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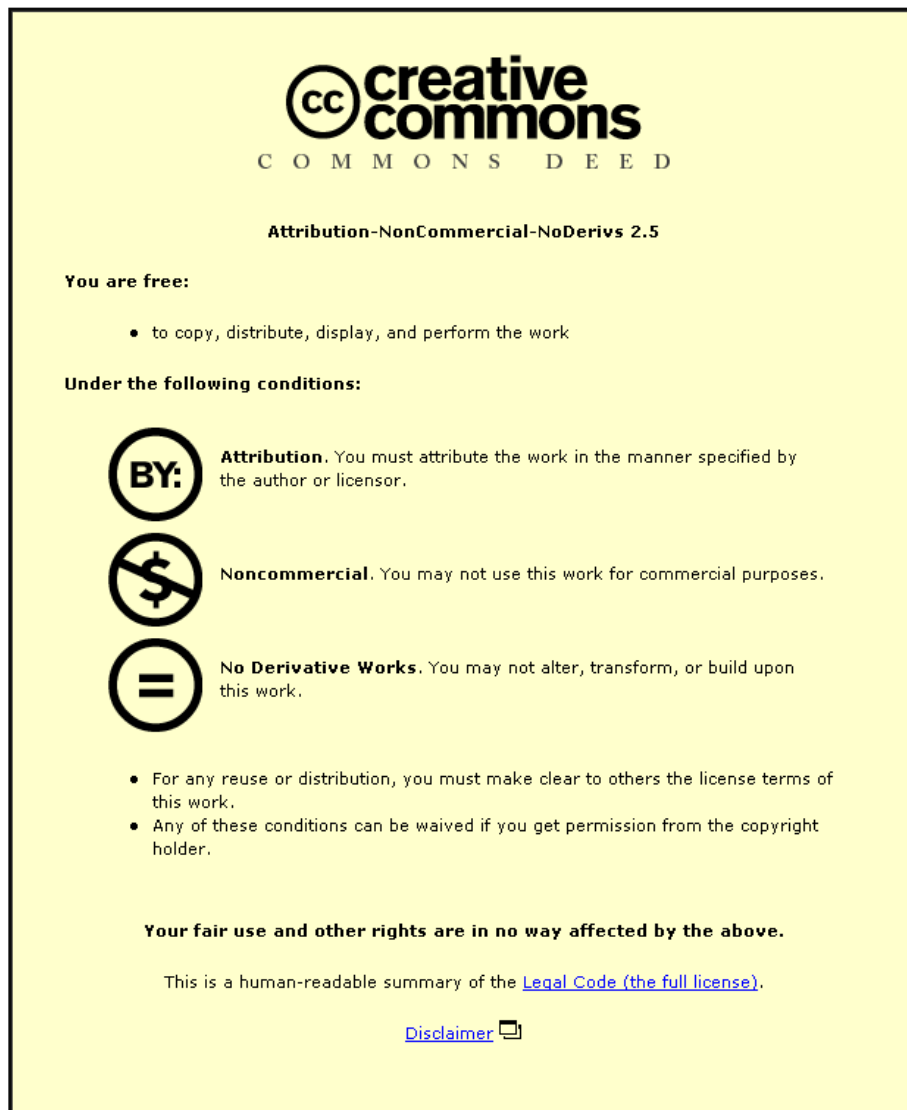
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‘Citizenship is not a word I use’: how women’s movement activists understand citizenship

by

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Remaking Citizenship in Multicultural Europe: Women’s Movements, Gender and Diversity. Basingstoke: Palgrave Macmillan, pp. 188-212.

Introductionⁱ

Citizenship has become a core concept in feminist theory. Yet, the phrase ‘citizenship is not a word I use’ summarises a central finding from our research with women’s movement activists in Norway, Spain and the United Kingdom (UK). Our interviewees tended not to regard ‘citizenship’ as a term that was relevant to their political activism - a finding that contrasts with citizenship’s status as a central notion in feminist scholarship. Citizenship is, however, also a highly contested term in feminist theory. The interviewees’ rejections may reflect concerns based on experiences of inequalities related to citizenship, which in the language of feminist theory appear as barriers to *lived citizenship*, and in this respect our findings support efforts to expand the notion of citizenship. This book’s concern with the role of women’s movements in remaking citizenship in multicultural Europe is addressed in this chapter through the following questions: How is the term *citizenship* understood by contemporary women’s movement activists? Is *citizenship* a concept used normatively by movement activists – does the term have political relevance for women’s movement claims? What reflections and experiences do activists report in relation to *lived citizenship*? And, finally, does ‘citizenship’ as a concept have a positive potential for future women’s movement activism?

Lister and colleagues argue that there is ‘remarkably little empirical analysis of lived citizenship in comparison with the volume of theorising about citizenship in individual member states of the European Union (EU), never mind cross-nationally. This is particularly the case with regard to citizens’ own understanding of citizenship’s meaning’ (Lister *et al.*, 2007, p.168; see also Kabeer, 2005, p.1). Our study of women’s movement activists and citizenship in Norway, Spain and the UK seeks to fill some of this gap in current scholarship.

The first section of our chapter traces relevant developments in scholarly discussions of citizenship, and in the following section the research methods and contexts for our research are presented. We then move on to examine how the women’s movement activists whom we interviewed understand the term ‘citizenship’, and to explore their reflections on and experiences of exclusion and inclusion in lived citizenship, and whether they use the citizenship frame and how useful they think it is in their activism

– do they embrace it or reject it? Moreover, we look at the alternative frames (Benford and Snow, 2000; Ferree and Merrill, 2000) – equality, social justice and human rights frames - that are being used by the activists whom we interviewed, before a concluding section that summarises our findings and addresses the usefulness of ‘citizenship’ as a concept that can bridge feminist theory and women’s movement activism.

Remaking the concept of citizenship

‘Citizenship’ refers to a status of equality within bounded political communities (Benhabib, 2004). The emphasis on equality has made citizenship a revolutionary notion and a tool ‘for marginalized groups struggling for social justice’ (Lister, 2007, p.49). The seeming simplicity of the term conceals complex issues, however, such as *who* are supposed to carry the status of equals, *what* counts as equality, and *where* should any boundaries be drawn? Feminists have revealed how citizenship is inherently gendered (e.g., the phrase ‘all men are equal’), and how the term has been applied in a state-oriented way, focusing primarily on political-legal issues of rights and responsibilities. They have engaged intensively in grappling with citizenship both normatively and empirically to make the term more inclusive (Lister, 1997; Friedman, 2005; Kabeer, 2005; Squires, 1999; Tastsoglou and Dobrowolsky, 2006). Gender-related issues such as care work and unpaid work (Lister, 1997) are being discussed in relation to social and economic dimensions of citizenship (Bergman *et al.*, and Le Feuvre *et al.*, both this volume). Further dimensions of citizenship have also been introduced, including multicultural (Lister *et al.*, 2007; Siim, 2007; Siim and Squires, 2007; Yuval –Davis, 1997 and 2008), bodily (Outshoorn *et al.*, this volume), sexual (Bell and Binnie, 2000), and intimate citizenship (Roseneil, 2010; Roseneil *et al.*, this volume) citizenship. In the broad feminist view of citizenship, civil society is a dynamic space in which citizenship is lived, contested and negotiated. The non-state arenas of social movements and civil society organisations, and the horizontal citizen-to-citizen relations, constitute important sites of citizenship practice.

Moreover, the value of any conferred citizenship status is context-dependent, as rights and obligations vary across different bounded political communities (Joppke, 2010, p.154). Moreover, the state is no longer necessarily the appropriate unit of justice when citizenship rights are disaggregated from the territorial state (Young, 2000, p.250; Benhabib, 2004; Fraser, 2008, p.13). A growing concern with the 'exclusionary dynamics of the nationally bound citizenship' (Tambakaki, 2010:21) has inspired discussions of post-national, cosmopolitan and global citizenship alternatives (Sassen, 2002; Hutchings 1999; Carter, 2001; Strasser, this volume). The growth of transnational political structures and 'the rise of a global human rights culture after World War II' (Soysal, 2004, as cited in Joppke, 2010, p.21; see also Reilly, 2009) have contributed to such discussions. Furthermore, increasing migration across national borders and socio-economic globalisation processes has inspired innovative feminist discussions of a politics of belonging, and of the relationship between human rights and citizenship (Benhabib, 2004; Tambakaki, 2010; Yuval-Davis, 2008; Roseneil, forthcoming). New forms of belonging and membership have emerged, and there is a growing concern with dilemmas between the practice of exclusive membership in nation-states and ideas of universal human rights (Benhabib, 2004, p.17).

It has been argued that citizenship has become a *momentum concept* with 'egalitarian and anti-hierarchical potential' (Hoffman, 2004, p.138). Struggles for rights, recognition, participation and inclusion can be described as citizenship struggles (see, e.g., Lister, 1997; Kabeer, 2005; Tastsoglou and Dobrowolsky, 2006) irrespective of whether 'citizenship' is a term used by the parties involved. At the same time, 'citizenship' is also an inevitably exclusive concept, as it confirms a particular 'insider' status and a set of rights and obligations for a group of people within the bounded political community, and sets the 'insiders' apart from those defined as 'other', strangers, aliens and outsiders (Isin, 2005, p.377). The claim that citizenship is 'internally inclusive' and 'externally exclusive' (Brubaker, 1992) is, however, too simplistic, as it exaggerates and fixes a distinction between 'included citizens' and 'excluded aliens', rather than seeing the relationship between inclusion and exclusion as both fluid and contested (Benhabib, 2004, p.19). Feminists have a solid tradition of addressing the internally excluding notions and practices of citizenship, the production of hierarchies and inequalities within the privileged 'citizen

group' (Hernes, 1988; Pateman, 1989; Siim, 1991). Women are still in many ways excluded from the status of citizen, and are struggling to obtain both legal and actual rights to equality. Feminists and other academics have argued for a wider interpretation of social dynamics to include state-family relations in addition to state-market relations, i.e. 'the personal is political' (Phillips, 1991), and for a recognition of actors beyond those that are class based. Political, economic, social and cultural rights should be gender-sensitive and address issues related to the personal, sexual, and intimate.

Feminist scholarship has also contested the limitation of citizenship to issues of status, rights and duties, and has launched a broader understanding of citizenship which encompasses participation and belonging. Feminist contributions have highlighted citizenship as *lived practice* – as social relations and participatory practices within all spheres of life, be they political, economic, social, cultural, religious, bodily, domestic or intimate (Halsaa *et al.*, 2011). The concept of *lived citizenship* captures citizenship as practice: it is about 'the meaning that citizenship actually has in people's lives and the ways in which people's social and cultural backgrounds and material circumstances affect their lives as citizens' (Hall and Williamson, 1999, p.2, as cited in Lister *et al.*, 2007, p.168). Moreover, lived citizenship 'is about how individuals understand and negotiate the three key elements of citizenship: rights and responsibilities, belonging and participation' (Lister *et al.*, 2007, p.168). As lived practice, citizenship is not a fixed status or the attribute of a particular group of individuals included in a given polity, but rather involves dynamic processes of negotiation and struggle taking place within a variety of contexts at local, national and transnational levels of interaction.

During recent years there has been increased focus on citizenship in relation to the challenges of increasingly multicultural societies, in particular indigenous, national and ethnic minority claims to a special status with concomitant rights, as well claims of recognition, participation, and belonging. The notion of multicultural citizenship (Kymlicka, 2010) foregrounds issues of marginalization, discrimination and inequalities related to people's nationality, race and ethnicity. The claims of ethnic minority groups, indigenous peoples and national minorities have at times been framed as group citizenship rights, and have generated extensive debates on the

extent to which societies based on individual citizenship rights can and should accommodate group citizenship rights (see Vertovec and Wessendorf, 2010). Following Okin's (1999) question about whether multiculturalism is bad for women, there has been an intense and heated international debate about the paradox that political efforts to remedy wrongs done to ethnic minorities may increase the problems of women within those minorities (Al-Hibri, 1999; Nussbaum, 1999; Shachar, 2001). This dilemma highlights the need for multicultural policies, designed to respond to citizenship struggles by minority groups, to take gender into account.

Combining feminist ideas about how citizenship struggles are gendered with notions of how citizenship struggles are rooted in racial and ethnic inequalities and discrimination reveals intersectional tensions between inclusionary ideals and exclusionary practices. Scholars are increasingly addressing the issue of how 'citizenship analyses must negotiate equality in the context of diversity' (Siim and Squires, 2007, p.414; see also Siim, 2007). In other words, the concept of citizenship must be *intersectionalized*, as suggested by Yuval-Davis (2008).

Due to 'how relentlessly the idea of inclusion produces exclusion' (Isin, 2005, p.381), the concept of citizenship also poses a dilemma for both feminist scholarship and women's movement activism: should it be used normatively to frame struggles for equality and justice? If so, what opportunities and limitations does such usage bring? The question about the extent to which the term 'citizenship' is considered useful in struggles for justice and equality is open to debate and empirical research, and scholarly investigations must pay particular attention to place, space and scale (Desforges *et al.*, 2005). Women's movements and their claims-making at local, regional, national, transnational and global levels constitute important sites for such investigations. Our research, which examines how women's movement activists in three European countries understand and talk about citizenship, is a contribution to this effort.

Research methods

Our discussion of how women's movement activists understand the term 'citizenship' is based on qualitative, in-depth, face-to-face interviews with thirty women's

movement activists; ten in Spain, ten in Norway, and ten in the UK.ⁱⁱ These three rather different countries were chosen to obtain a variety of circumstances and contexts in which women's movements have mobilised to claim women's political interests. With a small number of interviewees, our study is not representative of women's movement activists in the three countries. However, the interviews highlight important viewpoints, reflections and experiences that are likely to indicate salient cross-national differences, as well as being indicative of broader issues within women's movements in Europe. The activists we interviewed are from a variety of ethnic backgrounds, with roughly half from ethnic majority and half from ethnic minority backgrounds. Those from ethnic majority backgrounds were born in the respective countries in which they live but their experiences are of course varied in other respects. Those from ethnic minority backgrounds also represent varied experiences and are either from a national minority group, first generation immigrants, refugees or asylum seekers, or born to immigrant parents. All the interviewees were recruited from organizations that seek to advance women's interests and to influence public policy. Organizations were selected on the basis of existing academic literature, websites that offer comprehensive listings of current women's organizations, and activist recommendations. Our main aim was to recruit activists from women's organizations with explicit feminist aims and identities, but we have also included women's organizations that do not necessarily describe themselves as feminist. They do, however, view themselves as part of the broader women's movement. The names and organizational affiliations of our research participants are kept confidential.

Topic guides were developed to structure the interviews along similar dimensions in each country. The guides were used as flexible research tools, providing the key issues to be discussed while also allowing some context-based variations and follow-up questions. For example, interviewees in the UK were asked about specific policy initiatives meant to speed up the naturalization process for immigrants who partake in voluntary work. The analysis is based on an inductive approach, grounded in the interview data, and inspired by the as yet under-developed comparative discourse analysis approach (Kantola, 2007), which attempts to bridge the gaps between historical institutional analysis, comparative analysis and feminist discourse analysis (Mazur and McBride, 2010).

Historical and socio-political contexts

Concerns about citizenship issues have, as discussed above, emerged for a number of reasons. Colonial and post-colonial legacies, transitions from authoritarian to democratic regimes, experiences of civil and other wars, changing patterns of migration, the institutionalisation of human rights, the growth of women's policy agencies, and the development and enlargement of the European Community,ⁱⁱⁱ have deeply but differently affected contemporary European countries. Crucial events in the political histories of Norway, Spain and the UK have impacted on women's movements in terms of claims-making, political opportunities and outcomes (Mazur and McBride, 2010; Kulawick, 2009). Without going into much historical detail, some important issues nevertheless should be mentioned.

While the allied struggle against Hitler's regime 1939-45 strengthened political relations between Norway and the UK, Spain followed a very different political trajectory. The Spanish fascists, who won the Civil War 1936-39, sided with the German regime, and in effect isolated Spain from Western Europe.^{iv} The death of Franco and the end of the fascist regime in 1975, together with the period of transition culminating in the democratic Constitution of 1978, are defining moments in Spanish history.

Norway does not have a colonial history like Spain and the UK, but cannot deny 'colonial complicity' (Vuorela, 2009, p. 19). Since the 1970s Norway has experienced increasing migration from non-Western countries, but a ban on labour immigration was implemented in 1975. Spain and the UK have both been heavily influenced by their respective and different colonial histories. Spain has only recently become a country of net immigration, while the influx of residents from former colonies to the UK during the 1960s led to the restrictive 1968 Commonwealth Immigration Act.

In Norway, the first significant anti-racist movement emerged in the 1980s (Nydal, 2007), but the existence of racism was acknowledged relatively late by the Norwegian state and by Norwegian society at large. Due to a combination of recent

increase in immigration and new EU initiatives, debates on political rights for immigrants and Roma people have intensified in Spain. Unlike Norway and Spain, the UK has had a strong anti-racist movement since the 1960s, and the state introduced anti-discrimination laws and policies as early as the 1960s, resulting in anti-racist policies setting the standard for gender equality policies. On the Migrant Integration Policy Index (MIPEX), which in 2010 ranked Sweden as the overall top country for migrant integration, Norway, Spain and the UK were all grouped as states considered 'partially favourable for promoting integration'.^v Spain, however, scored low on migrants' political participation, on their access to nationality, as well as on anti-discrimination policies. Norway scored very high on migrants' political integration but low on their access to nationality, and was given a medium score on anti-discrimination policies. UK scored 'half-way to best practice' on immigrants' political participation, 'slightly favourable' on access to nationality, and high on anti-discrimination policies (also see country profile tables in the Appendix).

A strong mobilisation of feminism took place from the late 1960s in Norway and the UK, where gender equality policies were institutionalized during the 1970s.^{vi} These processes were later in Spain (Valiente, 2003, p. 41), where during the fascist regime (1939-1975) only the Falangist organisation for women was legally sanctioned by the state, and other women's associations operated as clandestine (Threlfall, 1996). The fascist regime, supported by the Catholic Church, was characterized by gender hierarchy, promoted a strict division of gender roles, and celebrated motherhood as the only decent and proper role for women.

The state-society partnership, or 'institutional symbiosis' (Hernes 1988, p.189), of the public and private in Norway, explains the greater inclination among feminists there (compared to other countries) to regard the state as a 'friend' and as a tool to be used strategically (Siim, 1991, p.178). Gender equality policies in Norway and Spain emerged earlier than anti-racist policies, in contrast with the UK where anti-racist policies preceded gender equality policies.^{vii} With periods of Social Democratic government (1982-1996 and from 2004), as well as new EU initiatives, the institutionalisation of gender equality in Spain has gained speed, and Spain has moved from being a 'dictatorship and a latecomer in gender equality policies to being one of the European pioneers' (Lombardo, 2009, p.4). In sum, differences in

timing and sequence have affected the ways in which gender, race, ethnicity and migration intersect and are articulated (or not) within women's movements and state policies in Norway, Spain and the UK.

Importantly, the term 'citizenship' has different varieties and connotations in the three countries of our study. Norway does not have an ordinary or proper Norwegian word for 'citizenship', but sociologist Grete Brochmann (2002, p. 56-60) has introduced *samfunnsborgerskap* to broadly cover the English term 'citizenship'. She uses *statsborgerskap* about the legal aspects and *medborgerskap* about the social aspects (identity, loyalty, belonging, trust, and participation). The term *medborgerskap* has increasingly been used in Norwegian politics to denote participation and belonging within democratic institutions and civil society. In Spanish society, citizenship (*ciudadanía*) appears generally to be understood in a more limited and specific way and is mainly associated with nationality and long-term residency within the territory of the Spanish state (Medrano, 2005). However, according to Medrano (2005), Spaniards tend to associate the notion of rights with actual residents in Spain rather than with formal citizens of Spain. In the UK, an understanding of 'citizenship' which covers all of the dimensions of citizenship (status, rights, duties, loyalty, belonging and active participation) is being promoted through government documents and citizenship education in schools (see Kiwan, 2007). Moreover, the term 'active citizenship' has been used in British politics to mobilize voluntary work and community participation (Lister, 1997; Yuval-Davis, 1997).

Women's movement activists' understandings of citizenship

In the next three sections we examine how women's movement activists in Norway, Spain and the UK understand the concept of citizenship. They were all asked to respond to a general question worded either as 'When I say the word citizenship, what do you think about?' or as 'When I say the word citizenship, what does it mean to you?'

Norway: citizenship as responsibilities and participation in society

The wider Norwegian context, with its history of a social-democratic, inclusive, consensus-oriented and “women-friendly” (Hernes, 1987) welfare state, provides the background for how citizenship was talked about among the interviewed activists in Norway. Generally, ‘citizenship’ is not a term that the activists in Norway use in *any* of its meanings. When we asked what the term ‘citizenship’ (*medborgerskap* or *samfunnsborgerskap*) means to them, some interviewees said they were entirely unfamiliar with it. Others felt unsure, but did make some suggestions about the possible meaning of the word. For example, one activist associated it with ‘inhabitants’, and said that *‘all those who are being born, they must, they do belong in a society, and then they are citizens’* (*medborgere*). Similarly, another activist stated that *‘it does not [mean] anything more than that we all are [citizens]’*. A third activist in Norway asserted that although ‘citizenship’ is not part of her vocabulary, it means that *‘you are a part of society; you have a voice’*. Another interviewee associated ‘citizenship’ with academic language and suggested that it is a political buzzword. She understood ‘citizenship’ to mean a person who is part of the society as an individual with responsibility towards others, and as someone who is contributing in a positive way; one who tries to influence the everyday life he or she is a part of in a positive direction.

As interviewers we did not use the Norwegian term *statsborgerskap* (‘state citizenship’), which might have led more participants to reflect on legal issues such as being or becoming a naturalized citizen; having or obtaining a passport. However, one majority and two minority activists quickly associated the term ‘medborgerskap’ with being a citizen of Norway (*statsborger*), a term which refers explicitly to the vertical relation between individuals and the state (in the form of rights and obligations). The other activists instead reflected on citizenship as *medborgerskap*, which signals more of the horizontal dimension of citizenship; that is, relations between citizens and citizens’ participation and belonging in society.

Activists in Norway also offered some brief but interesting comments when we asked them to reflect on the meaning of a ‘good citizen’, a follow-up question which was also asked in Spain and the UK and solicited similar responses. One activist in Norway, who did not associate the term ‘citizenship’ with anything in particular,

thought a 'good citizen' is someone who respects the law, does not cause any problems for others, and contributes to society on the basis of his or her capabilities. Similarly, another interviewee associated good citizenship with taking responsibility for herself as well as for society. To the extent that the activists in Norway associated anything with the term 'citizenship' it was in the sense of being a responsible, decent person who takes care of others, rather than it being a matter of individuals' rights in terms of any legal claims on the state. Among those who offered more substantial comments, the concept of citizenship was related to values of caring for others and for society as such, and to participatory activities, including having a voice, being actively involved, and trying to influence society in a positive direction. For several minority activists, this also meant learning the Norwegian language, understanding cultural codes, and participating in the labour market (economic citizenship). A focus on political citizenship was almost absent among the interviewees in Norway, contrary to Spain, probably because voting rights, quotas and women's presence in politics are taken for granted in Norway. The activists in Norway, just like the activists in Spain and the UK, do take advantage of their voting rights, and most of them confirmed that they take part in political activities such as demonstrations and petitions. Since 1983, immigrants who have resided in Norway for a minimum of three years have the right to vote in local and regional elections, and Norway does not discriminate on the basis of country of origin in granting immigrants the right to vote. Hence the issue of voting is not politicized. The issue of 'ordinary' or formal political participation was not talked about by activists in Norway without them being prompted. Some of the activists did, however, talk about their engagement in politics related to conditions in their country of origin. They felt restricted in voicing their protest against oppressive regimes from which they had fled, and feared being identified by embassy employees, as well as not being granted visitor rights to their country of origin.

In contrast to the UK, the activists in Norway made very few direct or indirect references to state power, except in relation to restrictions on *home return* for activists with refugee status. Instead, the interviewees talked about feelings of belonging (or not) in Norwegian society. This can be understood in relation to the generally positive view of the state as a 'friend' or potential ally both of people generally and of voluntary organizations in Norway. The representation of Norwegian

citizens as responsible and caring in the interviews is also related to the discourse of state-society partnership, a discourse which is reflected among both majority and minority activists. Minority activists were quite clear, however, that they can never become '100 per cent Norwegian'. In various ways, they experienced being viewed by others as temporary 'guests' in Norway. Norwegian is a new language for migrants arriving in Norway (except for those originating from other Nordic countries), which contrasts with the experience of many migrants from former colonies to Spain and the UK. Moreover, those who had fled their country of origin expressed a desire to return, should it become possible. The fact that they are often involved in struggles related to their country of origin adds weight to their ambivalent feelings of belonging.

Spain: political citizenship and individual rights

The wider Spanish context, with its history of empire, civil war, a fascist regime and the transition to a democratic regime in the second half of the 1970s, provides the background for how citizenship was talked about among the activists in Spain. For example, the historical legacy of the Franco regime was noted by one interviewee as having hindered the development of the notion of citizen participation in Spain, as well as excluding women from the notion of citizenship.

Many of the activists in Spain focused immediately on citizenship as embodying a set of rights for individuals living within a particular nation-state or polity. Such rights were most often talked about in terms of 'equal rights' or 'human rights,' extending to a number of dimensions including the political, social and economic, and being in possession of such rights was seen as a measure of inclusion in society.

Concomitantly, the absence of rights was seen as a measure of exclusion.

Citizenship was also viewed by activists in Spain as encompassing a number of duties or obligations, such as respect towards other individuals, caring about the place in which you live, and respect for the law. The quotes below illustrate the links made by activists in Spain between citizenship and rights:

'Full rights, for any person – to me this would summarize the meaning of the word citizenship. These rights would include all manner of civil, political, social and

economic rights that every person should have access to –that’s what I call citizenship’.

‘Citizenship means that a person has the right to develop socially in all spheres. Through access to voting, to political participation, both formal and informal, access to social services, to education, to employment. In other words, citizenship should be universal for everybody, regardless of where they are, without any kind of constraints arising from the place you were born’.

In Spain, contrary to Norway and the UK, political citizenship in terms of the right to vote and to participate in policy-making processes was talked about as a fundamental aspect of inclusionary citizenship practice. A few contextual issues have probably contributed to this focus. In Spain, claims concerning migrants’ right to vote have recently been forwarded in the public sphere ‘from immigrant associations, left-wing political parties and other social actors’ (Zapata-Barrero, 2010, p.397; see also Hellgren, 2007). While EU citizens who are living in another EU member state are eligible to vote or stand as a candidate in local and European elections, the issue of non-EU immigrants’ right to vote in Spain has only recently been addressed by the state. During the last few years, reciprocal agreements have been made with a number of Latin American countries and also with Norway and other countries, giving immigrants officially residing in Spain for five years whose origin is from one of these countries the right to vote in municipal elections from 2011. In practice, however, the condition of the existence of a reciprocal agreement conditions ‘results in far-reaching restrictions [on political citizenship] or de facto nonexistence of voting rights’ (Groenendijk, 2008, p.5) for individuals who do not happen to originate from a country with a reciprocal agreement. Moreover, gender quotas were a hot topic in Spain during the period of our interviews. Parity provisions, introduced in the March 2007 Equality Law, were taken to the Spanish Constitutional Court by the Popular Party with accusations of unconstitutionality (Lombardo, 2009).^{viii}

In this context, it is not surprising that voting rights was a significant issue among the activists we interviewed. One ethnic minority activist, for example, emphasized the demand by immigrants ‘to be able to vote at least in the regional and local elections’. She was also concerned about how rules on acquiring Spanish nationality differ by

country of origin, thus referring to discriminatory legacies from Spain's colonial past. Another ethnic minority activist also emphasized what she saw as a fundamental right for all residents to vote, and the injustice she perceived in some immigrants having to wait ten years to obtain citizenship with full voting rights.

These findings demonstrate how activists in Spain focused on the rights to political citizenship, as well as on the notion that such rights should be equal for everyone. In Spain, the concept of rights was a central element in the 1975-78 transition to democracy, and continues to play an important role in political claims-making related to gendered, regional, ethnic and language-based groups and identities.

The UK: citizenship as welfare rights, and patterns of exclusion and discrimination

The wider UK context, with its history of empire, post-colonial immigration, a liberal welfare regime with high levels of inequality and lower spending on social protection relative to other European welfare regimes (Fenger, 2007), and an active anti-racist movement combating well-documented racist practices, provides the background for how citizenship was talked about among the UK activists. Their views centred on issues of inclusion and exclusion in relation to nationality, participation and belonging. Moreover, they referred to racism and discrimination as barriers to inclusive citizenship for ethnic minorities. Access to welfare rights, rather than political rights, was also emphasized. The notion that the UK has different tiers of citizenship for different groups of people depending on their ethnic minority status was, for example, mentioned by an ethnic minority activist who framed citizenship in terms of individual rights and freedom from racism: *'Citizenship is about being an individual who has rights, the same rights as everybody else. And due to the level of racism and institutional racism [...] they have several different tiers of citizenship'*. This activist was also very critical of the system in which immigrants are required to gain their passport through different routes,^{ix} while the same level of involvement (in paid and voluntary work) is not required of British born citizens. Some UK activists talked critically about the government's policy of encouraging immigrants to volunteer in order to integrate in society and as a means to speed up their naturalization. An ethnic minority activist was sceptical about the government's

expectation that all immigrants should be *able* to volunteer, and stated that the marginalized position of refugees and asylum seekers may prevent them from participating in the voluntary sector.

One UK interviewee, a majority activist, stated that she does not think much about citizenship as an issue, because she herself is *'a person with the right to vote and whose name is on the electoral register and with a national insurance number. But it never occurs to me that it applies to me'*. Instead, she associates citizenship with women refugees and asylum seekers who have been trafficked or are escaping violence in their homeland. The only UK interviewee who does not participate in political elections is an asylum seeker who has applied for citizenship. She was concerned with her lack of freedom of movement due to not having a British passport. She clearly identified citizenship with *status*, and saw the holding of a passport as imbuing a person with *power* – the power to travel and to freely leave and enter the country one resides in. Having been a resident without papers in the UK for many years, she was frustrated with the length of time it has taken for her claim to asylum to be processed: *'If citizenship goes with power, then I need a passport to gain the power. So how long is it going to take me to work for that power to come? So if it is going to take me centuries, at the end I will be dead'*.

The association of citizenship with state power was also highlighted by another UK ethnic minority activist, who found citizenship to be *'a very problematic term [...]. Because it suggests borders; it suggests boundaries, it suggests limitations and it suggests ways in which the state can penetrate and surveillance communities and individuals'*.

A lack of freedom of movement was also mentioned by UK activists who are full citizens or have permanent residency in the country. These interviewees highlighted how people from ethnic and religious minority backgrounds are often targeted by police and by immigration officials.^x For example, one activist stated that her freedom of movement is constrained by her race: *'... you can't go in and out of the country without being asked many, many questions, depending on your race'*. Similarly, another British-born activist stated:

'The notion of citizenship is that [...] you have access, free access as a citizen to travel and to be part of this global community' [...]. But I don't feel, me being an Indian woman, an Asian woman, black feminist, lesbian and all that, single parent, or a parent with somebody. It doesn't give me the same rights of movement and the same rights of access to a voice, or access to services, or the freedom of just movement'.

In the UK, a large section of the immigrant population has enjoyed voting rights due to their origin in a Commonwealth Country (totalling 55 countries including Australia, Canada, New Zealand, Bangladesh, India and Pakistan). The issue of voting rights has therefore not been highly politicized in the UK context, despite the fact that the state discriminates on the basis of country of origin in granting the right to vote only to immigrants of certain nationalities. One interviewee recounted her discovery that being a citizen of a Commonwealth country entitles her to vote, but despite being a legal resident and tax payer in the UK, she also emphasized that she is *'a woman with no recourse'* and that she is *'not entitled to any benefits from the public purse'*, including child benefit if she and her partner were to have a baby. Stressing that she doesn't mind paying taxes and that doing so is part of being a citizen, she felt her lack of access to social or welfare rights is discriminatory as she is not entitled to the same rights as other UK tax payers. The UK has imposed similar rules for Bulgarian and Romanian immigrants to the UK, despite their status as EU citizens.^{xi} All other EU and EEA citizens are entitled to child benefit, other welfare benefits, and tax credits while residing in the UK. The unequal rules applied to different groups of residents in the UK is an example of discriminatory practices which in effect create different tiers of citizenship.

In comparison with the activists in Norway, the UK activists demonstrated a far less benign view of the state. This is in line with British radical and Marxist feminist traditions of scepticism towards a centralised state which has provided women with less political access and representation than alternative arenas located within civil society and sub-national politics (Siim, 2000 p.101). Moreover, Asian and Black women, as well as the broader anti-racist movement in the UK, have been highly critical of the state's racist practices. Therefore, rather than seeing the state as a 'friend' or potential ally, UK activists emphasise how the state can be implicated in

racist and discriminatory practices which marginalize black and ethnic minority communities. Similar to our findings from Norway, however, activists in the UK are less concerned with political citizenship in terms of voting rights and more with issues of participation and belonging, probably because voting rights are taken for granted, while issues of participation and belonging are still fraught with tension.

In Norway and Spain, activists' responses revealed that they do not use the term 'citizenship' in political claims-making. In the UK, the activists we interviewed were also presented with the FEMCIT project's multidimensional understanding of citizenship along the political, economic, social, multicultural and religious, bodily and intimate dimensions, and were asked specifically about the extent to which they currently use, or would consider it a good idea to use, a citizenship frame in their claims-making. The overwhelming finding was that UK activists, like the activists in Norway and in Spain, do not currently use the term citizenship in their mobilization and claims-making: several interviewees said, *'Citizenship is not a word I use'*, and there was also an inclination to describe it as an academic, abstract term. The preference for a human rights frame, an equality frame, or a social justice frame, rather than a citizenship frame, was clearly expressed. Although activists appreciated the multi-dimensionality of FEMCIT's understanding of citizenship, they did not consider it useful to women's movement activism. For example, one activist stated that she does not envisage using the term in her activism: *'But as a feminist doing the work I do, it wouldn't be the language I would use. It is a secondary concern to me as a way forward'*. Even though she finds the concept to be 'hugely modelled on patriarchal notions' and therefore of limited use to women, she did not close the door entirely on using the concept of citizenship: *'I think we women are extremely clever at taking the concept which is current at the time and using it to our own ends. And if citizenship can be used that way, go for it. If it is going to get in the way, drop it'*. In other words, if those with political power are using the concept, then women's movements should consider using it strategically to further their own ends.

Lived citizenship: experiences of exclusion and inclusion

We turn now to the issue of lived citizenship, and explore the activists' reflections on the possibility of practising full citizenship. Although 'citizenship' was not a term used, the activists did have a lot to say about their own experiences of inclusion and exclusion. What scholars analytically call 'lived citizenship', or 'everyday life citizenship', was filled with meaning.

The activists are all 'active citizens', in that they engage in political activities related to women's everyday life, participate in independent women's movement organizations outside the formal political system, and work towards women's integration in political institutions (Siim, 2000, p.5). As women's movement activists, they are eager to contribute and to influence society in ways they consider to be positive. They participate in formal politics in various ways, including political elections. The minority activists in our study speak fluent Norwegian, Spanish or English; they are either in work or in education - and in those respects they might be seen as 'objectively' 'well integrated'. However, each individual's effort to be an 'active citizen' is only half the picture; the discriminatory and exclusionary structures and processes that they encounter must also be addressed.

We asked about 'lived citizenship', or about experiences of exclusion and inclusion along the citizenship elements of rights and duties, participation, and belonging, and found that there are hindrances to women's ability to exercise full citizenship in all three countries. Sometimes these are easily identifiable, such as direct forms of street racism or institutional racism. At other times they are more difficult to identify; discrimination often works exactly because we do not see it, or because we consider it to be '*normal*', as one of the Norwegian majority activists put it. The activists' experiences give useful information about how gender, race, ethnicity, religion and class intersect and affect everyday lived citizenship.

Lived citizenship in Norway

The activists in Norway were concerned with what they saw as their duty to contribute to creating a better society, rather than with the duties of the state and society towards the individual. This finding is related to the strong tradition in Norway of participation in voluntary community work ('dugnadsarbeid'), which is perceived as a civic duty for all inhabitants (Lorentzen and Dugstad, 2011). Another finding is that

activists thought that women in Norway are privileged compared to women in other countries, and they also viewed majoritized women as privileged compared to minoritized women in Norway.^{xii} Research participants saw gender equality as a societal goal and agreed that it has yet to be realised. They also stated that minority women experience barriers related to a lack of language skills, professional and private networks, and most of all, job experience. A lack of self-earned income was viewed as contributing to minority women's dependence on men and as impacting negatively on their lived citizenship.

When barriers to economic citizenship were discussed by majority women in Norway, they addressed them in class terms and related to socialization processes. According to one majority activist, she has never met any '*physical hindrance*' or experienced that anyone has told her not to do certain things because she is a woman. In her opinion, the real barriers are due to her upbringing and gender socialization, which have led to a lack of self-confidence. As a girl she felt that it was expected of her to care for family members and others. When she grew up, she felt that if she only took care of herself, she was being egoistic. As an adult, she has become aware of this; however, she thinks it is very difficult to get rid of that feeling of being egoistic. This feeling, she said, is a result of her experience of growing up with certain expectations to her as a girl and internalising these gender specific norms.

These experiences resonate with studies of working class women in Norway (Skilbrei, 2005) and the UK (Skeggs, 1997). They show how the interaction of gender and class shape limitations for working classwomen, who have to relate to strict ideals of motherhood, responsibility and sexuality (Skeggs, 1997, as cited in Skilbrei, 2005, p.52). The 'decent thing to do' for a working class woman is to take care of her children and husband, as well as other relatives.

For women in Norway, family life or aspects of social and intimate citizenship (see Bergman *et al.*, and Roseneil *et al.*, both this volume) - the uneven distribution of child care responsibilities between women and men - were experienced as barriers to full citizenship. For example, women in Norway are still expected to take the main responsibility for child care. One majority activist outlined what she regarded as an

‘underlying expectation’ that when women become mothers, *‘they should stay at home as much as possible and not prioritize other issues, at least when children are young’*. Another majority participant also talked about the need for an increase in the availability and acceptance of individually tailored solutions for women, in contrast to a more rigid understanding of gender equality which prescribes that women must take on paid employment, work ‘like men’, and place their children in nurseries. A more flexible attitude towards women’s choices would also give more space for minority women’s preferences, she suggested. This majority activist is well educated, and her middle class upbringing taught her that she had many options before her. However, the reality of combining motherhood with a career and feminist principles was experienced as challenging, and she chose to take unpaid leave for some time to care for her child. Her experience convinced her that there is more than one way to be a ‘good feminist’. The story indicates that expectations surrounding motherhood do not only affect working class or minority women; however, the ideal of combining motherhood and a career is perhaps stronger in the middle class – and this ideal is difficult to live up to.

The Norwegian activists stated that, from a legal and formal perspective, women and men in Norway enjoy equal rights; however, they perceived women to have fewer opportunities than men in practice. Nevertheless, to focus explicitly on gender discrimination may be difficult because some of it is hard to put a finger on. Gender discrimination is often invisible because it seems *‘normal’* to us or it constitutes *‘the sum of little things’*, as one of the interviewees phrased it. They can seem like minor issues, like one activist’s experience of not always being taken seriously due to being soft-spoken. Moreover, to voice critiques of discrimination of women, and to address inequality as such in Norwegian society, was experienced as difficult by interviewees. The discursive space for such interventions was found to be limited due to a general discourse of gender equality having been achieved in Norway – and perhaps also because of a lack of consideration of class differences.

A problem for minority activists in Norway, in contrast with majority activists, is a lack of recognition; an issue that runs like a scarlet thread through the minority women’s stories. The interviews displayed various ‘accommodation strategies’ used by minority women in order to cope with numerous forms of everyday discrimination,

and also the necessity to counter prejudice and prove themselves to be 'worthy' of living in Norway. They talked about their lived experience in terms of overcoming barriers related to language skills, networking, access to work, and educational qualifications, but unlike the UK participants they did not frame their experiences much in terms of 'racism'. This was not surprising, because the word 'racism' is difficult to use in everyday Norwegian, despite an active anti-racist movement in Norway (Nydal, 2007). 'Racism' is a taboo concept as well as an insult to Norwegians who see themselves as beyond racist behaviour (Gullestad, 2006). The interviewees could therefore have hesitated even mentioning the term, let alone talk about racism in any depth with researchers of ethnic majority backgrounds. When minority activists in Norway mentioned the term 'racism', it was very briefly or in passing, and mainly in relation to Muslims' experience of being labelled as terrorist, or head-scarf wearing Muslim women being viewed as 'dumb' and being discriminated against in the labour market. Although racism was not talked about much in our interviews in Norway, the importance of race, religion and ethnicity was indicated by the inclination of minority women activists to associate our questions of inclusion and exclusion with their own minoritized backgrounds, while the majority activists never made that connection when outlining their own lived citizenship. Instead, majority activists associated dynamics of inclusion and exclusion more specifically with gender issues. Race and ethnicity remained silenced issues among them, a finding in line with the taboo surrounding race-talk in Norway generally.

Lived citizenship in Spain

As in Norway, among the activists in Spain there was not much talk about racism and discrimination in everyday life; rather, as stated previously, the main focus was on issues of inclusion and exclusion in the polity and on political, social and economic rights. As in the UK and in Norway, however, activists in Spain talked about how cultural and religious practices within ethnic minority communities can hinder women's citizenship, and how gender based violence provide barriers to citizenship for all women. At the centre of their discourse in this regard was the concept of human rights, which was presented as taking precedent over any cultural or religious practices that may be deemed as contrary to human rights.^{xiii} Some majority interviewees in Spain also saw the wearing of the Muslim headscarf as problematic, as they perceived it as a sign of women's submission, echoing Spanish-

born women's tradition of wearing a headscarf in a more patriarchal past. When asked about the barriers she perceived for minority women to be included in Spanish society, one minority activist replied that even though these women have rights, they are largely unable to make use of them due to a lack of knowledge. She continued:

'and sometimes they are also unaware of their duties and the social norms prevalent in this country. And this disorientation is what gives rise to vulnerability. These women's dependency on their husbands, their lack of financial independence, their lack of freedom of residency, since their right to stay in their country is conditional upon their husband's, so really, these women are subject to a lot of constraints [...]'

The interviewee perceived a lack of awareness of women's rights among immigrant women as a big problem, and suggested that learning about rights is the most important step forward. She went on to suggest that immigrant women, rather than being dependent on men and having their residency permit processed through their partners, should be *'entitled to be granted a residence permit and, if it expires, to be able to renew it without depending on the man'*. Her views were echoed by other activists who saw women's dependency on men's residence status as highly problematic in relation to safeguarding their rights to freedom from gender based violence. For example, one interviewee stated that *'for immigrant women, the foremost fear is that if they report their husbands they will get thrown out of the country'*. However, her solution to such problems was not to forward claims regarding citizenship, but to frame policy demands as issues of human rights and women's rights. She emphasized that women who suffer from violence should be entitled to protection regardless of their citizen status, as human rights are universal and therefore must apply also to women with insecure immigrant status.^{xiv} Such views were echoed by another activist in Spain who also framed human rights as a priority concern over and above the citizenship status of individuals: *'We work from the standpoint of rights [...]. What we defend is that in Spain, safeguarding human rights is something that takes precedence over any kind of immigration policy'*.

Activists in Spain, Norway and the UK alike were concerned with issues of gender based violence within immigrant communities and with misleading stereotypes about ethnic minority communities and individuals. Activists in Spain and the UK noted

that immigrant women without legal documents who experience domestic violence are in a particularly vulnerable position, since they may be financially dependent on their partners and avoid reporting violence due to fears of deportation. As noted earlier, activists in the UK referred to the 'no recourse to public funds' rule which prevents women with insecure immigration status who experience partner violence from accessing public funds.^{xv} Rather than framing this as a citizenship issue, however, activists in both the UK and in Spain framed the support for immigrant women experiencing violence as first and foremost a human rights issue: *'Yes, that seems to be a basic bloody human right, let alone a citizenship issue, to not have to choose between violence and homelessness and destitution'*.

Only a couple of minority activists in Spain focused specifically on direct experiences of racism and discrimination in their interviews. An activist working for a Roma (Gypsy)^{xvi} women's organization gave the example of Roma women who are widowed with no legal right to draw a pension due to having married only via 'Gypsy rituals': *'This constitutes an example of an unacknowledged cultural difference which involves discrimination'*. Another interviewee claimed that governmental institutions do not discriminate, *'when you go there they pay attention to you even if you are not a naturalized citizen with voting rights'*. Rather, she identified racism as a phenomenon she has experienced *'in the street by someone who says "nigger, go back to Africa"'* and through immigrants with professional qualifications being bypassed for employment by lesser qualified Spanish-born individuals. A third activist, on the other hand, said she had felt discrimination at the institutional level more strongly than at the personal level. The example she gave was that of a recent policy proposal for immigrants to sign an 'integration contract'. She identified this type of discourse as discriminatory and racist.

A majority activist in Spain working for an organization promoting the interests of Roma women also noted the existence of negative stereotypes: *'they [Roma women] are thought to be submissive, prone to abuse and more male chauvinism than other women'*. Her organization denies these stereotypes, *'because patriarchal male chauvinism is present in all cultures and is not more pronounced in the Gypsy culture even though that perception unfortunately still persists'*. She was also concerned about stereotypes regarding Muslim women. She refuted the idea that some

religions are more discriminatory against women than others, as well as the notion that all Muslim women are oppressed.

Activists in Spain also identified the lack of affordable child care facilities as a barrier to women's participation in politics and in paid work, while at the same time noting that this issue is now on the government's political agenda. In this regard, interviewees also noted the difficulty of reconciling immigrant women's work in domestic services with its long hours and low pay with child care responsibilities.

Lived citizenship in the UK

In the UK, several of the activists associated the term 'citizenship' with the term 'British' – not in the sense of having a British passport, but in the sense of wanting to be accepted or included as an equal citizen without having to experience racism and discrimination in public spheres such as politics, employment, or on the street. Race and ethnicity, and also to some extent religion (Islam) were clearly felt as negative markers and as barriers to full citizenship by all of the interviewees in the UK. Unlike Norway, majoritized interviewees in the UK also emphasized the continued prevalence of racialized discrimination. One minority activist explained that she finds it difficult to 'buy into' the notion of 'global citizenship or European citizenship' as long as black and ethnic minority people in the UK do not have the same rights and the same access to services as ethnic majority people in the UK.

The UK activists expressed a broad range of concerns about exclusionary, marginalising and discriminatory practices that prevent minority women from experiencing equal citizenship. Some interviewees mentioned the current *citizenship test* which has to be passed by those seeking formal citizenship in the UK. Many referred to additional hurdles that were also mentioned by activists in Norway and Spain, such as restricted access to paid work, as well as barriers related to voluntary work, language skills and educational qualifications. At the same time, people of racial and ethnic minority backgrounds born in the UK, as well as immigrants, refugees and asylum seekers, experience a number of constraints and barriers to equal citizenship due to their skin colour, culture or religious beliefs. These findings

echo those of the Parekh Report on multi-ethnic Britain, which highlighted experiences of racism and discrimination based on skin colour, culture and religion (The Runnymede Trust, 2000). For example, a minority activist born in the UK talked about citizenship as a term that signifies belonging. Yet, she does not feel that she belongs to the society in which she lives, and does not feel a connection with the word 'citizenship'. When asked why, she replied that her childhood experiences of racism in shops and of being the only black person at school, as well as her adult experience that contemporary society is 'very racist' and does not take seriously the issues that affect black people, make her feel that she is not fully accepted: *'We are still facing those kinds of issues every day so that is why I cannot embrace the word citizenship because I don't feel like a citizen'*. The interviewee went on to suggest that due to such experiences, people might choose to remain within their own communities and families, rather than taking an active part in the broader community, and that they might not want to get involved in anything *'for fear of reprisals, for fear of being told that you do not belong here'*. Her story illustrates how citizenship as lived, everyday practice can be experienced in terms of exclusion, just as strongly as experiences of exclusion that are related to citizenship as status and rights.

While UK activists generally focused on exclusionary practices within various arenas of the majority society as barriers to citizenship, some UK activists (as well as activists in Spain and in Norway) also talked about obstacles found within immigrant communities, such as patriarchal practices which hinder women's participation. For example, a British citizen of ethnic minority background recounted how she does not feel included or accepted as a citizen, and that she has experienced *'loads'* of barriers and limitations *'on the grounds of my colour, my gender, my sexuality'*. She did not think that minority women can fully exercise citizenship in the UK society. Yet, she pointed to immigrant communities themselves as posing the strongest barriers to minority women's participation. Due to what she perceives as the *'patriarchal nature of those communities'* she regards it as difficult for black women to speak out about issues of oppression originating within minority communities.

Several of the minority activists interviewed in Norway, Spain and the UK were directly involved in working against issues such as forced marriage, honour-based

violence, female genital mutilation and other forms of gender-based violence within their own communities. Some majority women activists also spoke specifically about 'culture' as a barrier to citizenship, and argued that cultural practices which contradict human rights should not be tolerated.

In addition to emphasizing barriers to participation originating within immigrant communities, however, some UK activists were also concerned with stereotypes about such communities in general, and about women from ethnic minority backgrounds in particular. For example, Muslim women were mentioned as a group that is frequently associated with negative stereotypes. One interviewee reflected on the issue of passing a citizenship test, and how that in itself does not guarantee the equal treatment of a new citizen in terms of her religion, race and ethnicity. She mentioned that Muslim women, in particular those who wear a burqa or a hijab, might be taunted on the street and suffer from a lack of access to citizen rights due to racism and discrimination.

Another UK-born interviewee stated that her race is more salient than her gender in everyday life. When something happens to her, she reflects on whether it is due to her being black or being a woman. More often than not, she finds that her skin colour explains more than her gender. Differences related to race, ethnicity, gender and religion were thus identified as the basis of different forms of exclusion from full lived citizenship.

In sum, activists in all three countries talked about barriers to full citizenship experienced by women, in particular barriers related to inclusion, participation and belonging. They mentioned difficulties in accessing work and affordable, quality child care, and the importance of being able to balance work and family duties. Additional barriers experienced by minoritized women were related to their lack of language skills, educational qualifications and networking, as well as to oppressive practices within ethnic minority communities and discriminatory practices within the majority society related to gender, race, ethnicity and religion.

Conclusion: a gap between feminist scholarship and movement activism

We have examined how the concept of citizenship is understood by women's movement activists, the extent to which they use a citizenship frame in their political claims-making, and the experiences they talk about in relation to citizenship as lived practice. Our findings demonstrate the importance of considering the specific historical and socio-political contexts in which social movement activism is situated in order to understand why the interviewed women's movement activists in Norway, Spain and the UK understand the term 'citizenship' differently.

In Norway, the term 'citizenship' was unfamiliar to most of the interviewees, but when asked to freely associate around it, several activists emphasized people's responsibility to play an active part in society, to contribute positively to it, and to care about the well-being of others. The women we interviewed in Norway mainly talked about the responsibilities and duties of individuals to society – the horizontal dimension of citizenship - when they talked about citizenship as an abstract term. They talked a lot about the need to be recognized, but they did not talk much about individual rights or about the state. This indicates that such rights are taken for granted in the Norwegian welfare state, and that the state is viewed as a rather benign entity.

In Spain, activists focused first and foremost on the rights of the individual – on political rights, on women's right to equality (in the labour market and through public provision of child care), and on freedom from gender-based violence. They talked about citizenship in terms of the inclusion or exclusion of ethnic minority groups in the polity, and on the different access to nationality, naturalization and voting that are accorded different immigrant groups in Spain. The vertical state-citizen discourse foregrounds citizenship as rights, and is related to the expectations that the democratic state should remedy previous discrimination of women, that Spain only recently became a country of net immigration and has yet to grant many immigrant groups the right to vote, and that racism and discrimination have only recently begun to be seriously addressed by policymakers.

Women's movement activists in the UK, however, associated the term 'citizenship' more with issues of national identity, participation and belonging, and with racist and discriminatory practices by the state and in society at large that exclude and marginalize ethnic minority communities in general and ethnic minority women in particular. The vertical aspect of citizenship in the UK is not primarily about rights, as in Spain, but about criticism of the state. These views can be understood in reference to the UK context, where colonial and post-colonial legacies continue to play an important role in relations between majoritized and minoritized groups. Although the UK state has been at the forefront of developing legislation to prevent racism and discrimination, racist and discriminatory practices are still abundant (Pitcher, 2009).

Although the term 'citizenship' was not applied by the activists themselves, we have profited from using 'citizenship' as an analytical concept when interpreting our findings. In particular, the concept of 'lived citizenship' - how individuals understand and negotiate rights and responsibilities, belonging and participation (Lister *et al.*, 2007, p.168) - has been useful. Through a focus on the lived experiences of women's movement activists, we have identified a broad set of barriers to women's full political, economic, social, multicultural and intimate citizenship. In this respect, activists in Norway, Spain and the UK are concerned with similar issues.

We found that very few of the women's movement activists whom we interviewed explicitly made a link between conceptions of citizenship as an active participatory practice and as a struggle for a set of rights (Lister, 2007, p.52). They did not talk about their own mobilization as a 'citizenship practice', but rather as a struggle for the realisation of human rights, equality and justice.

Through our analysis of how women's movement activists' talk, and do not talk, about citizenship, we have identified a divergence between the feminist scholarly focus on an *inclusionary* normative notion of citizenship as *lived practice* – as social relations and participatory practices within all spheres of life, be they political, economic, social, cultural, religious, bodily, or intimate (Halsaa *et al.*, 2011) – and the ways in which activists understand and use the notion of citizenship. Although a complex, multidimensional and multilevel notion of citizenship corresponds

empirically with the activists' agendas, the activists do not apply the concept normatively. The activists *do* associate citizenship with issues such as status, rights, participation and belonging, but they emphasize its fundamentally *exclusionary* aspects, and tend to see it as an abstract term which is not very useful in everyday movement practise. Consequently, the analysis of interviews with women's movements activists in Norway, Spain and the UK show limited evidence of 'citizenship' being used as a term to frame political demands. The notion appears to have little political purchase or relevance in enabling women's movement activists to mobilize politically. Only in specific contexts, such as those addressing issues of racism and discrimination experienced by ethnic minority women in general and by women with insecure or dependent citizenship status in particular, does the term appear to be of any relevance to movement activism. However, activists who work on issues related to women's insecure immigration status, especially in relation to domestic violence, stated a clear preference for a human rights frame for their claims-making. Overall, normative frames other than that of citizenship, in particular the human and women's rights frames, and also the (gender) equality frame and the social justice frame, are preferred by activists addressing inequalities and discriminatory practices across national and political contexts.

Our findings thus indicate a gap between grassroots women's movement activists and feminist scholarship in relation to citizenship as a normative concept, and substantiate the claim that 'citizenship' has an ambiguous status in relation to feminism. However, we also found agreement regarding the empirical descriptions of barriers and limitations to full citizenship. The partial mismatch we have found between theory and activism, and between normative conceptualizations and empirical descriptions, is evidence of different discourses among academic feminists and grassroots women's movement activists. This does not necessarily imply, however, that the 'citizenship' concept should be discarded; rather, both the concept and practice of lived citizenship should be 'remade' to promote inclusion, participation, justice and equality. Due to the importance of citizenship as a political-institutional concept at local, national and global levels, feminist citizenship scholarship has the potential to serve as a useful bridge between grass-root feminism and more formal, institutional politics, if it succeeds in producing knowledge of lived citizenship that translates to feminist activist communities as well as to

institutional politics. Only then can the 'remaking of citizenship' become an accepted, as well as strategic, frame in women's movement discourse and policy demands.

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ⁱⁱⁱ The UK became an EU member state in 1973, Spain in 1986. Norway is not an EU member, but complies with EU legislation via the European Economic Area agreement (with some exceptions).

^{iv} For example, Spain was not granted UN membership until 1955.

^v MIPEX measures policies to integrate migrants in 25 EU Member States and three non-EU countries via 140 policy indicators (<http://www.mipex.eu/> [accessed 20 June 2011]).

^{vi} Norway: the Equal Pay Council (1959); the Gender Equality Council (1972); the Gender Equality Ombud (1979); the Gender Equality Act (1979). Spain: the Women's Institute (1983). UK: the Equal Pay Act (1970); the Sex Discrimination Act (1975); the Equal Opportunities Commission (1975)

^{vii} Both Norway's recent anti-discrimination legislation and Spain's National Observatory against Racism and Xenophobia were introduced in 2005.

viii In January 2008, the Constitutional Court rejected this claim, and gave its approval to the parity provision of the Spanish Equality Law (Lombardo, 2009).

ix In the UK, citizenship can be acquired through descent, declaration, marriage, or adoption. The 2009 Borders, Citizenship and Immigration Act made further distinctions between different routes to citizenship for immigrants.

x For documentation of the discriminatory stop and search practices, see the Equality and Human Rights Commission (EHRC, 2010).

xi Romanian and Bulgarian nationals are not allowed to become 'an unreasonable burden on public funds'; see <http://www.ukba.homeoffice.gov.uk/eucitizens/bulgarianandromaniannationals/> [accessed 21 June 2011].

xii We use the terms (ethnic) 'majority' and (ethnic) 'minority', as well as 'minoritized' (Gunaratnam, 2003) and 'majoritized', when talking about different feminist and women's movement actors. Our approach is inspired by Yasmin Gunaratnam (2003), who applies a social constructivist perspective to the terms 'minority' and 'minority'. She employs the term 'ethnic minority' not in a descriptive sense, but sees the label and its connotations as socially constructed and therefore uses the term in quotation marks. Gunaratnam prefers the term 'minoritized', as it signals 'the active processes of racialisation that are at work in designating certain attributes of groups in particular contexts as being in a 'minority'' (2003: 17). In our own writing, for the sake of readability we have not consistently used quotation marks around the terms 'majority' and 'minority'. Moreover, we use these terms interchangeably with 'minoritized' (as suggested by Gunaratnam), and 'majoritized'. The term 'majoritized' signals that 'the majority is constituted as a majority by virtue of its power to, simultaneously, define the rules, be a fellow player and act as judges' (Gullestad 2002: 100; our translation). This 'majority-inclusive perspective' takes seriously the fact that majorities and minorities are constituted in relation to each other, and that the very categories that are being constituted are a result of differences in material as well as discursive forms of power: '[t]here are differences of power and of being marked and unmarked, privileged and non-privileged, powerful and non-powerful' (Staunæs 2003: 105; see also Staunæs and Søndergaard 2006; Frankenberg 1993; Brah 1996: 186). In other words, the labelling of people as 'majority' or 'minority' is in large part determined by existing power relations and power differentials between different groups. Minoritization and majoritization processes occur through social relations that are shaped by power, resources, interests, language and discourse. The distinction between race and ethnicity, which used to refer to alleged biological versus cultural and/or religious differences, is blurred. Theories of race are discredited by scholars, but 'race talk' in everyday life is very much alive (Taylor, 2003) and we therefore apply the term.

xiii Female genital mutilation and domestic abuse among minority women were talked about as religious and cultural practices, rather than as practices rooted in gender inequality.

xiv In Spain, immigrant women who are victims of domestic violence or sexual exploitation obtained a concession for independent residence in Organic Law 4/2000, which granted them a one year permit with access to social benefits but no right to work (Protection of Migrants, 2007, p.11; Amnesty International, 2008).

xv The immigration regulation 'no recourse to public funds' affects non-British nationals and Bulgarian and Romanian nationals (other EU and EEA nationals are exempt from the rule). The regulation denies state support and welfare benefits to those with insecure immigration status, and has therefore made immigrant women who experience domestic violence particularly vulnerable (see Amnesty International and Southall Black Sisters, 2008).

xvi The interviewed activists in Spain used the term 'Gypsy'. We have retained this usage when quoting interviewees, but our preferred term is 'Roma'. For a conceptual discussion see Hancock (2002).