to what extent the emphasis on the intersections of gender with other inequality creating social categories can contribute to overcome the problematic dualism in social science between diversity and gender as the primary categories.

The second part illuminates the conceptual points in relation to citizenship, diversity and equality. The focus is on the intersections of gender with ethnicity and religion in the construction of national belongings. The focus is on Danish debate about the headscarf, which is compared with findings from the European VEIL-project. They demonstrate that there is often a

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[3] In critical frame analysis frames create policy problems and policy solutions because they interpret and give meanings to events and experiences. The frame analysis in this paper is inspired by the frame analysis employed in the VEIL-project. The frame is here defined as "an interpretive schemata that signifies and condenses "the world out there" by selectively punctuating and encoding objects, situations, events, experiences, and sequences of actions in one's present or past environment' (Snow and Bedford 1992) cited from Kilic, Saharso and Sauer 2008; 402-403).

hierarchy of principles in political and legal debates and they indicate that social and political actors articulate the interaction between social categories, e.g. gender, ethnicity and religion, in ways that both exclude and include minorities and immigrant groups in society (see Christensen and Siim 2009 and special issue of Social Politics no. 4, 2008).

Part I: Rethinking the citizenship frame

Globalisation and increased migration and mobility across and within national borders has challenged the nation state and raised critical questions about citizenship, national communities and belongings (Beck 2002). Migration has been followed by problems with social cohesion, with integration of immigrant and refugees in the national communities and with relations between the old majorities and the new minorities. Questions related to citizenship, migration and politics of belonging have become crucial political issues in most European countries. The citizenship approach has illuminated the tensions in liberal democracies between traditions for equality and ethnic, religious and cultural diversity; between concerns for gender equality and respect for the culture and religion of ethnic minorities (Modood et al 2006; Lister et al 2007; Siim & Squires 2008).

In T.H. Marshall's model citizenship refers to equal civil, political and social rights for all people legally living and these rights were attached to the nation state (Marshall 1950). Scholars often differentiate between three dimensions: a) equal status, rights and obligations; b) political participation and citizens' voices and c) political identities and belongings (Bellamy et al. 2003). The citizenship frame has analyzed who is included and who is excluded – who is defined as being 'inside' national communities and who is defined as being 'outside'. The classical model focused on the inclusion of the working class in society has been criticized from a gender and diversity perspective, and the citizenship approach also address the inclusion of women and marginalized social groups in society (Lister et al 2007).

Globalisation and migration has challenged the citizenship model attached to the nation state. One approach has responded by expanding the model to include respect for diversity and protection of minorities (Kymlicka 1995), while another approach has emphasised the importance of overcoming the nation state bias and develop a multilayered model which include the transnational level (Soysal, 1994; Yuval-Davis 1997; Beck 2002).

Citizenship research has traditionally focused on demands for equal rights but claims for the recognition of and respect for diversity has raised new issues about the state's obligation to

respect ethno-national and ethno-cultural (group) rights (Kymlicka 1995; Eisenberg et. al 2005). One example is Will Kymlicka's multicultural citizenship model, which explores the collective rights of ethno-cultural and ethno-national minority groups within liberal democracies (Kymlicka 1995; 2000).

Comparative research has explored the contextual nature and routes to citizenship and has emphasised the variations in citizenship traditions, institutions and understandings. On this basis scholars have identified different citizenship, migration and gender regimes[4] with different political opportunity structures and discursive framings of equality and diversity (e.g. Koopmans & Stratham 2000; Bellamy et. al. 2003). The recent notion of 'lived citizenship' has emphasized that citizenship concerns more than rights and obligations, namely "a set of social and political relationships, practice and identities that together can be described as a sense of belonging" (Lister et al. 2007, p. 9). One key issue is to study how migration/integration policies and discourses at the national and transnational levels affect citizens' individual and collective identities and social and political practice.

National belongings

The idea of the nation/nation state as an imagined community was introduced by the American scholar Benedict Anderson, who defines the nation as imagined "*because the members of even the smallest nation will never know most of their fellow-members, meet them, or even hear of them, yet in the minds of each lives the image of their communion*" (Anderson 1983, p.15). Nira Yuval-Davis' has expanded this understanding by rethinking the linkage between citizenship and national belongings from a gender perspective. Her influential book *Gender and Nation* offers a number of examples of how creation of identity politics has been used to exclude specific groups, and she shows how gender has helped define the nation as an imagined community, for example via arguments of origin, kinship, culture and religion (Yuval-Davis 1997). Her later work has explored the notion of belonging as a way to enrich and clarify discussions of contemporary citizenship and develop the notion of 'multi-layered citizenship' (2007). The arguments are that people nowadays are no longer connected primarily to the nation state but are simultaneously citizens in more than one political community. At the same time political conflicts and increased migration has changed the role of the nation states towards a growing securitization of today's borders and boundaries.

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[4] One example of how gender regime is used is in Sylvia Walby's model, which employs the notion of gender regime in order to distinguish between the form of the gender regime and the degree of gender inequality as well as to analyse the ongoing transformations in gender relations from a domestic to public form (Walby 2004: 7-11, see also Siim and Borchorst 2008).

"My argument is, however, that focusing on issues of citizenship in the contemporary political context is somewhat misleading and that we need to situate citizenship in the wider context of contemporary politics of belonging which encompass citizenship, identities and the emotions attached to them. (Yuval-Davis, 2007:561).

This approach is based upon an analytical separation of 'belonging' and 'politics of belonging'. 'Belonging' is about emotional attachment and about feeling at home and feeling safe. 'Politics of belonging' refers to "specific political projects aimed at constructing belonging in particular ways to particular collectives that are, at the same time, themselves being constructed by these projects in very particular ways" (Yuval-Davis 2006a; 197). In other words, 'politics of belonging' is basically about demarcations of who is 'in' and who is 'out' of communities. The major part of Yuval-Davis' work focuses on this part. She refers to 'politics of belonging' as "the dirty work of boundary maintenance" (Yuval-Davis 2007; 563).

According to Yuval-Davis' analyses of 'belonging' must be founded on an intersectionality perspective.

> *"There is no meaning to the notion of 'black', for instance, which is not gendered and classed, no meaning for the notion of 'women', which is not ethnocided and classed, etc. This is a very important point when we discuss issues of citizenship and belonging, because so much of the discussion on these issues, inspired by identity politics, attempts to homogenize the differential meanings of such identity notions such as blacks or women, etc.* (Yuval-Davis, 2007; 565-66).

I find that this approach which connects citizenship, belonging and intersectionaliy is a useful strategy to study gender and diversity, and a systematic emphasis on the intersections of different kinds of diversities, which address the interrelations between inclusion and exclusion of gender and marginalized groups could contribute to overcome the dualism between gender research (Lister et al. 2007) and migration research (Koopman & Stratham 2000; 2005).

One final point about politics of belonging is the interplay between constructions of belonging and un-belonging. The construction of who 'belongs to' the nation state triggers a construction of who does not 'belong to' the nation state. Belonging/un-belonging is thus

inextricably linked. In the same way as *"if the state is what 'binds', it is also clearly what can and does unbind. And if the state binds in the name of the nation, conjuring a certain version of the nation forcibly, if not powerfully, then it also unbinds, releases, expels, banishes"* (Butler & Spivak 2007; 4-5).
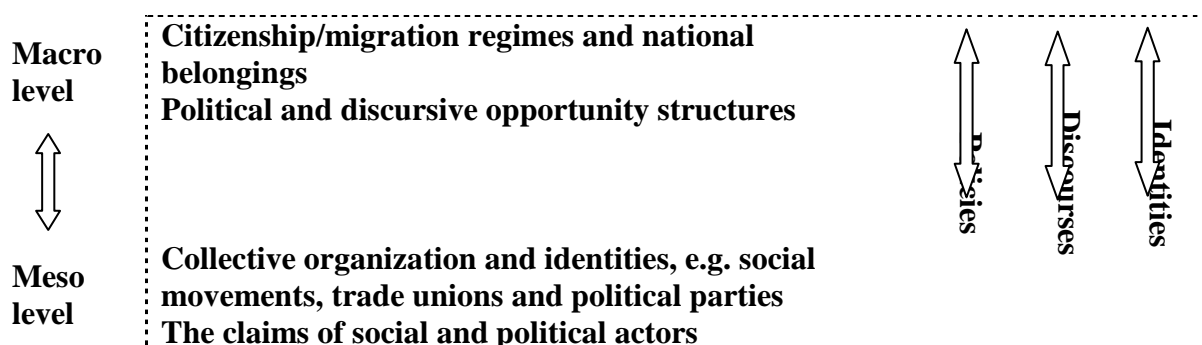
Contextualising Intersectional Analyses of Multilayered Citizenship

Gender research has explored how citizenship/migration and gender regimes affect the meanings of key concepts and categories like class, gender and ethnicity/race (Hobson, Lewis & Siim 2002; Lister et al 2007). Citizenship and gender regimes affect not only the hierarchy between the universal principles but also the meanings attached to equality and diversity (Siim & Squires 2007).
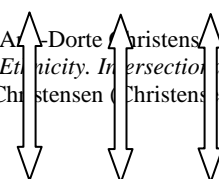
Scholars have argued that intersectionality needs to be analyzed on different levels of analysis, e.g. in relation to structures, institutions and identities (Phoenix 2006, Yuval-Davis 2006). In addition the tension between structures, institutions and identities manifests itself in relation to exclusion and inclusion of citizens and must be discussed with sensitivity to history, context and the theoretical frames (Christensen & Siim, 2009).

The model below serves as a tool to structure intersectional analyses. The focus is on the interrelations between policies, discourses and identities within a multi-layered citizenship frame. The categories in 'the triad of race-class-gender' refer both structures/social positions and to forms of identity, the latter being shaped not mainly by social structures but also by institutions and collective organizations.

A model for intersectional analyses of citizenship[5]

Macro level

Citizenship/migration regimes and national belongings
Political and discursive opportunity structures

Meso level

Collective organization and identities, e.g. social movements, trade unions and political parties
The claims of social and political actors

Policies   Discourses   Identities

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[5] The analytical model was originally developed together with my colleagues Anette Borchorst, Ann-Dorte Christensen and Sune Qvotrup Jensen. It is used as an analytical model in the *INTERLOC-project: Gender, Class and Ethnicity. Intersectionality and Local Citizenship* http://www.interloc.aau.dk. It was further elaborated in an article with Ann-Dorthe Christensen (Christensen & Siim 2009).

$\Updownarrow$

Micro level

Lived citizenship and every day life
Face-to-face relations and individual identities
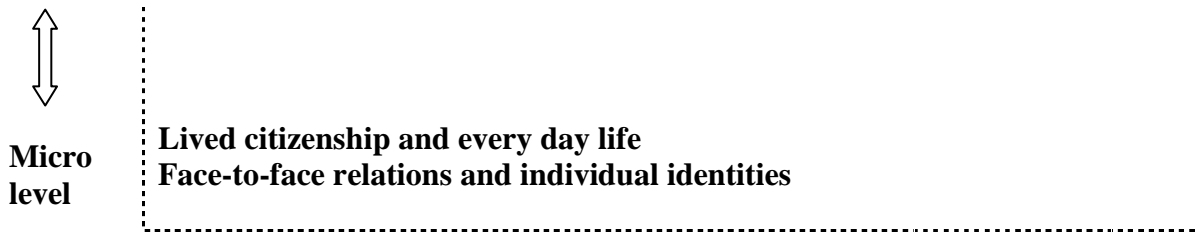
The model illustrates the complex interplay between social differentiations and inequalities in relation to citizenship/migration regimes at the *macro level* and lived citizenship and every day life at the *micro level.* The claims and identities of social and political actors organized collectively for example in social movements and political parties localized at the *meso level* can mediate between between the two.

- *Macro level* - refers to support to larger '**imagined' communities.** Politics of belonging on the macro level here refer to (dominant) political discourses and framings of citizenship, gender equality, national identities and democracy (Anderson 1993; Yuval-Davis 1997; Butler & Spivak 2007).
- *Meso level* - refers to the association of social and political actors with **collective organizations**. Political identities at the meso level here refer to political discourses embedded in specific political organizations and social movements (Castells 1996; Siim 2008; Pristed 2008).
- *Micro level* – refers to lived citizenship and everyday life. At this level belonging may refer to the identities of individuals, social groups or local communities, which are based mainly on face-to-face-relations (Savage et al. 2005; Skegss 1997; Gullestad 2006).

The model also illustrates how *policies*, *discourses* and *identities* can serve as active and bridging elements between micro, meso and macro levels. *Policies* here refer both to something that affect significant parts of the framework for everyday life and to individuals' and groups' attitudes towards policies in everyday life. Likewise, *discourses* refer to perceptions that are significant for nations, groups', institutions' and organizations as well as for actions in everyday life. Finally *identities* refer to collective communities as well as to individual identity constructions.

The contextual nature of social categories has recently been discussed by Gudrun Axel-Knapp (2006) in relation to the arrival of the notion of intersectionality in Germany. Her main point is that the travel metaphor applies not only to the notion of intersectionality, but also to the

categorical triad of 'race-class-gender', which has reached Europe from the US. Knapp argues that we need a greater focus on the diverse and contextual significances of categories in relation to the history of ideas. In relation to the ongoing debate on the meaning of the category of gender in feminist theory, Knapp emphasizes that the notions of class and race have quite different meanings in a German and in an American context.

She notes that the difference is most striking in relation to the category of race, which is a common basis for identity claims in the US, whereas 'Rasse' is a category that cannot be used in an affirmative way in Germany either to describe others or as a basis for identity claims. In Germany it relates back to the history of the racist identity politics of National Socialism (Knapp 2005:257). Knapp emphasizes that the class category also harbors large contextual differences. In the US context, class seems to be a commonly used category for localization of social differences, whereas the German notion of 'Klasse' is almost exclusively used in relation to Marxist theory (Knapp 2005). This resembles the French case where it is also impossible to use the notion of race affirmatively, because it goes against the Republican understanding of the nation as an undivided entity (Kastoryano 2006).

To sum up: The contextual nature of key categories is a crucial aspect of the contextual framing of citizenship, which can explore the historical roots, underlying meanings and different understandings of gender, class and race (in)equalities according to processes of inclusion and exclusion cross-nationally. The model illustrates that political institutions and political belongings affect both the meanings and interactions of the social categories, e.g. gender, race/ethnicity and religion. It further indicates that policies, discourses and identities within and between different analytical levels affect each, e.g. that policies and public discourses about the veil affect collective organisation and mobilisation of Muslim women as well as their individual identities.

Multiculturalism, women's rights and gender equality
This section revisits the academic debate about diversity focusing on multiculturalism, women's rights and gender equality. Political theory has illuminated the tensions between cultural and religious diversity and gender equality, and the recent focus on 'minorities within minorities' (Eisenberg and Spinner-Halev 2005, Phillips 2007) has raised questions about the power and representation of women and vulnerable persons within minorities. The debate has explored the tensions between minority rights and women's rights and conflicts between different principles, e.g.

religious rights and gender equality, which are crucial issues in political regulations of and media debates about the headscarf.

The multicultural paradigm introduced by Will Kymlicka (1995) is one of the most comprehensive citizenship models to address the diversity of religious, cultural and national groups. Kymlicka's multicultural model (1995) presents a strong liberal defence of group rights premised on a combination of individual rights and the protection collective rights. This approach distinguishes between *ethno-cultural group rights* for indigenous peoples, e.g. Aboriginals and American-Indians, and the *poly-ethnic rights* of new immigrant groups. The notion of 'diverse citizenship' (Kymlicka & Norman eds. 2000) is an elaboration of this model, which distinguishes between different kinds of minority groups and various forms of minority rights.

Kymlicka's approach was concerned with state protection of ethno-national and ethno-cultural diversity. This model was criticized by Susan Moller Okin (1999) for neglecting the protection of women's rights. In the debate with Okin, he expanded the multicultural model arguing and distinguished between *external protections* of minority groups and *internal restrictions* of individual rights within minority groups, for example women's rights. The argument is that the state should protect the collective rights of minorities against the majority, for example through representation rights and language righty, which place external restrictions on the majority but not the collective rights that impose 'internal' restrictions of individual rights/autonomy within the group (1999; 31-34).

Within feminist theory the American scholar Susan Moller Okin has presented one of the most influential criticisms of the multicultural paradigm. In the controversial article: "Is multiculturalism bad for women?" (1999) she claimed that there is a contradiction between multiculturalism, defined as protection of the rights of minorities, and women's rights. This provoked an intense debate in the US (see Cohen, 1999), which travelled to Europe. She argued that minority groups often have patriarchal religions and family structures, and she warned that minority rights should not be defended as a strategy to achieve gender equality and improve women's rights. The claim was that group rights, exemplified with forced marriages and polygamy, are potentially and in many cases also in practice anti-feminist and harmful for women. First, group rights strengthen men's patriarchal control over women in minority cultures, and second it is the most powerful men who formulate the interests, values and practices of the group.

Many scholars interpreted Okin's article as a liberal feminist attack on both the multicultural paradigm and on group rights. She was criticised by many feminist scholars who

argued that her approach was premised upon an essentialist perception of 'culture' that forced minority women to choose between 'my rights and my culture'. Okin's approach was read by many multiculturalist scholars as a liberal defence of universal gender equality against cultural diversity (Parekh, 1999). In a response to Okin, Kymlicka argued that feminism and multiculturalism are potential allies in a struggle for a more inclusive concept of justice based upon a combination of individual and collective rights that takes account of both gender-based and ethnic diversity (1999; 34). Okin has later qualified and contextualised her position explaining that she is not against collective rights per se and that her main point was to give women a voice in negotiations about groups rights between the majority and minority cultures (2005; 88-89).

To sum up: The debate has raised important points about the relations between protection of 'group rights' and women's rights, for example the naming of "the paradox of multicultural vulnerability", i.e. that vulnerable social groups' needs and interests can be undermined by group rights (Shachar 2000; 200). It emphasises that women and other vulnerable groups should have a voice and influence in both minority cultures and in society, and that women in minority cultures should be respected both as culturally different from the national majority and be treated as equals in the majority and minority cultures (see for example Eisenberg et. al. 2005; Modood et. al. 2006).

Conflicts between principles of equality and accommodation of diversity
Another key issue is about *the hierarchy of principles* and the conflicts between various principles that are all universal. Anne Phillips (2005) has noticed that there is often a hierarchy of principles in social and political theory, which all refer to universal human rights. Liberal pluralism often emphasises the diversity of ideas and are less interested in the diversity of social groups, whereas liberal feminism is primarily interested in gender equality and has only recently been concerned with cultural and religious diversity. It follows that migration theory gives priority to universal principles of ethnic/racial and religious rights and that gender equality often becomes a non-negotiable principle in feminist theory (119).

In her most recent book Anne Phillips (2008) has introduced a diversity model premised on a new notion framed as 'multiculturalism without culture'. Here she argues that egalitarians should be committed to both sex equality and at least some version of multiculturalism. According to Phillips the conflicts between sex equality and the values of a particular cultural tradition are not deep value conflicts but rather political conflicts between two equality claims –

between religious, ethno-national, ethno-cultural equality and gender equality. Her main point is that conflicts between competing equality principles are contextual and need to be negotiated between social and political actors. This 'multiculturalism model' is without culture - and without groups. In this model rights should primarily be attached to individuals, because the main issues are about discrimination. Phillips concludes that '*the multicultural question is– whether existing legislation is biased towards the cultural identities or religious beliefs of particular groups? Laws and rules that enjoy majority support may reflect a cultural bias*' (2008;166)

The 'contextual turn' has made political theory more sensitive to national variations in rights and value conflicts. Comparative European research has confirmed the basic arguments that multiculturalism and feminism are often seen as competing equality claims (see Lister et al. 2007). Conflicts between gender equality and recognition of cultural diversity, for example around marriage and divorce rules, often express political contextual dilemmas, which should be resolved through negotiations. The debate about gender and cultural diversity raises important issues about the relations between individual and collective rights, the hierarchy of principles, and about strategies to solve value conflicts, which should be explored further by comparative research. *One critical question to Phillips approach to multiculturalism is whether a contextualised political theory can rely solely on individual rights and discard collective rights and the notion of cultural groups?*

Rainer Bauböck has recently proposed (2008) a different defence of multicultural diversity within a framework of rights, which includes cultural groups. This approach distinguishes between multiculturalism as a set of political ideas on the one hand and public policies that address social facts on the other hand. It is a constructivist approach emphasising that the facts of cultural diversity are themselves socially constructed rather than naturally given. Bauböck discusses how normative political theory has responded to the challenge from diversity by navigating between (psychological, sociological and normative) culturalism and statism differentiates. The model is presented as a contextualised liberal defence of multiculturalism and a political justification for institutional arrangements (15).

One premise for Bauböck's approach is that cultural diversity should be seen '*as a background condition to which a differentiated system of citizenship rights responds and … as the outcome of collective actions and societal processes that are enabled by a framework of such rights*' rather as normative ideals or political goals (19-28). The proposed model of rights within the context of diversity rests upon three basic values: 1) cultural liberties, 2) equality and 3) self-

government right. He notes that these rights can be stated in both individualist and universal terms and that group-differentiated and collective right can be justified both by moral individualism and by universalism.

Bauböck's has proposed a multiculturalist and egalitarian model within the framework of rights, which is both institutional, contextual and transnational (Bauböck 2008;29). The primarily focus is on accommodation of cultural diversity of minorities, but claims for equality, which include exemptions, protection against discrimination, public support of recognition and special political representation, can in principle be extended to other kinds of inequalities. The strength of this approach is the broad notion on diversity and inequalities according to culture, religion as well as to nationality. The question is whether the model is able to address inequalities according to gender and sexuality.

To sum up: The debate illustrates that it is difficult to overcome the dualism between theories addressing diversity and those that address gender inequality. Models that address ethno-national and ethno-cultural 'diversity' usually fail to address the intersections between gender and diversity. Phillips' deliberative model to diversity is an attempt to overcome the dilemmas between cultural diversity and gender equality based on political negotiations and legal rights frames. This model is premised upon individual rights and seems to abolish both cultural groups and collective rights. This is problematic, because inequalities have structural roots and thus cannot be addressed solely within an individual rights frame and in addition there are different kinds of differences, which cannot be addressed within one theoretical framework. The relations between equality and diversity will be explored further in the following with a focus on the intersections of gender with ethnicity and religion in the European headscarf debates.

Part 2: Gender, Ethnicity and the Construction of National Belongings - the headscarf as a cultural and religious symbol

This part explores the intersections of gender with ethnicity and religion in the Danish headscarf-debate. The Danish case is discussed from a comparative European perspective on the basis of findings from the VEIL-project. The aim is to discuss the double-edged character of the notion of intersectionality in citizenship analyses. I find that the headscarf debates can illustrate the potentials in using the notion of intersectionality as an analytical approach to study the different framings of the headscarf issue. At the same time they also point towards the problems attached to using the concept in political and academic debates.

Citizenship and the politics of belonging – the Nordic case from a European perspective

In spite of the transnational dimension of national and religious belongings the nation states decide who has access to citizenship and who has the right to live and work legally in the country. Citizenship models are still to a large extent premised on nation states, and scholars often refer to three models of citizenship, which affect the overall construction of national and religious belongings and the political and discursive opportunity structures. They include: the civic-assimilationist (republican model), which provides easy access to citizenship but does not recognize the cultural and religious groups differences, the ethno-cultural model, where the nation state is seen as culturally homogeneous, and the multicultural (liberal) model, which is able to accommodate diversity (Kilic, Saharso & Sauer 2008; 400).

The Nordic countries do not belong to one of the main citizenship models and do not belong to any of the three models. The Social Democratic model has been interpreted as an off-shoot of the liberal branch because it broadened the domain of rights to include social rights, which in its Nordic form has also emphasized participation (Lister 2007; 8). From a historical comparative perspective, the Nordic welfare states are said to belong to the same welfare, citizenship and gender regime characterized by universal social rights, state feminism and 'women-friendly' policies (Siim & Skjeie 2008; Borchorst and Siim 2008).

The Nordic countries are small countries, which have been described as exceptional, because they have during the last 150 years been relatively homogeneous in relation to culture, ethnicity and religion (Østergård 1992). They have since the First World War developed a welfare society where social equality and individual freedom have become key values (Melby 2008). Key elements of this model based upon a comparably high degree of equality but they have had no tradition for antidiscrimination legislation.

The countries have recently chosen different policies and discourses in relation to citizenship/migration (Hedetoft 2006). Sweden being the only Nordic country which has referred to itself as a 'multicultural' model and the only country which has adopted dual citizenship (in 2001) and has separated ´state and church' (2003) (Lister 2007, see also Siim and Borchorst and 2007). Reports conclude that in spite of these differences integration of have failed in all the countries, because immigrants from countries outside Europe, North America and Australia are marginalised on the labour market, in politics and in society (Brochmann & Hagelund 2005). In the following the challenges to the Nordic social and democratic model to combine the universal framework of social

citizenship and gender equality with ethnic and religious diversity will be explored by looking at the Danish headscarf debate.

The exclusionary framings of gender with ethnicity and religion

Denmark has been regarded as a mix of the main citizenship models, because the country combines elements from the ethno-cultural and the pluralist liberal model (Togeby 2003; Mouritzen 2006; Siim 2007). The ethnocultural elements refer to a relatively high degree of cultural, ethnic and religious homogeneity, and the liberal accommodating elements refer to extensive state support to the voluntary associations and 'free' schools for cultural and religious groups, and the early adoption of voting rights for immigrants to municipal elections.

The Danish shift in immigration and asylum policies Denmark from one of the most liberal to one of the most restrictive migration and asylum legislations between 1981 and 2001 illustrates the underlying tension between the two elements (Siim 2007). After the election in November 2001 a new government coalition between the Liberal and Conservative Parties came to power with parliamentary support of the far Right, the Danish Peoples' Party (DPP). As a result of Danish migration policies and discourses have become more restrictive since 2002. This includes restrictions on family unification as a way to combat forced marriage with the adoption of the infamous 24-year rule as one of the most illustrative examples[6] (Borchorst & Siim 2008; Siim & Skjeie 2008).

During the last 25 years the meanings of 'Danishness' and 'Danish values' have become a controversial public issue and debates about national and religious belongings have intensified. According to Per Mouritzen the cultural nationalism was gradually replaced by a new civic nationalism emphasizing a new type of egalitarianism (Mouritzen 2006; 76). He finds that Danish nationalism represents a particular universalism or instrumental civic nationalism, because the dominant political discourse equates Danish common values with civic values, and thus democracy and egalitarianism are perceived as a cultural way of life (Mouritzen 2006; 78-79).

Research has demonstrated that gender equality became a strong marker of 'Danishness'. In media debates the framing of gender, ethnicity and religion is premised on an underlying understanding of ethnic Danish women's equality, which is contrasted with the

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[6] This government replaced the Social Democratic led Government in power since 1993. In 2000 the coalition parties of Social Democrats and Social-Liberal Centre [Det Radikale Venstre] adopted special rules to prevent forced marriages between young Danish and foreign citizens from Third countries. The present Liberal Conservative government have dramatically tightened the right to family reunification in 2002 by adopting a mandatory age of 24 for couples wanting to marry a foreign citizen and by extending the obligation to economic self-sufficiency (see Siim & Skjeie 2008).

oppression of Muslim women who are wearing the veil (Andreassen 2005; Siim 2007). This understanding is then used as an argument to exclude both Muslim men and women from the national community. Rikke Andreassen's work shows that there is generally a strong gender difference: Muslim men are often portrayed as 'the oppressors', and Muslim women are often perceived as victims of 'their culture and religion' (see Andreassen 2005).

This understanding became the prevalent discourse in the arguments and rhetoric of The Danish People's Party, a populist anti-immigration party. It is remarkable that the party, which has never supported Danish gender equality policies before, in its criticism of ethnic minorities, has taken over gender equality arguments. One example is the recent use of gender equality arguments in several newspaper adds to position Muslim groups as 'outside' and 'unbelonging' in a Danish context, for instance by a picture of a burka-clad judge, which was intended to signal a strong disapproval of the possible use of head scarves in Danish courtrooms.

The ad is titled SUBMISSION. The subtext read:

"The Islamic headscarf is a symbol of women's submission. The Islamists use it as a strong and visible sign of the belief system dominates man and women, Muslims and non-Muslims. It is not only about "30 gram of cloth". It is about tyranny and submission! A majority in Parliament is willing to accept this in Parliament, and the Independent Board of Judges has decided that you as a

citizen in the future must accept that you in the courtroom can meet a judge clocked in the tyranny of veil".

In this way the add links the debate about the right of the judges to wear headscarves with women wearing a burka, and the last sentence is an emotional call to national feeling: *'Give us back Denmark.*[i]

The ad is a forceful illustration of the exclusionary framings of the Far Right: First of all the text employs a strong language to construct a borderline between 'us' and 'the others'? The text of the ad clearly refers to the so-called 'Islamists' who use the headscarf, which symbolizes women's submission and thus accept tyranny. With its negative rhetoric the ad manages to construct all Muslims as different 'from us' who do not cloak our women and therefore outside 'Danishness'. Secondly, the title of the ad claims that 'they' have taken Denmark away 'from us'. Considering who is constructed as 'the others', there can be no doubt as to who this is. The ad constructs all Muslims as being outside the national Danish community because Islam is based upon a belief system which dominates women, and this framing is premised on an underlying notion about ethnic Danish women's gender equality.

The ad illustrates how the Danish People's Party uses 'politics of belonging' as a political project to define who is 'in' and who is 'out' in terms of the national community. It also shows how the dominant understanding of gender equality is used to stigmatize and exclude immigrant women. In both cases the constructions are based upon intersections of gender, ethnicity and nationalism, and the ad demonstrates how a specific framing of intersections can be instrumentalized to exclude immigrant minorities. Swedish/British sociologist Keith Pringle uses the term *'abusing intersectionality'* to emphasize how certain couplings of categories (here gender and ethnicity) can be applied to exclude marginalized groups (Pringle 2006).

To sum up: In spite of the restrictive migration and asylum legislation Danish nationalism still presents an ambiguous mix of ethno-cultural nationalism and civic pluralist nationalism. In the official discourse gender equality is increasingly being associated with 'Danishness' based on the underlying premise that gender equality has already been achieved for the white majority. The Danish, and indeed Nordic, debates about Muslim minorities is based upon a premise about the Nordic countries as normative models not only in relation to democracy and social equality but also for gender equality (Gullestad 2002).

Intersectionality in European gender projects

Research findings from the European VEIL-project can further illuminate the challenges to intersectional analyses in comparative gender projects from a perspective of citizenship and migration. A number of European gender projects have focused on the intersections of gender with other inequality creating categories using a critical frame analysis[7] (see Verloo 2007; Kilic, Saharso and Sauer 2008). Here it is a methodological challenge to distinguish analytically between different framings of intersections of gender with other categories, and researchers have identified different forms of intersectionality, for example in European gender equality policy texts (see Lombardo & Rolandsen Agustin 2008).

This paper introduces a preliminary definition[8] of *exclusionary intersectionality* as a discursive framing, which give priority to one form of inequality (e.g. gender inequality) while at the same time exacerbating other inequalities (or inequality creating mechanisms) among other categories (e.g. between ethnic groups). This can contribute to exacerbate differentiations, for example between majority and minorities. This contrasts with *inclusionary intersectionality* as a discourse, which recognizes the intersections of different inequality creating categories, and the potential negative consequences of these inequalities for creating equality (in diversity) (see Siim 2008 and Christensen & Siim 2009).

The European debates about the headscarf

The VEIL-project has explored the similarities and differences in regulations and debates about the headscarf in eight European countries, including Denmark. The headscarf debate is about the right to wear religious symbols in liberal democracies, and as Muslim women are the bearers and representatives of these symbols, the project addresses the interconnections between gender, religion and ethnicity/race from a historical, comparative and transnational EU approach. The

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[7] The projects analyse policies, institutions, and debates but they have different theoretical frameworks and methodological designs. The QWING project analyses the framing of intersectionality in the EU gender equality policy documents from 1995 to 2007 (Lombardo & Rolandsen Agustin 2008). The VEIL-project analyse similarities and differences in regulations and debates of Muslim women's headscarves within an institutional frame analysis, which combine an institutional analysis with a study of written documents on eight different sites (see Social Politics 2008). The EUROSPHERE-project analyse debates about migration/mobility, EU-polity, EU-migration and EU-citizenship from a diversity approach and combines a quantitative and qualitative media analysis and through interviews with social and political actors on four sites, political parties, social movements, think tanks and the media (Siim 2009a).

[8] This definition clearly has a normative basis to combat inequality and create greater equality and cannot the answer questions about which type of inequality it is most important to address in specific contexts. The distinction between exclusionary and inclusionary intersectionality is inspired by talks with Ann-Dorthe Christensen about the different framings of intersectionality in the Danish case and with and Lise Rolandsen Agustin about analysing gender and intersectionality within the gender work package of the Eurosphere project.

debates about the headscarf can illuminate the conflicts about different equality principles as well as the different framings and articulations of the intersections of gender with religion. The debates disclose how political forces on the Left and Right employ arguments and frame intersections of gender, ethnicity and religion in inclusionary as well as exclusionary ways.

In terms of regulation the overall results from the Veil-project illustrate that European countries have adopted diverse strategies to accommodate religious and cultural diversity influenced by historical traditions and political opportunity structures. The cross-national comparison suggests that different factors may explain national regulations: a) citizenship regimes and integration policies; b) church and state relations and the recognition of religious communities; c) gender equality and anti-discrimination policies; and d) strategies of framing (Kilic, Saharso and Sauer 2008; 399).

The comparative studies conclude that most countries, including Denmark, do not have any national regulation of the use of religious dress in the public arena (see special issue of Social Politics, No. 4 2008). The banning of the headscarf as a religious symbol thus represents exceptions to this general rule. The ban concerns pupils in French public schools, public employees in Turkey and teachers in part of Germany. In terms of political and legal regulation[9] policies may be accommodating towards the headscarf, but the debates show these debates are often neutral and ungendered with the main arguments referring to universal principles of 'religious freedom' or 'state neutrality'. Here there is no articulation of intersecting inequalities with women wearing the veil being discriminated but rather a hierarchy of principles with 'religious discrimination' and 'state neutrality' as the dominant principles.

This contrasts with public debates, which are highly gendered and culturalised, and these debates often articulate exclusionary framings of the intersections of gender, religion and ethnicity. Here the dominant frame is a 'victimization frame', which constructs a divide between gender equality of the national white majority and the oppression of Muslim women wearing headscarves (Lettinga & Andreassen 2008). On this site the principle of gender equality is being instrumentalized not only by Right-wing parties, but also by part of the Left as well as by some

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9 It is not easy explanation of variations in regulations and framings of the veil with reference to citizenship regimes; church state relations or gender regimes. Findings illustrate that there are tensions between national, transnational and regional regulations. Most of the countries have no regulation of the headscarf on public sites. In France the ban of the headscarf only concerns pupils in public schools below 16 years; in 3 German states it only concerns teachers in public schools, whereas in Turkey it concerns all public offices. The rest of the European countries have either tolerant regulations or no regulation of religious dress on public sites. The Danish government's proposal to ban religious and political symbols for legal judges thus represents a significant change the Danish form of regulation.

feminist organisations, who all claim that Muslim women are 'the problem' because they are oppressed by the veil. Muslim women's voices and organizations are usually absent from these debates, and when they are often forced into defensive minority positions, for example in the Dutch case (Saharso & Lettinga 2008; 472).

Results from VEIL-project have also identified inclusive framings of the intersection of gender with religion in the public debates. These framings may articulate the veil as 'a problem' which is repressive towards women and still argue that Muslim women should have the (autonomous) right to decide both 'as Muslims' and 'as women' whether to wear a headscarf or not. For example in multicultural countries like Britain and the Netherlands, where anti-discrimination and gender equality commissions did indeed frame the headscarf and other forms of bodily covering as an equal opportunity issue and hence supported Muslim women's right to wear these coverings (Kilic, Saharso & Saier 2008; 402). These articulations, however, represent minority positions and the national case-studies conclude that multiculturalism is under pressure in all countries, including the Netherlands and Britain (Saharso and Lettinga (2008). One interesting question is how the different citizenship traditions affect debates about the headscarf. Saharso and Lettinga's study of the Netherlands (2008) suggests that countries with multicultural traditions are more accommodating towards the headscarf are less inclined to ban the headscarf and other forms of veiling.

Comparisons between Denmark and Norway, which is not a partner of the VEIL-project, can illuminate how countries with strong equality traditions affect the headscarf debates. The two countries have many similarities in terms of citizenship, migration and gender legislation and both have established state churches. The comparison between debates and regulations of the veil in Denmark and Norway illustrate that there are also differences in the political and discursive opportunity structures.

From the European context both countries are exceptional cases, because the political and legal debates have centred on the right of Muslim women to wear the veil to work in private companies, and until recently they have not addressed the right of citizens to wear the veil in the public arena[10]. In the first Danish court case the court found the Department store's ban on headscarves for their employees to be an indirect discrimination towards a specific religious group, and the employer was given a fine of 10.000 DDK. In the Føtex-case the employer argued that the employee did not live up to the general dress code of the supermarket, which demanded that employees had to be 'professionally

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[10] The report about the Danish court cases is based upon Andreassen with Siim 2007 and the report about the Norwegian case upon Siim and Skjeie 2008.

and nicely dressed'. The trade union, HK, argued that the employee was the victim of indirect discrimination. In 2003 the court acquitted Føtex and ruled that the dismissal was legal because the supermarket had adopted a uniform, and therefore the ban on headscarves was a general ban on all forms of political, religious and cultural symbols. This sentence was appealed and the case was taken to the Supreme Court, which confirmed the decision in January 2005 (Andreassen. with Siim 2007).

This development was different from Norway where the Equality Ombud ruled that employers did not have the right to ban the veil, and the Ombud furthermore introduced arguments intersecting gender with religion in support of Muslim women's right to wear a headscarf to work (see Skjeie 2007; Siim & Skjeie 2008). Here individual cases of veil discrimination were not tried until 2004. The compilation of cases was then presented as cases of gender discrimination under the prohibitions in the gender equality act, mainly because a general prohibition of ethnic and religious discrimination was not put into force in Norway until 2006. The complaint by a number of employees resulted in a decision by the Ombud that prohibitions of veil in work places were in violation of the ban on indirect discrimination in Gender Equality Act. In determining this, the Ombud compared such restrictions to the contrary, accommodating, uniform regulations within the military services (i.e. turbans). She reasoned that many Muslim women wear the veil because of religious reasons and it is thus a part of the personal integrity and situations could occur where they could not accept to work if they could not use the headscarf. A prohibition would thus entail significant disadvantage for these women. In two more recent decisions the Ombud has upheld this general line of reasoning. In the latest one, a ban of the veil was tried both according to the gender equality act and the new act against ethnic and religious discrimination, and the ban found in violation on both prohibition grounds (Siim & Skjeie 2008)..

From a citizenship perspective it was surprising to find different framings of intersections of gender with religion in the two cases which resulted in different in political and legal regulations of the veil. In the Danish case the main conflict was interpreted to be between religious discrimination and the liberal principle about the employers' right to decide on the dress code of the employees. The Norwegian case can be interpreted as an example of an inclusionary framing, which takes the intersecting of gender with religion and culture into account by acknowledging that it is women wearing the veil and that a ban would be both discrimination of a religious minority and indirect gender discrimination.

Both countries have citizenship (and gender) models with relative strong equality traditions and Siim and Skjeie suggest that two factors may explain the differences: One is the strong

pluralist religious tradition in Norway, which have positively affected the mobilization and organisation of Muslim women in the MIRA-centre. Another is a strong Gender Equality legislation and an independent Equality Gender Ombud, which have positively affected the framing of the debate about the regulation of the veil in work place as an indirect discrimination in relation to the Gender Equality Act (Siim & Skjeie 2008; 329-34). Siim and Skjeie conclude that the argument of the Norwegian Gender Equality Ombud, which emphasise the intersection of *direct* religious discrimination with *indirect* gender discrimination, expresses an inclusive democratic strategy towards diversity.

The Norwegian case can is a good illustration of an inclusive intersection of gender with religion, which articulates the interweaving of the two forms of inequalities and acknowledges that it is women who wear the veil and therefore would be the ones to be discriminated by a ban in the work place. It is an inclusive framing of intersectionality, because it recognizes the intersections of different inequality creating categories, and the potential negative consequences of these inequalities for creating equality (in diversity).

. The two countries' have had no ban on the veil in the public arena and the strong equality tradition may have affected the relative accommodating political regulation of the headscarf. This may be changing, and there have recently been intense debates about prohibiting the veil in relation to police officers (in Norway) and legal judges (in Denmark). The Danish government's proposal to ban the headscarf for legal judges indicates a shift towards a more prohibitive regulation of the headscarf (Andreassen, Pedersen & Siim 2008). This may be explained by the tendency to replace cultural nationalism with civic nationalism in the Danish citizenship model and arguably confirms the independent role of ideas in public policies.

To sum up: *From an intersectionality perspective* the findings illustrate that there are generally conflicting principles in political and legal debates. These debates tend to be ungendered and often construct the headscarf as an issue about accommodation of religious diversity against the principle of state neutrality. The main principle is about religious rights, the argument being that banning the veil would be a form of religious discrimination. This contrasts with publis debates, which are often highly gendered and culturalised. In media debates the arguments presented by various actors articulate the intersections of gender with religion and ethnicity within framings that have both exclusionary and inclusionary meanings and effects. The main framings of gender and religion tend, however, to articulate the intersection in an exclusionary way, which contributes to construct a divide between

'them and us'- between Islam and the Muslim culture and religion, which is perceived as submissive to women, and the white majority, which has already achieved gender equality.

Conclusion

The first part of the paper has focused on the 'turn to diversity', which arguably opens new opportunities for gender research to rethink theories, concepts and models capable of bridging claims for gender equality with claims for ethnic and religious equality. The growing feminist emphasis on an intersectionality perspective can be seen as a response to this challenge. The paper has emphasized that gender and diversity research face common challenges to formulate intersectional positions and models able to link studies of individual identities with meso-level studies of organizations/institutions and macro-level studies of citizenship- migration and gender regimes. In addition the paper has stressed that in spite of the similarities between the social categories - gender, class and ethnicity - the meaning of the categories is contextual, and thus the discursive and political opportunity structures affect public discourses and arguments. The notion of intersectionality as well as the social categories under investigation is contextual and acquires different meanings depending on the contexts.

The paper has argued that from the intersectionality perspective, the linking of different categories – for example gender and religion - is double-edged and can be applied in different ways: Intersectionality can be a sophisticated tool in order to understand how significant categories, for example gender, ethnicity and religion, are articulated in political and legal debates and also affect underlying notions of nationality. At the same time the paper has emphasised that there are different forms of intersectionality and that intersections of different kinds of inequalities can be articulated in ways that may serve both exclusionary and inclusionary objectives.

The empirical part of the paper has illustrated how the framing of intersecting categories of gender with ethnicity and religion have been articulated as an exclusionary discourse in the Danish media by the Danish People's Party against Muslim women's wearing a headscarf. The discursive framings are based on and tend to strengthen the underlying premise that Denmark/Scandinavia is a normative model of democracy and 'gender equality', which is constructed in opposition to Muslim culture and religion symbolized by Muslim women's headscarf. The discourse of 'Danishness' is based upon a social distinction between 'them and us' with gender equality as a strong marker.

Results from the VEIL-project further illustrate that discursive framings based upon intersections of gender with religion have had both exclusionary and inclusionary meanings and effects in European debates about the headscarf. In political and legal debates there is often a hierarchy of

principles which neglects gender and place arguments about religious discrimination/rights and state neutrality at the top. This contrasts with the public debates, which are often highly gendered. Here the intersection of gender with religion is articulated in ways that tend to construct Muslim women and their headscarf as 'the problem' that can be solved either by dialogue or by banning it. This exclusionary framing is not only characteristic for the far Right but also for part of the Left and some feminist groups. The Norwegian case presents an exception, because the political and legal debates have articulated an inclusionary framing of the intersection of two sets of principles: gender equality with religious and ethnic equality. This articulation is premised on a multidimensional approach to equality, which interprets relations between gender, ethnicity/race, religion and nationality as multiple intersecting forms of discrimination, not as contradictory or competing equality claims, can be interpreted as a promising democratic strategy.

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[i] See the add at http://www.danskfolkeparti.dk/pictures_org/DF-sloer-annonce4.pdf