

LIMITS OF LIBERAL INDIVIDUAL INTEGRATION: *Comparing Australian, British and Canadian Citizenship Guides*

Abstract

This article examines conceptual and policy limits underlying citizenship guides to prepare immigrants to take citizenship tests as part of their integration process in liberal democratic countries. The first section defines liberal individual integration and constructs three ideal types of liberal national, international and transnational individual integration. The second section applies these types to six Australian, British and Canadian citizenship guides, showing the predominance of liberal national individual integration. The argument is that this result, combined with citizenship oaths and ceremonies, supports the claim that citizenship tests are illiberal.

Keywords

Liberalism • individualism • integration • immigration • citizenship tests

Received 24 June 2014; Accepted 11 September 2015

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1 Introduction

This article contributes to the debate on the liberalness or illiberalness of citizenship tests in liberal democratic countries. The first section examines the debate focussing on Joppke's liberal state-centred approach to the debate (2008, 2010a, 2010b, 2013), and offers an alternative approach based on the immigrant's perspective and the liberal state's protective role. This is operationalised in the concept of liberal individual integration from which a typology of liberal national, international and transnational individual integration is constructed to apply to citizenship guides for citizenship tests. The second section outlines the three types of liberal individual integration; and the third section applies this typology to six Australian, British and Canadian citizenship guides from 2005 to 2013. The main argument is that the six guides are illiberal because the combination of guides, citizenship oaths and ceremonies contravenes the Kantian liberal boundary between external state law and the inner sphere of internal morality, and because the guides focus almost solely on liberal national individual integration and do not acknowledge immigrants' experiences and choices with respect to liberal international and transnational individual integration. The conclusion summarises the results and the argument, and discusses the limits of liberal individual integration in terms of Waldinger's liberal nationalism (2007, 2008), and communitarian and republican approaches to citizenship.

2. Liberal or illiberal citizenship tests?

The legal requirement to pass citizenship tests for the naturalisation of immigrants has increasingly become the norm in liberal democratic countries of immigration as part of a package of civic integration policies for entry, residence and/or naturalisation (Joppke 2010a: 53–4). These policies require certain categories of immigrants to pass courses and/or tests on their language proficiency and knowledge of national history, institutions, culture and everyday life (ibid). A liberal perspective applies criteria based, for example, on individual rights to these policies and their effects on immigrants and citizens even if these are a result of democratic decision-making processes. This is the case with civic integration policies such as citizenship tests in Europe that Joppke claims are illiberal (2008: 14, 16), coercive and punitive (2013: 3) in certain instances. This is particularly the case if a test focusses on the immigrant's 'moral and ethical views' and/or their adoption of national cultural content and social norms instead of 'political contents that are relevant for the liberal democratic process' (ibid: 10–11).

However, Joppke claims that "there is no agreement about what may constitute 'illiberalness' in the new citizenship tests" (2013: 10) between liberal theorists and researchers. He outlines maximalist and minimalist positions to encompass the range of diversity in claims about the liberalness and illiberalness of citizenship tests (2010b: 39–40). Maximalists take an ideological position that all citizenship tests are illiberal for settled immigrants who have become members

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of society over a few years, while minimalists adopt an empirical position, applying specified liberal criteria to each test, the sections and questions on each test and often the procedures and outcomes to evaluate how liberal it is in each case (ibid).

In his own range, Joppke is a minimalist who proposes an illiberal threshold that is reached 'when (a) beliefs (and not just knowledge) are tested, but also when (b) behavioural virtuosity is imposed as a condition for naturalisation' (2010b: 39). As such, citizenship tests are liberal unless they include features that can be categorised under criteria (a) and/or (b). Underlying Joppke's threshold proposal is a Kantian liberal separation in which "the proper realm of the state is external 'law', but not the inner sphere of 'morality'" (2013: 5). Citizenship tests that ask about one's beliefs and/or attempt to impose behavioural virtuosity on applicants are illiberal because they violate this 'distinction between morality and legality' with 'the state entering the inner sanctum of the individual that is only for her to inhabit' (2013: 10).

Joppke's position assumes the liberal democratic state's perspective on citizenship tests and does not consider the immigrant's perspective. He also provides a critical role for the liberal theorist and researcher to assess the state's perspective on how best to devise and implement 'liberal' citizenship tests. This article approaches the question of the liberalness of citizenship tests by assuming the immigrant's perspective and the liberal state's protection of individuals. It assesses the liberalness of citizenship guides in terms of the state's protection of the rights and interests of immigrants to make decisions that reflect their simultaneous experiences of integrating into the host society, while maintaining their cultural, social and membership links to their country of origin.

The immigrant's perspective is operationalised in the concept of liberal individual integration. This draws on the liberal tradition's focus on the dignity, autonomy, privacy and self-development of the individual through personal choices that reflect the individual's interests, purposes and needs (Lukes 1978). It also draws on the liberal emphasis on individual rights, the protection of individuals, their groups, associations and organisations from the power of the state, and institutional control of state power in the interests of individuals represented as a people in territory based, political units (Kelly 2005: 7–13). It draws too on integration defined as 'the process by which immigrants become accepted into society, both as individuals and groups' (IOM 2005: 459).

Liberal individual integration refers to three simultaneous, inter-related processes experienced by immigrants within the host society and between the host society and their country of origin, and the choices they make as part of these everyday life experiences of integration. The first is each immigrant's process of integration for the length of their stay in the host society, including naturalisation for permanent immigrants and continued integration as citizens of immigrant descent. The second is the immigrant's practice of their national culture of origin in the host society or national minority culture, including language, religion and, for some immigrants, family reunification, family formation, child rearing and education of their children. The third is participation in one or more of the following: transnational social networks of family, friends and acquaintances; business enterprises; and home country membership through dual citizenship and/or political and civil society activities in their country of origin.

To encompass the three processes of liberal individual integration, a typology is constructed based on the immigrant's perspective and the liberal state's protective role. This distinguishes between three ideal types of liberal national, international and transnational individual

integration. The first is intended to fit the state-centred approach, while the second and third are intended to match the immigrant's perspective and state's protective role with respect to international human rights and transnational citizenship rights and practices. Conceptually, the typology is based on the Max Weber's definition of ideal types, which are devised to accentuate 'one or more points of view' and synthesise 'many diffuse, discrete...concrete, individual phenomena...into a unified analytical construct' (1949: 90).

The structure and content of the typology is based on a literature review of relevant material in political theory, migration studies, human rights and citizenship studies. The three ideal types are presented in historical order with the origins of liberal national individual integration in the late 1700s preceding the development of liberal international individual integration in the post-World War Two period, and liberal transnational individual integration in the contemporary post-Cold War era. Empirically, though, there is some overlap between the three ideal types, with conceptions of international society, human rights and transnationalism that emerged in the liberal national period becoming more fully developed in the liberal international and transnational eras. Furthermore, it is assumed that all the three ideal types are currently available as policy options for liberal democratic states, and as experiential frameworks for immigrants to make choices in their everyday lives with respect to their individual integration processes.

3 Liberal national, international and transnational individual integration

Liberal national individual integration

Historically, this type of liberal integration originated in the late 1700s combining the rational, possessive individualism of Hobbes, Locke and Adam Smith, and the moral, emotional nationalism of Edmund Burke. In his analysis of Hobbes and Locke, Macpherson defines possessive individualism as the individual who 'is proprietor of his own person, for which he owes nothing to society' and who 'is free from any relations with others except those relations which the individual enters voluntarily with a view to his own interest' (Macpherson 2011: 263, 269). To this asocial individual, Smith adds self-love claiming that the best means to achieve one's material interest is to appeal to others' material interests or their self-love (1974: 118–19). Yet, he also claims that there is no human nature and that individual differences arise from 'habit, custom and education' (1974: 120).

Burke draws on this habitual, customary perspective of individuals in traditional society in his rejection of the French Revolution to construct a hybrid form of liberal nationalism. Thus, he argues that constitutions and governments should 'suit the circumstances of the nation' and the 'manners of the people' (1999: 280–1), and that 'love of his country' is next only to 'love of parents for their children' as a 'natural and moral' instinct (ibid: 405). More broadly, he claims that 'home-bred connections' or 'feeling for those who have grown up by our sides' is the 'natural basis for humanity', and that 'to love the little platoon that we belong to in society...is the first link in the series by which we proceed towards a love of country and to mankind' (ibid: 437).

This mixing of a rational individual who acts on one's interests in contracting with other individuals in society, and a moral individual who is emotionally attached to one's nation-state and national culture, is a powerful combination of rationality, morality and emotionality intersecting in the body of the person and the body politic. It sets the

boundaries for integration at the national level and assumes a single national culture that individuals integrate into through their upbringing, social connections and personal choices made in the context of the various linked institutions of one's national society. Individuals from historical national minority or new immigrant groups are supposed to want to integrate into this single national culture by completely assimilating to it by choice and/or natural assimilation.

Individual assimilation is shown in and through the body of the person by the internalisation and expression of common national beliefs, moral values, emotional responses and social practices in everyday life. State intervention to require or coerce individual assimilation is needed to the extent that rational choices and natural assimilation do not lead to a timely, behaviourally exhibited complete integration into the national culture by individual national minorities and/or immigrants. A limitation of this ideal type is the potential tension, if not contradiction, between its rational and moral/emotional components. This could lead to extreme nationalism, far-right movements and populism or to neoliberal, asocial and economic forms of national interest-based policies.

Liberal international individual integration

As suggested by Burke's link from love of country to mankind, the idea of international society follows from the division of the world into nation-states, and requires its own kind of social love. There were many attempts to institutionalise aspects of international society in the 19th and early 20th centuries, some of which were more successful such as the Anti-Slavery Society and others that ultimately failed like the League of Nations after World War One (Clapham 2007: 25–7). The post-WWII approach to international society focusses on multilateral, international organisations and individual rights enforced or at least not violated by states (Donnelly 2013: 29; Freeman 2011: 148). Thus, all of the rights in the 1948 *Universal Declaration of Human Rights* 'are individual rights' (Donnelly 2013: 29), which for immigrants includes rights to nationality, to leave and return to one's country and to seek refuge. The Declaration also assumes that 'individual human rights are sufficient to protect cultural minorities' and that 'the obligations not to violate those rights are borne mainly by states' (Freeman 2011: 133, 148). At the same time, Donnelly claims that the Declaration and other treaties and conventions assume "individuals are deeply enmeshed in 'natural' and voluntary groups ranging from families through the state" (2013: 31).

In particular, Article 16 of the Declaration states that 'the family is the natural and fundamental group unit of society, and is entitled to protection by society and state', which in practise means that individual men and women 'have the right to marry and find a family' (1948: 3). Furthermore, the Declaration states that 'Parents have a prior right to choose the kind of education...to give to their children' and that 'Everyone has the right to freely participate in cultural life' (ibid: 4). With respect to immigrants, the *International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families* facilitates family reunification (Article 44), the teaching of the local language, mother tongue and culture to the children of immigrant workers (Article 45), and 'ensures respect for the cultural identity' of the immigrant group (Article 31). The latter article also proclaims that 'maintaining their cultural links with their state of origin' by immigrant workers should not be prevented by the host state, and Article 45 adds that 'States of origin shall collaborate whenever appropriate' in terms of the language and cultural education of immigrant workers' children in the local school system (1990: 11, 13–14).

From this perspective, liberal international integration is a post-WWII phenomenon based on the granting of international human rights to all individuals including immigrants and national minorities. These individual human rights entail both social rights of persons involving marriage, family reunification, and choice in the education of one's children; and cultural rights with regard to freedom of religion, education of children in one's language, participation in the cultural life of one's immigrant or national minority group in terms of respecting the group's cultural identity, practicing the group's culture, language and religion and maintaining cultural links with one's country of origin. This direct linkage between individual and socio-cultural rights of persons as immigrants and national minorities means that liberal international integration assumes de facto that national societies are plural or multicultural societies too. This is significant given the level of family migration, which was 45 percent in the European Economic Area and 65 percent in the rest of the Organisation of Economic Co-Operation and Development countries, in 2011 (OECD 2014: 26). However, the lack of implementation and enforcement of immigrants' human rights by liberal democratic states is one of the main limitations of this ideal type in practice (GCIM 2005: 54, 64).

Liberal transnational individual integration

As an ideal type, liberal transnational individual integration is primarily a post-Cold War phenomenon from the early 1990s, related to academic and policy interest in transnationalism in general, and migrant transnationalism in particular (Vertovec 2009: 2, 13). There are transnational precursors before the end of the Cold War, such as Articles 31 and 45 of the *International Convention* discussed above, an historical dimension with respect to mass migration in the liberal national period, and the origins of the term 'transnational' (Bourne 1916; Kivisto 2001: 554-6). However, it is presumed that qualitative changes, such as economic globalisation, cheaper and more widely available transportation and the rapid spread of information communication technologies, have provided the structural conditions for more immigrants and minorities to choose a transnational individual path to integration (Vertovec 2009: 14-15). This includes the right of immigrants to choose transnational assimilation as a means to integrate 'working to maintain homeland connections' even as 'they are also engaged in the process of acculturating into the host society' (Kivisto 2001: 571).

More broadly, transnationalism refers to 'sustained cross-border relationships, patterns of exchange, affiliations and social formations spanning nation-states' (Vertovec 2009: 2). With respect to immigrants and national minorities, these social interactions include remittances and other cross-border economic flows, diasporic networks or transnational communities, dual or multiple identities, dual citizenship, return migration and transnational politics (ibid: 4–12, 90-3). It also includes 'everyday migrant transnationalism' in which individual choices are made primarily within families, according to 'norms of transnational life' that 'are often embedded in a transnational moral economy of kin' that encompass the first and subsequent generations of migrants and minorities (ibid: 61, 74-5).

One practical, policy manifestation of liberal transnational individual integration is the acceptance of dual citizenship by countries of immigration and origin. Thus, Sejersen argues that that there is global trend 'toward legislated dual citizenship being more accepted' as an 'extension of individual rights' (2008: 530-1). Sejersen notes that 'less than 20 per cent of the 115 countries examined allowed dual citizenship in the 1980s', while almost 'half the countries of world allowed it' by the mid-2000s, including over 60 percent in the

Americas and Europe (ibid: 542). In Europe, this was facilitated by the Council of Europe's new Nationality Convention of 1997, which revised its 1963 Convention on the Reduction of Cases of Multiple Nationality, 'the main aim of which was to reduce the number of dual citizens' (ibid: 530). The 1997 revision allows each European country 'to decide on the issue of dual citizenship itself' (ibid), and directly links 'dual-citizenship toleration and immigrant integration' (Joppke 2010a: 48). Yet, the extent of post-Cold War liberal transnationalism remains unclear varying by type of immigrant, structural constraints on transnational practices and individual choices. The latter is particularly relevant for individuals from subsequent generations who are brought up as national citizens, not as immigrants from another country (Vertovec 2009: 17, 19, 63).

4 Comparing Australian, British and Canadian citizenship guides

This section of the article applies the ideal types of liberal individual integration to a comparative analysis of all six Australian, British and Canadian citizenship guides published from 2005 to 2013, two from each country. The comparison of the three country cases is relevant because Australia and Canada are former settler colonies of the United Kingdom, who, as independent countries in the Commonwealth, retain the current Queen of England as Head of State. Furthermore, the national language of all three countries is English with French as the other official language in Canada.

The selection of two guides from each country reflects party political variations in the structure and content of the guides, with successive governments in each country producing a centre-left and centre-right citizenship guide at the national level. In Canada, the centre-left Liberal Party produced the first Canadian citizenship guide, *A Look at Canada*, in 1995, which was updated in 2005. The centre-right Conservative Party revised the guide for use from 2010, with the second version titled *Discover Canada*. In the UK, the centre-left New Labour Party published the first British guide, *Life in the UK*, in 2005, which the centre-right Conservative-Liberal Democrat coalition government revised in a new edition titled, *Life in the United Kingdom*, in 2010. In Australia, the centre-right Liberal-National coalition government produced the first Australian citizenship guide, *Life in Australia*, in 2007, which was changed into, *Australian Citizenship: Our Common Bond*, by the centre-left Australian Labor Party revised in 2012.

The centre-right parties focus more on individual beliefs expressed in terms of liberal values, knowledge of national history and a higher level of national language acquisition to pass the citizenship test. The centre-right parties also emphasise naturalisation as an endpoint of the integration process. The centre-left parties are more concerned with individual knowledge of liberal democratic institutions, everyday civic practices and language as a practical acquisition useful for everyday life. The centre-left parties are also more likely to view naturalisation as ongoing part of one's integration into the national society.

Liberal national individual integration and the citizenship guides

The main finding is that the ideal type most applicable to all six citizenship guides is liberal national individual integration. This is suggested by the party politics of the guides discussed above in which the debate centres on the relative importance of, and

emphasis on, liberal values including democracy, national history and language, and political and practical everyday knowledge of the national society. In particular, the guides tend to merge liberal values and the national such that the institutionalisation and instantiation of liberalism becomes both an integral part of national history and is embedded in the contemporary culture of each national society (Kelly 2005: 2). For example, the centre-right British guide claims that the fundamental values and principles of British life such as democracy, rule of law, individual liberty, tolerance and community participation are 'based on history and traditions and are protected by law, customs and expectations' (Home Office 2013: 7).

Similarly, the centre-left Canadian guide states that Canadian values like democracy, equality, social justice, respect for cultural differences, freedom, peace and law and order, and citizenship rights and responsibilities are based on 'Canadian laws, traditions and shared values' (CIC 2005: 7, 38). Likewise, the centre-right Australian guide provides a long list of Australian values and principles that includes various freedoms, democracy, rule of law, forms of equality and a 'spirit of egalitarianism that embraces fair play, mutual respect, tolerance, compassion for those in need and pursuit of the public good' (DIC 2007: 1–4). However, it adds that, 'while shared to some extent by many other countries, these values and principles have been adapted to Australia's unique setting' by the people who have settled in the country over time (DIC 2007: 4). This merger of liberal values and the national in the citizenship guides is similar to Joppke's concept of 'national particularisms' or 'local versions of the universalistic idiom of liberal democracy' (2010a: 137), or Lægaard's 'nationalisation of liberal values' (2007: 39).

At the same time, the interaction of liberalism and the national through peoples' actions over time in the territory of the nation-state creates distinctive national institutions, beliefs and practices. For instance, the centre-left British guide traces the origins of the UK's constitutional monarchy, unwritten constitution and the nations and regions of the UK (Home Office 2007: 37, 58). Furthermore, the centre-right Canadian guide focusses on the three founding Aboriginal, French and British peoples, Canada's system of government, and the 1982 Constitution of Canada with the Canadian Charter of Rights and Freedoms (CIC 2010: 8, 10, 28–9); and the centre-right Australian guide reviews Australian democracy and government, national symbols like the flag and national anthem, and its national history with respect to Australia's first inhabitants and its Anglo-Celtic heritage (DIC 2007: 4, 11–12, 22–5).

Yet, the guides include examples of national social customs, traditions and practices that are not necessarily related to the institutionalisation of liberalism in the national. The best example of this is the centre-right Australian guide that has sections on social customs like informality in social and work relationships, Australian English phrases like 'Ocker', and a discussion of traditions like mateship and a fair go 'that grew out of the often tough battle for survival by Australia's early settlers...and later generations...in the Australian bush who relied on and supported each other' (DIC 2007: 28–33). Even here, though, the guide acknowledges that these supposedly distinctive Australian national traits 'are characteristics shared and valued by many people around the world' (ibid: 31).

Liberal national values are also used to exclude immigrants who are deemed not liberal enough. Joppke refers to this as 'identity liberalism' that 'prescribes a shared way of life in which, say, men and women are equal and the secular trumps the religious' (2010: 138). In this sense, liberalism used as an identity attempts to separate 'liberal from illiberal people' (ibid), and exclude the illiberal based on 'the notion that the liberal state is only for liberal people' (ibid: 140).

Similarly, Lægaard argues that 'public invocations of liberal values as national values can exhibit essential features of nationalism' that function as a boundary mechanism and as a 'means of inclusion and exclusion' of immigrant minorities and Muslims in particular (2007: 52). These can be used against fundamentalist versions of Islam, and/or individual Muslims who are 'assumed to be incapable of adopting liberal values' (ibid: 49). It can be used too against immigrants from developing countries in which traditional cultural values and practices predominate, for example, with respect to 'the relation between the sexes' (ibid). The latter are more likely to migrate to 'modern' liberal democratic states under immigration categories as refugees, asylum-seekers, lower educated and skilled workers or as family members.

Beyond the central focus on liberal national values in the guides, there are a number of specific examples in the guides that function to reinforce identity liberalism by attempting to identify the 'illiberal' and exclude fundamentalists and/or traditionalists depending on the topic. Examples related to cultural diversity and tolerance are discussed below under liberal international individual integration. For instance, in terms of Islamic fundamentalism and the issues of the separation of church and state and sharia law, the centre-right Australian guide makes it clear that 'Australia has a secular government' and that 'religious laws have no legal status in Australia' (2007: 5). The most frequent use of identity liberalism in the guides, though, is in reference to gender equality against fundamentalist or traditional values and practices. Thus, the centre-right Canadian guide under the heading Equality of Men and Women states that: "Canada's openness and generosity do not extend to barbaric cultural practices that tolerate spousal abuse, 'honour killings', female genital mutilation or other gender-based violence" (CIC 2010: 9). The centre-left and centre-right British guides add forced marriage to this list of proscribed practices (Home Office 2007: 94; Home Office 2013: 150). Furthermore, the centre-right Australian guide adds bigamy or 'being married to more than one person at the same time' is illegal in Australia (DIC 2007: 5), while the centre-left Australian guide advances the liberal individualist doctrine that 'both men and women have the rights to make their own independent choices about personal matters' (DIC 2012: 19).

Finally, there is tension in the guides with respect to a rational and/or moral and emotional person. The guides assume a rational individual immigrant who acts in one's interest by choosing to naturalise. This liberal rational individual integration role is reinforced in the guides by the lack of interest in the role of one's family and ethno-national community in the process leading to one's naturalisation. Beyond the negative portrayal of traditional or fundamentalist families in terms of gender discrimination, oppression and violence, the few mentions of the family in the guides include 'getting a job' and 'taking care of one's family' in the centre-right Canadian guide (CIC 2010: 9), and being able to register 'children born overseas as Australian citizens by descent' as a privilege of citizenship in the centre-right Australian guide (DIC 2007: 41).

However, this presumed rational, asocial individual immigrant is also supposed to become a republican, participatory citizen who is active politically at least in terms of voting, who is active civically in the community and volunteers for charitable organisations, and who is proactive in protecting the environment. For example, the centre-left Canadian guide states that 'All Canadian citizens have the responsibility to vote in elections; help others in the community; care for and protect heritage and environment; and obey Canada's laws' (CIC 2005: 39). It then adds that 'Being a Canadian citizen... also means getting involved in your community and your country',

and suggests that one participate by joining 'a community group, volunteer to work on an election campaign', 'help your neighbours', and 'become a candidate in an election' (ibid). Yet, none of the guides mention active participation in immigrant and minority communities or in civic and political organisations that benefit immigrant and minority groups in the host society and/or country of origin.

This ideal or fantasy of the perfect immigrant citizen (Carrera 2009) is made real on occasion through the requirement that immigrants who have passed the test must attend a citizenship ceremony at which they recite a citizenship oath. The naturalised Canadian citizen currently swears 'true allegiance to Her Majesty Queen Elizabeth the Second, Queen of Canada' and to 'faithfully observe the laws of Canada and fulfil my duties as a Canadian citizen' (CIC 2010: 2). In the UK, the new citizen pledges to give 'loyalty to the United Kingdom and respect its rights and freedoms', to 'uphold its democratic values' and to 'observe its laws faithfully and fulfill my duties and obligations as a British citizen' (Home Office 2013: 8). Similarly, in Australia, new citizens 'pledge loyalty to Australia and its people who democratic beliefs I share, whose rights and liberties I respect, and whose laws I uphold and obey' (DIC 2012: 3). The main difference is that the new Australian citizen has the option to say 'under God' before the pledge (ibid).

There are also social and moral/emotional components to, and rituals designed for, the citizenship ceremony, apparently meant to elicit and show the new citizen's internal, authentic conversion to the nationality of their new state's naturalised citizenship. For example, the centre-left Australian guide stresses the role of social witnesses to the pledge and ceremony including 'other people who have chosen to become Australian citizens', 'representatives of the indigenous people' and 'leaders of the local community or government representatives' (ibid: 5). The latter officials offer 'words of welcome and encouragement' and 'make short speeches on the meaning of citizenship' (ibid). The parallel to religious conversion is directly indicated by the suggestion that 'you are welcome to bring a holy book or scripture to hold while you make the Pledge' (ibid). The pledge is also a performative act (Austin 1962: 6) in that one becomes an Australian citizen only after making the 'pledge of commitment to Australia' (DIC 2012: 5). After the pledge, one receives a certificate of Australian citizenship, and everyone sings the Australian national anthem, and is offered the 'chance to meet and celebrate with your fellow Australians' (ibid). Overall, the guide proclaims that 'the depth of feeling and pride among new citizens makes it a very joyful celebration' (ibid).

The states' use of these social, moral/emotional components and rituals at the ceremonies reinforces the ideal of the perfect immigrant citizen portrayed in the guides. It also transforms the new liberal national citizen from a potentially asocial, possessive individual into a socialised national. It overcomes too the potential division between the rational and moral/emotional liberal national by combining in the citizenship ceremony the individual's rational choice to become a citizen, social norms that reinforce the rightness of that decision and emotional attachment to one's new nation. However, it does so by transgressing the Kantian liberal boundary between external state law and the inner sphere of individual morality and as such, the putative boundary between liberal and illiberal citizenship tests.

Liberal international individual integration and the citizenship guides

The Australian, British and Canadian citizenship guides carefully delimit the role of liberal international individual integration reducing

it primarily to immigrant and minority cultural diversity, cultural pluralism and/or multiculturalism within the national society. In particular, the guides present immigration as contributing to greater cultural diversity in the national society. Cultural diversity at the societal level is connected to the necessity for tolerance of individual and group differences in everyday life. Furthermore, tolerance is invoked as a liberal value and expressions of intolerance are meant to self-exclude one from passing the test and becoming a citizen. This presumed link between immigration leading to cultural diversity, which requires individual belief in, and practice of, the liberal value of tolerance in order for an immigrant to become a citizen is the main finding in the comparison between the guides in terms of liberal international individual integration. The second main finding is the lack of discussion of immigrants' international human rights and the missing link between human rights, cultural diversity and tolerance at the national and international levels.

The centre-left Canadian guide views immigration in terms of a 'long tradition of welcoming newcomers' to the increased 'diversity and richness of Canadian society' in which Canadians are 'proud of the peaceful and tolerant society they have built' (DIC 2005: 3). The centre-right guide stresses that Canadian immigration begins with the three founding peoples and that Canada is a 'land of immigrants' for over 200 years with newer immigrant groups from Asian countries settling since the 1970s contributing to diversity in Canada, where 'ethnic and religious groups live and work in peace as proud Canadians' (DIC 2010: 12). The centre-right guide also emphasises the constitutional aspects of the relationship between Canada's founding peoples, immigration, diversity and tolerance noting that the Canadian Charter of Rights and Freedoms enshrines Aboriginal Peoples Rights, Official Language Rights and Minority Language Educational Rights and multiculturalism as a 'fundamental characteristic' of Canadian identity in which Canadians 'work hard to respect pluralism and live in harmony' (ibid: 8).

While new immigrants add to the already existing cultural diversity, they do not significantly affect the dominant national culture. Beyond a few examples, such as Hindu, Muslim and Sikh religious holidays in the UK (Home Office 2007: 40) and Chinese languages spoken at home in Toronto and Vancouver (CIC 2010: 13), the real cultures of the new immigrant groups as experienced by its members and other national citizens are not mentioned. For example, the centre-right Australian guide claims that one feature of cultural diversity is that 'Australians have the right to express their culture and beliefs' (DIC 2007: 8). Later, it notes that 'more recent residents have added richness to Australia's culture and character, and helped to forge new attitudes and traditions', with profound, enriching contributions to 'almost every aspect of Australian life, from business to the arts, from cooking to comedy' (ibid: 31). Yet, no specific examples are cited and there is no discussion about how immigrant cultures are contributing to change contemporary Australian national culture. In this sense, the guides largely deculture immigrant groups from their national culture of origin and refer to an abstract, societal feature of cultural diversity rather than to specific characteristics of immigrant cultures. This contrasts with the culturalising of some immigrant groups that are assumed to represent certain traditional, fundamental or 'illiberal' cultural values that are devalued by the citizenship guides.

Cultural diversity as a societal feature also entails toleration as a liberal value in Australian, British and Canadian national cultures. A corollary of this is that intolerance towards individuals or social groups based on cultural differences within the national society is rejected, and this becomes an additional illiberal cultural trait to be evaluated on the test. This relationship is expressed in the centre-

right British guide in which one of the 'fundamental principles of British life' is 'tolerance of those with different faiths and beliefs'; 'flowing' from this principle is the responsibility and freedom 'to respect the rights of others, including the right to their own opinions' (Home Office 2013: 7–8). However, the guide makes clear that 'there is no place in British society for extremism or intolerance' in terms of one 'being a British citizen or permanent resident in the UK' (ibid: 7). The centre-right Australian guide adds two more features to tolerance: Australians 'reject violence as a way of changing peoples' minds or the law' and they 'believe that change should occur by discussion, peaceful persuasion and the democratic process' (DIC 2007: 6). In these ways, cultural diversity and tolerance are used in the service of identity liberalism (Joppke 2010a: 138), and intolerance against the intolerant becomes redefined as tolerance.

None of the guides mention the immigrants' international human rights deriving from the various UN declarations and conventions. The nearest equivalent is a section on Human Rights in a non-testable chapter from the centre-left British guide. However, the human rights referred to are from the *European Convention on Human Rights* as transposed in the UK's *Human Rights Act 1998* (Home Office 2007: 92). The guides' silence on immigrants' international human rights breaks the link between individual and socio-cultural rights of persons as immigrants and minorities and cultural diversity, pluralism or multiculturalism as the norm for national societies derived from these human rights. In particular, the social rights to marriage and family and cultural rights to education for one's children are significant given that 60, 51 and 26 percent of permanent inflows into Canada, Australia and the UK in 2011 were under the family migrant and accompanying family of workers' categories (OECD 2014). The lack of recognition of these rights also means that the individual integration process presumed in the guides occurs without the participation of one's family, ethnic community and organisations. Overall, liberal national individual integration is reinforced by delimiting the liberal international type, detaching international human rights from cultural diversity and attaching tolerance as a liberal value to national cultural diversity.

Liberal transnational individual integration and the citizenship guides

There are no examples of liberal transnational individual integration such as transnational practices and the role of dual citizenship in the six Australian, British and Canadian citizenship guides. While dual citizenship is not mentioned in the guides, each of the countries allows for naturalised citizens to be dual citizens: the UK for the majority of the population from 1949; Canada from 1977; and Australia from 2001 (Sejersen 2008: 533). As such, one might expect that transnational practices and the practical dilemmas related to being a dual citizen would feature in the citizenship guides. Instead, the guides focus on elements of liberal national individual integration and detach the transnational from immigrant and minority citizen practices of cultural diversity in the national society with regard to liberal international individual integration.

In Canada, the lack of emphasis on dual citizenship may be related to concerns about 'citizenship fraud' by immigrants who stay temporarily in 'Hotel Canada', acquiring citizenship and a passport while flouting the rules on residency for naturalisation (Kenney 2009: 3; Winter 2014: 6). These concerns about dual citizens and other 'fraudulent' immigrants have led to a citizenship fraud tip line, a residence questionnaire for naturalisation, and the introduction into parliament of Bill C-24, *Strengthening Canadian Citizenship Act*,

in February 2014, which, if passed, would increase the residency period from 4 to 6 years, and the residency requirements for physical presence in Canada before a permanent resident can apply for naturalisation (Government of Canada 2014; Winter 2014: 6, 12). While dual citizenship is legal, dual citizens are represented as potentially undermining the liberal national intent and the nationally bounded liberal internationalism of the citizenship guides.

5 Conclusion

The results of the application of the three ideal types to the six Australian, British and Canadian citizenship guides from both centre-right and centre-left perspectives clearly show the dominance of liberal national individual integration compared to the liberal international and transnational types. This involves largely merging liberal and national values and presenting national history and contemporary society as the institutionalisation and instantiation of liberal national values in practise. It also involves using identity liberalism to identify and exclude supposedly illiberal or irrational cultural traditionalists and fundamentalists from naturalisation. Furthermore, the guides and the corresponding citizenship ceremonies portray a perfect immigrant citizen or national citizen in general, who believes in liberal national values, knows the liberal national history, speaks the national language at a high level, actively participates in politics and civic society, obeys all the rules and laws and is deeply committed to being a national of the nation-state.

Overall, the results support the argument that the citizenship guides are illiberal for two reasons. First, they are illiberal because the combination of guides, citizenship oaths and ceremonies contravenes the Kantian liberal boundary between external state law and the inner sphere of internal morality as specified by Joppke's state-centred, minimalist illiberal threshold. The guides are also illiberal based on the immigrant's perspective and state's protective role because they focus almost solely on liberal national individual integration and do not acknowledge and include immigrants' experiences and choices with respect to the liberal international and transnational individual integration, even though both have legal standing in Australia, Canada and the UK due to international human rights treaties and dual citizenship laws.

Waldinger and Fitzgerald's 'container model of society' (2004: 1179) can be used to explain the results, arguing that international migration as a process and immigrants as foreigners lead to 'state efforts to bound the societies they enclose' and 'civil society attempts to reinforce the boundaries of the national community' (ibid). State actions include 'coercive efforts to build a nation-state society by excluding outsiders' and the 'regulation of internal boundaries leading to citizenship' to 'distinguish between members and unacceptable residents' (ibid), and that these actions often involve 'using illiberal means to fulfil liberal ends' (Waldinger 2007: 343). Liberal nationalism in this case is both 'internally inclusive' allowing for cultural diversity in terms of 'ethnic differences within national boundaries', and 'externally exclusive' with respect to 'the bounded character of the national collectivity' (2007: 345–6).

From this perspective, the citizenship guides, tests, oaths and ceremonies are a 'form of political re-socialisation' of individual immigrants, who choose to nationalise by accepting and internalising

'the social models prevailing among nationals, replacing old country with new country solidarities' (ibid: 347). This satisfies nationals who are willing to accept immigration and immigrant naturalisation as politically legitimate only if it is controlled by state 'boundaries and bounding' of the container society (ibid: 346). This includes 'making sure that membership is only available to some' immigrants, and that their 'acceptance is contingent on a transfer of loyalties from home to host state, even though residual ethnic attachments are generally allowed' (Waldinger 2008: 8). For Waldinger, then, liberal nationalism is a reasonable liberal response to immigration and immigrant citizenship because it provides legitimacy among nationals for immigration and integration policies in the container societies of liberal democratic states, even it means coercing immigrants using illiberal means to re-nationalise themselves to become members of their host society.

Beyond Waldinger's liberal nationalism, communitarian and republican approaches to citizenship view state interference to coerce immigrants to re-nationalise themselves in order to become active, participatory citizens as legitimate state actions, not as a legitimising strategy to secure consent from nationals for immigration and integration policies. Thus, Etzioni supports a neo-communitarian perspective on citizenship tests that 'must encompass normative commitments', a 'readiness to assume responsibilities' such as obeying the state's laws and a willingness to share core national values, not 'merely knowledge' and 'knowledge of one's rights' (2007: 359). Similarly, a republican perspective of citizenship is based on duties to achieve the common good, not on rights; and citizens who embody and practice 'passionate patriotism', devotion and loyalty to the republic (Hanasz 2006: 292, 296). State actions to produce good citizens through civic education policies, including citizenship guides are a legitimate interference into individual lives (ibid: 290–1). This includes forcing an individual 'to choose wisely' in their 'own best interest' to foster 'accountable, dutiful and loyal' citizens of the future (ibid: 290–1, 300).

Finally, the analysis indicates there are two main limits to liberal individual integration. First, there is an empirical limit in terms of liberal national individual integration shown by the results of applying the typology to the Australian, British and Canadian citizenship guides. Second, there is a theoretical limit with respect to liberalism in which the debate about the illiberalness of citizenship guides and tests is not significant from the perspective of liberal nationalism, and is a non-issue for communitarianism and republicanism. In the search for the perfect immigrant citizen, the limits of liberalism in terms of citizenship guides and tests are perfectly normal and mainstream for liberal nationalism, communitarianism and republicanism. From an immigrant's perspective, these theoretical and empirical limits to liberalism do not give much solace to an individual who is made to experience an illiberal naturalisation process that includes a citizenship test, oath and ceremony as part of their integration into society.

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References

- Austin, JL 1962, *How To Do Things With Words*, Oxford University Press, New York.
- Brøndsted Sejersen, T 2008, "I Vow to Thee My Countries" – The Expansion of Dual
- Citizenship in the 21st Century', *International Migration Review*, vol. 42, no. 3, pp. 523-549, DOI: 10.1111/j.1747-7379.2008.00136x.
- Bourne, R 1916, 'Trans-national America', *The Atlantic Monthly*, vol. 118, no. 1, pp. 86-97.
- Burke, E 1999, *The Portable Edmund Burke*, ed. I Kramnick, Penguin, London.
- Carrera, S 2009, *In Search of the Perfect Citizen?* Centre for European Policy Studies, Brussels.
- Citizenship and Immigration Canada 2005, *A Look at Canada*, Ministry of Public Works and Government Services Canada, Ottawa.
- Citizenship and Immigration Canada 2010, *Discover Canada: The Rights and Responsibilities of Citizenship*, Ministry of Public Works and Government Services Canada, Ottawa.
- Clapham, A 2007, *Human Rights: A Very Short Introduction*, Oxford University Press, Oxford.
- Department of Immigration and Citizenship 2007, *Life in Australia*, Commonwealth of Australia, Barton ACT.
- Department of Immigration and Citizenship 2012, *Australian Citizenship: Our Common Bond*, Commonwealth of Australia, Belconnen ACT.
- Donnelly, J 2013, *Universal Human Rights in Theory and Practice*, 3rd edition, Cornell University Press, Ithaca.
- Freeman, M 2011, *Human Rights*, 2nd edition, Polity, Cambridge.
- Global Commission on International Migration [GCIM] 2005, *Migration in an Interconnected World*. Available from: <<http://www.gcim.org>>. [Last accessed: 6.2.2014].
- Government of Canada 2014, *Strengthening and Modernizing the Citizenship Act*, Available from: <<http://news.gc.ca/web/article-en.do?nid=814119>> [Last accessed: 20.5.2014].
- Cameron, D 2011, *PM's Speech at Munich Security Conference*, Government of the United Kingdom, Available from: <<https://www.gov.uk/search?q=pm%27+speech+at+munich+security+conference>> [Last accessed 22.5.2014].
- Etzioni, A 2007, 'Citizenship Tests: A Comparative, Communitarian Perspective', *The Political Quarterly*, vol. 78, no. 3, pp. 353-363, DOI: 10.1111/j.1467-923X.2007.00864.x.
- Hanasz, W 2006, 'Toward Global Republican Citizenship? *Social Philosophy and Policy*, vol. 23, no 1, pp. 282-302, DOI: 10.1017/S0265052506060134.
- Hobbes, T 1968, *Leviathan*, ed. CB Macpherson, Penguin, London.
- Home Office 2007, *Life in the United Kingdom: A Journey to Citizenship*, TSO, Norwich.
- Home Office 2013, *Life in the United Kingdom: A Guide for New Residents*, 3rd edition, TSO, Norwich.
- International Organization for Migration [IOM] 2005, *World Migration Report 2005*, IOM, Geneva.
- Joppke, C 2008, 'Beyond National Models: Civic Integration Policies for Immigrants in Western Europe', *West European Politics*, vol. 30, no. 1, pp. 1-22, DOI: 10.1080/01402380601019613.
- Joppke, C 2010a, *Citizenship and Immigration*, Polity, Cambridge.
- Joppke, C 2010b, 'How Liberal are Citizenship Tests?' and 'How Liberal are Citizenship Tests? A Rejoinder by Christian Joppke' in *How liberal are citizenship tests?* eds. R Bauböck and C Joppke, EUI Working Papers RACAS 2010/41, Florence, pp. 1-5, 39-41.
- Joppke, C 2013, 'Through the European looking glass: citizenship tests in the USA, Australia, and Canada', *Citizenship Studies*, vol. 17, no. 1, pp. 1-15, DOI: 10.1080/13621025.2012.669965.
- Kelly, P 2005, *Liberalism*, Polity Press, Cambridge.
- Kenney, J 2009, *Speaking Notes for the Honourable Jason Kenney, P.C., M.P., Minister of Citizenship, Immigration and Multiculturalism, "Good Citizenship: The Duty to Integrate" at Huron University College's Canadian Leaders Speakers' Series*, Available from: <<http://www.cic.gc.ca/english/department/media/speeches/2009/2009-03-18.asp>> [Last accessed 22.5.2014].
- Kivisto, P 2001, 'Theorizing transnational immigration: a critical review of current efforts', *Ethnic and Racial Studies*, vol. 24, no. 4, pp. 549-577, DOI: 10.1080/01419870120049789.
- Klapdor, M, Coombs, M and Bohn, C (2009), *Australian Citizenship: A Chronology of Major Developments in Policy and Law*, Department of Parliament Services, Canberra.
- Lægaard, S 2007, 'Liberal Nationalism and the Nationalisation of Liberal Values', *Nations and Nationalism*, vol. 13, no. 1, pp. 37-55, DOI: 10.1111/j.1469-8129.2007.00269.x.
- Locke, J *Two Treatises of Government* 1988, (ed.) P Laslett, Cambridge University Press, Cambridge.
- Lukes, S 1978, *Individualism*, Blackwell, London.
- Macpherson, CB 2011, *The Political Theory of Possessive Individualism*, intro. F Cunningham, Oxford University Press Canada, Toronto.
- OECD 2014, "Trends in Migration" in *OECD Factbook 2014*, OECD Publishing, Paris.
- OECD 2013, *Inflows of foreign population into selected OECD countries and the Russian Federation*, OECD, Available from: <[http://www.oecd.org/els/mig/A1\(e\)_IMO2013_PAC](http://www.oecd.org/els/mig/A1(e)_IMO2013_PAC)> [Last accessed 1.11.2013].
- Office of the High Commissioner for Human Rights 1948, *Universal Declaration of Human Rights*, United Nations. Available from: <http://www.ohchr.org/en/udhr>. [Last accessed: 6.2.2014]
- Office of the High Commissioner for Human Rights 1990, *International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families*, United Nations. Available from: <<http://www2.ohchr.org/english/bodies/cmwr/cmwr.htm>>. [Last accessed: 6.2.2014]
- Smith, A 1974, *The Wealth of Nations*, introduction A Skinner, Penguin, London.
- Vertovec, S 2009, *Transnationalism*, Routledge, London.
- Waldinger, R and D Fitzgerald 2004, 'Transnationalism in Question', *American Journal of Sociology*, vol. 109, no. 5, pp. 1177-1195, DOI: 10.1086/381916.
- Waldinger, R 2007, 'The Bounded Community: Turning Foreigners into Americans in Twenty-First Century L.A.', *Ethnic and Racial Studies*, vol. 30, no. 3, pp. 341-374, DOI: 10.1080/01419870701217423.
- Waldinger, R 2008, 'Between "Here" and "There": Immigrant Cross-Border Activities and Loyalties', *International Migration Review*, vol. 42, no. 1, pp. 3-29, DOI: 10.1111/j.1747-7379.2007.00112.x.
- Weber, M 1949, *The Methodology of the Social Sciences*, eds. E Shils & H Finch, The Free Press, New York.
- Winter, E 2014, *Becoming Canadian*, Institute for Research on Public Policy, Available from: <<http://irpp.org/research-studies/becoming-canadian>> [Last accessed 22.5.2014].