Neoliberal communitarian citizenship: Current trends towards 'earned citizenship' in the United Kingdom, France and the Netherlands

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Abstract

As Western European nation-states adapt to the challenges posed to the nation-state by globalization and immigration, adjusting citizenship criteria for immigrants has been one of the responses to these developments. This article compares the current changes in citizenship policies of three Western European states: the United Kingdom, France and the Netherlands. The main concern of the article is to shed light on the emerging development of a form of neoliberal communitarian citizenship that involves an increased emphasis on the need to earn one's citizenship. While many have signalled a shift towards neoliberal citizenship, this study assesses to what extent such a shift is characterized by a contractual view that sees citizenship no longer primarily as a prima facie right but as a prized possession that is to be earned and can be lost if not properly cultivated. At the same time, the study analyses the content of citizenship criteria to see how the nation-state in these three countries is sacralized by an emphasis on the national community. These two trends of earned citizenship are conceptualized in the study as neoliberal communitarianism.

Introduction

For some decades now, citizenship has been of renewed interest both in scholarly discussions and in political debates (see Isin and Wood, 1999; Kymlicka and Norman, 1994;

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Shafir, 1998; Van Gunsteren, 1998). Scholars have argued that both internal and external pressures on nation-states have led to the development of adaptation mechanisms, wherein citizenship occupies an important place. Internal pressures such as the issues of ageing populations, changing family structures, unemployment, criminality, immigrant integration and social cohesion have constituted a predicament for nation-states and incited a critique of the strategy of 'welfarism' (Rose and Miller, 1992). Roche (2002) analysed these adaptation mechanisms among which citizenship occupies an important place and called them new 'social contractualist' politics. He further argued that as nation-states face similar internal challenges, their responses resemble each other, which in turn leads to policy convergence. Still, divergence in policies partly remained, which has been explained by politico-cultural and institutional path dependency (Roche, 2002).

As to the adaptation by nation-states to external pressures, the process of globalization, often referred to as 'time–space compression' (e.g. Harvey, 1990; cf. Schinkel, 2009), is often seen as a phenomenon that has raised the popularity of the notion of citizenship (see Brubaker, 1989; Hall, 2002; Van Gunsteren, 1998). Globalization and migration has brought about challenges to the nation-state which have led for instance to the adjustment of citizenship criteria (Benhabib, 2004; Bloemraad et al., 2008; Jacobson, 1996; Sassen, 2006; Schinkel, 2009; Yuval Davis, 1999). Analysing the national mechanisms of adaptation, some scholars argue the decline of distinct national models of inclusion and exclusion, pointing at the convergence of policies (e.g. Joppke, 2007a, 2007b), while others, pointing at politico-cultural or institutional path dependency, suggest that this claim is overstated (Jacobs and Rea, 2007).

In this article, we compare the current developments in citizenship regimes of three Western European states: the United Kingdom (UK), France and the Netherlands. We build on the recent debates on the transformation of, for example, citizenship policies in Europe, which have sought to analyse the shift towards assimilationism (see Balibar, 1991; Brubaker, 2001; Grillo, 2007; Joppke, 2007a; Modood and Werbner, 1997; Schinkel, 2008; Wieviorka, 2005; Zolberg and Woon, 1999). Our theoretical contribution to this debate consists of the application of the later work of Michel Foucault. An interesting way of 'taking Foucault into the field' of migration and citizenship is to analyse civic integration courses as manifestations of power (Löwenheim and Gazit, 2009). Another way of adopting Foucault's governmentality perspective is by incorporating the insights of scholars working in 'governmentality studies' (e.g. Burchell et al., 1991; Dean, 1999; Donzelot and Gordon, 2008; Miller and Rose, 2008; O'Malley, 1992; Rose, 1999) and using the conceptual triangle Foucault introduced to differentiate between his archaeological and genealogical approach.

From a governmentality perspective citizenship can be regarded as a technique of 'governing a global population of thousands of millions by dividing it into the smaller subpopulations of particular states' (Hindess, 2000: 1487). Citizenship is thus seen as a 'dividing practice' (Dean, 1999: 133) or a 'marker of identification' (Hindess, 2000: 1487). By governmentality Foucault denoted, among other things, 'the ensemble formed by the institutions, procedures, analyses and reflections, the calculations and tactics that allow the exercise of this very specific albeit complex form of power, which has as its target population, as its principal form of knowledge political economy, and as its essential technical means apparatuses of security' (Foucault, 1991: 102). Foucault introduced

his governmentality and genealogical approach providing us with some conceptual tools while at the same time distinguishing it from his earlier archaeological approach (cf. Foucault, 1966). Like Foucault we are concerned with the triad of the techniques of power, the political programmes and guiding strategies, which have been taken up by Donzelot (1979; see also O'Malley, 1992). These three elements, strategies, political programmes and techniques, vary according to the level of abstractness (see also O'Malley, 1992; Rose et al., 2006). *Strategies* are the more abstract theories or formulae of government dealing, for example, with relationships between state, market, society and citizens (e.g. 'welfarism': Rose and Miller, 1992: 22). *Political programmes* are the generators of action using 'problematization' (Burchell, 1993) and 'ends' or 'objectives', as such delineating a field of problems and practical objects for intervention enabling the more concrete techniques of intervention. *Techniques* are the concrete ways of intervention aimed at the management of the population (e.g. the panopticon as technique of disciplinary power: O'Malley, 1992: 258).

The main issue is thus *how is citizenship used as a technique of population management in the political programmes of different countries concerning immigration and integration*? In other words, *which criteria of acquisition of citizenship are used by states and by which strategies are they guided*? In answering these questions we first describe the main strategies of population management in Western European states: neoliberalism and communitarianism (Schinkel and Van Houdt, 2010). Subsequently, we describe the political programmes of citizenship with regard to the issues of immigration and integration in three countries, namely the UK, France and the Netherlands. Using the governmentality perspective on migration, integration and citizenship policies, we highlight three intertwined processes as deduced from the political programmes of citizenship in these three countries: (1) (re)formulations of *social contracts* between (potential) citizens, civil society, the state and the markets; (2) a renewed *sacralization* of the nation; and (3) a form of citizenship that involves an increased emphasis on the need to *earn* one's citizenship. We call the strategy arising out of these new techniques used by the three states *neoliberal communitarianism*. We argue that neoliberal communitarianism leads to convergence in policies of citizenship in these countries while allowing space for divergence based on politico-cultural and institutional path dependency.

Neoliberalism and communitarianism as strategies of population management

In line with Foucault's 'methodological nominalism' (Foucault, 2008: 2–3), we assume that the specific content of citizenship in time and space depends on the political programmes and strategies. The dominant strategies at a particular time and context is manifested in the layers added to citizenship (Marshall, 1963), the role citizenship plays as a mechanism of division (Dean, 1999: 133) and the moral images of good and active citizens vis-a-vis risky or inactive citizens which are constructed in the political programmes (e.g. Dean, 2007; Lockwood, 1996). The main 20th-century strategies of population management in Western Europe were communism, liberalism, fascism (Italian and national-socialistic fascism) and welfarism. The main contemporary strategies (or 'formulae of government') in Western Europe are (neo)liberalism and communitarianism

(e.g. Mulhall and Swift, 1996; Schinkel and Van Houdt, 2010). From a governmentality perspective, both neoliberalism and communitarianism are considered to be 'actually existing' formulae of the government of selves, others and the state as manifested within specific political programmes and techniques of intervention. Although analytically helpful, it must be recognized that the concepts of strategy, political programmes and techniques are empirically fuzzy. There is no clear top-down movement as if some actor is developing a strategy, while based on this another actor develops a political programme and yet another actor uses this to implement some techniques. Rather, new manners of governing are invented in an ad hoc way (see Rose, 1999: 27). Like a rhizome this triad emerges, linking different actors, ideas and documents. In contrast to perspectives in political philosophy, we are not concerned with moral issues of a 'fair and just society' or 'the right relation between the state and citizens'. Instead, from a governmentality perspective we consider these normative standpoints as fundamental points of departure for strategies of population management. Focusing on the practices of neoliberalism and communitarianism makes it possible to incorporate 'path dependency' in our analysis (see Brenner and Theodore, 2002). However, we first need to describe neoliberalism and communitarianism as strategies of population management. We do so by providing a 'sensitizing description' rather than giving a reifying 'definition' (Blumer, 1954).

Neoliberalism is a strategy of population management often regarded to have arisen as a reaction to the paternalist and coercive strategy of welfarism (leftist critique) and a critique of the expanding welfare state (conservative critique) (e.g. Foucault, 2008; Roche, 2002). The underlying moral image of the individual is one of the autonomous, free, rational and self-regulating citizen who disciplines her/his nature under the influence of the civilization processes s/he underwent (Dean, 1999). From a neoliberal strategy, citizens need to become active parties entering contracts between the state, society, markets and citizens (Rose, 1999: 165). Citizens are called to assume *responsibility* in regulating themselves, their children and their neighbourhoods (see Dean, 1999: 166–71). Such 'responsibility' is a crucial concept in a neoliberal strategy. An important question then becomes: 'Do we see an influence of neoliberal strategies on political programmes on citizenship in relation to integration and immigration?' In other words, 'Is there a neoliberalization (in the form of a contractualization) of citizenship?'

Communitarianism, on the other hand, is a strategy of population management developed partly as a critique of (neo)liberalism in the 1980s (Mulhall and Swift, 1996: xii). Delanty (2002) distinguishes a communitarian strategy from both a neoliberal strategy and a socialist strategy. Communitarianism can be distinguished from (neo)liberalism since it focuses on the community instead of individuals and contracts between them. Communitarianism can also be distinguished from a socialist strategy as it focuses on culture more than on material strategies. The key issues are thus the community, common values and the commitment of individuals to endorse and defend these values (Etzioni, 2007: 359). As Rose (1999: 176) argues, one way to understand communitarianism is as a strategy which seeks to 'govern through community'. An important question then becomes. 'Do we see the emergence of a communitarian strategy in the political programmes of citizenship in relation to integration and immigration?' or 'Is there a communitarianization of citizenship?'

In the following sections we look into the recent trends of the political programmes of citizenship in the UK, France and the Netherlands. While analysing the specific conceptualizations of citizenship in these three countries, we primarily concentrate on the criteria for obtaining citizenship.[1] Our main focus lies in analysing the dominant representations of citizenship in the latest legislative texts and policy documents. While assessing these developments, we also refer to the historical traditions of citizenship in order to interpret the current trends in their national contexts. We first discuss developments in the direction of a *contractualization* of citizenship. Then, in the fourth section, we discuss a parallel process of *sacralization*. In the fifth section we outline the emerging idea of *earned citizenship* in the countries under study and the sixth and concluding section outlines *neoliberal communitarianism* as an emerging political strategy.

Contractualization of citizenship

The striking characteristic of the new citizenship regimes in Western Europe is that citizenship is presented and wrapped up as a form of contract between the prospective citizen and the state. According to this contract, the applicant accepts the responsibilities that need to be undertaken in order to acquire the citizenship in question. Only when the responsibilities are fulfilled is the individual entitled to the status of citizenship together with all the benefits that come with it. Using of the technique of a contract is often recognized as part of a neoliberal strategy, all the more in cases where the state also involves the (local) community or private parties in terms of sharing the responsibility in this citizenship process (see Rose, 1999: 165; Yeatman, 1998). Though this neoliberalization is a common trend in the three countries we study, there are variations in the extent to which the contract between the state and the prospective citizen is viewed as consisting of mutual responsibilities. This is where national elements of communitarianism enter the equation.

United Kingdom – a new deal for citizenship

Historically, the focus of the British conception of citizenship has not been contractualist. Instead of rights (and responsibilities), British citizenship is based on privileges which may also be extended to non-citizens (Everson, 2003: 78). The new citizenship system, however, presents a sort of contract, a 'deal for citizenship' in its own terminology, which matches the rights and benefits of citizenship with the responsibilities and the 'right contribution' of the individual which will lead to full citizenship (meaning the whole package of rights and benefits). The journey to British citizenship consists of three stages: temporary residence, probationary citizenship and British citizenship/permanent residence.[2] Temporary residence is the initial settlement period of the migrant during which the requirement to progress consists of economic contribution and/or self-sufficiency. The most interesting category is the provisional stage of 'probationary citizenship' when individuals are expected to 'integrate fully into British society'[3] and to 'demonstrate they have earned their right to British citizenship'.[4] Concretely, the requirements are listed as:

- Proficiency in the English language and knowledge of life in the UK;
- Paying taxes, economical self-sufficiency, demonstrating genuine relationships;
- Obeying the law;
- Joining in with the British way of life (active citizenship).

The deal consists therefore of responsibilities on the part of the individual until s/he completes the journey to citizenship and becomes a British citizen or permanent resident.

A defining element in British citizenship and immigration policy is labour market considerations (Geddes, 2003).[5] Within this economic conception, (to-be-)citizens are viewed as human capital turned on (post-Second World War rebuilding of the economy, to be competitive in the global world economy) or off (in times of economic crises such as the oil crisis in the mid-1970s, beginning of the 1990s, and currently) at the will of the British government. The sense of economic pragmatism in British policy is demonstrated through the expression of the perceived needs of the British economy, framed as 'national interests', where immigrants are admitted and offered citizenship as contributors to the British market with their labour and taxes.

In the post-Second World War context, the economy is furthermore to be understood in the broader context, including the building, extending and shrinking of the British welfare state since this also corresponds to the rights connected to citizenship (Delanty, 1996; Roche, 2002). The heyday and crisis of social rights are linked directly to the progression of the welfare state (Marshall, 1963). Currently, it is essential that migrants do not constitute a burden to the welfare system. As such, they prove themselves to be self-sufficient individuals and 'pay their way' into citizenship. Only when citizenship is earned does the migrant have full access to the benefits of the welfare system, such as social housing, etc.[6] Social rights are thus clearly earmarked as rights to be earned.

At the institutional level, an interesting element with regard to the developments in the citizenship field is that integration and cohesion are primarily expected to come into life and to be shaped at the local community level (Back et al., 2002: 447). The setting up of the Commission on Integration and Cohesion in 2006 can be seen as a demonstration of this trend. The Commission, a fixed-term advisory body, was set up with the aim of relying on local experience and expertise in order to develop practical approaches to managing diversity in communities across the UK.[7] Integration and cohesion is yet another policy area where 'the responsibility for progress is increasingly offloaded [from the national government] on to the individuals, communities, cities or regions' (Back et al., 2002: 448). The largest share of the responsibility, however, falls on the shoulders of individuals who need to behave to be worthy of becoming citizens or of being good/active citizens.

France – an obligatory contract for newcomers

In France, the path to citizenship also goes through an integration process which is guided by the Contract of Reception and Integration (*Contrat d'accueil et d'intégration*, or CAI).[8] Introduced in 2003, CAI consists of a three-module integration package (including the sub-modules French language, civic formation and living in France). Despite the fact that it is called a contract, the signing of this contract and fulfilling its

requirements are not voluntary and were officially made obligatory in 2006.[9] Furthermore, the renewal of residence permits is linked to the completion of the courses. As such, these contracts demonstrate a clear shift from the concept of denizenship/citizenship as a right deriving from residing on French soil to a prize or a virtue to be earned by showing the possession/knowledge of the 'right' skills and values.

To begin with, the title of this document resonates well with the French concept of nationhood originating in the idea of the daily plebiscite to belong to the nation (Renan, 1990 [1882]) and the social contract idea of Rousseau. That is why the French *Haut Conseil d'Integration*)[10] initially embraced the idea of these contracts since a contract would imply a voluntary agreement that the state and newcomer sign mutually (Joppke, 2007a: 12). A mutual voluntary commitment would thus lay a good foundation for citizenship. By signing the contract, the French state and the newcomer agree on their mutual integration duties. The state finances and organizes the integration track of the immigrant. The French Office of Immigration and Integration (*Office Français de l'Immigration et de la Intégration* or OFII) is responsible for the first contact with the newcomer where the content of the contract is explained, for determining the needs of the newcomer,[11] for organizing the courses the immigrant needs to take and for monitoring the progress of the individual. The newcomer is responsible for attending the language and civic knowledge courses and taking an elementary French language test (if s/he was obliged to take French courses in the first place).[12] The fact that the French government pays for the courses and checks on their attendance gives a clear sign of their commitment to integration. As long as the government continues to limit the monitoring of integration to the objective requirement of participation, the duties of the immigrant are clear cut. Only the conscious unwillingness to respect the contract (*non-respect manifesté par une volonté caractérisée)* may have implications for the renewal of the residence permit. Yet, given the French legislation in this domain has been changing at a growing speed and becoming stricter in the last few years, it remains to be seen if further proofs will be asked to earn French citizenship.

An emphasis on the duties (next to the rights) attached to citizenship is not a novelty in terms of the French republican citizenship. The novelty lies more in the duties attached to obtaining citizenship (and permanent residence), whereby the newcomer has to now prove that s/he has earned the right to stay and reside in France. These duties are laid out in the CAI, which signals to the newcomers that they have a responsibility to integrate in that they are expected to '*find* their place in French society'.[13]

The Netherlands – a new social contract and civic integration contracts

As several scholars have noted, in the Netherlands a shift occurred from pluralist (1980s) to universalist (1990s) to assimilationist (2000 onwards) policy/discourse (Joppke, 2004; Schinkel, 2007; Scholten, 2008; Spijkerboer, 2007; Vermeulen, 2007). Focusing on the genesis of the 'civic integration contracts', it can be said that they were born in the 1990s. In this period 'citizenship' became the leading principle of the current 'integration policy'.[14] This meant a break with the pluralist period, where 'group wise emancipation in the socioeconomic domain' was combined with a 'government-felt responsibility' to achieve this goal (e.g. Driouichi, 2007). With citizenship as the leading principle, the

central government expressed its claim that immigrants had to take responsibility for integration themselves, but it also articulated the responsibility of local governments.[15] This shift occurred due to situational factors such as high unemployment among the immigrant Dutch (e.g. Joppke, 2007b: 249–251) and cultural-political factors (e.g. changing government coalition) (see Brubaker, 1992: 159–64). In 1994 the Dutch government formulated the need for 'civic integration contracts' and its new policy path towards decentralization, 'responsibilization' (see Burchell, 1993) and 'individualization'.[16] In this context the 'technique' of the contract emerged and regulated the rights and duties of the contracting parties.

From 1996 to 2004 local governments were obliged to offer civic integration courses to newcomers.[17] Initially, the civic integration contracts were accepted voluntarily by newcomers.[18] However, since the Civic Integration Newcomers Act (CINA) (*Wet Inburgering Nieuwkomers*) came into force in September 1998, newcomers are obliged to follow the civic integration courses.[19] With CINA a newcomer arriving in the Netherlands has to report immediately to the local government. The local government has to investigate the background of the newcomer, the newcomer's cognitive skills such as her/his mastering of the Dutch language, and it has to estimate the risk of the newcomer taking a socially disadvantaged position that can potentially lead to claiming state assistance.[20] Based on this individualized inventory a civic integration programme is set up. In the 1990s the courses focused on learning cognitive skills such as the Dutch language in order to enhance the potential to sustain oneself independently in Dutch society and obtain a place in the Dutch socioeconomic sphere (e.g. the labour market) (see Fermin, 2009; Joppke, 2007b).[21] If a newcomer does not comply with this requirement, a financial sanction is applied which is determined by the local authority.[22]

It can be argued that the 'civic integration contract' was born as a technique regulating the changing relations (rights, duties and ideal types) between states, local governments, the market, citizens and potential citizens. In addition to this, two further observations must be made. First, it can be argued that the universalistic path taken in the 1990s meant both an individualizing and responsibilizing way of managing (ethnic or sub-) populations. It was therefore a mutation in policy and political programmes. This was based on a neoliberal strategy, which continued in 2004 when the civic integration courses were released to the invisible hand of the free market. Since 2004 market parties are the new partners in the civic integration contract based on the twofold assumption of the free choice of the immigrant to choose his/her own course and the optimal price–quality relation.[23] However, next to this discontinuity some continuity existed in the 1990s, for the focus remained on socioeconomic integration. As we describe below, both the content and the focus would change in the late 1990s under the influence of the process of 'sacralization' and the increasing need to earn one's citizenship.

Second, the technique of the contract has wider applicability in the Netherlands. For example, the 'New Social Contract'[24] formulated by the Dutch government deals with the need to change the relationship in terms of the reciprocal rights and duties of the state and its citizens and to accommodate this relationship to the 21st century (cf. Ossewaarde, 2007). The Dutch Cabinet formulated a new perspective on governance in its 2003 'Cabinet's Perspective on a Different Government' (*Kabinetsvisie 'Andere Overheid'*),

which was followed by the 2005 action programme 'Exploring Citizenship and Different Government' (*Verkenning Burgerschap en Andere Overheid*). Both documents deal specifically with a new social contract that is 'meant figuratively, as used by J.J. Rousseau in "*Du contrat social*" '.[25] In these documents it is argued that the government, in its striving for the common good, needs active citizens and good citizenship: 'when government and citizens need each other to guarantee the common good, active citizenship is expected of citizens. Good citizenship is indispensable for society.'[26] The good citizen is defined as the citizen who 'is able to cope for him/herself, has reached the age of majority, who is committed, which expresses itself not in the first place with claims, demands and appeals against the government, but in societal self-organization and initiatives'.[27] This explicitly applies to the new generation of citizens, namely the youth and newcomers.[28] It is argued that civic integration and 'citizenship building' cannot be achieved without obligatory requirements and the duty to take responsibility for oneself.[29] In the following paragraphs we describe how this perspective combines with the specific and changing content of the contract according to new problematizations and political programmes under the headings of 'sacralization' and the need to 'earn' citizenship.

Sacralization of citizenship

The technique of sacralization means to separate the sacred from the profane by commanding respect for the sacred object due to its privileged status (Brubaker, 1992: 147). The sacralization of citizenship is closely linked to the contractualization of citizenship but refers to the criteria of citizenship that need to be fulfilled which are specifically related to the membership of the nation-state in terms of cultural and moral criteria. Furthermore, these cultural criteria are often presented as a precursor to an autonomous functioning individual in society. In this sense, the convergence consists of the increased value attached to the national identity and to national values in demonstrating one's progress towards citizenship. The cultural components serve multiple purposes: for testing knowledge of the country, for showing loyalty to the dominant values, and finally for creating an ideal image of the citizen and the contributions s/he is expected to make to the national community. These emphases in turn point to the communitarian underpinnings of earned citizenship. How these requirements are translated into citizenship practices is highly coloured by what is considered to be representative for the nation-state in question. This also becomes visible in the content of citizenship courses and/or tests. National symbols and citizenship ceremonies are also to be seen within this framework and are also on the rise.

United Kingdom – active citizenship as a British value

Language is presented as a precursor to integration into British economic and community life.[30] Only when an individual speaks English[31] can s/he be self-sufficient in daily public activities. Language proficiency is also seen as a prerequisite to contacts in the community of residence. To foster the use of English, the British government not only encourages local communities to provide for English lessons, which need to be financed by the participants themselves, but it also invites them to limit the translation of documents (which would also help them to reduce their translation costs).[32]

The knowledge of life in the UK that an aspiring citizen is expected to possess includes basic knowledge of British history and institutions (political, economic, social and legal).[33] This type of information is partly practical and necessary for surviving in the new country of residence. Besides, this is the sort of information that is seen as crucial in facilitating meaningful civic (political and civil society) participation. The value attached to this knowledge is confirmed by the fact that this knowledge has to be proven by passing the 'Life in the UK Test' for those who wish to become British citizens (since 2005) and permanent residents (since 2007).

Though formal proficiency tests can be seen as formalistic requirements that may be considered as standardized prices to pay for citizenship, economic self-sufficiency, law obedience and active citizenship constitute rather prescriptive requirements that require potential permanent residents and citizens to (only) *positively contribute* to British life.[34] In their journey to citizenship, the UK monitors individuals in terms of their positive and negative contributions to the community. Whereas committing a crime can lead to a halt or stop in the journey (i.e. deportation in the case of serious crimes), voluntary community work accrues positive points and fastens progress towards citizenship.

Especially in the last stage towards citizenship, the period of 'probationary citizenship', the aspect of positive contribution becomes the most important. This is when active citizenship comes forth as the ideal form of citizenship. Interestingly, joining the British way of life is almost equated with active citizenship. It should be stressed here that active citizenship is a virtue that the British state prizes for all its citizens, especially its young citizens, in particular through citizenship courses. As such, playing an active role in one's community, for instance through voluntary work, is expected from all citizens. As a citizenship criterion, it is not obligatory but highly appreciated. In practice, this means that a candidate citizen can earn points with it and will thus accelerate her/his progress towards citizenship.

By fulfilling the formal requirements and passing the necessary tests, the prospective citizen has thus to prove s/he has earned citizenship. As to the symbolic aspect of acquiring citizenship, the UK has been requiring an oath of allegiance for new citizens that was introduced with the Nationality, Immigration and Asylum Act of 2002, but since 2004 this has been transformed from an act done privately in the presence of a person with the power to witness oaths to a public ceremony organized by the local government so as to celebrate this significant event and to mark the official welcoming into the local community together with others in the area who are becoming British citizens.[35]

France – revalorizing republican values

Historically, France has a tradition of making citizens out of immigrants (or peasants: Weber, 1976) through assimilation into French republican values (Brubaker. 1992; Favell, 2001). As such, integration has been defined in France as an ability to 'become "French" ' (Givens, 2007). A prospective citizen is thus expected to integrate into French society by endorsing the values of equality, liberty and fraternity. The new republican integration package introduced in 2003 may be seen in this light, especially the sections on the civic formation (*formation civique*) and living in France (*vivre en France*).

Yet, the integration package may also be viewed as a manifestation of the larger effort of *revaluing* citizenship. The sacred character of citizenship has occupied a place in the

French political debates on citizenship since at least the late 18th early 19th centuries (Brubaker, 1992: 88–90). More recently, a '*sacralization* debate' was put on the agenda in the 1980s (Brubaker, 1992: 138). The terms of this debate not only openly referred to becoming French as something to be deserved (echoing the *Front Nationale* slogan '*Être Français, cela se mérite*'), but also something that has to be done from the heart (*Français de cœur*), not only on paper (*Français de papier*) (Brubaker, 1992; Geddes, 2003; Hansen and Koehler, 2005).

French citizenship has always presupposed a moral component of what it means to be French (Favell, 2001: 66). By virtue of defining the contours of this *citoyenneté*, nationality laws have occupied a central space in discussions over immigration and integration and have been closely linked to the concepts of nation and national identity (Favell, 2001: 63), which is also manifested in the recent national debate on the French national identity.[36] Becoming French has assumed having internalized the core values of the French Republic, diligently echoed in *nationalité réussite* with reference to immigrants who have fulfilled the moral and legal criteria for integration (Favell, 2001: 159). In this sense, one can speak of continuity in the development of the French concept of earned citizenship. What is significant, however, is that the 'earning' is not taken for granted anymore, but that the process of earning is codified and monitored through the coupling of residence and citizenship entitlements to the contract of integration. The integration package actually admits that the assimilating power of the French state is not taken for granted anymore and needs to be exerted by means of obligatory requirements. Once individuals do achieve the status of French citizens, this achievement is celebrated with a ceremony (*cérémonie d'accueil dans la citoyenneté Française*)[37] organized by the local authority since 2006. Citizenship is thus also sacralized and ritualized in France.

The Netherlands – Dutch citizenship as a moral value

The Netherlands is a frontrunner when it comes to the moralization and culturalization of citizenship in relation to the sacralization of community (Schinkel, 2007; Van Houdt and Schinkel, 2009). Since the late 1990s, Dutch discourse on integration has increasingly centred on notions of 'culture', 'norms and values' and proper definitions of 'Dutchness' and of 'Dutch society' but also on the defence of social identity and loyalty and commitment to the community and its values (Schinkel, 2007). This resulted in (the search for) a 'Dutch Historical Canon' (ratified by parliament in 2008) and a Dutch National History Museum where these elements will be displayed. In addition to this, civic education became part of the obligatory Dutch school curriculum. Moreover, there has been a debate on drafting a preamble to the Dutch Constitution where the fundamental national values are to figure. In effect this means a moralization or culturalization of citizenship, which is also visible in the content of the 'civic integration contracts' and the sociopsychological demands placed upon immigrants.

Since the late 1990s, double nationality became a problematized issue in politics but now also in the media (Fermin, 2009). Therefore, in 2003, the 1985 Bill on Dutch Citizenship was amended to include more restrictive and culturalized terms. As a consequence of this, a more extensive naturalization/civic integration test together with the requirement to renounce the original nationality have been introduced. It has been argued that failing to give up one's original nationality shows a lack of commitment to

the Dutch society which is thought to block integration into Dutch society (Vermeulen, 2007). The new civic test consists of an oral and written examination of language skills, knowledge of 'Dutch society' and Dutch political institutions.[38] In addition to this, since 2006 naturalization ceremonies are obligatory if one is to receive Dutch nationality, for 'becoming Dutch is a special occasion'.[39] In this ceremony, the potential citizen has to pledge his/her commitment to the Dutch nation/state. In the context of the sacralization of citizenship, citizenship becomes ritualized (Verkaaik, 2009).

With regard to integration, the 2002 Integration from the Perspective of Immigration Act (*Integratie in het Perspectief van Immigratie*) emphasized Dutch norms and values as well as responsibility and autonomy that have to be assumed by aspiring citizens. This continued to be the spirit of the influential 2004 policy document 'Framework of Civic Integration' (*Contourennota Herziening Wet Inburgering*) formulated by a central-right coalition. It reiterates a strong focus on norms and values and national identity. While in the former system it was believed that a strong formal citizenship status was necessary for acquiring good or moral citizenship, in recent years this has been turned around: nowadays moral citizenship comes first and afterwards a formal status can be obtained after demonstrating good citizenship, e.g. by making the effort of following, paying for and passing civic integration tests (requiring a sufficient level of knowledge of Dutch language, society, norms and values)[40] and pledging commitment to Dutch society by attending citizenship ceremonies (Schinkel, 2007; see also Spijkerboer, 2007; Vermeulen, 2007).

Earned citizenship

The convergence in the trend towards citizenship is to be seen in the three countries under study in the body of citizenship criteria which have increasingly transformed citizenship from a status to be obtained as a result of residence in a particular country to a process of manifesting that the potential citizen is worthy of the citizenship and all the rights and benefits that come with it. As such, the process of earning the citizenship is one in which the newcomer or applicant bears the responsibilities of citizenship and can only look forward to enjoying the full rights and benefits of citizenship when s/he succeeds in fulfilling the economic and cultural conditions of membership. Earned citizenship has thus both neoliberal and communitarian underpinnings. Whereas there is convergence at the conceptual level, i.e. the understanding of citizenship as something to be earned, there are variations as to how each state fills this package of responsibilities of the potential citizen. In what follows, we analyse the different manifestations of earned citizenship in the UK, France and the Netherlands.

United Kingdom – earned citizenship as an official concept

Historically, the policy fields of citizenship and immigration have been marked by continuity and incremental change in the UK. The recent reforms, however, have transformed the whole system considerably, which the Green Paper of 2008, *The Path to Citizenship*, which launched the legislative changes, has described as 'the most sweeping changes to the immigration system for over 30 years' and 'revolutionizing'.[41] The changes to the British nationality law, which have been officially introduced by

the Borders, Citizenship and Immigration Act 2009, came into force in January 2010. As its title indicates, the new law has now combined the aspects of border control, immigration and citizenship into the one Act. These areas, which have in practice always been related, are thus legislatively bundled with the official aim of simplifying and clarifying the rules regarding immigration and citizenship. Symbolically, this legislative move has petrified the fact that citizenship is no longer a matter-of-fact status of membership of the nation-state, but that it is something to be contained, controlled and secured. Combining it with border security and immigration control securitizes the issue of citizenship. Remarkably, this new conceptualization is also reflected in the institutional reform of the management of citizenship and immigration which now falls under the UK Border Agency of the Home Office. Set up in April 2008, the centralization of policy at the Border Agency forms part of the plans to streamline the control of who enters and leaves Britain.

What the new British system also makes clear is how this new model of citizenship is to be seen. Citizenship is no longer to be obtained automatically. Introducing the proposed changes, the Border and Immigration Minister, Phil Woolas, said, 'Being British is a privilege – these proposals break the link between coming to work here temporarily and being given the right to citizenship.'[42] The prospective citizen thus needs to go through the 'journey/path to citizenship'. Citizenship is thus transformed from an 'automatic right'[43] to membership by the virtue of residence to a status to be deserved as a result of fulfilling a series of criteria. This understanding and system of citizenship is also explicitly termed as 'earned citizenship', making the British approach exemplary for the new conceptualization of citizenship.

The British government links citizenship requirements to a points system, which translates the earning of citizenship into concrete steps, actions and points. Especially with regard to economic migrants, there are strict selection criteria, involving the introduction of a points-based system (inspired by the Australian model) identifying highly skilled immigrants and skilled workers with a job offer as welcome migrants who will positively contribute to the British economy. The control and selection aspects can be partly seen as elements of continuity and incremental change since they strengthen the already dominant focus on border security and economic benefits. The rather revolutionary part is the new concept of citizenship which requires the newcomer to show, on the one hand, that s/he is worthy of British citizenship and, on the other hand, that s/he is willing to put energy into this permanent residence/citizenship journey thereby actively demonstrating her/his commitment to the British society. In the British conception, citizenship is 'a certain quality of communal social life, of civilised behaviour' (Favell, 2001: 100). According to this conception, citizenship is at its strongest when it refers to 'full, participative social membership in social society' (Favell, 2001: 113). As such, the focus on active citizenship is not in and of itself new. The novelty lies more in the codification of expectations and requirements linked to becoming a British citizen.

France – deserving instead of obtaining citizenship

The most recent waves of change in the citizenship domain in France are prominently associated with the person of Nicholas Sarkozy. Sarkozy has initiated significant legislative

changes, codified in the Sarkozy Laws 2003 and 2006 and the Hortefeux Law 2007. The reforms introduced to the French citizenship regime resemble the developments in the neighbouring EU states. An institutional creation of Sarkozy's has been a whole ministry designed to coordinate all immigration-related activities, the Ministry of Immigration, Integration, National Identity and Mutually-Supportive Development (*Ministère de l'immigration, de l'intégration, de identité nationale et du développement solidaire*). This mirrors the centralization drive we observe in the UK. The French add an extra dimension, though, and made national identity a central piece,[44] which is an issue we have discussed in the section on sacralization.

Sarkozy Law 2006 marks France's move to a new regime explicitly favouring high-skilled immigration with the introduction of a new temporary residence card (*carte de séjour compétences et talents*).[45] Sarkozy called this move a shift from 'unwanted' to 'chosen' immigration (Joppke, 2007a: 11). The economic earning of citizenship constitutes a considerable step in the land of *fraternité*. In line with the developments in other European countries, France has also introduced a new system according to which high-skilled migration is encouraged by individuals likely to contribute to the economical development and the standing (*rayonnement*) of France or their country of origin.[46]

With the Hortefeux Law 2007, family reunification also needs to satisfy economic conditions on the part of the receiving family member.[47] The receiving family member has to earn at least the minimum income and live in accommodation considered to be normal for a family living in that region.[48] The immigrating family member, on the other hand, has to demonstrate sufficient knowledge of the French language and republican values.[49] If the immigrant does not possess the required knowledge, then s/he has to attend a course organized by the French authorities for a maximum duration of two months. This practically means that the immigrant nowadays has to also earn the right to join her/his family. In the French context, the move towards the selection of immigrants shows a move away from the inclusive conception of French citizenship. As such, French citizenship is also transformed from a right into a status to be earned.

The Netherlands – the rising price of citizenship

In the context of the contractualizaton and sacralization of citizenship in the Netherlands, the requirements and obligations for newcomers and for second or third generation migrants have been broadened (Schinkel, 2007; see also Entzinger and Dourleijn, 2008). Dutch citizenship has increasingly become something to be earned while the criteria to earn Dutch citizenship have been extended. Whereas we can see the changes introduced in 1994 as the beginning of a thin conceptualization of earned citizenship with its focus on the economic responsibilities, the changes introduced in the late 1990s represent a move towards a thick conceptualization of earned citizenship with the addition of moral and cultural requirements. This becomes apparent if one wants to gain a permit to enter the netherlands, if one wants to reunify one's family and if one wants to naturalize to become Dutch citizen.

In 2004, a new article was added to the Alien Act 2000 (*Wet Inburgering Buitenland*). The new conditions require immigrants to pass a civic integration test in their own country to obtain an initial residence permit for the Netherlands. If a person passes these tests,

obligatory civic integration continues upon arrival in the Netherlands (Driouichi, 2007: 82–3). Within three years a new exam has to be passed. Failing to do so means a fine or a limitation on the duration of legal stay.[50] Immigrants initially have to pay and search for the civic integration courses themselves (Driouichi, 2007: 52–3). The idealized image is that of the good citizen as a working ('participating') citizen (Spijkerboer, 2007: 46).

The failure of immigrants to properly participate (economically) is explained culturally. This is presented as an individual responsibility and failure (Schinkel, 2008; Spijkerboer, 2007). Therefore, non-western immigrants have to 'close the cultural gap'. Furthermore, specific emphasis is put on immigrant mothers and imams in their role respectively as child bearers and educators of youth. They are specifically targeted as in need of (urged or forced) integration (see Spijkerboer, 2007: 46).

In addition to this, a special regime will be implemented for highly educated or high potential immigrants.[51] It is argued that, under the current restrictive regime, an exception must be made for those who will contribute to Dutch economy.[52] The high potential migrant is allowed to enter the Netherlands and to search for a job or to start an innovative enterprise. During this period s/he is allowed to make use of Dutch welfare arrangements. After one year the successful migrant can opt for a more permanent stay as 'knowledge migrant' (*kennismigrant*). How hard one needs to work in order to earn Dutch citizenship thus depends on where one stands on the citizenship ladder.

In 2007 a new Civic Integration Act (*Wet Inburgering*) was passed, replacing the 1998 Civic Integration Newcomers Act. What remained the same is the individualized and responsibilized approach considering it the responsibility of an immigrant to take care of her/his own integration. However, whereas in 1998 newcomers were only obliged to take part in a 'civic integration course', nowadays there is an obligation to actually pass the exams. The content of the courses has also changed: one has to earn Duct citizenship by showing knowledge of Dutch norms and values and political institutions.[53] Here a 'deindividualization' kicks in under influence of a strong focus on national community. It can be argued that two registers are operating in the formulation of the new social contract in the Netherlands: first, an economic register, embedded in the transformation of the welfare state and international competition, and second, a social order or cultural register embedded in concerns of social cohesion concerned with Dutch norms and values. In the context of integration and naturalization this means an emphasis on earning citizenship in two complementary ways: (1) potential citizens are responsible for their own economic integration, as well as (2) their own cultural integration (assimilation) – for some newcomers starting even before entering the Netherlands.

As a consequence of the new path taken, earning citizenship in relation to contractualization and sacralization in the Netherlands means that more demands are placed on immigrants in the Netherlands (e.g. the demand to discard one's original nationality), immigrants are made responsible for their own integration, more and severe (financial) penalties are made possible, there is a strong emphasis on culture and the reach in the sense of geography has become broader. However, it needs to be seen whether the current Dutch system with its heavy emphasis on the need to earn citizenship of the sacred Dutch community by fulfilling the obligations of the civic integration contracts will hold in the future. For example, the new system has introduced income requirements for family reunification whereby the partner living in the Netherlands is required to earn

120 percent above the minimum income threshold. This requirement, however, has been judged as incompatible with EU law by the European Court of Justice.[54]

Conclusion: Neoliberal communitarian citizenship

As the preceding sections suggest, the conceptualization of citizenship has recently undergone significant changes in the UK, France and the Netherlands. As Western European nation-states are adapting to internal and external pressures, citizenship, because of its pivotal position between the individual and the collective level, emerges as one of the crucial elements of population management. We consider citizenship to be a crucial technique in the national and international management of populations as formulated in the political programmes of nation-states. The political programmes of citizenship in relation to immigration and integration in the UK, France and the Netherlands manifest, on the one hand, a 'neoliberalization' of citizenship that involves an increased emphasis on the need to earn one's citizenship and, on the other hand, an increased 'communitarianization' (Etzioni, 2007), or in the words of Brubaker (1992) a 'sacralization' of the nation in response to immigration. Both elements are encapsulated within newly formulated 'social contracts' describing and prescribing the duties, responsibilities and moral capacities of potential citizens, citizens, the state, community and the market.

In the three countries we discuss, individual responsibility has emerged not only as a rhetoric of activation, but also as a judicially codified element of recent reforms of national citizenship regimes. In the UK, this explicitly takes the form of a notion of 'earned citizenship'. It is the responsibility of the individual to earn his or her rights, obligations and the appending benefits. In France, a similar process has taken place, albeit less accentuated. Nonetheless, since 2003 a package of demands is placed upon the immigrant who, in living up to these demands, has to illustrate her/his virtuous citizenship. This is even more pronounced in the Netherlands, where immigrants are obliged to arrange their own civic integration course. Here, as in the UK, the demand for individual responsibility entails the individual's responsibility to learn individual responsibility (which is characteristic of the citizen). Becoming a citizen is conceptualized as a prize one is to attain individually.

In all three countries, the simultaneous appearance of a neoliberal rhetoric is visible. The UK conceptualizes civic integration as an 'earned citizenship' that is part of a 'deal' with the state. France employs the notion of 'contract', as does the Netherlands. This has been accompanied by a more strict immigration regime. The exclusive character of citizenship in these countries also emerges in the form of a more culturally exclusive focus. These three processes, (1) the newly formulated social contracts, (2) the sacralization of the nation and (3) 'earned citizenship' with a focus on individual responsibility, are manifestations of a new strategy or formula of government which we call 'neoliberal communitarianism'. The concept is graphically represented in Figure 1.

Neoliberal communitarianism is a paradoxical strategy of population management using both neoliberal techniques and rhetoric (e.g. an emphasis on activation and contractual notions) as well as communitarian notions and techniques (strong emphasis on national community, e.g. supporting its core of shared values as guiding principles). It is a form of governing through both community *and* individual responsibility. Under a neoliberal communitarian regime, it becomes one's responsibility, expressed in the form
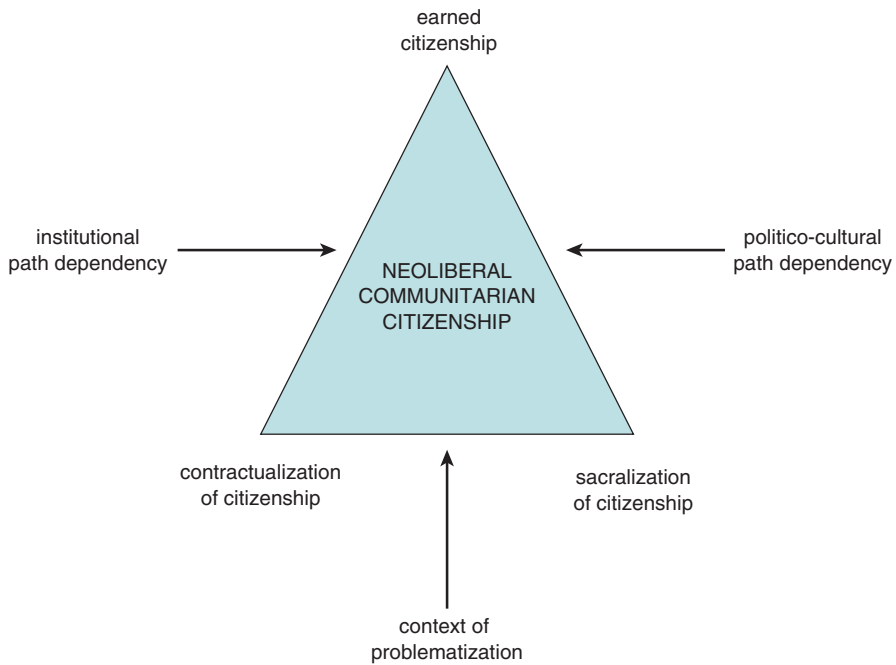
Figure 1.

of 'earning' one's citizenship to convert to a nation that is sacralized as a bounded community of values. Neoliberal communitarianism thus combines two at first sight contradictory strategies (cf. Foucault's logic of strategy: Foucault, 2008: 42). It combines an individualizing focus on earned citizenship with a deindividualizing focus on the nation. This combination might be surprising, but on a closer look both neoliberalism and communitarianism are based on the same diagnosis of society and its internal and external threats (Dean, 1999; Mulhall and Swift, 1996). As such, the fact that neoliberalism accompanies a cultural assimilationism or exclusiveness is not paradoxical per se. Thus, a neoliberalization of citizenship can be cross-nationally observed in the development of either 'Britishness', 'Frenchness', or 'Dutchness'. Often, after citizenship is granted to the new citizen, s/he still has to manifest her/his commitment, knowledge, responsibility and morality. This 'virtualization of citizenship' (Schinkel, 2010) is a crucial technique in the neoliberal communitarian strategy which makes it possible to identify, differentiate, monitor and intervene in populations and individuals based on deviation from cultural grounded values and individual responsibility.

Whereas neoliberal communitarianism can be regarded as the guiding strategy of political programmes of citizenship in differing countries such as the UK, France and the Netherlands, some distinctive national features still remain. This is possible because neoliberal communitarianism itself is a flexible strategy whereby the neoliberal or communitarian elements can be emphasized differently according to place (country) and time. In other words, politico-cultural (Brubaker, 1989) and institutional path dependency (Jacobs and Rea, 2007) still play a role in the specific conceptualization of citizenship and community (e.g. Etzioni, 2007: 360–1) (see Figure 1).

Therefore, while different states develop along different trajectories, their strategies of inclusion and exclusion through citizenship show some striking similarities. While the nation is in a sense re-sacralized, it is at the same time a partner in a new contractualism. We argue that it is precisely this sacralization of the nation that lends weight to the idea of 'earning' one's citizenship. If citizenship is a contract with a sacralized collective, one's contractual requirements and obligations – often in the form of a cultural conversion to the sacredness of the nation – becomes scrutinized to the extent that there is a continuous need to prove one's worthiness as a citizen. The renewed articulation of symbolic weight given to the nation thus at the same time raises the stakes for individual citizens. These stakes become apparent in the twofold requirement of (1) cultural adjustment to the nation and (2) individual responsibility in ensuring such adjustment. Debates over citizenship thereby become charged as a highly contested issue. Indirectly, it is the symbolic status of the nation that is at stake. Earning one's citizenship then amounts to a thoroughly individualized cultural conversion to the communitarian ideal of a nation defined by a bounded set of values. Abiding by the new social contract, then, at the same time comes down to exhibiting an active commitment to the nation-state to which one has migrated.

Funding

Notes

1. Our analysis excludes asylum seekers and refugees since they still enjoy a special status and are exempt from most of the requirements that economic migrants and family members are expected to fulfil.
2. Home Office, UK Border Agency (2008) *The Path to Citizenship: Next Steps in Reforming the Immigration System*, Chapter 1.
3. Ibid., p. 22.
4. Idem.
5. Randall Hansen (2000) rejects this reading and argues that in the 1950s and 1960s the Ministry of Labour had consistently been opposed to an expansive migration policy.
6. *The Path to Citizenship*, op. cit., Chapter 5.
7. At: www.communities.gov.uk/archived/general-content/communities/commissionintegration/
8. Note that the CAI is obligatory for migrants who come to France under a family reunification scheme.
9. Article L311-9, *Loi n°2006-911 du 24 juillet 2006 - art. 5 JORF 25 juillet 2006.*
10. High Council of Integration.
11. The OFII official also determines at this point whether the person needs to take a French language course and has the discretion to exclude those who have a satisfactory level of French from the necessity of taking a course. In the Netherlands, the government official can only do so if an individual can prove her/his level of Dutch with an official certificate or diploma.
12. The language requirement is interesting in the French case since most immigrants to France can already speak the French language due to the French colonial legacy. This is also demonstrated by the fact that 69.3 percent of those signing the CAI were already competent in French. See ANAEM, Direction des statistiques, des études et de la documentation, 20 novembre 2006, *Juillet 2003–Novembre 2006: 200 000 Contrats d'accueil et d'intégration signés*, p. 11. Language does not constitute a high hurdle in France whereas it is a big issue

in Germany and the Netherlands where most immigrants do not speak the language and have to follow intensive language courses to be able to reach a basic level that enables them to participate in the labour market (Joppke, 2007a: 9–10).

13. *Contrat d'accueil et d'intégration* (emphasis added).
14. Ministerie van Binnenlandse Zaken (1994) *Integratiebeleid Etnische Minderheden*, Tweede Kamer, vergaderjaar 1993–1994, 23684, nr. 1:24
15. Ibid., p. 28.
16. Dutch Parliament (www.tweedekamer.nl): Tweede Kamer, vergaderjaar 1993–1994, 23 715, nr. 11. The term 'civic integration contract' is literally used in the Netherlands (e.g. Dutch Cabinet, 1994, *Regeerakkoord: Keuzes voor de Toekomst*, Tweede Kamer, vergaderjaar 1993–1994, 23 715, nr. 11).
17. Tweede Kamer, vergaderjaar 2003–2004, 29 543, nr. 2: 11–12. Since 2004 the courses are offered by private institutions.
18. Tweede Kamer, vergaderjaar 2003–2004, 29 543, nr. 2: 1.
19. *Wet Inburgering Nieuwkomers* (1998) Staatsblad, 1998, nr. 261 (announcement) & nr. 533 (activation).
20. Ibid., art. 4.
21. Ibid., art. 5.
22. Ibid., art. 18.
23. Ministerie van Vreemdelingenzaken en Integratie (2004) *Herziening van het Inburgeringsstelsel,* Tweede Kamer, vergaderjaar 2003–2004, 29543, nr. 2: 11–12.
24. Dutch Cabinet (2003) *Kabinetsvisie Andere Overheid*, Kamerstukken II 2003/04, 29 362, p. 8; Ministerie van Binnenlandse Zaken en Koninkrijksrelaties (2005) *Verkenning Burgerschap en Andere Overheid,* Tweede Kamer, vergaderjaar 2004–2005, 29362, nr. 31.
25. Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, 2005, p. 2.
26. Ibid., p. 5.
27. Dutch Cabinet, 2003, p. 5.
28. Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, 2005, p. 13.
29. Ibid., pp. 13, 16.
30. *The Path to Citizenship*, op. cit., Chapter 2.
31. Alternatively Scottish or Welsh.
32. Commission on Integration and Cohesion (2007) *Our Shared Future*, p. 73.
33. Life in the United Kingdom (2007) *A Journey to Citizenship*.
34. *The Path to Citizenship*, op. cit., Chapter 4.
35. At: www.ukba.homeoffice.gov.uk/britishcitizenship/applying/ceremony/
36. See the website www.debatidentitenationale.fr for the activities connected with this national debate.
37. Article 21–28, *Loi n°2006-911 du 24 juillet 2006 - art. 85 JORF 25 juillet 2006, Loi n°2006-911 du 24 juillet 2006 - art. 86 JORF 25 juillet 2006.*
38. At: www.ind.nl/nl/inbedrijf/nederlanderworden/naturalisatieceremonie.asp
39. Idem.
40. Ministerie van Vreemdelingenzaken en Integratie (2004) *Herziening van het Inburgeringsstelsel,* Tweede Kamer, vergaderjaar 2003–2004, 29543, nr. 2: 11–12.
41. *The Path to Citizenship*, op. cit., p. 9.
42. 'Tough new points system for earning citizenship', 3 August 2009; at: www.ukba.homeoffice.gov.uk/sitecontent/newsarticles/2009/august/pbs-for-citizenship
43. Sarkozy's Cabinet reshuffle in November 2010 has resulted in a reorganization whereby immigration and integration affairs have been placed under the Ministry of Interior and 'national identity' has disappeared from the name of the new ministry.

44. Home Office, UK Border Agency (2010) *Earning the Right to Stay. A New Points Test for Citizenship. Analysis of Consultation Responses*, p. 4.
45. Article L315-1, *Loi n°2006-911 du 24 juillet 2006 - art. 15 JORF 25 juillet 2006.*
46. Article L315-1, *Loi n°2006-911 du 24 juillet 2006 - art. 15 JORF 25 juillet 2006.*
47. Article L411-8, *Loi n°2007-1631 du 20 novembre 2007 - art. 1 JORF 21 novembre 2007.*
48. Article L411-8, *Loi n°2007-1631 du 20 novembre 2007 - art. 1 JORF 21 novembre 2007.*
49. This new measure also resembles the Dutch pre-integration module including an introduction film with homosexuals and topless women. In the French case, it is the 'republican values' of equality between men and women and secularism (*laïcité*) that are emphasized frequently and explicitly in the French policy documents.
50. At: www.ind.nl
51. At: www.ind.nl/nl/inbedrijf/actueel/Met_ingang_van_1_januari_2009_toelatingsregeling_voor_hoogopgeleiden.asp
52. Idem.
53. At: www.ind.nl/nl/Images/5013_Ned_worden_tcm5-574.pdf
54. See C-578/08 ECoJ-decision on 4 March 2010; at: www.curia.europa.eu/

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Résumé

L'ajustement des critères d'accès des immigrants au statut de citoyen constitue l'une des stratégies d'adaptation des États nations aux défis posés par la globalisation et par l'accroissement des flux migratoires. Le présent article propose une analyse comparée des politiques d'acquisition de la citoyenneté dans trois sociétés européennes occidentales: le Royaume-Uni, la France et les Pays-Bas. Notre préoccupation principale consiste à éclairer l'émergence d'une forme néolibérale de citoyenneté communautariste, qui insiste de plus en plus sur l'idée que la citoyenneté doit « se gagner ». Alors que d'autres auteurs ont déjà relevé le déplacement vers une telle conception néolibérale de la citoyenneté, nous proposons d'examiner le degré selon lequel un tel déplacement se caractérise par une vision contractualisée de la citoyenneté, qui ne conçoit plus la citoyenneté comme un droit fondamental, mais plutôt comme un objet de valeur qui doit être gagné et qui peut être perdu s'il n'est pas correctement utilisé. Parallèlement, nous analysons les critères d'accès à la citoyenneté, de manière à illustrer comment, dans ces trois pays, l'Etat nation est sacralisé par l'accent mis sur la communauté nationale. Nous désignons ces deux dimensions de la citoyenneté contractuelle sous le concept de communautarisme néolibéral.

Mots clés: citoyenneté, communautarisme néolibéral, France, Pays-Bas, Royaume-Uni

Resúmen

Según las sociedades de Europa Occidental se adaptan a los desafíos que la globalización y la inmigración plantean a los estados-nación, el ajuste de los criterios de ciudadanía para los inmigrantes ha sido una de las respuestas a estos cambios. En este artículo, se comparan los cambios en las políticas de ciudadanía en tres estados de Europa Occidental: Reino Unido, Francia y Holanda. El principal objetivo es arrojar luz sobre el emergente desarrollo de una forma de ciudadanía comunitaria neo-liberal que implica un énfasis creciente en la necesidad de ganarse la propia ciudadanía. Mientras muchos señalan un cambio hacia una ciudadanía neo-liberal, aquí se investiga hasta qué punto este cambio se caracteriza por una visión contractual que ya no ve la ciudadanía principalmente como un derecho sino como una posesión con precio que tiene que ser ganada y puede ser perdida si no es cultiva adecuadamente. Al mismo tiempo, se analiza el contenido de los criterios de ciudadanía para ver cómo se sacraliza el estado-nación en estos tres países a través de un énfasis en la comunidad nacional. Aquí se conceptualizan estas dos tendencias hacia la ciudadanía ganada como comunitarismo neo-liberal.

Palabras clave: ciudadanía, comunitarismo neo-liberal, Francia, Holanda, Reino Unido