Varieties of *Leitkultur* debates in North-western Europe

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**Abstract**

This article discusses national variations of the notion of common culture, specifically the German concept of *Leitkultur*, and related concepts across five north-western European countries: Denmark, Ireland, the Netherlands, Britain and Germany. Similar debates have taken place in these countries, with each facing integration challenges concerning the need to integrate migrants into society and to balance cultural diversity on the one hand with forms of unity - variously conceived - on the other. Within this common trend, however, remains significant national variation. The conceptual vocabulary as well as the very structure, semantic content, and perceived functions of what should be ‘common’ differs significantly across the five countries, e.g. as regards versions of civic-liberal, religious, and ethno-cultural culture; the degree of assumed comprehensiveness or ‘thickness’ of how culture is shared or common; and what emerges as the very point of sharing it. A succinct analytical reading of some main arguments from social and political theory about common culture as an element of good, cohesive and integrated national societies is employed to structure the empirical analysis of the countries covered (?). The analysis shows that....

**Introduction**

Over the last 15 years north-western European countries have had recurring debates on the need to reformulate measures aimed at the insertion of immigrant minorities with respect to securing an overarching unity and, thereby, the cohesion or integration of society. The latter has been seen as requiring sets of common key values, the sharing by all citizens and newcomers of a common public ‘culture’, or even a sense of ‘national identity’, which some read as substantiating Brubaker’s (2001) predication of ‘returning to assimilation’ (cf Lentin and Titley, 2011).¹

Concern with national culture and identity developed, in part, from a broader, reactive ‘euro-nationalism’ (Hedetoft, 1999) of old and settled Western European nation states, which began as a right wing version of EU-scepticism in the name of national independence, evolved into anti-immigration/anti-Islamic discourse, and continues to inspire new right parties. But it is now a much broader phenomenon, which spans most of the political spectrum. As an elite discourse, which directly informs policies in several fields, it reflects concerns, emerging from the mid 1990s and accelerating since 2001, that minorities need more sustained societal incorporation and that multiculturalism as
a social and public-policy ideal stands in the way of this. While Germany and Denmark gave up the illusions of not being ‘immigration countries’ and started to talk of integration, the Netherlands and the UK began self-critical appraisals of multiculturalism policies.

Everywhere, the discourse was the last stage of a cumulative development from emphasis on ‘functional’ labour market participation, residential integration, and education, towards – particularly after 9/11 – concern with ‘civic integration’ (Joppke, 2007; Goodman, 2010; Mouritsen, 2012), which culminated in ideas that neither acquisition of liberal values nor ‘active’ citizenship is quite enough, unless these civic ideals become embedded in, bolstered by, or take the shape of, a common culture (Mouritsen, 2008).

These notions of society as a fragile, cultural edifice, which needs nurturing, and where each individual newcomer has a responsibility to fit in, have inspired integration programs and policies targeting new immigrants and refugees, changes in national education and cultural policy more broadly, and conditionalities and tests governing citizenship acquisition and permanent residence. This article, however, shall concentrate on broader public and political elite debates within each country, beginning with the debate on the need for, and contested content of, a national Leitkultur which took place in Germany. Although it only indirectly inspired some of the other debates, it remains a useful point of reference for what for the purposes of this article we call ‘national Leitkultur-debates’.

Section 1 sets out some basic distinctions from social theory, which appear to inspire or reflect ‘folk theories’ of societal integration (Favell, __). Section 2-5 lays out the sequence, protagonists, main arguments and semantic elements in the four countries. A comparative section (6) highlights similarities and differences, including how each debate remains significantly national and particular in terms of structure, content and perceived functions. A concluding discussion raises critical questions about these functions or the very point of common culture and ‘values’ as devices and signs of integration.

1. Social theory and national ideologies of civic cultural integration

Some general things may be said about the national Leitkultur debates. First, they all tap into conceptions of societal integration. They can be traced back to a tradition of classical sociology, whose focus is social order and the ways in which individual and society are simultaneously integrated through the internationalisation and social diffusion of norms. In current “amateur sociologies of integration” (Favell, _quote?_) societies will fall apart, lest each (new) individual is properly socialised. This link can assume conservative, traditional forms. Durkheim analysed a modern ‘organic’ solidarity between diverse individuals, facilitated by general rules, which reflected increase of interactive complementa-
rity in the economic and broader social division of labour. Solidarity arose where man “depends upon society, because he depends upon the parts that go to constitute it” (Durkheim, 1984: 83).

This was also the logic of functional conceptions of immigrant integration, which until recently prevailed in policy literatures (Enzinger & Biezeveld, 2003: 19ff). Here, *doing things together* – working, living, participating in politics – is more important than *being alike*, i.e. that ‘mechanical’ solidarity of resemblance and conformity to values and expectations, often in religious forms, which characterised traditional societies, to Durkheim. Contemporary ideas of integration through common values appear to be more mechanical than organic. The latter also entails values, indeed a “whole system of rights and duties joining them in a lasting way to one another” (Durkheim, 1984: 337). But in Durkheim respect for them arises from the universalistic thrust of social interaction itself; it is not something that has to be inculcated before interaction may start.

Secondly, *Leitkulturen* are national, both in presupposing a framework of territorial bounded society and institutions – a national space that needs integration – and in the sense of affirming or reinforcing a feeling of we-ness, which is seen as necessary or legitimate, to the degree that politicians talk of Dutch or Danish values, even ‘Britishness’ or ‘Danishness’ (not, incidentally, ‘Germanness’). In this registry of *particularity of culture*, several modalities ensue. One distinction is between communitarian and instrumental defences of particular culture. The political theorist David Miller (1995) presents several arguments, firstly, for the national right to further popular cultures, e.g., that they provide content, direction and motivational force for moral obligations, and that such privileging makes it possible to express, feel proud of, and be safe in a national identity. But he also has a second argument about nationality as homogeneity, which creates trust, which in turn facilitates redistribution and deliberative democracy (p. __). Neither argument is necessarily exclusive or chauvinistic and may be combined (as in Miller) with ideas about dialogue, self-critique, and opening national culture to newcomers (p. __). Miller’s work also contains a typical ambiguity between nationality as common culture (i.e. substantial sameness in terms of values, habits, language or religion) and as national identity or identification (i.e. as an imagined destiny or project), which unites groups that do not share any or all the usual dimensions of common culture (as in Switzerland or Belgium) (Miller, 1995: ).

Thirdly, *Leitkultur* is not typically conceptualised in the traditional terms of an old-fashioned *Kulturnation*, at least not exclusively. Ethno-historical, religious heritage is laundered and linked to civic and liberal values, or the national guiding values are simply conceptualised in civil and liberal terms. The community is conceptualised as civic in content (liberal values, participation) and onus on voluntariness (possibility and responsibility to integrate) over ethnic origin or fate. Again, several modalities of culturally embedded, ‘particularised’ civickness ensue (cp. Mouritsen, 2006; 2008). Many have speculated on the emergence, twenty years after Habermas’ original campaign, of an ideology of *con-*
stitutional patriotism, or the notion that host countries should and could (only) expect and demand affirmation of, and allegiance, to the basic principles and values of a liberal-democratic Rechtstaat (Fossum, 2008; Joppke, 2008; Müller, 2007). To Habermas the concept implied that liberal values would be moral lodestars for self-critical public apprehension of what was good and bad in national histories, whose remaining concreteness would then constitute the Sittlichkeit of solidarity (Laborde, 2007). His early nineties context was Europe-driven weakening of nationalism not its return in the face of immigration. Nevertheless, the very idea of loyalty to a country’s institutions and constitution, with its specific flavour of liberal democracy, as well as the emphasis on engagement with the political past and present of one’s country, invariably involves particularity. This ambivalence has been reflected in conceptualisations of civic Leitkultur.

…A section as bridge to case discussion…

2. Germany – The original debate
Germans have struggled to find acceptable ways to express collective pride and a shared sense of identity since the traumas of World War II and the Holocaust. Overt nationalism is risky; the word ‘nation’ was polluted by the National Socialists. Indeed, some argue that Germans should learn from their past to avoid national pride altogether. Those who find this unsatisfactory often find it easier to agree on what Germans are not than on what they are. Post-war West Germany defined itself by contrast with the Germany of the Nazis, or autocratic East Germany (see for instance Müller 2007, Faas 2010). Even the positive definitions of German identity that did emerge tend to restrict themselves to a lowest common denominator.

The most distinctive of these minimal definitions is Verfassungspatriotismus or constitutional patriotism, a concept introduced by Sternberger (1979/1992) and elaborated by Habermas among others (1992). This refers to the West German Constitution of 1949, which was also adopted by the former East Germans in 1990 (with little political debate). Although the importance of this document derives in part from the juxtaposition with the un-constitutional rule of the Nazis, it builds on a longer German tradition of the Rechtsstaat or rule of law. The Constitution is said to express positive ideals in which Germans can take pride, e.g. the inviolable dignity of human life and the duty of the state to provide the conditions for individual fulfillment. Habermas argues that taking pride in the Constitution rather than ethnic traditions is a step towards true democracy, which he see as an exercise in continuous self-critical debate over shared ends. Here, the self-critique is oriented to the Nazi past. Habermas (2003) even argued for a similar justification of the European Constitution, in response to concerns over its lack of popularity. But critics argue that dry constitutional documents cannot inspire affections, and will produce instrumental loyalty at best. Hence they must be supplemented by ideals and traditions that stir German (or European) emotions (e.g. Lammert 2006).
The word ‘Leitkultur’ was introduced in 1998 by Syrian-born Bassam Tibi. He espoused a ‘European’ rather than a German ‘Leitkultur’. The word connotes the desire of migrants in Germany and elsewhere in the EU to participate in European politics and society on the basis of ‘democracy, secularism, the Enlightenment, human rights and civil society’ (Tibi 1998: 154). Tibi feared that a ‘multicultural’ approach to integration downplayed these core values. He simultaneously paid West Europeans a compliment by recognizing the European origins of Enlightenment values, and demands that they live up to these avowedly universal values instead of demanding that migrants assimilate to a particular way of life (Tibi 2001).

In October 2000, the concept took on a different tone when taken up by the Christian Democrat (CDU) politician Friedrich Merz. Merz argued in a series of interviews that ‘foreigners who want to stay in Germany permanently must adapt to the free and democratic German Leitkultur’ (Esser 2004, Merz 2000). This demand received the support of some politicians and commentators in the media, but also provoked criticism. The demand for assimilation was issued in the context of an ongoing debate over reform of German immigration laws. Having lost the 1998 elections, the CDU was able in January 2000 to regain a majority in the upper house, allowing them to block most legislation on the back of a populist campaign against the proposal of the Social-Democrat and Green government to facilitate the naturalization of immigrants.

Although much of the original commentary on Merz’s Leitkultur was critical, it found broad support in the German population. For example, a survey commissioned by the Frankfurter Allgemeine Zeitung found that in 2000, 60 per cent of Germans agreed that ‘foreigners living in Germany should orient themselves towards German culture.’ This may explain why Conservative politicians have returned to the concept at various points since the debates of late 2000 and early 2001. For example, when the CDU returned to power in 2005, the new President of the German Parliament tried to reignite the debate. And one of the last acts of the long-time Prime Minister of Bavaria, Edmund Stoiber, was to enshrine a reference to the Leitkultur in the official program of the CSU (the Bavarian sister party of the CDU) in 2007.

With successive iterations the discussion of the Leitkultur has become less controversial. In part, the concept has lost its power to shock. But it may also be because the demand that foreigners should assimilate to the German way of life is supported by increasing numbers of Germans. In a 2008 follow-up to the survey mentioned above, the number agreeing that foreigners should orient themselves towards German culture had increased from 60 per cent to 78 per cent (Petersen 2008). Increasingly explicit demands for integration are now enshrined in policies regulating new immigration, and the acquisition of citizenship by those already living in the country. For instance, applicants for citizens-
hip must now pass written tests on Germany history. Early advocates of such tests, especially in conservative-ruled states such as Bavaria and Baden-Württemberg, believed that ‘cultural’ knowledge should also be required. Although these proposals were unsuccessful, the fact that citizenship tests were introduced at all represents a victory for these conservative forces (other parts of the country had initially rejected written tests altogether). The resulting tests are sufficiently easy that the great majority of applicants pass, but the heated debate over the tests may itself be one of the reasons that ever fewer people are applying, even though millions are thought to be eligible.

Whereas previously the implicit contrast behind attempts to formulate a German national identity was the Nazi past, or the Communist East, the recent debate over the *Leitkultur* is oriented to a new ‘other’, namely immigrants, especially Turkish-origin Muslims. The debate over the *Leitkultur* was conducted in parallel with debates over the suitability of Turkey for membership of the European Union, and often the arguments employed were very similar. Further evidence for the new contrast can be seen in the way that pre-existing themes are re-drawn to highlight contrasts with immigrants in general, and Turkish-origin Muslims in particular. For example, taking pride in the Constitution has acquired a new meaning. Since 2005, applicants for citizenship must sign to show their ‘commitment’ to the ‘free and democratic order of the Constitution of the Republic of Germany.’ Of course, applicants were bound by the Constitution even before this requirement was introduced. Hence the obligatory ‘commitment’ (a word with religious connotations, which also translates as ‘denomination’) stems from the belief that immigrants need to be publicly reminded of the primacy of the German Constitution. Some take the presumption that (certain) immigrants do not adhere to the Constitution even further. In early 2006, the Interior Ministry of the federal state of Baden-Württemberg decreed that applicants for citizenship from predominantly Muslim countries must answer a special set of questions on topics ranging from terrorism to gender rights to religious tolerance. And Baden-Württemberg, along with Bavaria, insists on checking with the German intelligence service (called the ‘Verfassungsschutz’ i.e. protectors of the Constitution) before granting citizenship; membership of some Muslim organizations, including many that officially decry violent pursuit of Islamic goals, may suffice to reject the application (see also the discussions in Faas, 2010).

Religion also enters the debate over the *Leitkultur*. Advocates, even including the German Pope, stress the ‘Judeo-Christian heritage’ of Enlightenment and hence German values. Pope Benedict XVI’s wider purpose is to insist that Christian thought is in large part the basis of, rather than antithetical to, secular rationalism (Habermas and Ratzinger 2006). But he has been accused of associating himself too closely with the claim that whereas Christians persuade, Muslims proselytize with the sword (Butler 2008), and ultimately apologized for citing an argument to that effect. Few explicitly argue that Islam is in itself incompatible with the Enlightenment heritage. Instead, the accusation is that too many Muslims are intolerant of other religions. Some critics argue that, especially in Germany, claiming
that Europeans are experts in religious tolerance ignores a long history of violence and even seems hypocritical (Klusmeyer 2001). But others insist that it is precisely because tolerance is such a recent achievement that it requires robust protection (Buruma 2006).

A final sign that the debate over the German Leitkultur is primarily an exercise in contrast with a commonly understood ‘other’ is that there has been remarkably little reflexive debate over whether Germans themselves actually meet the criteria. As in other countries, the publication of the questions to be included on citizenship tests provoked a flurry of interest; many newspapers and websites invited Germans to check whether they would pass. But the interest remained faddish, at the same level as popular online quizzes used to check one’s IQ or compatibility with a potential date. No public connection was made between the claim that the Leitkultur includes religious tolerance, and the recent bans in various German states on headscarves but not crucifixes in the classroom. These headscarf bans were, of course, controversial. But the link to the tolerance celebrated in the Leitkultur was not made. Nor, as seen for example in the United Kingdom, has any connection been drawn between the norms of the Leitkultur and patterns of civic engagement. Attention to civil society organizations has tended to focus on the concern that groups founded by migrants could incubate ‘parallel societies,’ though in recent years the federal government has started encouraging mainstream German associations to be more open to immigrants.

3. United Kingdom

While not expressed in the terms of leitkultur, it is true that the idea of British national identity, its construction and acquisition, have in recent years enjoyed prominence in several kinds of arenas (Uberoi, 2008). One influential articulation in governmental policy and discourse, frequently discussed in the press, has sought to renew or reinvigorate British national identity through the promotion of common civic values, as well as English language competencies; a wider knowledge of - and self-identification with - cultural, historical and institutional heritages, in addition to approved kinds of political engagement and activity (Meer and Modood, 2009). This may be cast as a sort of British civic national identity that remains embedded, as the Commission on the future of Multi-Ethnic Britain (CMEB) (2000) – also known as the Parekh report - described, in particular cultural values and traditions that involve not only a rational allegiance to the state, but also intuitive, emotional, symbolic allegiances to a historic nation, even while the nature of the nation is contested and re-imagined.

Britain has faced its own particular challenges in addressing issues of disadvantage tied to cultural difference experienced by a variety of ethnic and religious minorities. The most substantive response developed cumulatively during the final quarter of the last century and comprised a range of policies
and discourses commonly known as multiculturalism. This has sought to engender equality of access and accommodate aspects of minority difference while promoting the social and moral benefits of ethnic minority related diversity in an inclusive sense of civic belonging. Indeed, at a public policy level Britain rejected the idea of integration being based upon a drive for unity through an uncompromising cultural ‘assimilation’, over 40 years ago, when the then Labour home secretary Roy Jenkins (1966) defined integration as ‘not a flattening process of assimilation but equal opportunity accompanied by cultural diversity in an atmosphere of mutual tolerance’.

This has neither been a linear nor stable development, however, and has frequently been subject to criticism not only from a variety of camps who - for different reasons - militantly resisted and opposed it, but also from those who ‘accept[ed] multicultural drift grudgingly as a fact of life, regretting the passing of the good old days when, they believe, Britain was a much more unified, predictable sort of place’ (CMEB: cmmd 2.2 p. 14). As the CMEB infamously insisted:

> Britishness, as much as Englishness, has systematic, largely unspoken, racial connotations. (cmmd 3.30 p. 19). […] Britain confronts a historic choice as to its future direction. Will it try to turn the clock back, digging in, defending old values and ancient hierarchies, relying on a narrow English-dominated, backward looking definition of the nation? (cmmd 2.3 pp: 13-14).

The commissioners perhaps found their answers in the hostile reaction upon the immediate publication of their report, based upon (mis)readings that the report was anti-British and/or unappreciative of how contemporary Britishness was already inclusive of minorities (McLoughlin and Neal, 2004). Indeed, and while criticised by the media for being anti-British and suggesting that ‘British’ was a racist term, the Report actually suggested that there was a need to reconceptualise what it means to be British, so as to reflect Britain’s culturally diverse nature. At an approximate time, however, it was an equivalent inquiry which set the tone for proceeding discussion. The Cantle (2001) report into the aftermath of the episodes of social disorder that occurred in the summer of 2001 in Oldham, Burnley and Bradford – several months before 9/11, was orientated toward a renewal of citizenship. Importantly, however, it was also indirectly concerned with British national identity by characterizing a lack of community cohesion as the absence of ‘common values and a sense of collective British citizenship’. This is a reiteration of how matters surrounding the nation are conceived in civic terms (whether or not one believes that civic nationhood can ever sufficiently de-couple itself from ethnic dimensions).

This was explicitly stated in the White Paper Secure Borders, Safe Haven (Home Office, 2001) in which Britain’s approach to these matters are characterised as a commitment to ‘a nationality, immigration and asylum policy that secures…sustainable growth and social cohesion… an essential part of
our core principles... a two-way street requiring commitment and action from the host community and asylum seekers and long term immigrants alike (ibid. 14, 32). A key part of the treatment of British national identity in this report is its relationship to English language competencies. This has led Julios (2008: 135) to argue that ‘in establishing a direct link between our national identity and the English language, the government has gone further than ever before by unequivocally defining British citizenship as an English-speaking Anglo-Saxon model’. Indeed, the acquisition of British national identity and a demonstrable capacity to speak English is now interdependent. Thus, Secure Borders argues:

**Becoming British through registration or naturalisation is – or should be – a significant life event. It can be seen as an act of commitment to Britain and an important step in the process of achieving integration into our society. Yet, in spite of this, some applicants for naturalisation do not have much practical knowledge about British life or English language, possibly leaving them vulnerable and ill-equipped to take an active role in society. This can lead to social exclusion and may contribute to problems of polarisation between communities. We need a sense of civic identity and shared values; and knowledge of the English language…can undoubtedly support this objective (ibid. 32)**

In line with this the Nationality, Immigration and Asylum Act (2002) required would be applicants to meet three prerequisites, name 1. a ‘sufficient knowledge of a language for the purpose of naturalisation’, 2. ‘sufficient knowledge if life in the UK’, and 3. taking up a citizenship Oath and Pledge at a civil ceremony (ibid. c 41, sec. 3 (1)) of the following kind:

**Oath: ‘I [name] swear by Almighty God that, on becoming a British citizen, I will be faithful and bear true allegiance to Her Majesty Queen Elizabeth the Second, Her Heirs and Successors according to law’.

Pledge: ‘I will give my loyalty to the UK and respect its rights and freedoms. I will uphold its democratic values. I will observe its laws faithfully and fulfil my obligations as a British citizen’.

There are clear disparities between the oath and the pledge, namely the diverging emphases on the monarchy and in the oath and the centrality of political participation in the pledge. These can be accounted for in an interview with Bernard Crick (2007), who oversaw their introduction, and who informed the interviewer (Meer) that while the oath came from Downing Street, he was very much responsible for the pledge.

Perhaps the closest Britain has come to an explicit debate on *leitkultur* was initiated by the centre-left commentator, David Goodhart, in his 2004 essay ‘Too Diverse?’ in Prospect magazine. This described in the following terms as a ‘liberal dilemma’ over the tensions between the levels of social solidarity required for welfarism and the levels of ethnic and cultural diversity:
[Compared with the immediate post-war consensus] The difference now in a developed country like Britain is that we not only live among stranger citizens but we must share with them. We share public services and parts of our income in the welfare state, we share public spaces in towns and cities where we are squashed together on buses, trains and tubes, and we share in a democratic conversation—filtered by the media—about the collective choices we wish to make. All such acts of sharing are more smoothly and generously negotiated if we can take for granted a limited set of common values and assumptions. But as Britain becomes more diverse that common culture is being eroded.

Goodhart bases his argument on a series of contestable assumptions. Amongst others Harris (2004: 5) argues that Britain never experienced the levels of social solidarity measured in terms of ‘shared values’ as Goodhart contends. While there was indeed less ethnic diversity upon the creation of the welfare state, there was greater class and gender inequality, something compounded by fractured regionalisms and strong localisms – perhaps best described as a historical diversity. Or as Parekh (2004: 7) puts it: ‘even if all immigrants were to leave the country, deep diversity would remain and continue to pose challenges to a strong view of solidarity’. Indeed, as Crick (2004: 1-2) agrees, ‘the fallacy of the excluded middle is hard at work here: it is not either solidarity or loss of identity - our identity lies in our political sense of living with dual identities’.

Secondly, Goodhart conflates ethnic diversity with immigration. Where a cornerstone of ‘shared values’ might be an attachment to or self-identification with Britishness (whatever this may entail), settled post migrant ethnic minorities are consistently found to have the same as if not greater attitudinal affinity to British nationhood (Heath and Roberts, 2008: 14; Gallup, 2009). Equally, there is less hostility from majorities to established ethnic minorities – including more affinity and less social distance – than there is to recent migrants (Evans, 2008). This is further reflected in the considerably high levels of intermarriage between white and settled ethnic minority groups (Saggar, 2004).

Thirdly, the presumption that public resentment on the take-up of welfare by diverse user-groups, is empirically only supported by a single poll from 2003. In contrast, and by mapping the empirical terrain through the British Social Attitudes Survey (BSA) and British Election Studies (BES) over the last 20 years, Evans (2008: 173) argues that ‘there is no connection between declining support for welfare and increasing resentment of minorities… there is no evidence that negative attitudes toward minority rights provision have become more closely linked to the rejection of welfare.’

However Goodhart’s comments were received in a context host to various discussions over questions of immigration, asylum-seekers and ‘Islamic fundamentalism’, and all manner of concerns over social fragmentation informing the sorts of anxieties occupying Parvin (2009) at the top of this discussion. Actually taking his cue from the Conservative politician David Willetts, peaking at an earlier roundtable debate on welfare reform (Prospect, March 1998), the key parts of Goodhart’s dilemma might be distilled in the following steps:
1. The basis on which you can extract large sums of money in tax and pay it out in benefits is that most people think the recipients are people like themselves, facing difficulties which they themselves could face.

2. If values become more diverse, if lifestyles become more differentiated, then it becomes more difficult to sustain the legitimacy of a universal risk-pooling welfare state. People ask, ‘Why should I pay for them when they are doing things I wouldn’t do?’

3. You can have a Swedish welfare state provided that you are a homogeneous society with intensively shared values. In the US you have a very diverse, individualistic society where people feel fewer obligations to fellow citizens.

4. Progressives want diversity but they thereby undermine part of the moral consensus on which a large welfare state rests.’

Of course, one feature of this formulation is how ‘the US haunts this debate, as if it’s experience confirms some natural law that diversity erodes solidarity’ (Banting and Kymlicka, 2004: 1). But of course, Goodhart’s thesis is not purely focused on social diversity per se – but in contrast is precisely concerned with ethnic diversity. Indeed, it does in fact employ what others have observed as a type of ‘banal majoritariansim’ (Fenton, 2005) in which the ‘we’ are not open and negotiable. For Goodhart the solution is a Britishness that is ‘reassured that strangers, especially those from other countries, have the same idea of reciprocity as we do… membership in such a community implies acceptance of moral rules, however fuzzy, which underpin the laws and welfare systems of the state.

4. Denmark

The Danish debate was different from the British, more like a tougher version of the German. Like Germany, Denmark had no tradition of multicultural accommodation to speak of. Here, an early liberal ideology of equal treatment and humanitarian concern for the well-being of exploitable foreign workers and their families had begun, from the early and mid-nineties, to give way to a quid pro quo discourse of duty to integrate through labour market participation, language training and overcoming cultural obstacles to employability, including gender norms (Mouritsen & Olsen, 2013: ).

This culminated in a comprehensive Law on Integration in 1999, passed on the initiative of the social democrats to curb electoral competition from the new-right Danish People’s Party, which introduced mandatory three year integration courses, individual action plans, and measures (quotas and requirements to stay in the locality for three years) to ease diffusion of refugees, along with a lower “introduction benefit” as incentive towards early employment (Ejrnæs, 2001). Still retaining the language of equal treatment, the law shifted the obligation to integrate one-sidedly towards immigrants and introduced a new purpose, supplementing the previously dominant discourse of socio-economic integra-
tion with an ambition, as the law’s preamble puts it, to “convey to each foreigner an understanding of the fundamental values and norms of the Danish society” (cited from Ejrnæs, 2001: 4).

This ambition was well in line with the incumbent, and struggling, social democratic prime minister, Nyrup Rasmussen’s increasingly hard line, particularly after 9/11, where he appealed for all who wish to live their lives in Denmark to commit themselves clearly to the idea that democracy and the constitution stand over all else, including religion. For human rights and democratic values to be respected in Danish society. For clear distance to be taken from fundamentalism. For women to have the same rights as men. For everyone to have the right to choose his or her partner. For all to have equal access to education. For all to take responsibility to contribute to positive integration in Denmark (Rasmussen, 2001)

This social democratic appeal to immigrants to declare their liberal egalitarian values was not enough to keep him in office though. From later in 2001, Anders Fogh Rasmussen headed a liberal-conservative coalition, with the Danish People’s Party as its stable electoral support, which fundamentally redirected Danish migration and integration policies. The change, including restrictions in the area of family reunification and citizenship acquisition, which placed Denmark as a distinct hardliner in Europe was accompanied by a steadily growing concern with Muslim religion and culture, which became linked with what was conceptualised literally as a “struggle over values” (værdikamp)^0 – spearheaded by the government, which presented itself as a defender of the people against Copenhagen based progressives – which became associated with hostility towards multicultural ideology, relativist leniency towards Islam, and failure to defend Danish values.

An early – pre-Cartoon Crisis – analysis of what was less a structured debate than a highly dominant set of tropes (Mouritsen, 2006) indicated that these Danish values were above all liberal and universal values, rather than recognizably national ones (also Joppke __), but they were often presented as such. More traditional communitarian ideas of a national right-to-own-culture had their main provenance in the Danish People’s Party, for whom “our duty as a nation first and foremost regards Danish culture and its Christian foundation of ideas” or our “culturally determined [sic] faith, norms, traditions and attitudes.” The party program, from where the quotes are taken, was less than lucid about the concrete content of this secularised Christianity-as-culture (Mouritsen, 2006: 77).

Often, in this culturalised and historicised “particular universalism” values were projected as growing out of a distinct national heritage, not as abstract principles as much as a particularly freedom-loving, egalitarian, autonomous and participatory way of life, associated with, e.g., the country’s this-worldly brand of Lutheranism, nineteenth century experience with cooperative peasants movements and tradition of Folk High Schools – a cultural pedigree and communally lived-through history, on the background of which the liberal aspirations – or pretentions – of newcomers from less happy districts of the globe were regarded as more unsafely grounded, if at all. Beyond this, the new discourse also
simply presented universal values as Danish, or as values that Denmark had particularly promoted, or had promoted in a distinct way, which should not be given up in the name of misplaced multicultural relativism or “compromise”. Hence, to a Social Democrat politician:

There is a Danish identity, which builds on respect for certain basic values and rights. We should not exclude others or be intolerant, but we must dare to say that to be Danish and to live here is also about saying yes to for instance equal treatment (ligestilling) and free-mindedness (frisind). It is dangerous if we do not dare affirm Danish values … such as democracy, freedom of expression and much else, on which we should not compromise (Redder, 2004)

Or, equally condescending, to the prime minister, in his 2003 New Year’s speech “immigrants must make an effort to get to understand the values on which Danish society is based. Many of these we consider as a matter of course, because we have developed them over many generations.” (Rasmussen, 2003). Here, particularity of national culture mainly arises, from considerations of context and assumptions about the civic acculturation process: Some immigrants are more likely to learn than others; the values themselves constitute a package deal (indeed a cultural package deal), that newcomers are not invited to negotiate or influence (Jensen, 2014; Jensen & Mouritsen, 2015))

This discourse also occasionally came, particularly in the centre-left opposition, in a less combatant, ‘intercultural’ version, but where values are still existentially embedded, so that

A country with a strong common culture dares to meet the world. Culture shapes our values and gives us a point of reference in the world. The better we know ourselves and our own culture, the easier it will be to meet and understand the culture of others (Social Democrats, 2004: 7-8)

But any meeting of culture is asymmetrical. The government’s Action Plan to promote equal Treatment and Combat Racism made clear that “it is the government’s view that a modern welfare state should be based on liberalism, diversity and inclusiveness … We should be true to our own values while remaining open to impulses from outside”. Such impulses would not change much though, as

The principle of equal treatment does not mean we should treat everyone the same. The ancient Nordic saying ‘freedom for Loke as well as Thor’ promotes the principle of equal treatment while conveying the message that we are not the same and should not be forced to be alike. [However,] freedom to differ does not mean that anything goes and everything is equally good (Danish Government, 2003)

If most of these national values were liberal, some differentiation at least arose from priorities: Some universal values were particularly important in Denmark. This, certainly, was one outcome of the Danish Mohammad Cartoon crisis, following the publication in autumn 2005, by Jyllands-Posten, of satirical cartoons depicting the prophet – with a caption by cultural editor Flemming Rose saying that Muslims must be ready, like any other group “to put up with scorn, mockery and ridicule” (Jyllands-Posten 30 September, 2005). In the cartoon debate, which cannot be covered here (Meer & Mouritsen; Mouritsen et al, Rostbøl/Lægaard), and which is still going on, fuelled by terrorist attacks in France
and Denmark itself, freedom of speech is both a (or even the) key national liberty, and a virtue to be practiced (and in some cases endured). For most participants in the debate there is no ‘intercultural’ surrender and no inkling of “ancient Nordic” live-and-let-live accommodation or frisind. Here, in what comes close to civil religion, this one essential, and essentialised, value represents a form of life which is not just something newcomers are lacking in, and have to be taught, but may be threatened overall, unless citizens are willing to fight for it, and society at large will confirm its unconditional status for instance – as very recently suggested by the Conservatives and the Danish People’s Party – by making them mandatory elements of the school history curriculum.

As in the Netherlands and Britain, value discourse has often focused on citizenship – medborgerskab in Danish – often with prefixes such as ‘active’ and ‘contributing’. This Danish term had been peculiarly out of use for most of the twentieth century but became very central in the new integration debates, including policy discourse and white papers, from 2002. While, on the one hand, the concept is post-assimilationist and open in principle (Joppke, ___) – everybody, including newcomers can be, or become citizens – it also has a flexible, expandable meaning, where the civic ‘culture’ broadens from values and beliefs into practices, identity and the competences required to participate in a way of life.

In the first official welcome booklet Citizen [medborger] in Denmark newcomers learned that Denmark’s being a welfare state means that every person must, to the best of his/her ability, make a contribution to the community – by, among other things, educating him/herself, working, paying taxes and supporting him/herself and his/her family [the Danish possessive pronoun ‘sin’ is ungendered] (Integrationsministeriet, 2002)

This neoliberal conception of citizenship – it is really about fiscal sustainability of the welfare state – competing against a prouder social democratic version (later to be adopted by the liberal-conservative government, as it moved towards the centre in later years), which celebrated a romantic image of an egalitarian, humane society, built by “workers who sweated and wore themselves down in the factories” and “women who also went out and worked hard on the labour market for the general welfare”. To Poul Nyrup Rasmussen, in a 2000 article, “it is their inheritance we are managing. And it is our job to take care of that welfare society, which is everywhere considered the world’s best” (Rasmussen, 2000). Or earlier on, in a 1997 New Year’s Speech:

We have created a society with better prosperity, more welfare, better safety and a cleaner environment than most countries. Elsewhere in the world this is called ‘the Danish model’ … We have a common responsibility and common share of payment through taxes to provide it … All must be a part of it – with duties and rights. The ideals of equality and community must include all and be respected by all (Rasmussen, 1997)

This connecting of an active, contributing worker-and-taxpayer citizenship to a Danish ‘model’ is explicitly linked, also in official ministerial discourse, to social recognition (“Having a job gives both self-respect and respect from others because it makes one capable of supporting oneself and one’s
family, and because this makes one capable of contributing to society” (Ministry of Integration, 2002: 85) and to education (where “a framework for immigrants and refugees getting better education and
good Danish capabilities … increase opportunities to participate as an active citizen in social and
democratic situations and to understand and commit oneself to that solidaristic community of which
the individual is a part” (The Government, 2003b)).

After the cartoon crisis in 2005, citizenship duties came to include, beyond work, education and tax-
payment and ‘participation’, also a deeper commitment to a series of values, which were no longer
just abstract principles, but parts of an entire way of life in the institutional community of the welfare
state’s work places, schools and kindergartens, characterised by personal autonomy in private, social
and political spheres and egalitarian relationships between men, women and children. Hence, the Dec-
lARATION of Integration and Active Citizenship in Danish Society from 2006 (to be signed when applying
for permanent residence), requires the signer to

acknowledge that men and women have equal rights and duties in Denmark, and that
both men and women should contribute to society. Men and women thus have the same
right – and in some cases duty – to educate themselves and to work, just as men and
women have the same right to participate in democratic processes. Both men and
women have a duty to pay taxes and to take parental responsibility for their children

The declaration also mentions duties to learn Danish, abide by the law, respect people of dif-
ferent religious persuasions and sexual outlook, acquire knowledge of the country, refrain
from marital violence, female circumcision, and forced marriages, not to support terrorists
and much else besides. Reading it, in the words of two observers,

it is difficult not to see it as drawing the profile of a problematic foreigner: an
intolerant male of Middle Eastern and Muslim background who has come to
Denmark to live off the welfare state; a male who prefers to stay in his council
flat; who regards it as his right to beat his wife and children; to force the chil-
dren to marry someone from his homeland; who watches al-Arabiya television
rather than familiarising himself with Denmark’s liberal society; and who is
likely to engage in terrorist activities or at least support violence and discrimi-
nation against homosexuals and Jews” (Østergaard & Sinclair, 2007: _).

As with the universal, yet Danish common values, civicness thickens here, crowding out, it is
hoped, much unwanted cultural ‘diversity’, as when prime minister Fogh Rasmussen asked
“that all Muslims practice Islam in a way that is consistent with the Danish traditions for be-
ing down-to-earth, for pragmatism, peaceful discussion and respect for others.” (Rasmussen,
2005).
If culturalized welfare state modernism and liberal egalitarianism, however ‘deep’ or ‘thick’, was still, in terms of its semantic markers, on the civic side of the civic-ethnic nationalism distinction, this line was certainly overstepped in the citizenship test (*indfødsretsprøve*), which was introduced in 2007, and later made more difficult, very much at the initiative of the Danish People’s Party, which compared, e.g. to the German and British versions contained a series of questions on national history, the introduction of Christianity in Denmark, writers and artists from earlier centuries (as well as contemporary *Trivial Pursuit*-type items, e.g. on the national football team) (Mouritsen 2012/13: _). Here, acculturation became a question of acquiring the type of background high culture *knowledge*, which no one would expect newcomers (let alone the average high school student!) to master, without serious study.

As in the broader common values discourse it is possible to see a vacillation between the notion that certain – already quite comprehensive – liberal democratic outlooks and civic dispositions must be demonstrated (just to be able to stay, and be seen as a valuable *medborger*), and the notion that broader cultural competences, bordering on assimilation or at least comprehensive familiarity with the national heritage is even better (and may be required if one wishes to be belong to the inner civic circle – and have full citizenship – *statsborgerskab*). Whereas some politicians in the liberal-conservative government and in the Danish People’s Party associated such requirements with a communitarian right to maintain national membership as an exclusive status – where obstacles to citizenship acquisition were openly linked to emotional ties, transferring of loyalties and cultural affinities – there was also a different, more instrumental argument, which linked up with what was perhaps the most influential discursive trope in the Danish debate, about social cohesion or *sammenhængskraft* (ref)

- Aspects of Social Cohesion/sammenhængskraft, not just common culture, but also equality, absence of parallel lives. Cohesion as cultural ‘glue. Instrumentality – welfare state, trust, security, democracy. Fogh Rasmussen (speech) and behind him Karen Jespersen.

- One place where this became very visible was the introduction of national canons on various school curricula – Danish literature, art, even historical events – and eventually a canon on democratic canon. Culture as ‘high culture’/Billdung – linked to democracy in a peculiar way. Minister of culture Brian Mikkelsen’s link between the author Johannes V. Jensen (who had undemocratic/nazi leanings) and the democratic deficit in schools
• The link to civics/citizenship education – Bertel Haarder – which became linked to aspects of identity and belonging on the one hand and ‘knowledge of values’ on the other – rather than critical dialogue and learning democracy by doing it

• The new Centre-left government: slightly different discourse, linked to changed policies, more emphasis on inclusion

• But it is not going away: The 2014 short debate over a canon of values (!); and the recent politicisation of Lutheran Christianity – particularly the conservatives and DF. Dabelsteen’s point about Danish Lutheran secularism as infused with peoplehood

5. The Netherlands

The perceived failure of ‘multicultural’ policies – and the related idea that cultural diversity (Islamic culture specifically) problematizes integration – has set the stage for discussions on leitkultur in the Netherlands since the early 1990s. The belief that the Dutch have been ‘too tolerant’ towards cultural differences was accompanied by the belief that a leitkultur was missing and the urgency to develop one. The semantic content of this leitkultur and the way in which it should be transferred has been subject to considerable debate and resulted in a number of policy changes over the last decade.

In 1991, Frits Bolkestein, leader of the Liberal-Conservative Party, was one of the first public figures to criticize Minorities Policy that favoured cultural group rights and has also been called ‘multiculturalism avant la lettre’ (Bruquetas-Callejo et al., 2006). While Bolkestein criticizes Ethnic Minorities Policy and proclaims the superiority of Western liberal culture, he does leave space for the expression of private cultural diversity. Although Bolkestein’s defence of ‘our liberal culture’ against ‘Islamic culture’ was an extreme position at the time, it did lead to a parliamentary debate on minorities in 1992, where the alleged multicultural elements of Ethnic Minorities Policy were criticized and many agreed that something had to be done about the limited integration of immigrants.

A new vision on integration was presented in 1994 in the Contourennota Integratiebeleid Etnische Minderheden (Contourennota Integration Ethnic Minorities), which defined integration as ‘a process leading to the full and equal participation of individuals and groups in society, for which mutual respect for identity was seen as a necessary precondition’. Citizenship (burgerschap) was introduced as leading principle for the new vision on the presence of persons from diverse cultures in the Netherlands. In 1998 ‘active citizenship of persons from ethnic minorities’ was made the main goal of integration policy, which meant that persons from ethnic minorities were now expected to make an effort to actively participate in education and labour market. In accordance with this socio-economic con-
ception of integration, the 1998 Newcomer Integration Law (Wet Inburgering) obliged all newcomers, except EU and OESO citizens, to participate in civic integration courses (including language training, orientation on society and the job market).

A more broad public debate on leitkultur would only emerge a decade after Bolkestein’s remarks. In 2000 Scheffer (a prominent member of Social Democrat Party) published a much debated opinion article titled ‘the multicultural drama’, in which he proclaimed the failure of multicultural policies, and argued for less indifference towards ‘our’ language, culture and history. Like Bolkestein did a decade earlier, Scheffer criticizes the too ‘tolerant’ multicultural policies, especially towards Muslims. Scheffer’s main concern however is not the defence of Western liberal values against Islam, but the poor socio-economic emancipation of allochtonen (non-natives) and related threats to social cohesion. Socio-economic arrears of immigrants and their children, in Scheffer’s view, are not only due to socio-economic factors, but also to cultural differences. Hence the need for the transferral of language, culture and history, which are presented as precondition for socio-integration and which in a later article he refers to as ‘shared citizenship’. While Bolkestein’s pledge for (the defence of) leitkultur was based on universalistic and moral ideas, Scheffer’s pledge for (the development and transferral) leitkultur is more national and instrumental in nature.

Scheffer’s article catalyzed a public debate on the crisis of multiculturalism and the need for some sort of Leitkultur. While some criticized him of exaggerating integration problems and wrongly pinpointing culture as the main problem and solution for integration, others hijacked Scheffer’s argument to pledge for a more thick and moral national leitkultur. In a parliamentary debate on the integration of newcomers that year, most political parties moderated the ‘drama’ sketched by Scheffer, and downplayed the culturalization of integration problems. Only the leader of the Christian Democrats (then in opposition), de Hoop Scheffer, openly supported Scheffer’s argument for more transferral of national culture (Tweede Kamer, vergaderjaar 1999-2000, 27 038, nr. 70: 4700-4728). De Hoop Scheffer replaces the old Christian Democrat communitarian vision on integration (integration via pillarisation) with another communitarian vision on integration (integration via the national community) and makes civic integration (inburgering) not only about the acquisition of capabilities to participate independently in society, but also about the need to conform to Dutch norms and values.

While the problematic integration of Muslim immigrants was already pointed out by publicists like Bolkestein and Scheffer, the terrorist attacks of 9/11 and later the murder on filmdirector Theo van Gogh in November 2004 by a Dutch-Moroccan youngster affiliated to a radical Islamist network would further focus the attention towards Muslims and Islam. After the rise of the anti-immigrant Fortuyn party in 2001 most other mainstream political parties adopted a discourse that problematized the cultural differences between native Dutch and (Islamic) newcomers and addressed the the need for
promoting some form of _leitkultur_. The centre-right government formed in 2003 (consisting of the Christian Democrats, List Pim Fortuyn, and Liberal Party) made ‘shared citizenship’ the goal of integration policy (instead of the former ‘active citizenship’) and pushed the scope and obligatory nature of civic integration.

This new citizenship discourse is more obligatory and leaves less space for private level moralities and group diversity than before and led to a number of legislative changes. In 2006, a new Civic Integration Law is approved, which obliges migrants to pass a civic integration test in order to obtain permanent permits (instead of the former obligation to participate). It also replaced the naturalization test with a civic integration exam, consisting of an oral language test, an electronic written test and a ‘knowledge of society’ test. Acquisition of Dutch citizenship is further restricted by the abolishment of two renunciation requirements for having double nationality. While state citizenship (_staatsburgerschap_) used to be seen as instrument of integration, it was transformed into a reward after successful integration. At the same time the actual acquisition of citizenship was given more importance as well, by introducing a ‘naturalization day’ and ceremony. Finally, the Integration Abroad Law of 2006 has obliged (non-Western) newcomers to prove their language skills and knowledge of Dutch society already before entering the Netherlands.

In addition to these measures aimed at newcomers, other policy initiatives have been aimed at discovering and strengthening national identity in general. In 2005, a Commission for the development of a national canon for educational purposes was created (which became controversial among historians), and in 2006 the cabinet decided to start with the establishment of a Museum of National History. Two new political parties emerged on the political scene during this time as well, both stressing the importance of some sort of _leitkultur_: ‘Party for Freedom’ from Geert Wilders in 2006 and ‘Proud of the Netherlands’ from former Integration minister Rita Verdonk in 2007.

Critique on the strong emphasis on (conformation to) national identity came from the Scientific Council for Government Policy that in 2007 published an advice to the government called _Identificatie met Nederland_ (‘Identification with the Netherlands’). In the report an exclusive and singular conception of national identity is rejected, because it would problematize the integration of newcomers. Instead, the Council pledged for a dynamic, process-based understanding of identity to strengthen the necessary social cohesion, hence ‘identification with the Netherlands’. The report was fiercely criticized in the media, especially the argument that multiple identities are unproblematic. The need for some sort of liberal democratic culture as _leitkultur_ by now had become largely accepted, although the opinions about the content of such leading culture remains subject to debate.
The new government formed in 2006 (consisting of the Christian Democrats, Social Democrats and Christian Union) largely supported the conclusions of the report. It defined its own role in terms of providing the preconditions for the (necessary) identification of citizens with the core principles and freedoms of the Dutch constitutional state, while leaving the ways in which people wish to identify with the Dutch society and on what grounds to the freedom of people themselves (Minister van Justitie & Minister van WWI 2008; 16). The core principles are defined as: freedom (especially freedom of expression and freedom of religion), equality and solidarity. The cabinet also made ‘active citizenship’ (instead of shared citizenship) the main goal of integration policy again, which now is given also a political connotation:

Active citizenship means not only societal participation (seizing opportunities on education, schooling and work), but also solidarity via political participation and active participation in societal institutions and the societal mid-field. In order to function as active citizen in a more and more pluriform society, knowledge is needed of the constitutional state, the democratic core values and the democratic processes that are derived from it. (Minister van Justitie & WWI, 2008, Kabinetsstandpunt WRR-rapport Identificatie met Nederland. TK, vergaderjaar 2007-2008, 31 268, nr. 9: 4).

In comparison to the ‘active citizenship’ discourse of the 90s, there is more attention for knowledge (and active defence of) Constitutional freedoms and rights and societal and political participation. To stimulate this, the cabinet made ‘citizenship building’ one of the core goals of primary and secondary education, and initiated various project, like the establishment of a National Historic Museum, a House of Democracy and Constitutional State and a ‘Charter for Responsible Citizenship’, which is supposed to define the duties/responsibilities of good citizenship. It no longer emphasized the requirement that immigrants conform to national culture, but stressed instead the need to respect rules and feel a sense of belonging to and be loyal to the national culture. In order to strengthen the latter, a declaration of bonding/solidarity (verbondenheid) was introduced in the new Nationality Law, whereby people acquiring Dutch nationality have to pledge an oath of allegiance to the Constitution since 2009.

6. Comparison (in progress!)

The fact that all the countries under discussion have had versions of a Leitkultur may be seen as a sign of convergence. We have not looked into whether and how debates have spread and inspired each other, but it is likely that they have to some degree at least. We have also noted a series of common features, including the emphasis on societal integration as necessary and critical, that this is a belated wake-up call in the face of ‘multiculturalism’, the constant talking up of the nation and the national
space, and the tendency to adopt increasingly liberal and civic semantics of relevant communality – which, however, are still in various ways culturally embedded and particularised.

All the countries, arguably are becoming more 'French' (Favell, Mouritsen). But in what way? Underneath obvious similarities it appears that different national debates, despite some overlapping vocabularies, remain home grown and institutionally embedded, responding in un-trivially different ways to the common European problem horizon of immigration. For example ... .... This is perhaps not so surprising ...

Using Durkheimian distinctions, comparative analysis may ask more fundamentally about how cohe- sion or integration is structurally conceptualised in different countries. First, to what extent do discourses emphasise cultural similarity and norm-conformity and/or leave a space for normative integration through interaction, communication and the experience of (new) interdependencies? [...].

Denmark versus UK (insert quote from Mason on integration and the social cohesion discourse in Britain)

Secondly, to what extent is norm-conformity seen as a pragmatic outcome of (functional, interactive) integration, or as its cultural precondition [...];

and to what extent is it about specified values and norms to be known and affirmed, or merely about rules to be respected and adhered to in public life? [...]

Thirdly, how ‘thick’ or ‘thin’, ‘substantial’ or ‘formal’ is the normative fabric of the culture or values to be shared? Or: to what extent is there social-cultural ‘space’ left for the expression of private level moralities and group diversity, be they religious or ethnic? [...]

In all four countries value integration is conceptualised nationally. But a clear distinction here between countries where national culture is occasionally favoured because of the independent moral or aesthetic value of community (pride, comfort, belonging), which should not be diluted, must enjoy a special place, and may even be seen as existentially threatened [DK, mainly on the centre-right – Germany?];

And where ...the dominant trope present is more instrumental, where share values are a means of social cohesion and trust and the benefits they bring.

In both cases also clear differences in the extent to which nationality is presented as open and re-negotiable, or closed and given [UK vs. DK, Germany, NL?]

Also, one may ask if the requirement is that immigrants conform to (aspects of) a national culture, or that they merely ‘feel’ a sense of belonging. [Germany – the issue of loyalty; Britain – belonging]
Finally, comparative analysis may query to what extent the liberal and civic values of a nation are recognised as mere version of universal values – or possibly specifically European values; and to what extent as particular to a given nation.

In the latter case, how is such particularity of universal values conceptualised? Is it in a sense of some such value being especially important, or well developed, or constitutive of a nation (‘British’ fairness, ‘Danish’ gender equality), and more generally in national values being some subset or version or flavour of the universal? …

Is it through some conception of (subsets of) universal values somehow being specifically furthered and embedded in some broader historical and ‘thick’ cultural tradition, such as Lutheranism, Catholicism, secularism, or post-colonialism?

Inasmuch as some such embedding of values – and hence of the ‘civic’ blurring into broader realms of (national) cultural substance – is significant, is familiarity with (not necessarily affirmation of) these broader cultural elements and their historical origins still regarded as an important part of integration.xi

Just as the ‘patriotism’ of constitutional patriotism suggests more fire in the belly than mere rule observance, ostensibly ‘thin’ and civic values may be presented as deep cultural mores and articles of faith. We may ask how comprehensive, in terms of detail and penetration into forms of social interaction, common values are seen to be, and how deeply or ‘confessed’ they need to be held. Is mere belief in liberal values enough (cp. Bauböck, 2002), or is culture more like a form of life that has to be practiced and demonstrated? The civic element of integration in most countries is increasingly linked to ideas of active, responsible, or participatory citizenship. In what way do such concepts thicken and particularize integration requirements?

Summing up –

7. Discussion and conclusions [in progress]

The discourses covered by this article typically employ a series of interlinked ideas (Mouritsen, 2009), despite diversities in content, policy context, and consequence, which includes the view that societies may and have become ‘too diverse’ and fragmented (Goodhart 2004) and need to be integrated. Such diversity, while in itself disintegrative and conducive to parallel societies, is typically equated with a deficit of specifically liberal and civic values, such as democracy and gender equality. This deficit in turn is directly associated with multiculturalism, both as a policy of accommodating minorities, and as empirical existence of culturally diversity, which have been allowed to develop.
Hence there is often the implication that cultural diversity and its accommodation inherently conflicts with liberal democracy, except the dominant culture, from which all the minority ‘multi’-cultures differ and seek accommodation (Mouritsen 2008). [Although the UK may be at least be a partial exception.]

Although the latter, then, is superior in being universal and civilised, it is also often our culture, and thus particular and national (or at least particularly Western or European), tied to some degree to the histories, experiences, institutions – and maybe even religion – of a given nation state, and thus commanding loyalty, pride, comfortable familiarity – and potentially also involving exclusion.

Some more principled reflections on cross purposes and blind spots in the public understandings, e.g. a bit of the following (not all) – but not the usual political theory question (Laborde, Mason, Bauböck) of which types of value conformity it is normatively legitimate to require

- What kind of culture is in fact likely to be needed and functional (let alone normatively supportable) for immigrants: not just abstract ‘liberal values’. Culture as ideals vs. culture as on the ground going-on-knowledge and competences for social navigation.
- What kind of cultural policy is likely to integrate non-liberal immigrants – to ‘work’ - are they likely to become more liberal by being ‘forced’, or insultingly stereotyped? Depending maybe on institutions – e.g. difference between political discourse and, say, education
- The problem of hypostasising liberalism as ‘repressive liberalism’ (Joppke) or making ‘liberal people’: Liberal intolerance and integration
- Do liberal and civic values as culture crowd out minority ‘culture’ - or ‘merely’ minority ‘religion’: Or put differently – how much particularity is left of, say Islamic religion
- Culture and illusions of homogeneity – at various levels. ‘We’ are already quite different/whose Leitkultur anyway!?
- Functions of debates: functional, strategic, or normative, is it meant to include or to exclude; in bad faith and with double standards, or is it reflective and critical, with or without dialogue. Sending a signal about boundaries, or helping newcomers navigate; speaking to fearful electorates or engaging new citizens

Bibliography


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in Germany, the Social Democratic government under Schroeder (1998-2005) passed a new naturalisation law in 2000 as well as the first immigration law introducing integration courses in 2005. This was followed by a National Integration Plan in 2007 as well as several integration summits under the current Conservative government of Angela Merkel. In 1999 the Danish Social Democratic government passed a very comprehensive integration law.

Two key signalling events/dates in these countries. In the Netherlands, a new vision on integration was presented in 1994 in the Contourrennota Integratiebeleid Etnische Minderheden (Contourrennota Integration Ethnic Minorities), which introduced citizenship as leading principle for the new vision on the presence of persons from diverse cultures in the Netherlands. Meanwhile, in the summer of 2001, after civil unrest and rioting in cities in the north of England, multiculturalist policies became subject to critique. A local city report set the pattern by arguing that particular communities, widely understood as Muslim comm-

1 Hence in October 2010, German Chancellor Angela Merkel argued that ‘immigrants should learn to speak German. (…) The approach [to build] a multicultural [society] and to live side-by-side and to enjoy each other... has failed, utterly failed’. Similarly, in February 2011 at the Munich Security Conference, British Prime Minister David Cameron insisted that “under the doctrine of state multiculturalism, we have encouraged different cultures to live separate lives, apart from each other and apart from the mainstream. We’ve failed to provide a vision of society to which they feel they want to belong. We’ve even tolerated these segregated communities behaving in ways that run completely counter to our values”.

2 In Germany, the Social Democratic government under Schroeder (1998-2005) passed a new naturalisation law in 2000 as well as the first immigration law introducing integration courses in 2005. This was followed by a National Integration Plan in 2007 as well as several integration summits under the current Conservative government of Angela Merkel. In 1999 the Danish Social Democratic government passed a very comprehensive integration law.

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Østergaard, K & K. Sinclair (2007). Danish Muslims, the Cartoon Controversy, and the Concept of Integration, Global Dialogue, 9 (3-4).
nities, were self-segregating (Ouseley, 2001). This tendency was described in another report as the phenomenon of minority communities leading ‘parallel lives’ (Cantle, 2001).

Interestingly, this værdikamp – struggle over values – was initially meant, by Prime Minister Anders Fogh Rasmussen, as a more classical liberal (and populist), anti-state showdown with paternalism, high taxes, experts’ tyranny of public opinion, and left-wing dominance of media and education. Only later – possible because Rasmussen realised the futility of gaining support for any serious scaling down of the welfare state (Kurrid-Klitgaard __) – it became “cultural” and directed, above all, against what was perceived as multicultural value relativism.

The following section relies much on Mouritsen, 2006.

Which in recent years has been dominated numerically by proponents of not only full legal freedom of expression (very few people have argued against the right to publish, and there is also little public support for blasphemy and hate speech laws), but also of a position which positively applauds publication of ‘offensive’ cartoons (lest people practice ‘self-censorship’ and freedom of speech becomes threatened by not being used etc.) and which is critical of arguments that appeal to restraint, cultural sensitivity, or the ‘tone’ of public debates.

The socialdemocratic led government that came into office in 2011 pledged to change the content of the test in a more clearly civic direction, which statsborgerskabsprøve, der "vægter aspekter af det hverdagsliv og det aktive politiske liv, som møder borgerne i et moderne samfund" and eventually did so in 201_[cirkulæreskrivelse om naturalisation https://www.retsinformation.dk/Forms/R0710.aspx?id=152087]

An example of the linkage of these ideas was a conference in Lisbon organized by the German Bundeszentrale für Politische Bildung, which gathered experts and policy makers to discuss the proper content and organization of civics education in an environment of cultural pluralism. The conference blurb (which reflected many of the talks by both German and invited French, Dutch and English Leitkultur spokesmen) noted that ‘multiculturalism’ defined as intellectual discourse and a set of political concepts and policies emphasizing and encouraging difference over common political values, is in a state of crisis; claimed that European societies were ‘sleep-walking into segregation’; and called for a ‘paradigm shift’ towards emphasizing clear rights and duties. While this involved colour blind didactics of citizenship (‘irrespective of their origin, their skin colour or religion’), citizenship education should ‘facilitate the identification of immigrants in European societies with their respective country, its language, its culture and its laws’, see http://www.bpb.de/files/G13YVF.pdf accessed 28 July, 2011.