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Retracing the 'retreat'?

Exploring post-multicultural and civic turns in the Netherlands, Britain, Germany and Denmark

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Abstract

There is a widely shared view that the appeal of multiculturalism as a public policy has suffered considerable political damage. In many European states the turn to 'civic' measures and discourses has been deemed more suitable for the objectives of minority integration and the promotion of preferred modes of social and political unity. It is therefore said that the first decade of the new century has been characterised by a reorientation in immigrant integration policies - from liberal culturalist to the 'return of assimilation' (Brubaker, 2001), on route to a broader 'retreat from multiculturalism' (Joppke, 2004). In this article we argue that such portrayals mask a tendency that is more complicated in some cases and much less evident in others. To elaborate this we offer a detailed account of the inception and then alleged movement away from positions in favour multiculturalism in two countries that have adopted different versions of it, namely the UK and the Netherlands, and two countries that have historically rejected multiculturalism, namely Denmark and Germany. We argue that while there is undoubtedly a rhetorical separation between multiculturalism and civic integration, the latter is in some cases building on the former, and broadly needs to be understood as more than a retreat of multiculturalism. Taking seriously Banting and Kymlicka's argument that understanding the evolution of integration requires the 'the mind-set of an archaeologist', we offer a policy genealogy that allows us to set the backlash against multiculturalism in context, in manner that explicates its provenance, permutations and implications.

Keywords: Multiculturalism, Civic Integration, Citizenship, Britain, Denmark, Germany, Netherlands

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Introduction

This article explores the status of multiculturalism in contemporary Europe. Focusing on four European Union countries we investigate the ways in which their diverging responses to multiculturalism have informed a renaissance in thinking about how best to reconcile political unity with ethnic and religious difference. One means through which this has proceeded has been cultivation and entrenchment of civic integrationist approaches, what Goodman (2010: 754) describes as a set of “civic hardware”, including integration contracts, classes, tests and ceremonies’. We are especially interested in the extent to which this civic hardware is deemed to redress multiculturalism’s alleged shortcomings, not least because a number of authors have stressed a relationship between a ‘civic turn’ (Mouritsen, 2008) and a ‘retreat’ from multiculturalism (Back et al., 2002; Hansen, 2007; Joppke, 2004; 2009; Levrau and Loobuyck, 2013). For example, Joppke (2004: 253), amongst others, has insisted that civic integrationist approaches are ‘most visible in Britain and The Netherlands, the two societies in Europe...that had so far been most committed to official multiculturalism’. One cautionary response to this reading is that Joppke’s interpretation assumes a dichotomy between ‘civic integration’ and ‘multiculturalism’, or at least ‘places the two in a zero-sum equation that ignores the extent to which they could just as plausibly be synthesized in a potential outgrowth of one another’ (Meer and Modood, 2009: 475).⁵

It is important to stress however that while we pay particular note to the elevation and promotion of civic integrationist measures (Mouritsen, 2008, 2009, 2011), we approach these by situating them in a politicisation of public policies on integration and citizenship. Thus we are not here offering a systematic comparison of civic integration measures, for this would repeat a collection of work that can be found elsewhere (e.g., Koopmans et al, 2012; Goodman, 2010; Baubock and Joppke, 2010; Baubock et al., 2006

⁵ Goodman (2010: 757) puts this differently but makes a similar point in her observation that, ‘A state can widen or liberalise the scope of people who are eligible to apply for citizenship while raising the expectations for new citizens. In other words, increasing the obligations of citizenship does not necessarily cancel out historically established or recently won membership rights.’

and Weil, 2001)⁶. We instead want to provide a contextually sensitive account of the fate of multiculturalism by returning to recent policy developments, where we can observe a cluster of seemingly novel tendencies, and yet which illustrate how the salience of recent civic integrationism only really makes sense in relation to debates about multiculturalism. We use the term *novel* to register a shift onto the identity of membership itself (Joppke, 2008), in a manner that has sought to give particular content to that membership in both vertical individual-state relations, as well as horizontally across civil society and social groups (Modood and Meer, 2011). According to Kostakopoulou (2010: 830) this is present across Europe in ‘policies for ‘social cohesion’, ‘integration’ and ‘assimilation’, including the official promotion of national identity, official lists of national values, language [and clothing] prohibitions in public transport, schools, universities and hospitals, compulsory language courses and tests for migrants, naturalisation ceremonies and oaths of loyalty’. Several elements of this description are recognisable in both Britain and the Netherlands; two of our chosen countries which - though differing from one another in their approaches to the integration of ethnic minorities - have previously rejected the coercive-assimilationist or *ius sanguinis*-exclusive approaches of other continental examples. Yet here too the instrumentalisation of citizenship for minority integration – which ‘emphasises the symbolic value of citizenship as an identity status’ (Bauböck, 2010: 852) – has increasingly been pursued as a short term panacea (and longer term prophylactic) to the sorts of societal disunity allegedly associated with ethnic minority separatism in general, and Muslim alienation, estrangement and (ultimately) violent extremism in particular.

No less striking – perhaps even perplexing – is that countries which have historically either actively rejected or benignly ignored multiculturalist public policies, and so have never adopted them, such as Germany and Denmark, claim that such policies have failed in their countries too. For example the

⁶ Though of course how such measurement should best proceed continues to be debated (cf Goodman, 2012).

German Chancellor Angela Merkel declared in October 2010 that ‘multiculturalism has failed, completely failed’ in Germany, while Søren Pind (2008), the former Danish Minister of Integration insisted on the need to re-assert that ‘the right word must be assimilation. There are so many cultures and people can go elsewhere and engage with them if this is what they want’.

Four Cases or Two Pairs?

These four cases, the Netherlands, UK, Germany and Denmark, are presented as two pairs that will facilitate a distinct inquiry because each pair has either incorporated or rejected multiculturalist policies, but has done so in different ways that cannot be understood without grasping something of their national policy trajectory. For example, Banting and Kymlicka’s (2013: 7-8) Multiculturalism Policy Index, which monitors multicultural public policies across twenty one Western democracies across three intervals (1980, 2000 and 2010), tells us that in 2000 the Netherlands and Britain scored 5.5 and 5.5 out of a possible 8 respectively, and Denmark and Germany scored 0.5 and 2 respectively. By 2010 the score for the Netherlands had been reduced to 2, Britain remained the same, Denmark was at 0 and Germany had increased to 2.5. This offers a mixed picture of the fate of multiculturalism that is given qualitative support in Vertovec and Wessendorf’s (2010) reading that while the term multiculturalism has ‘disappeared from the political rhetoric’ (ibid. 18), this is something that is not paralleled by the ‘eradication, nor much to the detriment, of actual measures, institutions, and frameworks of minority cultural recognition’ (ibid. 21). While the criteria Banting and Kymlicka use goes ‘beyond anti-discrimination to offer some degree of positive recognition, accommodation and support of minorities’ (2013: 7-8), taken on its own the index risks overlooking the richer contextual explanation that can be garnered from an excavation of recent historical policy developments. These are especially relevant to the *why* questions. Amongst them, why have states with different migration and integration policy experiences adopted civic integration policies?

To our minds, however, this question rests on a prior investigation of *what* is expressed in the debates that these four countries with such different experiences have come to have over multiculturalism. These are necessarily empirical as well as theoretical questions that relate to timing and context in the process of policy change to which we turn next. Our broader point is not to deny either the structural reasons for the development of post multicultural agendas, nor that changes do not also reflect power political and discursive shifts. An objective instead is to show how arguments regarding multiculturalism's retreat in Europe do not do justice to the complexity of the processes that led up to the adoption of civic integrationist policies in the Netherlands, Britain, Germany and Denmark, something that obscures the ways in which multiculturalism can be seen to 'wear different faces' (Alexander, 2013: 2). Drawing on data compiled in the cross-national CiViTURN project (2009-2013) we rely on policy documents, governmental statements and public discourse that formed part of a five work-package analyses. The materials were selected and coded by each national partner and a conventional inductive analysis was undertaken before the data were brought together qualitatively and synthesised by the research team. It is therefore worth re-stating that we are not undertaking a systematic review type comparison on civic integration measures (as we indicate above), but instead seek to grasp the nature and process of change, in no less rigorous fashion, but focusing on the motivations and form of policy change broadly conceived, and it is to this that we next turn.

Modeling Policy Change

It is widely accepted that attempting to understand policy change can be a dense and at times elaborate activity (Smith and Kattikireddi, 2013), and to the extent that there is a prevailing account of *what* the study of policy change should incorporate, it could be argued that this seeks to explore a series of distinct but interrelated stages (Hogwood and Gunn, 1985). The precise configuration and description

of stages reflects the wider theoretical stance that is adopted, but these stages can typically comprise: problem identification; agenda-setting; consideration of potential actions; implementation of agreed action; and evaluation (cf Dolowitz and Marsh, 1996).

In their account, Banting and Kymlicka (2013) point to two expressions of institutionalist thought. The first is inspired by biological models of evolutionary development, especially Baumgartner and Jones' (1993) notion of 'punctuated equilibriums' which posits that systems can quickly shift from one period of relative stability to another. They argue these 'punctuations' occur when persuasive ideas gain increasing attention, a situation which depends on external (political) factors as well the inherent qualities of an idea. As Banting and Kymlicka (2013: 4) note, 'many interpretations of the shift from multiculturalism to civic integration have this flavour'. The second expression they characterize as incremental adaptation which implies that 'change takes place, even in the context of stability in formal programs, through processes of drift, conversion and layering' (Banting and Kymlicka, 2013: 4). This latter point is especially important for both Banting and Kymlicka as well as to us, for it maintains that our understanding of changes needs to 'assume that each new generation does not start with a black slate. Understanding the evolution of immigrant integration, according to this perspective, requires the mindset of an archeologist' (ibid.).

We take seriously the observation of incremental adaptation by seeking to offer a policy genealogy in order to assess the implications and understand the permutations of the backlash against multiculturalism. To probe this we will focus upon four illustrative cases comprising two national contexts where different modes of multiculturalism have been embraced (The Netherlands and Britain), and two national contexts where it has never been adopted (Denmark and Germany). Our argument is that the underlying dynamics already evident in these cases are essential in delineating the 'post-multicultural' turn in Europe for the following reasons. Whereas current accounts employ the narrative of

a relatively seamless movement in the pendulum, that has directed the momentum from being in favour to being against multicultural policies (e.g., Joppke, 2004; Cattle, 2012), the momentum behind this pendulum must necessarily have been staggered in that each national context has a different starting point in this journey, leading to a more complicated and mixed outcome (Jacobs and Rea, 2007). Hence, while each of these four countries currently experience a civic integrationist turn, the logic of the manner in which this turn is a reaction to a perceived crisis of multiculturalism – the meaning of the ‘post’ in ‘post-multicultural’ as it were – is quite different, at the level of discourse as well as policy change. In the next section the article will offer a detailed account of the inception and then movement away from positions in favour of multiculturalism in two countries that have adopted different versions of it, namely the UK and the Netherlands, and the emergence of strong civic cultural criticisms of ‘the crisis of multiculturalism’ in two countries that never had much multiculturalism in the first place, but were also late in perceiving the need to integrate its newcomers at all, namely Denmark and Germany.

The Netherlands and Britain - a backlash in multicultural states?

Given the often assumed similarity of Dutch and British post-colonial multiculturalism, the challenge to (and sometimes reversal) of previous minority accommodation policies in the Netherlands has struck observers as both remarkable and indicative of the shape of things to come elsewhere (Sniderman and Hagendoorn, 2007). Yet we need to grasp how in both cases different starting points herald implications for the ‘maturity’ of different reactions. By this we refer to the longevity or the extent to which multicultural policies have been embedded and sedimented in political cultures and public policies in our cases, including in more discursive notions of belonging, which may either mitigate or accelerate the ease with which multiculturalism, may be dislodged. This is related to our further argument which concerns the assumption of an alleged homogeneity in the provenance of these

developments, principally attributing them to millennial anxieties over ethnic minority separatism in general, and Muslim alienation, estrangement (and ultimately violent radicalism) in particular.

Drilling down into the Dutch and British cases first and the German and Danish cases next, shows that this provenance is in fact quite mixed. Not only were some countries more multiculturalist to begin with, and others hardly at all, none were cut from the same cloth. Hence the Netherlands was never an arch-typical multicultural country (Kymlicka, 2008), and its internal critique of multiculturalism occurred relatively early, and indeed not long after it had been embraced. Dutch multiculturalism began as a peculiar mixture of welfare statist *laissez-faire* (with relatively generous group provisions), *gastarbeiter* returnism, and continuation of the country's legacy of ideological-religious institutional segregation, so-called *pillarisation*. This tradition extended well into the 1950s and 1960s, when many facets of everyday social life in the Netherlands were organised according to very distinct Protestant, Catholic, Socialist and Liberal constituencies – albeit with an over-arching ethno-national and political Dutch national identity. With the post-war movement of 300,000 migrants from former colonies (especially Dutch-Indonesians and Moluccans), as well as the arrival during the 1950s and 1960s of guest workers from Southern Europe, Yugoslavia, Turkey and Morocco, the social structure of pillars for existing minorities was simply extended to incorporate ethnic minorities (and a new religion) as well.

The extension of this mode of social organisation to migrants was at first anticipated to facilitate their return home,⁷ with the key premise that policies aimed at permanent integration could hamper such returning. It was only later that the retention of cultural identity was seen – by segments of the political left in particular – as a vehicle for emancipation and integration in Dutch society, and that cultural diversity was considered a means of enriching society. Yet unlike Britain or Canada, few attempts were

⁷ This applies less to those who came from the Dutch East Indies between 1949 and 1961, and who were expected to stay and adapt to the Dutch culture.

made, at least at the national level, to either change the majority society's institutions, to incorporate this new religious-cultural difference in Dutch national identity and official public culture (cf Duyvendak & Scholten, 2012).

The first official immigrant integration policy in the Netherlands was not therefore developed until the early 1980s, with a draft Minorities Memorandum in 1981 and the final Minorities Memorandum in 1983. The new policy was based on the assumption that ethnic minorities would remain in the Netherlands. Previously temporary 'guest-workers' or colonial migrants, they now were recognized as permanent 'cultural' or 'ethnic minorities' within Dutch society. Policy discourse thus stressed the social-cultural emancipation of minorities, political participation, combating discrimination, and enhancing the social-economic participation of members of minorities. However, the conceptualisation of cultural integration as retaining something of earlier identities, which has been called multiculturalism *avant la lettre* (Bruquetas-Callejo *et al.*, 2006: 16) was subject to criticism from the late 1980s, when a report by the influential Scientific Council for Government Policy (1989) concluded that insufficient progress had been made in areas such as the labour market and education, and that too much emphasis on retaining cultural identities was hindering ethnic minority participation in both. Indeed, the same Council that had advocated the 'multicultural' integration of minorities in 1979 now advised the government to focus on the civic integration of *allochtonen* (non-natives) instead of minorities and to balance the rights of immigrants with obligations.

Contrary to popular belief therefore, a public commitment to an idea of multiculturalism was by no means certain even at this early stage. Two years later, Frits Bolkestein had initiated a now familiar debate on the promotion of a *Leitkultur* of western values. The important feature of this debate was the extent to which it centred on an objection to Islam, and more precisely the role Islamic culture allegedly played in

hindering the integration of immigrants. Bolkestein's initiated a parliamentary debate on minorities in 1992. While his binary defence of 'our liberal culture' against their 'Islamic culture' may not have been widely shared, the alleged multicultural elements of Ethnic Minorities Policy that he criticized tapped into a *Zeitgeist* which maintained that the integration of immigrants had been limited and that something had to be done. A new vision of integration was therefore emerging and by 1994 a ruling cabinet consisting of Christian Democrats and Social Democrats introduced the Policy Memorandum Integration of Ethnic Minorities (*Contourennota Integratiebeleid Etnische Minderheden*). This emphasised – at a very early stage compared to the rest of Western Europe (Mouritsen, 2010) – 'good citizenship' and 'self-responsibility' in a manner that promoted a shift away from disadvantaged *groups* towards individuals (*allochtonen*), and from emphasizing cultural and multicultural policies towards socio-economic incorporation policies. The notion of citizenship (*burgerschap*) that was achieving traction reflected a view that the duties of citizenship had too long been under emphasised, and so in 1998 the 'purple' cabinet (a coalition of social-democrats and liberals) introduced the Civic Integration Act (*Wet Inburgering Nederland*) which obligated migrants to take language lessons and introductory courses on institutions and practices of society. Although civic integration courses were initially introduced as instruments to facilitate immigrants' socio-economic integration, they would soon be transformed into requirements for obtaining residence permits and legal citizenship (*staatsburgerschap*).

Each of these developments was well underway long before 9/11 and other terrorist activity had contributed a security imperative to the revision of integration policies. Thus Paul Scheffer's (2000) widely cited critique of multiculturalism in the Netherlands, 'The Multicultural Drama' (*Het multiculturele drama*), gave form to the view that the Dutch had been too generous in accepting cultural difference, while ignoring basic liberal democratic values and the importance of learning Dutch language, culture and history. The article firmly oriented debates on the failure of Dutch multicultural policies to the

role of Islam in the failure of the integration of Muslim migrants, *before* the fallout from 9/11 and domestic developments such as the electoral victory of the populist Fortuyn Party (which promised policies of ‘zero migration’ and a ‘cold war against Islam’, and which compelled other parties to reposition themselves on immigration and integration). The murder of filmmaker and columnist Theo van Gogh in 2004 by a Dutch-Moroccan extremist elevated the sense of a schism between Muslim minorities and Dutch society as a whole. The murder entrenched a perception of Islam’s incompatibility with western democratic values, and arguably marked the moment when the relationship between political unity and religious-cultural diversity came to be symbolised by the ‘Muslim question’.

By 2002, a new Minister of Aliens’ Affairs and Integration (named by the press ‘Iron Rita’) introduced her ‘new style’ Integration Policy that built upon earlier ideas of ‘citizenship’ and ‘self-responsibility’ which were salient in the 1990s, but which now contained a stronger emphasis on the requirements of minority cultural adaptation. This marked the beginning of a period in which existing multicultural policies would be withdrawn (such as bilingual education schemes), or modified (such as making subsidies more conditional for ethnic minority associations), while new integration and citizenship policies insisting on minority (cultural) adaptation were being introduced. In 2003, a new Nationality Act came into force, introducing a naturalization test for oral and written language skills and knowledge of Dutch society. Other requirements were added later, such as participation in a naturalization ceremony in 2006 and a pledge of solidarity to Dutch society (*verklaring van verbondenheid*) in 2009. Prior to this, in 2007 a new Civic Integration Act (*Wet Inburgering*) had already made the acquisition of a permanent residence status dependent on a successful civic integration test, in addition to making people pay for their civic integration courses and permits. Of course the 2006 Integration Abroad Act (*Wet inburgering Buitenland*) linked this directly to new migration, requiring as it did newcomers to demonstrate language competencies and knowledge about Dutch culture and society *prior* to entering the Netherlands.

That the Dutch multiculturalism backlash was both early and a peculiar mixture of liberalism and modernist civic nationalism, in part reflects the paucity of effective positive integration measures in such areas as education, employment and housing, and the fiscal vulnerability of a comprehensive welfare state to these failures. But it also reflects the lack of multicultural civic integration, understood as insertion of cultural and religious diversity, and sensitivity to such diversity, in the mainstream of an increasingly egalitarian and secularist society. The pillarisation of Islam informed the early development of a Dutch version of Germany's *Leitkultur* concerns, which was less conservative and more clearly anti-*religious* than was the case in Germany. Here, incremental anxiety about the social and political segregation of Muslims became coupled with an assertive liberal-way-of-life-‘Dutchness’ – which, while deeply resonant with cosmopolitan elites, was also advanced by right wing parties. This way of life was associated with egalitarianism, feminism, autonomy, secularism and traditions of tolerance, but not, since the early nineties, and certainly not compared to Britain, with any a great appreciation of the value of diversity (let alone Islam), nor of the need for its ‘burgerschap’ to make room for such diversity (Duyvendak & Scholten, 2012: 280). Are there similarities here in the British case?

Of course British multiculturalism is rooted in its specific historical background of imperial nationhood and a concept of citizenship. That is to say that in the move *from* an imperial *to* a post-imperial power, Britain approached the ‘jus soli’ (place of birth) and ‘jus sanguinis’ (parental origin) fork in the road but took a distinct path by implementing a peculiar synthesis of mainly jus soli with a doctrine of continuing allegiance to the Crown. Accordingly, ‘those born as subject of the crown remained subjects, regardless of emigration or even naturalisation’ (Koslowski, quoted in Owen, 2005: 9). For example, the 1948 British Nationality Act granted freedom of movement to all formerly or presently dependent, and now Commonwealth, territories (irrespective of whether their passports were issued by independent or colonial

states) by creating the status of ‘Citizenship of the United Kingdom and Colonies’ (CUKC). Until they acquired one or other of the national citizenships in these post-colonial countries, formerly British subjects continued to retain their British status (Lester, 2008). This is one of the reasons why a common distinction between national minority rights and ethno-cultural minority rights contained within Anglophone social and political theory is not easily transposed on to Britain (see Modood, 2007). From a national cultural perspective, therefore, beyond legal conceptions of citizenship, rests on what Asari, Haliliopoulou and Mock (2008: 1) consider the ‘bitter irony’ of British multiculturalism since:

[A]ll of the civic, assimilative signifiers upon which a multicultural British or for that matter English national identity could potentially draw from the existing historical-cultural matrix of myths and symbols are deeply implicated in the project of empire – a political project that is not only past but conceptually discredited; associated, and not unjustly either, with hierarchy and racism.

What this interpretation under-emphasises is how migrant communities and British born generations have been recognised as ethnic and racial minorities requiring state support and differential treatment specifically in order to overcome obstacles in their exercise of citizenship, and to prevent, minimise and redress an impairment of their civic status. So rather than assimilative and national-civic ‘signifiers’, there developed a multicultural minority incorporation, which had a civic intent in the sense of equal treatment understood as anti-discrimination, removing of barriers to participation, and anti-racism. This stresses a *different* type of civic incorporation from the civic assimilation in a historically tainted imperial nation, of which the quote speaks. This includes how, under the remit of several Race-Relations Acts (RRAs) the state has sought to integrate ethnic and racial minorities into the labour market and other key arenas of British society through an approach that has promoted equal access as an example of equality of opportunity (Lester, 1998). Indeed, it is now nearly forty years since the introduction of a third Race-Relations Act (1976) cemented a state sponsorship of Race Equality by consolidating – and cumulatively building upon - earlier, weaker legislative instruments (RRA 1965 and 1968).

Alongside its broad remit spanning public and private institutions; recognition of *indirect* discrimination and the later imposition of a statutory public duty to promote ‘good race-relations’, it also created the now defunct Commission for Racial Equality (CRE) (which merged into the Equality and Human Rights Commission (EHRC)) to assist individual complainants and monitor the implementation of the Act. This is an example, according to Joppke (1999: 642), of a citizenship that has amounted to ‘a precarious balance between citizenship universalism and racial group particularism [that] stops short of giving special group rights to immigrants.’ What it also suggests is that the creation of a space from which to begin to redress racially structured barriers to participation represents a defining characteristic in the British approach to integrating minorities. Yet the British case is not solely comprised of anti-discrimination, for during the 1990s a specific form of multiculturalism emerged through developing certain racial equality discourses and policies beyond their starting points in a response to minority ethnic and religious assertiveness (Modood, 2007). These rejected assimilationist perspectives and were inclusive of ethno-religious minority groupings, and took hold in a cumulative and progressive institutional form in, for example, the outlawing of religious discrimination and the incitement to religious hatred. It also took educational form in the inclusion of some non-Christian, non-Jewish faith schools within the maintained sector in England (Meer, 2010).

In 1999, the Stephen Lawrence Inquiry’s examination of police forces also introduced the concept of ‘institutional racism’. Shortly afterwards, the Commission on the Future of Multi-Ethnic Britain (CMEB) made policy recommendations to help ‘a confident and vibrant multicultural society’ take advantage of ‘its rich diversity’ so that Britain should realise its full potential (CMEB, 2000: viii). Entitled *The Future of Multi-Ethnic Britain*, their report strongly endorsed both the possibility *and* desirability of forging a meta-membership of ‘Britishness’ under which diversity could be sustained. Its recommendations not

only sought to prevent discrimination or overcome its effects; they also advocated an approach that could move beyond conceptions of formal equality by recognising the substantive elements of ‘real differences of experience, background and perception’ (CMEB, 2000: 296). It recommended that central government take steps in formally declaring Britain ‘a multicultural society’, hoping that such an approach would invalidate the social and political inequalities derived from minority cultural differences. This document was criticized, not only from the right but also by liberals who believed that its approach flouted universalistic principles, not least those recommendations which promoted diversity as a means to facilitate equality. Moreover, in the summer of 2001, after civil unrest and rioting in cities in the north of England, multiculturalist policies became subject to further critique. A local Bradford report set the pattern by arguing that particular communities, widely understood as Muslim communities, were self-segregating (Ouseley, 2001). This tendency was described in another report as part of a wider (and so not just Muslim) phenomenon of leading ‘parallel lives’ (Cantle, 2001), after which a more integrationist discourse became prevalent in linking between community cohesion, belonging, citizenship, and civic-national identity. Yet what largely goes unnoticed are the ways in which the rediscovery of ‘citizenship’ discourses in the policy zeitgeist owes much less to anxieties about Muslims in Britain, and much more to a reforming government in waiting’s commitment to civic renewal. For example, working closely with New Labour and Tony Blair, Giddens (1998: 78) drew on some of the core concerns of social capital theorists to propose his ‘third way’ solution to an alleged ‘civic decline’:

In contrast to the old left, which tended to be dismissive of worries about civic decline, the new politics accepts that such anxieties are genuine. Civic decline is real and visible in many sectors of contemporary societies . . . It is seen in the weakening sense of solidarity in some local communities and urban neighbourhoods, high levels of crime, and the break-up of marriages and families.

Thus Giddens (2000: 73) saw the focus of a New Labour administration as ‘education, incentives, entrepreneurial culture, flexibility, devolution, and the cultivation of social capital’. And it is significant

how in his first speech as Prime Minister, Tony Blair (1997) invoked the concept of social capital, and some of the key concerns of theorists of social capital, in maintaining that New Labour would ‘recreate the bonds of civic society and community’. Indeed, even while they were still in opposition, the Blair administration undertook a Commission on Social Justice (1994: 308) which reported that social capital was one means of addressing the civic deficit and material disadvantage of marginalized communities

Thus before and during taking office Blair (1998: 20) committed New Labour to: ‘promoting civic activism as a complement to (but not a replacement for) modern government. [...] Promoting better state and civic support for individuals and parents as they meet their responsibilities is a critical contemporary challenge, cutting across our approach to education, welfare, and crime reduction’. What is therefore being argued is that the years immediately prior to and after Labour’s general election victory in 1997 a range of key actors, including politicians, pundits, academics, think-tanks and pressure groups, became increasingly concerned about a range of different problems, *of which civic integration/participation was only one*, but which closely corresponding to concerns of social capital theorists. Kisby (2006) has shown this persuasively, including how these perceived problems included concerns about a ‘democratic deficit’ and low voter turnout and, in particular, about civic and political disengagement and cynicism among young people. What needs to be stressed is that issues of Muslim integration initially came to rest in this mould before that mould would be later re-cast. Thus when the term community cohesion enters the lexicon, following an inquiry into civil unrest or ‘rioting’ in some Muslim areas in the North of England, the commissioners conceive it as encompassing a ‘domain of social capital’ which facilitates ‘people [to] feel connected to their co-residents’ (Cantle, 2001: 74).

Nevertheless by 2002, the Nationality, Immigration and Asylum Act now explicitly, in the test that applicants seeking British citizenship must sit, requires ‘a sufficient knowledge of English, Welsh or Scottish Gaelic’ and also ‘a sufficient knowledge about life in the United Kingdom’ (Jacobs and Rea,

2007). Immigrants seeking to settle in the UK (applying for an ‘indefinite leave to remain’) also must pass the test. If they do not have sufficient knowledge of English, applicants have to attend English for Speakers of Other Languages (ESOL) and citizenship classes. In explanatory documents, the Home Office stresses that the tests aim at ‘integration’, but without this meaning ‘complete assimilation’ (Home Office, 2004: 14). What has been taking place in Britain cannot therefore accurately be called a ‘retreat’ of multiculturalism. Certainly it is true that the inclusion of ethnic minorities is now increasingly premised upon greater degrees of qualification. However, the British approach still promotes the mainstreaming of ethnic monitoring and positive duties of care. Critiques of the emergent multiculturalism of the 1990s continue to emphasise what is usually present in some form in most accounts of multiculturalism (Meer and Modood, 2014). The question currently facing British multiculturalism concerns the extent to which the recognition of diversity needs to be offset with civic incorporation, or, more profoundly, to what extent multiculturalism and citizenship can be mutually constitutive and defined in interdependent terms in a way that is inclusive of Muslims.

Germany and Denmark: The backlash in non-multicultural states

Thus far we have discussed the sequence, political provenance and permutation of counter multiculturalist movements in two states that had previously adopted favourable, though very different, approaches. What, however, can be said of a ‘retreat’ in countries which had never ‘advanced’ multiculturalist public policies? To explore this we can begin with Germany, a country that has, until relatively recently, displayed a long tradition of recruiting ‘guest workers’ from neighbouring countries. For example, between the 1890s and the First World War, during a period of rapid industrial growth, it recruited large numbers of seasonal workers from Poland and the Austro-Hungarian and Russian Empires to address labour shortages (Bade, 1995). During the Weimar Republic, fewer numbers were recruited, as a result of the Great Depression and rules that allowed foreign labour only if it could be shown that no

German workers were available. After the Second World War, three periods of recruitment may be distinguished: firstly, the arrival between 1945 and 1949 of nearly twelve million German refugees and expatriates; secondly, the importation of ‘guest workers’ from Turkey, Italy, Spain, Greece, Portugal, Yugoslavia and other Mediterranean countries during the 1950s and 1960s to fill shortages of industrial labour; and thirdly, the three million ethnic Germans who returned to Germany following reunification.

Despite this, until the late 1990s German citizenship laws meant that in order to obtain German nationality applicants would need to prove German descent (Panayi, 2004). German citizenship was not automatically granted, therefore, to people born on German soil, meaning that in the post-war period second and third generation immigrants remained outside its formal citizenry and so enjoyed fewer civil and political rights in the country of their birth than their non-minority peers. As a consequence, though Germany does have constitutional protections, politicians have not often faced electoral pressures to deal with issues of racism and accommodation of minority needs. The important point is that until 1998, Germany did not officially recognise the existence of migrants and ethnic diversity in society (Meier-Braun, 2002). This political stance was adopted in 1973 by the official recruitment ban on foreign guest workers and the slogan ‘Germany is not an immigration country’ – which reflected a political attitude but not the social reality (Eckhardt, 2007). Germans have struggled to find acceptable ways to express collective pride and a shared sense of identity since the traumas of the Second World War. Post-war West Germany defined itself in contrast with Nazi Germany or an autocratic East Germany, often in European terms (Faas, 2007). What positive definitions of national identity did emerge they tended to restrict themselves to a lowest common denominator, the most distinctive of which was *Verfassungspatriotismus* (patriotism to the Constitution), a concept introduced by Sternberger (1979/1992) and popularised by Habermas (1992), amongst others. This refers to the West German Constitution of 1949, which was also adopted by the former East Germans in 1990 (with little political debate). This document builds on a

longer German tradition of the Rechtsstaat or rule of law (which was important in the work of both Max Weber and Carl Schmitt, for example). 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 fulfilment.

It was only in the 1980s, more than 25 years after the arrival of the first guest workers that a debate surrounding multiculturalism developed in Germany. Since then German academics and politicians have controversially debated and developed the concept of multiculturalism (see for instance Radtke, 1994; Schulte, 1999; Bukow et al., 2001). Some authors (see Kiesel, 1996) focused upon its ideological dimensions while others (including centre-right and right-wing political parties) regarded multiculturalism as a threat. Demographic reasons for immigration (e.g. ageing population, shrinking birth rates) were ignored in favour of the preservation of cultural and national homogeneity (Herbert, 2003). The Catholic and Protestant churches introduced the term ‘multicultural society’, which is closely related to multiculturalism, in 1980 during a day of the foreign fellow citizen with a view of broadening the public’s view of this guest worker group. Instead of viewing the ‘foreigners’ only in terms of their economic value and problems, the German population should recognise the various foreign cultures which migrant workers had brought with them as an enrichment of German culture (Von Dirke, 1994). The subsequent debate over fairer terms of inclusion was driven by members of the Green Party as well as some more progressive figures within the conservative Christian Democrats (Vertovec and Wessendorf, 2010).

However, in the early 1990s, some high profile episodes of racial violence prompted introspection on the assertion of German social tolerance. It is around this period in 1993 that the term ‘multiculturalism’ achieved a degree of salience, and translations of the work of Charles Taylor featured in intellectual discussion. Habermas (1994), for example, elaborated an idea of nationality that would no longer be

linked to ethnicity, but based on a continuing process of civilisation. The cultural embedding of (West) German democracy, he argued, should not be designed to 'cultureless' besides or beyond the advanced welfare state of the post-war period. This embryonic consideration of pluralism and diversity in public discourse was quickly challenged, however, in the *Leitkultur* debates of the early 2000s, indeed conservative Christian Democratic Union politicians such as Jörg Schönbohm and Friedrich Merz had already begun to argue in 1999, in opposition to the then newly elected centre-left government of the Social Democrats and the Green Party, that multiculturalism would encourage social conflict and undermine a common set of values.

Despite this criticism the new Schröder administration (1998-2005) introduced new laws for immigration, integration and citizenship that would address the concept of a *volk*, as well as establishing an Independent Commission on Immigration (the Süßmuth Commission), which in July 2000 recommended establishing clearer application criteria, actively recruiting skilled migrants, improving asylum procedures, and implementing a comprehensive integration programme (Kruse et al., 2003). In reaction to the Süßmuth Commission, in autumn 2000 Friedrich Merz, then chair of the Christian Democratic Union, demanded that immigrants be willing to accept German mores which he termed 'liberal German *Leitkultur*'. This initiated a series of contentious debates on *Leitkultur* in the aftermath to 9/11 which seriously undermined efforts by the government to secure the level of political consensus required to introduce legislation based on the Commission's recommendations. For whereas previously the formulation of a German national identity was hampered by a Nazi past, or the Communist East, the *Leitkultur* debate was oriented toward a new 'other', namely immigrants, especially Turkish-origin Muslims. The debate over *Leitkultur* was thus twinned with debates over the suitability of Turkey for membership of the European Union - often employing very similar argumentation.

Since 2005, applicants for citizenship have been required to show their ‘commitment’ to the ‘free and democratic order of the Constitution of the Republic of Germany’, an obligatory ‘commitment’ which stems from the belief that immigrants need to be publicly reminded of the primacy of the German Constitution. This led to a slew of new legislation such as the Immigration Law (2005), which is geared toward integration strategies, and the invitation to migrants and civil society actors to take part in four National Integration Summits (since 2006). Further Islam conferences have sought to focus on the interaction between the national majority and Muslim minorities. Each of these are said to comprise ‘milestones’ in that they speak with minorities and not solely about them. This is evident in the Federal Commissioner for Integration Maria Böhmer’s (CDU) statement in which she revised an earlier position in stating: ‘Germany is not an immigration country, but an integration country’. To this end formal citizenship can be acquired through a process of naturalisation after eight years of legal residence, provided the applicant has sufficient German language skills and other civic competencies. The amendment to the Citizenship Law (2000) means that the children of ‘foreigners’ now automatically acquire German citizenship if one parent has been legally residing in Germany for at least eight years with a ‘right to abode’ permit. These children can retain dual nationality until the age of twenty-three, after which they have to choose between German citizenship and the citizenship of their parents.

In 2010, Thilo Sarrazin published a controversial book entitled ‘Germany Is Doing Away With Itself’ which sold over one million copies and sparked a long and often heated debate over culture and integration in Germany. In his book, Sarrazin denounces the failure of Germany’s post-war immigration policy. He advocates a restrictive immigration policy with the exception of the highly skilled and the reduction of state welfare benefits, and describes many Arab and Turkish immigrants as unwilling to integrate. He calculates that Muslim population growth may well overwhelm the German population within a couple of generations at the current rate, and that their intelligence is lower as well. Polls at the

time suggested that almost half of the German population (including Social Democrat members) agree with Sarrazin's political views and 18 percent would vote for his party if he started one.

Significant, again, is timing. Germany, refusing its immigration country status well into the nineties, while having a relatively benign experience of socio-economic incorporation of immigrants, only began to in earnest of integration around the millennium. When it finally did, discussion revolved around conditions of citizenship and naturalisation. These conditions, no longer ethnic (Faist, 2008), were predominantly conceptualised in securitized political cultural terms, i.e. as a required capacity for civic maturity and emotional allegiance to liberal institutions. In a country that had experienced what lack of such maturity could entail, and in the aftermath of 9/11, Islamic radicalism was easily paralleled to Germany's ghosts from the past. Its civic integrationist turn became dominated by the perceived need to make new liberal democrats out of traditional Muslims, and its 'crisis of multiculturalism' came to denote not the failure of any cultural minority incorporation policy (of which there was none), but the mere acceptance of civically unassimilated groups living their parallel lives in Germany

In recent years, the Conservative Christian Democrats (CDU) has continued to frame citizenship as a reward for successful integration whereas the Social Democrats (SPD) who have always lobbied for dual nationality and consider it a precondition for successful integration. However, as a result of the most recent grand coalition negotiations in the new Merkel cabinet (since 2013), people from migrant backgrounds born in Germany will for the first time be able to apply for dual citizenship rather than deciding for one nationality between the ages of 18 and 23. This policy change is most significant for the country's sizable Turkish population, although it will uphold an existing dual nationality ban for later arrivals who choose to become German citizens. There is now also cross-party consensus that Germany is a multicultural immigration society even though Chancellor Merkel and others said that multiculturalism

as a public policy has failed. Instead, integration has become the buzzword in recent years under Chancellor Merkel (since 2005) in both political and educational debates with intercultural education being a strong component of the federal curricula frameworks (see for instance Faas, 2011). In 2013, Aydan Özoğuz became the first ever woman with Turkish roots and Muslim member of the German Federal Government as Minister of State for Immigration, Refugees and Integration – another sign that underlines Germany's revised approach towards diversity.

Unlike Germany, Denmark has had comparatively lower levels of contemporary immigration, and historically, in the early post-war period, immigration only really originated from other Nordic and western European countries (there has been free labour mobility between the Nordic countries since 1954). During the 1960s and early 1970s, guest workers were recruited from countries such as Turkey, Yugoslavia and Pakistan to undertake work which Danes were not prepared to. However, the numbers were modest and after recruitment of guest workers was stopped in 1973, the main forms of immigration were family reunification and, from the 1980s, asylum. Today, ethnic minorities from non-western countries comprise about six percent of the Danish population of five million (Jensen, 2010). Danish immigration and integration policies have passed through three stages (Mouritsen & Olsen, 2011). Neither of these may be called 'multiculturalism' in any conventional, positive sense. Larger municipalities have adopted "street level diversity practices" (Hedetoft, 2010: 111) and use immigrant friendly discourse. By contrast the negative attention at the national level to immigration related diversity *per se* and to all forms of minority recognition, as well as attempts to curb diversity through tough asylum laws and integrationist measures in the name of Danish "fundamental values, which must be accepted by people wanting to live here" (as the then Prime minister Fogh Rasmussen famously put it in his 2003 New year's speech (Rasmussen, 2003) could be seen as emerging "Danish anti-multiculturalism" (Lægaard, 2013)

In the seventies and early eighties, where numbers were low, emphasis was on equal treatment and elite-led social tolerance. This reflected a national self-image as an open and tolerant country, assister of its Jews during the Second World War, and promoter of human rights principles in international relations (Østergaard-Nielson, 2003). While some worried that Denmark now received ‘families with roots in cultures which deviate strongly from the Danish [culture],’ as one conservative MP put it (Hagensen, cited in Hvenegaard Lassen 2002: 150), he and others were concerned with how immigrants could come to live on an equal footing with Danes in the welfare society, in a context in which ‘culture’ might become an obstacle to equality, although most politicians would assume that some allowance should be made for immigrants to retain part of their customs – not least because many were assumed to return to their countries of origin. During the 1980s recession, and borrowing from Sweden, Denmark introduced local election rights after three years residence in 1981, and in 1983 one of the world’s most liberal asylum laws, which included a ‘de facto’ refugee category. Yet it took none of Sweden’s positive steps towards official recognition of immigrants’ rights to freedom of cultural choice (Borevi, 2010).

In the next stage, during a significant influx of refugees in the 1980s, which briefly placed immigration high on the agenda, the onus was increasingly on the obligations of individual immigrants to make an effort to integrate into Danish society. The liberal asylum law was tightened and resulted in a serious political rift between the Social Democrats and the rest of the Left. The third stage from the late 1990s until recently was characterized by the high political saliency of immigration with a gradual shift of focus from labour market integration towards ‘Danish values’ integration, active citizenship and attempts to counter Islamic radicalisation. The portrayal of immigration as a threat to national cohesion and national identity has emanated in particular from the populist Danish People’s Party, which has played a pivotal role as a stable parliamentary support of the right-wing coalition government that was in power from

2001-11. While always more 'liberal' than multicultural, some policies did in fact accommodate minorities in the realms of language, education and culture (Mouritsen & Olsen, 2011). Migrants' ethnic (not religious) organizations enjoyed some financial support. Until 2002 public funding was allocated to mother tongue teaching, and Denmark retains a publicly supported system, originating in the nineteenth century, of 'independent schools' (*friskoler*), which also has been used to found Muslim faith schools. But the benign, liberal approach did not last longer than a few years and never developed into anything like British or Dutch multicultural public policy.

Since the late eighties migrant minorities were called upon to take more responsibility for their 'functioning' and adjustment to Danish society, particularly in terms of not burdening the welfare system. In 1999, Denmark took a sharp turn towards a more integrationist, or effectively assimilationist approach, introducing an Integration Act with a mandatory introduction programme, including up to 2000 hours of language training. In all legislation respect for cultural identity is omitted and self-support became the overall goal (Mouritsen & Olsen, 2011). The integrationist-assimilationist approach was intensified after the 2001 election, which had focussed on unemployment and welfare costs of immigrants (Jensen, 2010). A new, lower 'introduction benefit' was introduced for new immigrants (2002), along with 'integration contracts' (2005) and severe restrictions in family re-unification rights. The new right-wing coalition now made systematic use of the concept of *medborgerskab* or 'good citizenship', as distinct from legal citizenship (*statsborgerskab*), emphasising that one could be a good citizen without enjoying the political rights possessed by legal citizens, and indeed that proving one's capacity for the former was a precondition of aspiring to the latter. Danish 'anti-multiculturalism', in the absence of any special rights or programs to dismantle, increasingly centred on limiting diversity through the tightening of membership access, in consecutive agreements between the Danish People's Party and the government between 2002 and 2010, e.g. with longer required period of legal residence, a very difficult history, politics and high

culture citizenship test (the Danish People's Party's pet idea), and an extremely tough language requirement, which effectively blocked citizenship for most non-European and non-academic applicants. Access to permanent residence and family reunification was also progressively tightened throughout the period, e.g. with the introduction of a complicated point system rewarding labour market activity, language facility, educational level, and voluntary 'active citizenship' (Mouritsen, 2010, 2011; Mouritsen & Olsen 2011).

Following 9/11, the government focused increasingly on defending liberal values such as freedom of expression, personal autonomy, separation of politics and religion, and tolerance. This issue exploded with the publication in *Jyllands-Posten* in September 2005 of cartoons depicting the prophet Muhammad to test alleged problems of self-censorship and encourage Muslims to accept 'scorn, mockery and ridicule' to be able to live in a secular democracy. The episode illustrates well how Danish citizenship culture had become increasingly identity-related in ways that made it appropriate to speak of a *culturalised* civic nationalism (Mouritsen 2006; 2009), whereby political and public life was awash with notions of an egalitarian and liberal democratic superiority, which was presented, however, as embedded in the particularity of Danish national history (including, for some politicians, the free-spiritedness that emanates from Danish Lutheranism).

There was a sense that universal values are realised more, or in a better way here than elsewhere, or even that acquiring such citizenship qualities was the function of a long historical heritage (which excluded those born off the Northern shores of democracy). A peculiar national *værdikamp* (literally, 'value struggle') was staged, not so much over the actual semantic content of Danish values, but over whether these values were threatened by, should be defined in contrast to, or had to be defended against an increasingly essentialised Islamic other. While much of the Danish version of the *Leitkultur* debate (in a

manner very similar to the Netherlands) was about standing up for the comprehensive egalitarianism and feminism of social democratic state institutions, which always aimed to ‘liberate’ its citizens, it also concerned fear that diversity in and by itself would jeopardize the trust, solidarity and cohesion of a small but open society, which historically celebrated its tribe-like sameness as a resource against the world (Hedetoft, 2010: 116-17).

Much as Germany relative to the Netherlands and Britain, Denmark was slow to accept its status as an immigration country and to follow its neighbour Sweden’s initiatives in the field of active labour market integration policies, let alone anti-discrimination. This, as well as its choice to part company with both Norway and Sweden in the field of citizenship and residence policy (Brochmann & Hagelund, 2010: 348) was partly due to party political, electoral, and coalition-logic reasons – above all the role of a politically very capable new right party – and partly the hold of a particular ethno-cultural citizenship and national identity tradition, which emanated from nineteenth century wars with Germany and subsequent loss of territory, and which continued to value the idea of cultural homogeneity, even as old style ‘Danishness’ had become diluted. This trajectory significantly contrasts with Swedish state modernism, always prevented Denmark from combining its deep-seated social egalitarianism with serious susceptibility to multiculturalism (Jensen, 2014).

Recent years have seen very important changes. The centre-left government, led by the social democrat Thorning-Schmidt, which came into office in 2011 has rolled back some of the toughest citizenship and residence legislation from the 00’s, e.g. lessening the language requirement.. Asylum law administration and family reunification practices have also been slightly eased, and most recently dual citizenship has become allowed. Symbolically important the Ministry of Refugee, Immigration and Integration Affairs has been dismantled and many policies which were previously exclusively framed as having to do

integration and immigrants, are now processed as broader social, educational and labour marked policies (Læggaard, 2013). The change of government was also a change in discourse. The previous government had overplayed its hand with yet more proposals in 2010 for tightened border controls and naturalisation, and Thorning-Schmidt rightly sensed that the electorate thought that tightening had gone too far or at least far enough (this was confirmed in opinion polls at the time). The new government pledged to create “a new balance where integration gets priority over exclusion,” spoke of immigrants as regular citizens with rights who wanted the same things as everybody else, and called for more “decency and respect” in immigration and citizenship policies, promising that “all those who wish to be part of Denmark should not constantly be met with new, unreasonable demands” (Danish Government, 2011: 51).

Opinion polls consistently confirm high and growing levels of social tolerance in Denmark, also compared to most other European countries (a fact which contrast with the xenophobic image the country earned in international opinion during the cartoon crisis) (Gundelach, 2011), and its metropolitan everyday multiculturalism remains in place. But debates about Islam and integration continue, albeit at a lower level after the financial crises has shifted public attention towards the more immediate issues of unemployment and the fiscal sustainability of the welfare state. The normative content of Denmark’s ‘civic turn’ remains comprehensive, combative, and egalitarian way-of-life-oriented as in the Netherlands, but also culturalised and ‘ethnicised’ in a backward looking way, which sits uneasily with any sensitivity to cultural diversity. Unlike either Germany or Britain, the Danish *Leitkultur* and concern with good citizenship harbour little self-doubt. Integrating immigrants – Muslims mainly – is still about teaching them the liberal democratic virtues, traditions of active citizenship, and egalitarian norms that non-Muslims Danish society is deemed to possess in abundance already.

Conclusions: Complicating the Retreat

In several cases our survey of the emergence of civic and other allegedly ‘post-multicultural’ developments in these four countries points to both the resilient and porous nature of national models. They are resilient where institutional opportunity structures have embedded and sedimented multiculturalist public policies to a greater or lesser extent (as in the UK but not in the Netherlands), but they are more porous where anxieties over Islam are repeatedly observable across the different national frames of Denmark, Germany, and also the Netherlands. These centre on separatism in general and Muslim alienation, estrangement (and ultimately violent radicalism) in particular. Indeed, Banting and Kymlicka (2006: 7) point to a relationship between anti-multiculturalism and illiberal practices perceived to be manifested within the kind of culture that is being accommodated. More precisely: ‘It is very difficult to get public support for multiculturalism policies if the groups that are the main beneficiaries of these policies are perceived to be carriers of illiberal cultural in order to maintain these practices’ (ibid. 54). Elsewhere Kymlicka (2005: 83) narrows this further in his conclusion that ‘if we put Western democracies on a continuum in terms of the proportion of immigrants who are Muslim, I think this would provide a good indicator of public opposition to multiculturalism’.

Across our cases the evidence supports the reading that citizenship have explicitly shifted onto the identity of membership itself, but our discussion shows how the provenance of this development is in fact quite mixed, taking into account issues of social capital in the UK, integration and national unity in the Netherlands, social welfarism in Denmark, and to some extent national identity in Germany. That is not to say that there are no convergences, even unlikely ones. For example it is striking to note the similarity in the Dutch and Danish cases; although there was more multiculturalist policy in the former than in the latter, the combined Danish ‘on-the ground’ municipal accommodation, together with targeted social

policy, resembles multicultural governance in the Netherlands. Indeed, in both cases a sharper secularism and ethnicised conception of the nation cuts against the grain of a more pluralist nationhood in Britain.

Comparing Germany to the Netherlands and Britain, meanwhile, is to observe a number of points. The first and most obvious is that the critique of multiculturalism and parallel societies has been noticeably robust in a country which has seen little multiculturalism in the first place. The second is to register that claims-making has been minimal though not absent, and has come from a largely disenfranchised migrant and migrant descendant population. Here one might point to the role of the church, whose institutional entrenchment in the welfare state delayed and watered down German implementation of EU anti-discrimination legislation, or indeed the continuing hold of the country's historical legacy of a language, culture and descent based conception of *Volk*, which was not legally challenged, at least in part, because of post war partition and the political necessity to provide for 'natural' German citizens in the East. The point in each case is that the extent to which this marks a retreat of multiculturalism needs to be set against the background that there is no simple account of an 'advance' of multiculturalism in each country in the first place. That is to say that whereas some accounts employ the narrative of a relatively seamless swing in the pendulum, that has moved the momentum from being in favour to being against multicultural policies, we find it difficult not to observe how the momentum behind this pendulum has been staggered across different national contexts with different starting point in this journey.

That is to say that in our analysis of the present fate of multiculturalism as a public policy – something concerned with the 'remaking of public identities in order to achieve an equality of citizenship that is neither merely individualistic nor premised on assimilation' (Modood, 2005: 5) - we must not ignore how the pattern of its development in different national contexts is neither linear nor unbroken. This substantiates a reading of incremental adaptation which argues that 'change takes place, even in the

context of stability in formal programs, though processes of drift, conversion and layering' (Banting and Kymlicka, 2013: 4). The implication being that where there have been advances in policies of multiculturalism, these have not been repealed uniformly, nor on occasion at all, but may equally have been supplemented or 'balanced out' in civic integrationist approaches.

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