# Nationalism and Citizenship

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ABSTRACT Nationality and citizenship are frequently confused but analytically distinct concepts. In the context of the United Kingdom they are especially problematic, for state identity (British) and national identities (English, Scottish, Welsh, etc.) have evolved in a highly implicit manner since the state was formed in the eighteenth century. The development of multiculturalism in the second half of the twentieth century adds to this complexity and diversity. At the end of the twentieth century, nation, state and society are increasingly differentiated, presenting particular problems for sociology whose orthodoxies usually treat them as synonymous. Today, fewer societies can be described as 'nation-states'. On the other hand, the United Kingdom is a multi-national and multi-cultural state in which ethnic and national identities sit uneasily alongside citizenship or state identity. Compared with modern republican states such as the United States or France, as well as Germany, the United Kingdom faces particular challenges to its historically implicit and complex set of political, territorial and ethnic identities.

KEYWORDS citizenship, ethnicity, nation-state, national identity, nationalism.

If someone asked what your nationality was, how would you answer? And your citizenship? Would you treat these questions as identical? Most people living in the United Kingdom today would say they were. After all, they would reply, we are British, and we carry a passport issued by the British government, even though that passport also describes them as a European in so far as the United Kingdom is a member of the European Union.

For about 15 per cent of the population of Britain, however, the questions would elicit a different response, or at least cause them to pause before they answered. The non-English peoples of the British state — the Scots and Welsh in particular — would be more likely to treat nationality and citizenship as different orders of concept. One's nationality — nation-ness might be a better term — would be Scottish or Welsh, whereas citizenship — their stateness — is British. Most people, however, would give little thought to this distinction, and would only be confronted with alternatives when faced with an immigration form or a hotel register in a foreign country which demanded to know their 'nationality'. Indeed, English people would also be faced with a decision. Do they say that they are British, or English? Most would treat these as synonyms for each other. Older people, however, who lived through the Second World War would be more likely to describe themselves as British, whereas younger

people might be more likely to say that they are English. That still leaves 1.5 million people to whom the issue of nationality and citizenship is highly problematic and contentious, the people of Northern Ireland. The Unionist majority claims their Britishness as an act of political faith, whereas the Nationalist community by and large denies its Britishness except as a *de facto* – and disputed – political reality. Around two-thirds of Protestants say they think of themselves as British, and about the same proportion of Catholics that they are Irish (Curtice and Gallagher 1990). The numbers of Protestants supporting nationalist parties, and Catholics unionist parties are exceedingly small (Breen and Hayes 1997).

In addition to these issues of nationality, there is the question of ethnicity. How, on the one hand, do 'ethnic minorities' relate to this multiplicity of national and state identities? These are matters as yet poorly understood. Can black people be English, for example, or do they think of themselves primarily as British, given that they are citizens of the state? Do nationalities, on the other hand, imply ethnicity, matters of blood rather than residence? When, in the 1980s, the Conservative politician Norman Tebbit invoked his 'cricket test' – if you live in England, you should support your country of residence rather than your country of origin – he was asserting the primacy of citizenship over nationality, even though he was falling into the usual trap of thinking that Britain was England.

We now know that members of ethnic minority groups are more likely to think of themselves in ethnic terms rather than being British. The 1997 Policy Studies Institute survey of ethnic minorities in Britain concluded (Modood 1997: 330):

They [ethnic minorities] were not...comfortable with the idea of British being anything more than a legal title; in particular they found it difficult to call themselves 'British' because they felt that the majority of white people did not accept them as British because of their race and cultural background.

Are the British in general unusual in their confusions about nationality and citizenship? Yes and no. On the one hand, as we shall see, there has always been something fundamentally problematic about national/state identity in these islands, even though for much of the history of the British state, which is less than three hundred years old, most of its citizens, at least on the British 'mainland', have not treated it as a problem as they go about their daily lives. On the other hand, as the new millennium begins, all modern societies are beginning to live through a time in which nationality and citizenship are in essence problematic. This is caused in part by new political systems emerging – the European Union is an obvious one – which problematise existing states. Put simply, the doctrine of national sovereignty is being eroded significantly and deliberately in the modern world so that power and jurisdictions become layered, operating at different levels for different purposes at different times. In many ways the conventional nation-state is being hollowed out, losing power and sovereignty to supra-state bodies like the European Union, as well as to sub-state nations and regions which are asserting their autonomy. The

argument of this article is that these changes in the political, social and cultural fabric of societies is so fundamental that sociologists in particular have to come to terms with them by developing new frameworks of understanding.

### State, Society and Nation

Why should this be a particular problem for sociologists? The issue of nationalism is more often seen as the concern of political scientists for whom the nature and salience of the state is central. It is – or should be – a matter for sociologists also. It is true that sociology did not develop an explicit theory of nationalism (McCrone 1998). Its 'founding fathers' were more concerned with explaining other aspects of the great transformation, from pre-industrial and pre-modern society, to industrial, modern society. Marx, Weber and Durkheim, of course, lived through the classical period of nationalism from the nineteenth to the twentieth centuries, but it was not central to their respective sociologies. Marx took the view that nationalism was, by and large, a bourgeois device for entrapping the proletariat, except in the few instances where it could become a progressive vehicle for this liberation. Durkheim, by contrast, was a 'nation-builder', and has been called 'the theologian of the French civil religion' (Llobera 1994:157). Weber regarded the 'nation' as in essence a political concept which was defined in terms of the state but not coterminous with it.

It is plain, however, that concepts like 'state' and 'nation' have taken second place in sociology to 'society'. Be that as it may, sociology has never properly sorted out what it meant by its core concepts like society, still less what it took to be nation and state. Put simply, sociologists used 'society' in one of two ways. On the one hand, with a capital S, 'Society' referred to the broad and common patterns of human organisation which could be subdivided into key types – industrial society, capitalist society, and so on. On the other hand, lower-case 'society' simply meant the political unit as we had come to know it. Alan Touraine (1981:5) observed:

The abstract idea of society cannot be separated from the concrete reality of a national society, since this idea is defined as a network of institutions, controls and education. This necessarily refers us back to a government, to a territory, to a political collectivity. The idea of society was and still is the ideology of nations in the making.

Most sociologists settled for an implicit and taken-for-granted understanding of 'society' as what came to be known as the nation-state, a bounded and self-contained social system within which most meaningful social, economic and cultural relations took place. In practice, society was simply the state: British, American, French, German and so on. Sociologists found their niche as commentators on the particular society in which they found themselves, without giving too much thought to the parameters it afforded social action.

The equation of society and state was overlaid by a third concept, the nation, so

that the three became virtually indistinguishable. Anthony Giddens, for example, has defined the nation as a 'bordered power-container'. He observed: 'a 'nation', as I use the term here, only exists when a state has a unified administrative reach over the territory over which its sovereignty is claimed' (1985:119); a 'nation-state' is therefore 'a set of institutional governance maintaining an administrative monopoly over a territory with demarcated boundaries (borders), its rule being sanctioned by law and direct control of the means of internal and external violence' (1985:121).

Most sociologists, to be sure, would have little quarrel with Giddens in these matters. Even those who might point out that nation, state and society belong to different orders of understanding – the cultural, political and social, respectively – would probably accept that they have become so intertwined in modern life that to distinguish them becomes mere wordplay. In essence, it implies that the key unit of modern life is the territorial entity in which social organisation, political control and cultural identity coalesce. It might appear to matter little which term we use – society, state, nation. But yet it does. We can no longer assume that they are in alignment. Somehow, the taken-for-granted assumptions upon which modern sociology has grown up during the twentieth century no longer work as well as they used to.

In our modern world, we are increasingly accustomed to viewing 'society', more precisely, 'civil society', as out of alignment with the state. This is because most of us inhabit social worlds which do not correspond simply to the territory over which the state rules. Daniel Bell has pointed out that the nation-state as it is currently constituted 'is too small for the big problems of life, and too big for the small problems of life' (quoted in McGrew 1992:87). Secondly, the term 'nation-state' looks increasingly problematic. In essence, it implies that the realms of the cultural (nation) and political (state) are at one. There appears to be, however, in Benedict Anderson's felicitous phrase, an 'impending crisis of the hyphen' (1996:8), and lessening correspondence between the two spheres. If we are strict about our definitions, and treat 'nation-state' not in Giddens's sense of simply the political jurisdiction, but as the correspondence of a cultural grouping – a 'people' – with their actual self-government, then there are few genuine nation-states in the modern world. It has been estimated that fewer than 10 per cent of existing states could be so described (Connor 1990). Some sociologists like Charles Tilly (1992) have argued that the term 'national state' is much to be preferred, as it does not imply that cultural and political units overlap.

Why should this unpicking of terms matter? Let us recall the comment by Humpty-Dumpty: 'When I use a word, it means just what I choose it to mean – neither more nor less.' Sociologists, naturally, would have more sympathy with Alice's reply: 'The question is whether you can make words mean so many different things,' as well as Humpty's riposte: 'The question is who is to be master – that's all' (Lewis Carroll's *Through the Looking Glass*, 1998:186). Words, in short, signify power. The elision of society, state and nation is a key aspect of the weaponry of political

debate in the modern world. It implies that genuine 'societies' are those in which social, political and cultural dimensions are in alignment. Where they are not, then genuineness is in doubt. This will no longer do. It neither describes nor explains the way the modern world is, nor what it is likely to become.

It is the drifting apart of the three key concepts – society, state and nation – which underlies the puzzle we began with: the relationship between nationality and citizenship. In other words, how do people's identities as members of a nation, their cultural identity, relate if at all to the membership of the state which considers them its citizens? To sharpen the point a little more, let us redefine nationality as 'nationness' to indicate that we are talking about how people see themselves in cultural terms. Let us, further, look to the sociological wisdoms to see how we might relate these to each other.

## **Problematising Nationality and Citizenship**

In general terms, sociology has approached the relationship between nationness and citizenship in one of two broad ways. By far the prevailing orthodoxy in Western, certainly British, sociology is to see them as basically antithetical. Liberal social science in the twentieth century has, by and large, treated civic identities (citizenship) as good, and what it defines as ethnic identities (nation-ness) as bad. Modern societies, in other words, are seen as those in which people are bound to the state as social-political actors rather than as cultural-ethnic beings. The marker for much of this approach in the second half of the twentieth century is the seminal essay of Hans Kohn in 1945 in which he sought to justify the superiority of Western – political – forms of national identification over Eastern – ethnic – forms. Western forms were deemed to be political and territorial in which people were defined as citizens. Eastern forms, by contrast, defined people – according to Kohn – as ethnic. People as citizens, as it were, versus people as folk. Whereas in the West, nationalism was a state-led ideology driven by a concern for individual liberty and rational cosmopolitanism, the Eastern form 'extolled the primitive and ancient depth and peculiarities of its traditions in contrast to Western nationalism and to universal standards' (Kohn in Smith and Hutchinson 1994:164).

While Kohn's distinction was clearly framed by the rise and fall of Nazism, the West–good, East–bad distinction as regards nationalism entered the grammar of liberal social sciences in the second half of the century. It is probably fair to say that social scientists generally view nationalism with some suspicion. After all, is not nationalism responsible for so much ethnic division in the world? Does it not lead inevitably to 'ethnic cleansing' wherever one looks? Hence, there is a tendency to say: 'I am patriotic; you are nationalistic.' The celebration of 'cosmopolitan' values over against 'nationalism' – the universal versus the particular – helped to sustain social science in thinking of itself as non- even anti-nationalist. This view derived from

what Ernest Gellner characterised as the 'dark gods' theory of nationalism. From the 1980s when ethnic issues re-appeared on the political stage, the conventional wisdom was to adopt a Pandora's box view of nationalism and national identity as if someone had let the evil genie escape.

The problem with such a conventional wisdom is that it is profoundly unsociological. It starts from the premise that such conflict is the inevitable outcome of social and ethnic differences; in other words, that differences lead to conflict. This, plainly, cannot be so. In class analysis, for example, it is almost a truism that class differences rarely generate actual class conflict as such. Similarly, it is not difficult to show that ethnic differences do not automatically spill over into the extremes of ethnic cleansing. In the Balkans, for example, Serbs, Croats and Muslims lived in reasonably contented proximity for centuries, and it was not until the social and political conditions changed radically in the 1980s and 1990s that living together became impossible (Malcolm 1994). There was nothing inevitable about the process. Closer to home, conflict in Northern Ireland is not the result of some essentialised and eternal differences between two religious groups, but a complex proxy for a sociopolitical struggle of relatively recent provenance. On the British mainland, few can doubt the felt differences between Scots, Welsh and English, but there is little evidence that open conflict might ensue without some fundamental change in political conditions on this island.

It was Ernest Gellner (1983) who took the orthodoxy that nationalism is inevitably conflictual and evil severely and properly to task. Gellner's lasting contribution to the sociology of nationalism was to show that modern societies were fundamentally nationalist whether they admitted it or not. This was because they required people's active and daily commitment to and expression of their nationality, not usually in an explicit way, but in the form of what Renan (1882) had called the 'daily plebiscite'. By this he meant that all citizens affirmed their national identity by the minutiae of everyday life. They did so because the state needed their active legitimation to justify its actions. Gellner argued that modern societies, which require a high degree of economic and cultural integration, do not easily tolerate abiding inequalities — that is, of a cultural, not of a class, kind. Such inequalities of status do not sit easily with the high levels of social mobility which modern societies require, as well as their levels of universal literacy. In Gellner's words, everyone is a clerk in so far as they trade literary skills in the marketplace as the *sine qua non* of modernity.

This insight by Gellner turned the prevailing orthodoxy on its head. Modern societies were highly nationalistic, but usually in an implicit and basic way. The fact that neither the state nor its citizens thought of themselves as such was the real power of nationalism. Contrary to the cosmopolitan liberal orthodoxy, nationalism and citizenship were not inimical to each other. Far from it. Gellner showed exactly how fundamentally and implicitly nationalistic modern societies are.

There is however a basic problem with this insight which is central to our argument here. If Gellner is right, and citizenship and nationality are so intertwined, if the modern state is a thoroughly nationalistic machine, why are so many states challenged by alternative nationalisms in the modern world? It is as if they have actually failed to inculcate state nationalism sufficiently well into the fabric of the society. And yet how can this be? In many ways this is Gellner's dilemma. He shows how modernity and nationalism go together, but he implies that this is a once-and-for-all process, which manifestly has not turned out to be so.

The two orthodoxies we have examined here take opposite stances on the relationship between nationality and citizenship. The cosmopolitan/liberal perspective argues that these are antithetical, that ethnic and civic identities – the particular and the universal – are in conflict with each other. Yet Gellner's revisionism shows that nationality and citizenship have actually become as one, for in modern societies, each requires the other. What both perspectives miss is that nationality and citizenship are neither necessarily in alignment nor are they antithetical. Rather, it is becoming clear that they are in complex, even contingent, relationship to each other, such that in the twenty-first century the tensions between them will become more obvious. To flag our later argument, it will become clear that nationality and citizenship actually belong to different spheres of meaning and activity. The former is in essence a cultural concept which binds people on the basis of shared identity – in Benedict Anderson's apt phrase as an 'imagined community' - while citizenship is a political concept deriving from people's relationship to the state. In other words, nation-ness and state-ness need not be, and increasingly are not, aligned.

# Whatever Happened to Nation-States?

How does this kind of analysis play in actual societies? To what extent can we characterise the United Kingdom and other societies as nation-states? What evidence is there that the relationship between nationality and citizenship is changing, and what is it likely to look like by the first quarter of the twenty-first century?

T. H. Marshall's classic essay on 'Citizenship and Social Class' is a useful starting point. Published in the middle of the twentieth century, it marked a particular stage in the United Kingdom just at the point when it became a welfare state. It presented a picture of Britain as a homogeneous society, leading its critics in the last few decades to point to his ignoring of issues of gender and ethnicity. Most critics however fail to pick out the real point of his essay, namely, to show the relationship between *de jure* equality of legal-political citizenship, and *de facto* inequalities of social class. Marshall was interested in how these two dimensions related to each other, and his essay was not meant as a characterisation of Britain in mid-century.

What, with hindsight, we can say about his essay is how problematic it was at that point in British history to say that the British were citizens at all. They only became such by sleight of hand under the 1948 Nationality Act (Goulbourne 1991). Prior to that act, the inhabitants of the British Isles and the British Empire were formally 'subjects' of the Crown. The post-war shift from being subjects to citizens came about because independent states such as Canada and India wanted to define citizenship for purposes of immigration. While post-war British governments wanted to retain the (post-)imperial notion of people owing allegiance to the Crown first and their own states second, independent countries baulked at this somewhat archaic definition of their own citizens. As a result, it was as if the British became citizens by stealth, or at least by default. The Labour party too connived at this, wishing to retain a rather loose and non-ethnic sense of Britishness to encompass post-imperial peoples. The legacy was a somewhat confused political identity for the British — as new citizens and yet as old subjects.

If British nationality was, in Robin Cohen's (1994) useful phrase, 'fuzzy' in terms of external relations, then it was so in terms of these islands. Ireland had formally become a republic in 1948 to make the point that the British state had no theoretical jurisdiction over its citizens as erstwhile 'subjects' of the Crown. The fuzziness of being British was not simply a reactionary legacy of empire. At least part of the Labour party's reluctance to redefine subjects as citizens was to keep the door open to peoples of the Commonwealth and to show solidarity with liberation struggles there. It also allowed in-migration to Britain in the post-war period, notably from the Caribbean, by people who indubitably thought of themselves as British. It was not until much later – the 1960s and 1970s – that a more 'ethnic' definition of the British emerged, and the 1981 Nationality Act ushered in a patriality clause allowing the right of settlement to white people. The law of blood (*ius sanguinis*) rather than the law of territory (*ius soli*) was embedded in law, with distinctly reactionary consequences.

Let us review what Britishness meant. It had grown up as essentially a non-national, encompassing form of political identity, well suited to an expanding imperial state. Linda Colley's characterising of Britishness as defined *contra* the 'other' in the eighteenth century, against the French, and against Catholicism, provided an umbrella identity to the Scots and the Welsh, though not to most of the Irish who were never considered properly 'British' (Colley 1992). The majority people, the English, went on assuming that the new Great Britain was in essence Greater England, leading to a long-term confusion of England and Britain which the British state is coming to terms with only in the late twentieth century with constitutional reform.

We have therefore inherited in these islands a complex and confusing set of national political identities. Robin Cohen (1994: 35) has described these as follows:

British identity shows a general pattern of fragmentation. Multiple axes of identification have meant that Irish, Scots, Welsh and English people, those from the white, black and brown Commonwealth, Americans, English-speakers, Europeans and even 'aliens' have had their lives intersect one with another in overlapping and complex circles of identity-construction and rejection. The shape and edges of British identity are thus historically changing, often vague and to a degree, malleable — an aspect of the British identity I have called a 'fuzzy frontier'.

Issues of ethnicity and nationality in the United Kingdom strongly suggest that we cannot describe it as a 'nation-state'. It has too many accretions and legacies of an imperial and pre-modern past for that to be an accurate description. It has been described as an 'unprincipled society' (Marquand 1988), that is, without a written, documented constitution. The elision of Britain and England meant that genuinely 'British' history was only invented in the twentieth century (Pocock 1975), and that in any case 'Britishness' had always had, like ancient Rome, an imperial quality — 'civis Britannicus sum'. It might be, however, that Britain is merely the exception to a general rule that modern societies are nation-states, at least in ideal-typical form. If the United Kingdom does not fit, what of other more 'modern' states in the West?

Modern European states would seem to be the place to look, with Germany and France the most obvious contenders. They are, after all, modern republican states with little of the pre-modern and aristocratic accoutrements of the United Kingdom.

Looking at Germany, however, reveals other anomalies. Before the unification of East and West Germany in 1990 it was not even clear where 'Germany' was. Being German remained largely a matter of blood rather than soil, ius sanguinis rather than ius soli. Rogers Brubaker (1992) has argued that the two ideal-typical models of citizenship in Europe are those of Germany and France. In Germany, the concept of 'nation' (blood) preceded that of 'state' (soil), whereas in France it was the other way round. The late unification of Germany in 1871 did not create Germans; they already existed in ethnic terms, and were governed by other states – Austria, Prussia, Russia and so on. Hence, anyone with German blood could claim to be German whether or not they lived on German soil. France, however, was a state before it was a nation, created as it was as a dynastic state by a succession of monarchs who claimed territorial jurisdiction on the basis of who happened to live there. Such a state had then to create French people. In Eugene Weber's phrase (1977), peasants had to be turned into Frenchmen, and there is evidence that this making of citizens did not occur until the late nineteenth century as a result of war (mainly against Germany) and by means of a state education system.

What implications does this have for how citizenship is defined? Brubaker (1992:3) puts it this way:

The state-centred assimilation is understanding of nationhood in France is embodied and expressed in an expansive definition of citizenship, one that automatically

transforms second-generation immigrants into citizens, assimilating them – legally – to other French men and women. The ethnocultural, differentialist understanding of nationhood in Germany is embodied and expressed in a definition of citizenship that is remarkably open to ethnic German immigrants from eastern Europe and the Soviet Union, but remarkably closed to non-German immigrants.

What we find, then, is that the two great continental European states have different routes to nationality and citizenship. Germany was first a nation and only later a state, so that the category of 'Germans' is, even today, wider than those who actually live in the confines of the state. It follows too that not all those who live in Germany can be German citizens. France, on the contrary, might be considered a state-nation, for it was first a dynastic realm, and only then a state of French citizens. It may have been the first thoroughgoing European republic of citizens, but 'making Frenchmen' took at least a century after the revolution. Its own imperial legacy has meant that it took its territorial definition of citizenship further than the British did, conferring on its colonies the right to settle in mother-France itself.

Germany too is characterised by anomalies, fuzzy boundaries and ambiguities. The relatively short and bloody history of the German state has resulted in a hierarchy of Germanness (Forsythe 1989). Before unification, West German citizens of German descent living in the republic were at the core, followed by GDR citizens living in the socialist republic next door. This post-war division meant that defining German citizens in territorial terms was not politically feasible, given the aspiration to unification and the political pressure of East German refugees living in the federal republic. Like ripples in a pool, outer circles contained 'Restdeutsche' living in land still claimed by some as Germany or in other areas of eastern Europe; 'Auswanderer', emigrant FRG citizens of German descent living in German-speaking countries such as Austria; and people of German descent living in foreign non-German speaking countries such as the United States, whether or not they spoke German.

One can only conclude that these two great European states provide fairly unusual and somewhat inappropriate models for understanding nationality and citizenship. While Germany was a nation which became a state, France was a state which transformed itself into a nation.

What of that other great republic of the late eighteenth century, the United States? Surely that offers the ideal-type for constructing thoroughly modern versions of citizenship and nationality? Certainly, the United States went about inventing citizens in a spectacularly successful fashion. It had to. This was the state which became a nation *par excellence*. Its founding myths of the 'melting pot' and its successful mobilising of mechanisms of 'banal' nationalism – most obviously the daily pledge of allegiance in American schools – helped to forge a national identity of robust and lasting form. Leah Greenfeld (1992) has argued that the original modern idea of the nation emerged in sixteenth-century England (some would put it further back than that (Hastings, 1997)), before being inherited by the American colonies

who refined the individualistic civic form of nationalism which came to characterise the West. Greenfeld takes the American case as paradigmatic of the essential independence of nationality from ethnic and geo-political factors. She comments (1992:23–4):

Since nationality is the original identity of the American population, which preceded the formation of its geo-political and institutional framework, the analysis of American nationalism does not focus on the conditions of its emergence, which is unproblematic, but rather on its effects, which can in this case be observed in almost pure form.

We might take the United States as the prime example of the state which forged a succession of immigrant people into citizens with a fierce pride in their nationality, regardless of their diverse origins and ethnicity – in Hobsbawm's words, 'Americans are those who wish to be' (1990:88). There are criticisms to be made of this optimistic and liberal view taken by Hobsbawm and Greenfeld. In the first place, it implies that the process was easy, straightforward and permanent. It is an essentially statist perspective which ignores deep and abiding differences. First, territorial integrity was severely threatened by the American civil war of the 1860s, echoes of which are not stilled even to this day, at least in the south. Secondly, one might ask: how pure is the 'civic' national identity? While in many respects the United States claims to be a pure form of a political rather than an ethnic community, it has its roots in Anglo-American Protestant traditions deriving from the Puritan forefathers who proclaimed the unique destiny for the chosen people in a North American New Jerusalem, what Anthony Smith has called 'vernacular ancestralism' (Smith 1991). In other words, even in this seemingly classical territorial state, some ethnicities were more equal than others. White Anglo-Saxon Protestants (WASPs) were not only more favoured in economic and social terms, but occupied a central part of the American foundation myth. In their canon, 'ethnics' are 'not-us', for in Michael Banton's term, they see themselves as 'minus-one' ethnics, for 'members of that group perceive themselves not as ethnic but as setting the standard by which others are to be judged' (1983:65).

### Nationality and Citizenship in the Twenty-first Century

Let us now return to our general argument about the developing relationship between nationality and citizenship. What is likely to happen in the first quarter of the twenty-first century, especially in Britain? In general terms we can expect to recognise that these concepts belong to different realms, nationality to the cultural realm and citizenship to the political. Further, it is quite likely that they will not correspond quite in the way we have grown used to in the last century or two. In the first place, citizenship will not be an all-or-nothing affair. Being a citizen will mean belonging to a number of political levels: the national, the state and the supra-state. The European Union is likely to play a greater role in the legal-political

decision-making realms of individual states. Alongside this, and largely reflecting it, the concept of 'sovereignty' will fragment. We will grow used to sovereignty being a multi-layered concept rather than a zero-sum one, a phenomenon which will distress some (like little Englanders), while being welcomed by others (such as Welsh and Catalan autonomists). The view of the world populated by autonomous societies-nations-states which we have inherited since the Enlightenment is one which is growing redundant. We will live increasingly in a political world beyond the sovereign state in which absolutism whether it is of the ethnic-nationalist or the civic-state variety no longer is operative (MacCormick 1996).

If this is the world we will have to adjust to, how well will individual societies make the adjustment? More particularly, how will Britain do so? What is the prognosis? Let us tackle these in the reverse order, beginning with the United States. As a modern republic, it has more or less successfully created generations of 'Americans' who think of themselves as its proud citizens. Nevertheless, there are significant points of tension when it comes to the relationship between nationality and citizenship, on both territorial as well as ethnic grounds. In many respects, the United States solved the tensions between the cultural and the political levels therein by simply melding the former into the latter. In other words, Americans are those who are governed by its government, and who pledge their allegiance to its institutions on a daily basis. There are, however, signs that all is not well. First of all, there is a growing tendency for 'hyphenated Americans', that is, the auto-description in terms of one's origins as well as one's political destination. Surely nothing wrong with that? Well, no, but it does perhaps signify that a straightforward 'political' form of identity is not enough. Secondly, there is a growing debate about the relative merits of cultural expression. Should, in other words, the English language be the dominant language to the exclusion of all others? This touches a raw nerve. The notion of one language, one people is so embedded in the United States that the sociologist Edward Shils (1995) has stated that American national identity would unravel if mono-lingualism were to be given up. He argues that multi-culturalism in the United States is destroying the national spirit, for the nation as a unity is premised on his view that there has to be a single culture generating national feelings of solidarity. One culture, one nation, one society remains still the leitmotif of Western thought, even though it does not sit at all easily with multiculturalism.

The European societies such as Germany and France are further along the shift away from notions of absolute sovereignty. The European Union will probably not develop into a United States of Europe, but will remain a confederation of states: *demos* rather than *ethnos*. Nevertheless, Germany and France will have their own changes to make. Since German reunification, there seems little to prevent a nonethnic definition of who is German in favour of a more civic or territorial sense. Yet the first efforts of the newly elected Social Democratic government in 1999 to permit dual citizenship for people of Turkish origin were initially defeated, though

eventually passed into law, suggesting that the tensions between ethnic and civic definitions of citizenship are still there.

France in many ways has had the most robust civic tradition of citizenship, one which encompasses those who are citizens by virtue of living in the former French empire. This inclusive definition, however, sits uneasily with a tradition of civic absolutism such that cultural forms which do not correspond with this tradition run into trouble. Being Muslim and wearing the *hijeb* (veil) is frequently deemed to be a contradiction with French culture. There is only one way to be French. Strong civic republicanism often carries an implicit multi-culturalism which is intolerant of alternatives (as we see in Shils's response above). This cultural clash can be exploited by far-right and racist movements such as the French Front Nationale. Much like its republican *confrère*, the United States, there is an implicit assumption that civic identity carries its own ethnic way of being French in cultural terms, from which deviations are rarely tolerated.

#### Will Britain Survive?

Although the republican states of Germany, France and the United States are not without tensions and strains between *demos* and *ethnos*, what is likely to happen to the United Kingdom in the first quarter of the twenty-first century? In many respects the strength of the state lies in its 'fuzzy' qualities. Even its name is fuzzy. What is the country called anyway – Britain? Great Britain? The United Kingdom? Certainly not 'England', although that is common enough. It is, in political terms, a unitary state with some constitutional devolution at its edges to the non-English parts of the United Kingdom. Britain – to stick with its simplest name, even though in strict terms that is to exclude that part of the United Kingdom not on the mainland, Northern Ireland – is a multi-national state, and increasingly a multicultural one. Formal citizenship is necessary to be able to register to vote in a British parliamentary election, but not in local elections nor those for the European Parliament. However, you do not have to be a British citizen to vote in the Scottish parliamentary or Welsh national assembly elections, which are classed as 'local' elections in terms of registration. It is simply enough to be resident and to register before the appropriate date. Being a 'civic' Scot or Welsh is all it takes to participate fully in the political process.

Indeed, one might ask, can we even consider the British as citizens at all? There is no written constitution, no bill of rights, and they remain 'subjects' of the Crown. In strict terms this is not the monarchy, but the panoply of governance which the British state took to itself so that it effectively became a seventeenth-century king. Its unformed quality in constitutional terms sits alongside a somewhat free-and-easy definition of who the British are in ethnic terms. Its long history of *laissez faire* and civic tolerance (two sides of the same coin in many ways) has created a multicultural

society, which, although in many respects a deeply racist society reflecting its colonial history, is also one of significant cultural mixing. There have been a considerable number of marriages across race, something almost unthinkable in the progressive United States and even republican France. For example, as many as half of Britishborn men of Caribbean origin, and one-third of women, have a white partner, while 39 per cent of children have one white parent (Modood *et al.* 1997). To be sure, the corresponding figures for people of Asian or Chinese origin are significantly lower, but they do seem to reflect a significantly multiracial society in terms of these most intimate forms of social relations.

The lack of precision as to who is 'British' reflects the haphazard history of the state in these islands. It is old in the sense that it was built around an older English core which was certainly one of the oldest nations in Europe, but new in the sense that it really only dated from the Treaty of Union with Scotland in 1707, or, if one is more precise about it, the Treaty of 1800/1 which formally incorporated Ireland into the United Kingdom. Britishness too was an imperial identity which allowed colonials in far-flung corners to celebrate being British, but it was an identity overly dependent on the peculiarities of war with continental neighbours, as well as distinctive in religion, until these ideological support systems no longer mattered.

And what now? Prediction is a hazardous exercise for sociologists, but this special issue of the journal encourages predictions, and the authors take their chances with their co-authors. There are indigenous and exogenous factors driving the new Britain. Internally, it is making a fairly successful transition to becoming a multicultural society, aided perhaps by the loose and fuzzy nature of national identity, and above all, the fact that being British is essentially a civic rather than an ethnic form. Externally, and as a member of a developing European Union, its market and cultural openness are likely to be fostered by this new political framework.

If Britain is in fair shape to make the transition to multi-culturalism, then whether it becomes a multi-national society is more problematic. The kingdom which was stitched together at the beginning of the eighteenth century was always a political and economic marriage of convenience which suited the two main partners England and Scotland for their different purposes. But conditions change. There was always ambivalence about the Union on either sides of the border. In Scotland, it was seen as a partnership, albeit between a senior and a junior partner, whereas south of the border there was much more inclination to see it as an incorporation of a troublesome northern neighbour: Britain as greater England. The other territories in Wales and Ireland had been formally annexed at earlier stages in their history, but there remained at the doctrinal heart of the United Kingdom an incubus of contradiction and anomaly (MacCormick 1998). Perhaps the component parts of the kingdom were too unequal in population terms — England was 85 per cent of the state's population — to become truly a federal, even a confederal, state.

The implicit nature of Englishness is further complicated by the seeming

juxtaposition of nationality and social class in England. In many ways, the dominance of the discourse of class, and its territorial proxies of 'north' and 'south' (Wiener 1985; Taylor 1993) has prevented, or at least delayed, the emergence of the discourse of 'nation' in specifically English rather than British terms.

A developing European Union is both a help and a hindrance to this process. On the one hand, the European project encourages the national territories of Scotland and Wales – even Northern Ireland, which has its own dual identity built into its cultural fabric – to strike out as autonomous parts of a greater Europe: a new European union swapped for an older British union? On the other hand, a looser confederation of states and territories allows more leeway to negotiate limited sovereignty for its component parts. Much will depend on what the French call *mentalité*, an ability to adjust one's mindset to new social, political and cultural conditions. Much too depends on what is left for the British to feel British about, for there is no longer war or religion to unite the peoples of these islands. It is, after all, so much easier to remake political constitutions than to remake cultural identities. There is a good chance that by 2025 being British will simply be a folk memory as the nations of these islands revert to a mixture of older habits and newer practices to see them through the twenty-first century.

#### ACKNOWLEDGEMENT

The authors are grateful to the anonymous referees for their helpful comments on an earlier draft of this article.

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