CONCEPTUAL FRAMEWORK FOR AN ANALYSIS OF CITIZENSHIP IN THE LIBERAL DEMOCRACIES

VOLUME I: CONCEPTUAL FRAMEWORK AND ANALYSIS

by
France Gagnon
Ethnic Studies Centre
University of Montreal
and
Michel Pagé
Department of Psychology
University of Montreal

for
Multiculturalism Directorate
and
Citizen Participation Directorate
DG, Citizens' Participation and Multiculturalism
and
Strategic Research and Analysis (SRA) Directorate
DG, Strategic Planning and Policy Coordination
Department of Canadian Heritage

May 1999

Reference: SRA-366a-e

For copies of this report contact us at:
sradoc_docras@pch.gc.ca
or Fax: (819) 997-6765

** The opinions expressed in this report are those of the author and do not necessarily reflect the views of the Department of Canadian Heritage.

FOREWORD

This study was commissioned by the Department of Canadian Heritage (Citizens' Participation, Multiculturalism and Strategic Research and Analysis Directorates) to support policy and program development in the Department and to advance the research agenda of the Citizenship Education Research Network (CERN). The study is in two parts. Part I includes the conceptual framework as well as a brief comparative analysis of citizenship in six jurisdictions. Part II includes more detailed country profiles, based on the conceptual framework, which present key dimensions of the citizenship debate in the United States, France, Australia, Great Britain, Canada and Canada (Quebec). Both parts of the study are available in French and English.

The study was completed by France Gagnon and Michel Pagé of the Université de Montréal with the assistance of Marie McAndrew. The study was also assisted by an advisory committee consisting of Joe Carens of the University of Toronto, Wayne Norman of the University of British Columbia, and Alan Sears of the University of New Brunswick.

EXECUTIVE SUMMARY[1]

The conceptual framework described in this report is a complex cognitive tool developed to capture the reality of citizenship in liberal democracies. The conceptual framework and the concepts it comprises therefore do not emphasize any theoretical approach or policy in particular; they are intended instead to formulate the concepts as issues by presenting various potential decisions and identifying their variations in each society. What system of rights do citizens enjoy and to what extent do these rights give consideration to particular identities? What structures for political and civic participation are available to citizens and how do these structures allow for minority participation? Finally, what are the country's principal minorities, to what extent are their respective identities and specific needs effectively recognized and what avenues do they choose to make progress in this regard? These are some of the main questions addressed by the analyses using the conceptual framework.

The first chapter of the report therefore presents the conceptual framework which reflects the interrelationship between the various elements of citizenship by expressing them as a system. This system, consisting of four main elements, namely, national identity, cultural, social and supra-national affiliation, is an effective system of rights and political and civic participation, which can then be divided into other elements which are also logically related to each other. The first step in our analysis is to determine how national identity is defined in each society as the sum of traits of collective identity which all citizens are invited or encouraged to share. The study places special emphasis on the room allowed for differential identities within national identity. It also examines the characteristics of national identity which can conflict with differential identity markers, associated with affiliation with an ethnic group, a sociological minority, a religious faith, etc. Secondly, we will take a detailed look at the diverse affiliations associated with differential identities. The conceptual framework allows for multiple affiliations and a number of subordinate concepts which indicate the importance and relative weight of particular affiliations. In the third part, the conceptual framework leads to a general consideration of the effective system of rights enjoyed by citizens. The analysis considers both the rights and the programs likely to provide recognition of diversity and ensure the survival and development of differential identities. Finally, the conceptual framework identifies the structures for political and civic participation characteristic of a particular society and gives special attention to expressions of various identities through participation by considering the following questions: Are minorities represented in elected positions, and how is such representation ensured? Do the avenues of civic participation provide for interaction among the various minorities or does it isolate them?

By highlighting the key debates on citizenship and the elements of citizenship, the conceptual framework allowed us to identify in the following chapters the concept or concepts of citizenship evident in public policies and which prevail in the United States, France, Australia, Great Britain, Canada and Quebec. Applying the conceptual framework to the various societies in this way also pointed out the similarities and differences among them with regard to institutionalization of citizenship, a topic which we will deal with in the last part of the first chapter.

After developing the conceptual framework explained in the first chapter, we tested this framework by applying it to the various societies under consideration. In view of the volume of citizenship literature for each society and since citizenship is also in a state of constant evolution, we do not claim to be exhaustive in our studies of the societies considered. On the contrary, it should be noted that the societies were analysed to confirm our initial hypothesis with regard to the structure of the conceptual framework and to demonstrate how it works when applied to a specific society. As a cognitive framework, it evolved gradually through an interactive process, which means that it has been altered, enriched and made more complex by studying observations on various aspects of citizenship. This is why the reports on the societies include a number of variants depending on the society in question. Moreover, after the first studies were completed (United States and France), we found that it was no longer necessary to alter to conceptual framework to reflect new comments on the subject so that our analysis is more cursory for the other societies.

[1] We would like to give special thanks to Marie McAndrew for her invaluable contribution as consultant during this project. Her timely comments served to guide us in the preparation of this conceptual framework.

For the United States, then, the conceptual framework was applied more exhaustively since this was the first society on which the framework was tested; some elements were added during this process. We analysed each of the sub-elements of the American system. The complexity of American society then led us to consider conflicting views of authors in Part II to illustrate the various types of interrelationships among the macro concepts in the conceptual framework. In the case of France, we made a detailed analysis of the various elements of the conceptual framework before proceeding to a short description of interrelationships among the macro concepts, especially among national identity and social, cultural and supranational affiliation. The chapter about Australia differs from the two preceding chapters in that the description of each element of the conceptual framework is very brief, as we spent more time on the last section dealing with the interrelationships among the elements of the conceptual framework and the analysis of Australia's multiculturalism policy in this regard. Since Great Britain has also developed a number of policies relating to citizenship and anti-racism, our analysis of British society was based on the model used for Australia. The chapter about Canada is not structured on the same lines as preceding chapters. We decided to proceed directly to the second level of analysis, namely the interrelationships among the elements and the concept of citizenship resulting from these interrelationships. This approach was also used for Quebec, which has developed its own concept of citizenship suited to its specific context within Canada.

INTRODUCTION

This report proposes a conceptual framework that seeks to encompass the multifarious dimensions and components of the different contemporary approaches to citizenship in liberal democratic societies. These societies, where citizenship status can be acquired through birth or naturalization and which, consequently, contain diversified populations are Australia, Canada, the United States, France, Great Britain and Quebec, which, within Canada, has developed a conception of citizenship adapted to its specific situation.

Developed on the basis of concepts widely used by contemporary citizenship models in the liberal democracies, the proposed conceptual framework rests on four macro-components: national identity; social, cultural and supranational belonging; effective system of rights; and political and civic participation. Around these major components gravitate a certain number of issues, sub-themes and variables which define the specific conditions under which citizenship is exercised.

Objectives of the conceptual framework

The conceptual framework proposed has been developed on the basis of the method which presents a discourse subject—in our case that of citizenship—in schematic form (Borel et al., 1983). The schematization consists in linking up all those aspects that generally form part of a discourse on citizenship.

The primary objective of a conceptual framework that schematizes citizenship is to present all the macro-concepts and secondary concepts that are necessary to grasp the overall meaning of citizenship, based on a large variety of discourses dealing with different concepts of citizenship. Citizenship is a complex, multidimensional subject with manifold ramifications and, because of this very complexity, it is rarely approached from a perspective that seeks to encompass all its aspects. On the contrary, the discourses produced on citizenship frequently deal with only one specific aspect of the subject, chosen on the basis of the author's preoccupations or the specific set of problems that interest him based on the discipline with which she is affiliated, or the organization or association whose point of view he wishes to represent. These may be, for example, the rights and privileges attached to citizenship, the conditions for obtaining citizenship, or the participation of citizens in the democratic life of their society and their responsibilities in this regard. The issue of social and economic inequality is another angle from which the citizenship question is frequently approached. The conceptual framework, on the other hand, seeks to cover the entire field of citizenship, that is, all of the aspects relating to citizenship that appear in discourses on the subject.

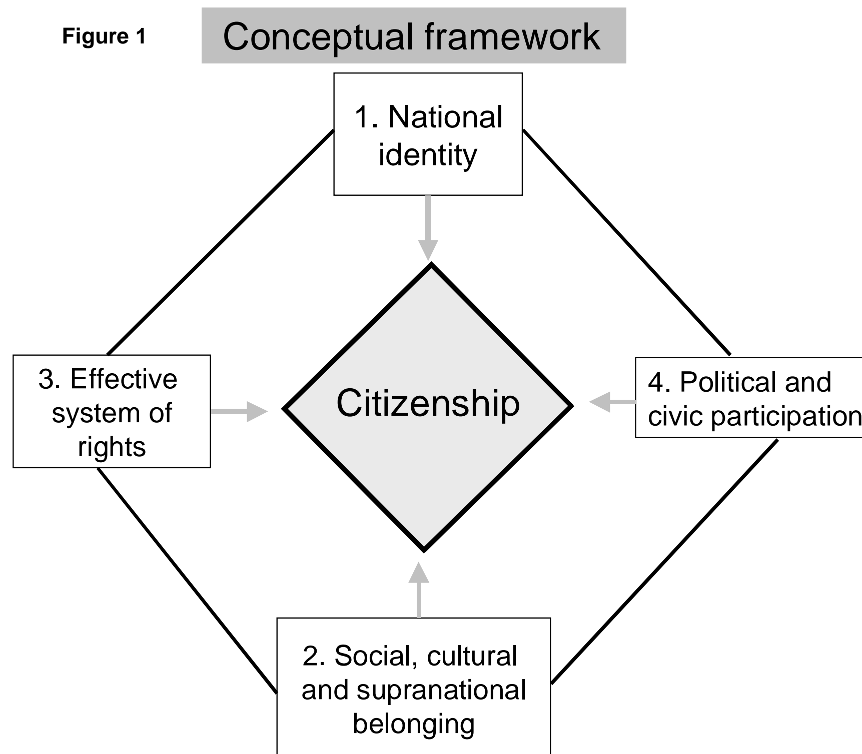
The conceptual framework will also make it possible to delimit the concept or concepts of citizenship evident in public policy, as practised in the six societies of our study, and to bring out the similarities and differences among them in so far as the institutionalization of citizenship is concerned. It is, moreover, an effective tool for analysing the various theoretical models of citizenship. That is why one of the objectives of the conceptual model is to define the different concepts used and to clarify their meaning in each of the societies examined, taking care not to place them in a situation that leads to citizenship being analysed from a specific viewpoint. The conceptual framework cannot, therefore, be constructed on the basis of a specific citizenship theory, or using the theorization of citizenship found in a specific scientific discipline such as sociology or political science. Furthermore, the conceptual framework must define each concept in a way that encompasses the variations in meaning given to concepts in different societies.

This is not an easy task, since the overall definition of different aspects of citizenship varies among the societies analysed and since citizenship tends thus to assume a different form in each society and from one theoretical model to another. Added to this is the fact that since, for the purposes of our research, the concepts related to citizenship are dealt with in two languages (English and French), they are subject to potentially confusing terminological variations. The same terms can sometimes be used in completely

different ways or, conversely, different terms can be used to designate one and the same reality. Apart from these terminological variations, the definition of a concept related to citizenship can be given a particular slant. Thus, for example, advocates of a renewal of civil society place activities which are on the civil society agenda at the forefront of their concept of participation. So that a conceptual framework can meet its objectives, definitions of terms related to citizenship should not favour a specific theoretical or political slant. The purpose of the conceptual framework and the concepts making it up is not to promote any particular standpoint on citizenship; rather, its aim is to problematize concepts by bringing out the various possible definitions, and to clarify their variations in each of the societies.

The third objective of the conceptual framework is to account for the interrelation among the various components of citizenship by linking them up in a network. The conceptual framework thus represents a map of sorts depicting the logical organization of the entire conceptual field of citizenship. This network, conceived on the basis of four major components—national identity; cultural, social and transnational belonging; effective system of rights; and political and civic participation—can be further subdivided into other components which are also logically inter-related. The organization of the conceptual framework is illustrated by the spatial representation of the figures 1 to 5 which follow. The first organizational basis of the network is the breakdown of the four main concepts of citizenship, the first level being composed of the four macro-concepts which define and give an overall picture of the concept of citizenship (see Figure 1). The second organizational basis of the scheme is the matching up of specific concepts which clarify the meaning of the macro-concepts (see figures 2 to 5). These particular concepts constitute clusters of sub-aspects of the macro-concepts.

Figure 1



In the centre of Figure 1, that illustrating the macro-concepts, is the concept of citizenship as characterised by the contribution of the four macro-concepts situated on two axes[2]: national identity, at the top of the figure, and social, cultural and supranational belonging at the base, constitute the vertical axis. The horizontal axis is formed, on the left, by the effective system of rights and, on the right, by political and civic participation. The perpendicular representation of these two axes does not suggest that

[2] Representing the macro-concepts in the form of axes is not meant to imply a quantitative representation. It is simply a spatial representation that provides a visual conceptualization of the interrelation among the various components of citizenship.

they do not have a force independent of each other. On the contrary, the four macro-concepts interact with one another and can even define one another. For example, cultural belonging, whose recognition is achieved through political struggle in a society, can have a direct impact on political participation. Or again, the concept of national identity prevailing in a society can help determine the way in which specific feelings of belonging—whether ethno-cultural or sociological—are recognized in that society. And, naturally, the effective system of rights is inter-related with the form of recognition given to specific feelings of belonging in the national identity.

Figures 2 to 5 represent the other levels (second and third) of the conceptual framework. Each of these figures is attached to a macro-concept in Figure 1. Moreover, each figure presents the network of intermediary concepts necessary to account for the significance given to the macro-concept in a particular society. The concepts at the second level usually have a logically inclusive relationship with their macro-concept, while those at the third level likewise have an inclusive relationship with the second-level concept with which they are linked. And so on. The sub-components thus establish relationships not only with the macro-concept with which they are associated but among themselves and with the sub-components of the other macro-concepts as well. The breakdown and spatial representation of the macro-concepts is not therefore meant to imply that the sub-components are isolated from each other. However, horizontal relationships between same-level concepts must be clarified since they can vary significantly depending on the society targeted or the theoretical model being studied. For example, in a given context the importance placed on the elements making up the societal culture can affect the role that civic culture plays in the characterization of the national identity.

To identify the conceptual framework's macro-concepts, the first-level concepts, we thought it appropriate to refer to studies that seek to conceptualize the entire field of citizenship from a perspective that covers several countries. A number of works have been completed in recent years which attempt to define the concept of citizenship.[3] We shall return to the theoretical models of citizenship later. At this point we would like to focus on conceptualisations of citizenship which appear to be in keeping with our objective of placing the essential aspects of citizenship in a logical network.[4]

The conceptual model of the International Educational Association's Civic Education Study (Torney-Purta, 1996) is one of the few references that can help us achieve our goal. This model, on which a consensus was reached among the 14 countries involved in the IEA project in 1995, provided a theoretical framework for the development of a questionnaire whose objective is to study how a sample of young people from a large number of countries define themselves in relation to the essential aspects of citizenship. Among other things, this study seeks to delimit the influence of the education received on this subject in the school system, as well as the influence of their extra-scholastic experiences. The three major dimensions identified in this field in the project in Appendix I are the following (Thorney-Purta, 1996): Democracy, Institutions, Rights, and Responsibilities; Sense of National Identity; Social Cohesion and Social Diversity. We used this model as a basis, especially the dimensions identified by the theoretical framework, while adapting it to the objectives set forth above.

We did find it necessary, however, to dissociate the first dimension from the IEA model which groups together Democracy, Institutions, Rights and Responsibilities into two separate macro-concepts: effective system of rights and political and civic participation. The equilibrium that establishes itself in a society on the vertical axis between national identity and separate feelings of belonging is achieved, on the one hand, through the participation of citizens in democracy and, on the other, through the effective system of rights, which do not constitute means of the same nature or scope and which must consequently be distinguished. As regards the institutions dimension identified in the IEA project, even if it is not dealt with in the form of a distinct component, it is found in the conceptual framework. For each macro-concept identified and each second- or third-level concept, there is a set of institutions which actualizes and embodies these various components within the democracies. In this first chapter we shall not identify

3 Regarding the various citizenship models, see Kymlicka (1992) and Kymlicka and Norman (1994).

4 Hall and Held, for example, have identified three main components in the concept of citizenship: belonging to a community; rights and responsibilities with regard to this community; and participation in the community to exercise these rights (Hall and Held, 1990).

each of these institutions; they will be dealt with at length in the chapters describing citizenship, with regard to each of the societies chosen.

Another way in which our work differs from that of the IEA project is that it allows for a clearer definition of the inter-linking logic among the various components of citizenship. The conceptual framework, which activates on one and the same axis national identity and specific feelings of belonging seems to us to account for what is revealed by the discourse on citizenship in multiple-component societies within which, as we shall have ample opportunity to see, the meaning of national identity cannot be defined without taking into account the diverse feelings of belonging of the components of such societies and their relationship to the national identity. It is also important to note that the two components which we have identified—effective system of rights and political and civic participation—are not necessarily conflicting, although they may at times appear to be so. Moreover, although they may appear to complement each other in certain cases, they differ sufficiently from each other to spark broad debate, such as that over whether the accommodation made for separate feelings of belonging should be fully guaranteed by a system of rights or, rather, be assured through democratic discussion. In the United States, for example, the effective system of rights has become a powerful tool for fighting inequalities, in particular because of the involvement of the Supreme Court in disputes regarding the implementation of civil rights.

By placing the components of the conceptual framework on the vertical axis of identity and the horizontal axis of equality, we concur with the analyses of Juteau (1998) who identifies the recurrence of two major themes in the literature on citizenship in the multi-ethnic liberal democratic societies. The first of these themes is expressed in terms of the issue of equality, that is, the institutionalization of the foundations of citizenship to resolve socio-political and socio-economic inequalities; the second is expressed in terms of the issue of national identity. Authors usually tackle these two issues separately, as Juteau notes in his review of the literature, owing to specific concerns dictated by the academic discipline to which they belong or their preoccupation of the moment. The conceptual framework presented here will allow us to approach citizenship from a perspective that encompasses both themes.

Definition of the components of the conceptual framework

The main structure of the conceptual framework consists of four macro-concepts: national identity, which includes a set of characteristics that all citizens are invited or encouraged to share, refers to the collective identity of a political community; feelings of social, cultural and supranational belonging, which refers to the fact that citizens may define themselves in terms of one or several feelings of belonging within a society; an effective system of rights aimed at ensuring the equality of citizens in the liberal democracies; and finally, political and civic participation, which brings together the competencies, actions and steps expected of a citizen and through which she displays her commitment to the governance of the society of which she is a member. These four macro-concepts are defined by an array of concepts that define their meaning[5].

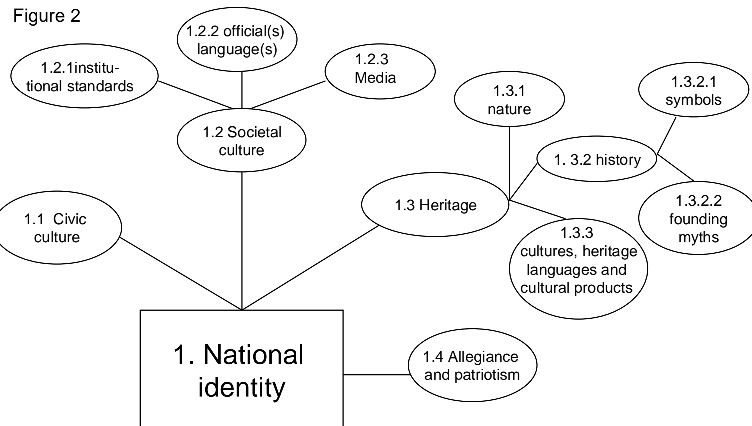
The societies in which we are interested are all engaged in a debate on their national identity, a debate fed by the presence of a population of diversified origins, culture, religion and lifestyle. In immigrant societies, there is an inevitable tension between their internal diversity and what constitutes the essence of their unity and their collective identity, the components of their national identity. However, the national identity debate is not solely a product of internal diversity. Current reflections—both theoretical and political—on the nation state and nationality also have their origins in the process of globalization. Free trade and the development of communications technologies present new challenges for countries that seek to protect their national identity. While mindful of individual freedoms and diversity, the liberal democracies are no less concerned to ensure that their established way of doing things is not disrupted by all sorts of different approaches. In this respect, it is important that there be a measure of agreement among the members of a society on the way of conducting public affairs.

---

5 The concepts are numbered; this was done to make it easier to make the link between the graphics and the text, not to suggest that some of the concepts are more important than others.

Citizenship is frequently defined in terms of legal and political status. However, a citizen is not just the extension of a system of rights; he is also defined in terms of his sharing in an identity which, in the conceptual framework, is represented by the macro-concept of national identity which refers back to this entire component of tangible citizenship. A citizen belongs to a specific society which has its own characteristics, language, history and which, in this capacity, has an important influence on her life.

Furthermore, the concepts defining national identity serve to clarify what constitutes a society's identity, what gives it a distinctive character and what—while not imposing homogeneity—sets this society apart from others. The conceptual framework approaches the question of national identity from different perspectives which are all mutually complementary (see Figure 2). The definition of national identity must, at the very outset, contain the coded elements which define the society as a whole and which have a universal value in that society. In this respect, civic culture (1.1) is a component of the national identity which occupies a predominant place in a liberal democratic system. A civic culture is centred primarily on normative elements and is defined essentially by the legal and political principles embodied in a tradition peculiar to each society (for example, the founding principles and values of the American Constitution or those of the Canadian Constitution and the *Canadian Charter of Rights and Freedoms*).



A liberal democracy is always rooted in a particular culture which distinguishes it from the other democracies; this constitutes its societal culture (1.2). The societal culture refers to everything that characterizes the public lifestyle of individuals in this society. Although it bears the historical imprint of the majority group that has moulded this society more than any other—its food, its recreation, the most prevalent lifestyles, its distinctive architecture, urban planning, etc.—it can also be marked by the various groups it harbours. Kymlicka defines societal culture as follows: "a societal culture is a territorially concentrated culture centred on a shared language that is used in a wide range of societal institutions, including schools, media, law, the economy, and government " (Kymlicka, 1998 : 27). The institutional standards (1.2.1) represent the first sub-component of this societal culture. Indeed, the functional standards of a society's institutions have a national complexion that distinguishes them from those of other democratic societies. The socio-cultural aspects characterizing institutions play an important role in regulating the behaviour of citizens in public life. The official language or languages (1.2.2) used by employees in public institutions constitute another dimension of societal culture. The shared language of public life in a society plays an instrumental role in communications and, as such, is a characteristic of the civic culture. The media (1.2.3) also play an important part in civic culture. Each society is characterized by its major national dailies which, to some extent, reflect the ideological and political currents present in that society.

Heritage (1.3), another sub-concept of national identity, is made up of several elements related to nature (1.3.1) (natural resources, national parks, etc); to history (1.3.2) including symbols (1.3.2.1) and founding myths (1.3.2.2), among them, for example, the historical development of democratic institutions and the legal framework; and to cultures, heritage languages and cultural products (1.3.3) (works of art, architecture). It should be noted that the last aspect refers to cultures in the anthropological sense and that the languages which form part of the society's heritage include minority languages and the official language(s) as cultural medium(s). Heritage, like societal culture, is invoked to define the specific characteristics of a society. However, heritage will be more diversified than societal culture, which is essentially defined on the basis of the majority ethnic group's ascendency over the institutions since, by virtue of its pluralistic nature, it embraces the collective and individual contributions of all citizens to the society's heritage. It is, therefore, an evolving and inclusive heritage which is complex and therefore difficult to define.

Allegiance and patriotism (1.4) also constitute sub-components of national identity, since their very definition refers to it. Patriotism is defined in terms of attachment to a political community and it can assume a different form depending on the element on which it is focussed. Patriotism can refer, for example, to the traditions and customs of a political community. It can also be defined at the emotional level in terms of attachment to the land (environmental), to the government and its structures, to rule by the people and a sense of civic responsibility, to a free market and to involvement in citizen activity for humanity as a whole.[6] The type of patriotism will thus vary depending on its specific form of attachment. For example, iconoclastic patriotism rejects emotional and symbolic attachment and advocates active and varied participation in resolving problems of economic inequality and political injustice, whereas symbolic patriotism is characterized by a very strong attachment to national symbols and an unconditional acceptance of the country and its institutional structures. Allegiance is defined more in terms of loyalty and conformity to the institutions of a political community.

The sum total of the principles and applications of civic culture, societal culture and heritage embodies the collective traits that apply to virtually all members of a society, and these are the elements that people attribute to themselves when they describe themselves as citizens of the society in question. It is in this sense that we consider them as components of national identity.

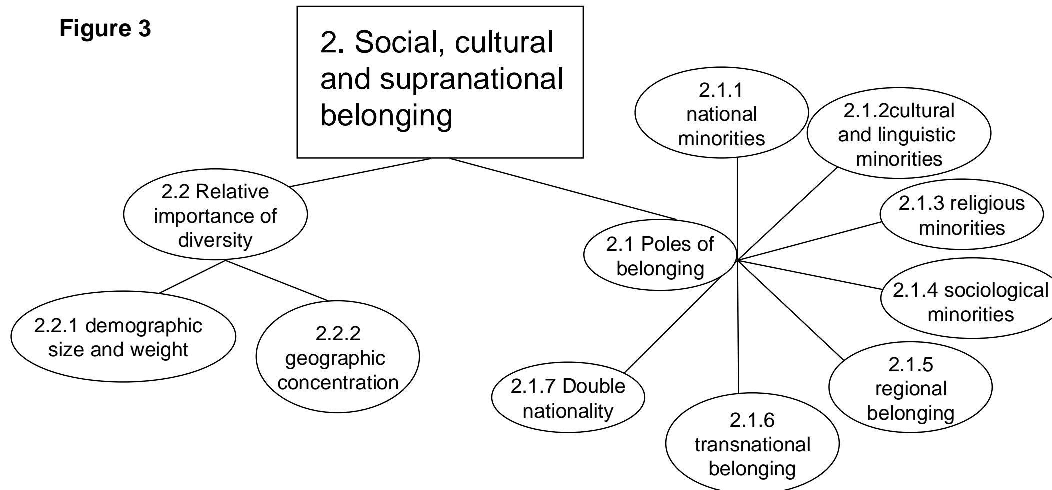
The societies that are the special focus of this study are immigrant societies which grant nationality—hence citizenship rights—to persons who arrive, year after year, from a variety of countries. These persons bring with them a national identity, including a culture, religion, language, etc., that is different from that of their host society. Having become citizens in a few years' time, they do not have the same relationship with their adoptive country as do individuals whose citizenship has been passed on through generations. Thus social, cultural and supranational belonging constitutes a second aspect of citizenship whose application is virtually universal, in the sense that the societies that we are concerned with all have minority components that refer to origins to which is attached a specific cultural identity. This macro-concept applies also to the majority component which, too, refers to a specific identity and a distinct culture. However, cultural and religious diversity must not be associated essentially with immigration; it is also the result of citizens' exercising their freedom, in the liberal democracies, of religion, conscience and association. As Pagé (1996) points out, pluralism refers also to a diversity of social, economic and political ideologies, as well as to a diversity of values.

The macro-concept of the conceptual framework that refers to social and ethno-cultural belonging includes the various forms that diversity of belonging as an accepted reality can assume in a given society. From this macro-concept we can see that the societies are made up of citizens of diverse origins who retain their attachment to and display these origins to varying degrees. As a component of the conceptual framework, diversity of belonging does not necessarily refer to the diversity recognized by the society's system of rights. It refers to the diverse composition of the citizenry as a demographic, geographic, social and cultural fact and to the demand for "recognition" that flows from this diversity. There are many poles of belonging (2.1) and each individual experiences them differently. Some citizens many identify with several group belongings or adopt none at all. The poles of belongings are as follows: national minorities (2.1.1) which are distinct from other minorities because they usually enjoy a separate legal status, control their own institutions, and their inclusion in the society, unlike that of immigrant minorities, is often involuntary in that it results from conquest, a decolonization process or population transfers; cultural and linguistic minorities (2.1.2); religious minorities (2.1.3); sociological minorities (2.1.4) (the elderly, women, young people, gays); or citizens who have a strong sense of regional belonging (2.1.5). The measurement of identity must include not only the various feelings of belonging already mentioned, but also a form of identity that transcends the nation and that we shall describe here as supranational belonging (2.1.6). This refers to a phenomenon closely linked with technological development, characteristic of the 20th century, and with free trade among countries. Communications, information and transportation have broadened the horizons of our social network by making it possible

[6] These trends in patriotism were identified by Theiss-Morse in the American context. She goes on to say that these various meanings allow us subsequently to define different types of patriotism, each of which corresponds to a specific configuration of elements such as emotional attachment to national symbols, the type de participation preferred, and priority national issues (for example, protection of the environment versus the quest for profit).

for us to go beyond the local and even national context. Contacts between individuals from different cultural groups are becoming increasingly frequent. Increased travel and the development of communications technologies makes it possible to belong to a community that no longer necessarily identifies with the State but with groups with which it shares common interests, ethnic origins or other ties. In some countries, dual nationality (2.1.7) allows citizens to take the oath of allegiance to their new society without having to renounce their original citizenship.

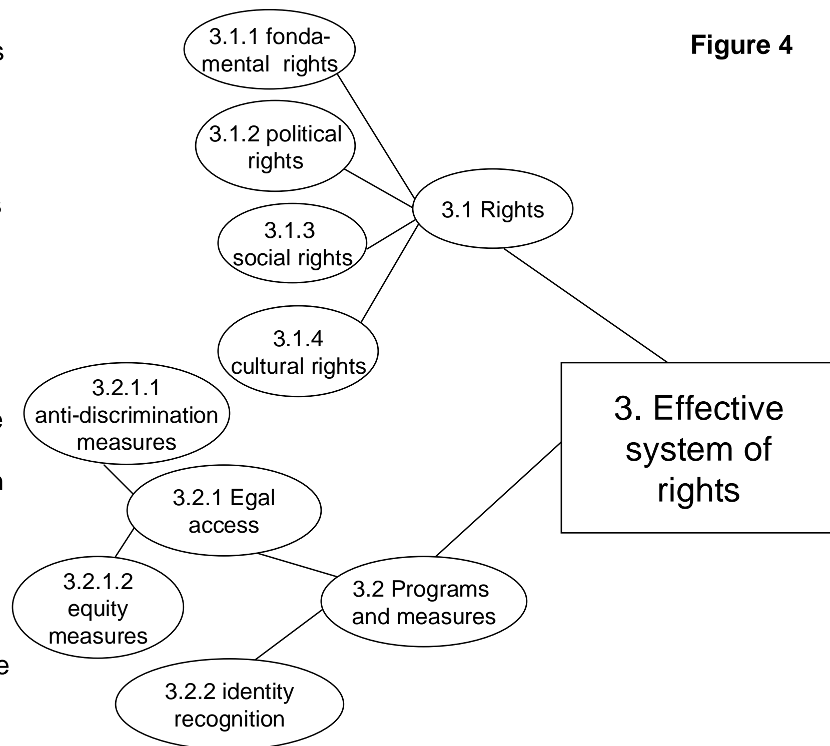
Figure 3



The relative importance of diversity (2.2) turns out to be an important indicator for experiencing citizenship at two levels. The ability of a particular group to acquire economic and political power is tied to its demographic size and weight (2.2.1). Apart from demographic weight, geographic concentration (2.2.2) adds to the influence of minorities and has an impact on their collective decision-making power. It can also be an indicator of residential discrimination and urban segregation. Similarly, a group's geographic concentration can have an impact on political participation; in some cases it can work to the advantage of candidates belonging to such groups.

Since the societies that interest us here are all liberal democracies that respect identities, they welcome this cultural and religious diversity, which does not mean that components of these societies are not faced with various difficulties in integrating into the institutions and economic life, difficulties that lead to numerous inequalities. However, the liberal democracies are, in one way or another, all committed through their founding principles to ensuring a system of equal rights for all their citizens. Equality in law applies, in different ways, to cultural and religious identity. It allows the retention of this identity, its transmission to subsequent generations and its display in everyday life. Consequently, diversity has become a fact of life in societies of this type.

The effective system of rights component refers to public norms which, in the liberal democratic societies, define the citizen's political and legal status: charters of rights and freedoms, laws, constitutions, etc. The constellation of concepts that clarify this major component includes two main concepts both of which raise the question of the equality of citizens: the rights recognized for all citizens (3.1); and the programs and measures (3.2) implemented to counter socio-economic inequalities and promote equitable access to societal and institutional resources. These concepts are spelled out in the various instruments through which the societies formalize citizens' equality in the four fields. Thus, 3.1 includes the three types of rights defined by Marshall: fundamental rights (3.1.1); political rights (3.1.2) (the right to participate in the political process); and social rights (3.1.3) (which includes economic rights and the right to a minimum standard of living and to social welfare), along with cultural rights (3.1.4).



Fundamental rights can be understood in their broad sense as rights that all people possess by virtue of their human nature; they constitute inalienable and inviolable prerogatives. The meaning adopted for the purposes of the conceptual framework is much narrower and refers to human rights that are institutionalized in law, that is, recognized and protected by constitutions, human rights charters or laws dealing with these issues. The fundamental rights guaranteed by legal instruments in the liberal democratic societies include the right to individual freedom, the right to life, the right to security, the right to physical integrity and the right to equality. Cultural rights are associated more with the protection of a collective identity characterized by a distinct culture and are the subject of general provisions such as section 25 of the *Canadian Charter of Rights and Freedoms* which deals with the multicultural character of society and its cultural heritage. They can also focus on the preservation of the culture of a particular group, as is the case with section 27 of the Canadian Constitution with respect to the Aboriginal peoples.

Socio-economic standards intended to promote equal access (3.2.1) are embodied in different mechanisms. The first such mechanism, the antidiscrimination measures (3.2.1.1), includes programs aimed at fighting discrimination based on criteria such as race, sex and age, among others. The second type of mechanism, the equity measures (3.2.1.2), encompasses those measures intended to remedy the systemic and involuntary aspects of discrimination that can be directed to the members of a specific group (equal opportunity programs). To these measures is added recognition by the State of distinctive identities, identity recognition (3.2.2) that citizens acquire by virtue of their particular group membership (for example, bilingual instruction in the United States for Spanish-language school clienteles, or the adaptation of history teaching manuals to diversity). Such programs are developed within a legal framework and are, for the most part, regulated by public authorities.

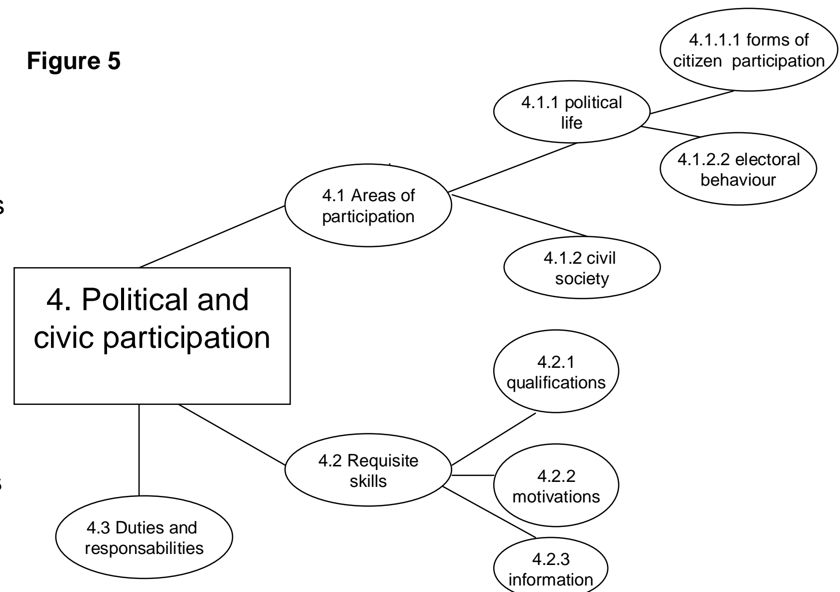
In a democratic context, participation in political life and civil society represent both a right and a responsibility for citizens. They are in effect responsible for assuming the governance of their society through political and civic participation. The exercise of control over the designation of those who are to govern and over the exercise of certain forms of autonomy in civil society is inherent in citizenship. More than the awarding of political rights, citizenship is, in its broadest sense, intrinsically linked to the conditions of participation by citizens in the life of their political community. This view of citizenship, which has been riding a wave of popularity for some years, forms the basis of studies on the duties, responsibilities and qualities of the model citizen. It is also promoted by certain authors in order to encourage the social cohesion of a political community. Political and civic participation is divided into three sub-components (see Figure 5): areas of participation (4.1) in public life in which citizens are called upon to become involved[7]; the skills that citizens are required to have as regards participation, requisite

[7] The division between the public and private domain has attracted numerous criticisms. Feminist thought, for one, has criticized the liberal philosophy that establishes a firm boundary between the public and the private and that tends to favour the groups or group that occupy a majority position in the public space and relegate minority points of view to the private sphere (Young, 1990; Benhabib, 1996).

skills (4.2); and the duties and responsibilities (4.3) tied to participation.

To begin with, it is important to distinguish two types of citizen participation in public affairs. This distinction is based on a clear identification of the areas of citizen involvement: that of political life (4.1.1) and that of civil society (4.1.2). It must, however, be kept clearly in mind that it is not just a matter of area, since the objectives of a citizen's participation and the nature of his involvement can vary depending on whether he devotes himself to an association or to political action.

Figure 5



Participation in political life is regulated by the Constitution and the laws that govern the functioning of the democracy's institutions. The democratic system in effect in a country sets the limits of citizen participation by regulating the electoral process. For example, citizenship regimes differ on important points in this respect, depending on whether a republican or a parliamentary system is involved. All the factors pertaining to citizenship which appear in the entries of the conceptual framework with regard to participation are thus understood and interpreted with reference to the system in effect in each society.

Several forms of citizen participation are identified (4.1.1.2) in the research on political participation (Stasiulis, 1997): exercising one's right to vote in elections, becoming involved in political discussions and keeping oneself informed, becoming a member of a party, working in election campaigns, communicating with politicians, running for public office at the municipal, provincial or national level and, finally, filling such office. The various forms of participation analysed by this research apply to both long-standing citizens and new arrivals.

The electoral behaviour (4.1.1.2) of citizens is an important subject for study in all societies. To characterize the form of political participation in a society, the reaction of citizens to the invitation to participate in the democratic process is interesting from two points of view. The first is the actual exercise of the right to vote by the electorate as a whole, which is often viewed as a yardstick of the health of the democratic way of life. The exercise of the right to vote by an identifiable part of the electorate, for example immigrants, is an indicator of their integration into political life and into society in general (Stasiulis, 1997). Electoral behaviour is also studied from another point of view, where the preference of an identified group for a party's candidates is correlated with that group's characteristics. The most frequently recurring characteristics are socio-demographic ones, such as ethnic belonging or geographic location.

Civic participation (civil society) (4.1.2) is understood as voluntary involvement in non-governmental organizations whose activities depend entirely on the initiative of their members. For the most part, these organizations are local, parish, municipal or school-related, although some, like the Red Cross, are international. Civic participation therefore expresses itself through associations, committees or local pressure groups formed and governed by citizens and pursuing objectives set by them. Civic participation is multidimensional and operates at several levels (Frideres, 1997). For example, civic participation can seek to influence the political decision-making process in the interests of a particular locality, or to implement a solution to a problem that the public authorities seem reluctant to tackle. The environmental protection movement, which is becoming more prevalent and more influential in contemporary societies and whose efforts to promote sustainable development testify to a preoccupation with the fate of future generations, is an example of this type of participation. The size of citizens' groups

mobilized for such purposes can vary considerably, from the local to the national. The contexts for such participation also vary greatly, including the workplace, educational institutions, ethnic communities, voluntary associations and religious organizations.

Participation in the administration of public institutions is also a form of civic participation by citizens which is becoming increasingly important; it can be seen in user committees, institution councils, parent-teacher associations. Thus, participation occurs in an overlapping area where the civil sphere and public administration meet. The objectives and operating procedures of such institutions are determined by laws and decision-making power is exercised within the mandates given to such bodies. Citizens can nevertheless exert a strong influence on the decisions taken in the organization of public services intended for their communities.

The skills required (4.2) on the part of the citizen refer to both political participation and involvement in civil society. The term “skills” is used here in a broader sense to include the qualifications that citizens must have to participate, the motivating factors that encourage them to participate and the information that they must possess to participate effectively.

Political participation requires citizens to have specific qualifications (4.2.1) so that citizens are able to vote or run for elected office (age is one example). The qualifications required or desired shed light on the expectations that a society has of its citizens. For example, being able to understand and speak the official language is considered in several cases as an essential skill for the citizen to exercise his right to vote. To what extent should this skill be required in all citizens? This question is still the subject of public debate today in societies with high immigration levels.

The education of the citizenry, according to the objectives and criteria established by a society, must evidently be regarded as a source of essential information for acquiring the skills required or expected of a citizen in that society. There are many such skills. Those most frequently mentioned in citizenship education programs are a good knowledge of democratic institutions, the ability to take an active part in political discussions and the prerequisites for life in an egalitarian society, such as tolerance and a preference for a negotiated resolution of conflicts.

A significant part of the public discourse on citizenship in democracies is devoted to the motivations (4.2.2) that lead a citizen to participate, in particular to take an interest in elections, to run for elected office and to become involved in community life. The factors that encourage citizens to participate or not, as well as the reasons for which they prefer one form of participation over another—for example, community participation rather than work for the organization of elections—are a subject of constant concern in democratic societies, as much among political or community leaders as among researchers interested in how democracy functions in their society.[8] The stock phrase “social capital” refers to the degree of citizen involvement in a community, that is, the degree to which citizens are willing to co-operate with one another in pursuing the collective good through political or civic action. Consequently it is interesting, on the one hand, to identify the arguments with which leaders try to encourage citizens to participate and, on the other, to learn the citizens’ true motives for doing so. Such research makes it possible to determine, among other things, whether a society’s citizens are more absorbed in the pursuit of their personal interest or whether they constitute a social capital that can be counted on to develop the community. Another interesting subject for study is the degree to which citizens become involved only in their own group as opposed to involvement in shared activities whose objectives transcend the interests of specific groups.

Information (4.2.3) includes all initiatives taken to ensure that citizens are well informed about the workings of the political system, about what is at stake in elections and about areas of civil society where they can become involved. There are a variety of means for informing citizens: investment in electoral publicity, time made available to the parties for presenting their programs, media coverage of political activities and of community initiatives. The quality of the information made available to citizens by

[8] See Frideres on this question, who formulates several of the reasons for which it is generally considered that citizens should be strongly motivated to devote their time, energy and resources to supporting the processes of political democracy and civil society (Frideres, 1997).

political organizations or the media is often subject to critical evaluation by the recipients. The degree of interest taken by citizens in public affairs, as well as the information that they acquire, represent a constant in participation surveys (Nevitte, 1998).

Under the heading of duties and responsibilities (4.3), mention should be made, first and foremost, of any legal or other provisions that may exist in a society and that are designed to ensure the participation of citizens. These may include the legal obligation to vote or risk incurring penalties provided for by law, as is the case in certain countries including Australia. Duties and responsibilities also apply to civil society, to the extent that its laws oblige the society's members to participate in the running of institutions made available to them. The duties and responsibilities show the extent to which the state compels citizens to become involved in solving problems and developing their life environment.

Interrelation between the macro-concepts of the conceptual framework

How is equality achieved in a pluralistic society? Through an effective system of rights or through political and civic participation? The interrelation among the components of the conceptual framework can provide a partial answer to this question through the logic of the intersection of the two axes of the conceptual framework, namely the vertical axis of identity— with national identity and social, cultural and supranational belonging situated at either end—and the horizontal axis of equality—with the effective system of rights and political and civic participation being at either end. The way in which national identity is defined and the place accorded to individual belongings in a society can determine the nature of equality within that society. Indeed, when a prominent place is accorded to the expression of diversity, it would be logical to expect the system of rights and the feelings of belonging within political participation to be established accordingly.

The four macro-concepts identified by the conceptual framework must be considered as four reflections of the same reality, four aspects of the same discourse subject: citizenship. By defining a macro-concept, we bring out what is specific to a particular aspect of citizenship, but it is certain that the information entered under the heading of a macro-concept, for example the effective system of rights, cannot be completely dissociated, in most cases, from the other aspects of citizenship. Thus, one of the major components of national identity in a liberal democracy—a civic culture—is incorporated into the society's system of rights, because it is made up of fundamental values and principles that must govern life in such a society, relations between citizens, and relations between the state and its citizens. The development of the conceptual framework does not therefore seek to isolate the macro-concepts from one another; rather, they are inevitably inter-related because they are aspects of the same subject of discourse. They are frequently the same realities that are apprehended, either in the form of the system of rights prevailing in a society, in the form of accommodation made for diversity within a society or in the form of a characteristic of the national identity. Thus the recognition of diversity of belonging is supported by a system of rights which reinforces the equality of all the society's components; one could say that it is a distinct characteristic of that society, thus an element of its national identity, to have a multiple national identity. This does not mean that the relations between the components must be in a state of perfect harmony; occasionally tensions can be present as when, for example, the system of rights is not in accordance with the status granted to the diverse components.

When the conceptual framework is applied to the analysis of a given society, it can be observed that the national identity—as the traditional and still valid mark of that society's specific character—is called into question by the diversity of belonging of its members. The system of rights (3) and participation (4) regulate, as it were, the relations between the two components of national identity and social, cultural and supranational belonging. By way of example, a society adopts norms of equality (system of rights), which make it possible to achieve the desired balance between national identity and diversity of belonging. The effect of the norms of equality is to increase or decrease the role of diversity of belonging in a society, by lessening or accentuating the domination of those characteristics of the society's national identity that make for uniformity. The framework's logic is thus one of interaction among the four components, which accords an importance to each one in the definition of citizenship. A society in which diversity of belonging is recognized by virtue of a great diversity in appearance will tend to have equality norms that guarantee this established fact; this fact will also give a special configuration to its national

identity, which will have few of the distinctive characteristics of an ethnic majority but will, rather, reflect that society's pluralism.

It is this interactive logic sustaining the conceptual framework that enables it to take into account the distinctive features of the concepts of citizenship of the various liberal democratic societies. It makes it possible concurrently to zero in on the approach to citizenship favoured by the public discourse and the shortcomings of this concept that become evident from public discussion. For example, a state which encourages a concept in which distinctive identities are brought to the fore emphasizes diversity of belonging at the expense of the majority national identity. It might well suffer reproaches from upholders of the national identity who may be fearful that the state's programs might undermine this identity. The way in which the state tackles certain specific identities may also call forth criticism or approval; symbolic recognition might be accepted, while the accompanying right to political representation might not be. The conceptual framework also makes it possible to analyse the way in which societies formulate their relationship to diversity which, in some societies, is institutionalized through a policy of multiculturalism. Such a formulation can be analysed on the basis of the two main axes of the conceptual framework: that of identity (relationship between national identity and diverse feelings of belonging) and that of equality and social justice (system of rights and participation).

The conceptual framework allows us to describe the various approaches to citizenship as so many specific interactive configurations among the four components, that is, as the meeting of complementary and harmonized concepts of these four components. It also clarifies the complementarity of these concepts by isolating the way in which, in a given society, the specific form assumed by its national identity makes it compatible with the system of rights. The framework is, therefore, a descriptive tool that offers a conceptual system for subdividing the complex concept of citizenship into its components, which may allow us to discuss it with precision and to consider all of its implications. If, in addition, it lets us analyse the similarities and differences in citizenship among the liberal democratic societies, it will have demonstrated its usefulness, since it is all the more difficult to differentiate among these societies in that the distinguishing traits are frequently not very marked. Indeed, it is more difficult to compare British multiculturalism and Canadian multiculturalism than it is to compare the concept of citizenship prevailing in a liberal democracy with that found in a country dominated by an ethnic majority which reserves the rights of citizenship for its members and denies them to all others.

The conceptual framework and theoretical models of citizenship

The conceptual framework does not correspond to any of the great ideological models of citizenship. Instead, it is useful for characterizing the ideological or political polarization that surfaces in public discussions of citizenship in the liberal democratic societies and to situate them in relationship to one another.

Like Castles (1997), we believe that the approach to citizenship in a society cannot fully match the description of a theoretical model. For example, a country which starts out with a differential exclusion model may, over a period of time, evolve toward an assimilation model and then go on to become a society that might be described as an integration model which, in turn, will gradually adopt a pluralistic social model. This progression can also vary on the basis of the aspects of citizenship studied. In some areas, such as economics or the social sphere, a society may adopt policies that correspond to the assimilation model, while in other areas, those of culture and citizenship for example, it may espouse pluralistic policies (Castles, 1997 : 115). Australian society, for example, presents a relatively clear picture of the successive changes that this society has gone through to arrive at its present model.

In the societies that we are concerned with, public discussions are going on regarding the current citizenship models, and we shall attempt to identify the key aspects of this discussion by considering the criticisms levelled and the changes proposed. These criticisms are not always formulated on the basis of a clearly identifiable ideological position that can be associated with one or another of the major theoretical models. Furthermore, it is appropriate to note that citizenship is experienced and represented in the various societies within the context of a societal culture and that it is also permeated by the power relationships existing within the society. By using our conceptual framework, however, we will be able to

identify the positions regarding the prevailing concept of citizenship in these societies, as well as the changes proposed, if any. The proposed modifications involve, for the most part, redefining one or more of the components of the conceptual framework and, in so doing, reorienting the diagram toward one of the conceptual framework's poles.

To understand the terms of the public discussion on citizenship in the liberal democratic societies, we can refer, as needed, to the major models delimiting the place of ethno-cultural and social diversity, such as those distinguished by Castles (1997). According to this author, the differential exclusion model advocates that immigrants be integrated in some areas of society (labour market), whereas they are refused access to others (social welfare, social security, political participation). Membership in the civil society (as a worker, a taxpayer, a parent) does not necessarily confer on one the right of membership as a citizen in the nation state. Exclusion can take place through legal mechanisms (namely refusal of naturalisation) or through informal practices (racism and discrimination). This model is more prevalent in countries where membership in a nation is based on belonging to a specific ethnic group (Castles, 1997). As understood by us in the terms of the conceptual framework, this model sets great store by maintaining the predominance of a definition of national identity which favours the majority group by refusing access to this identity to individuals with distinct ethno-cultural origins. This is achieved by imposing on the new arrivals a restrictive effective system of rights and norms that limit their participation in political affairs and the election of their rulers. A conceptual framework used to describe citizenship in a society of this type shows how the society succeeds in maintaining the exclusion of certain individuals.

The assimilationist model advocates a policy of immigrant integration into a society through a process of unilateral adaptation: the immigrants are expected to give up their linguistic, cultural and socially distinct characteristics and to assimilate to the majority population of the host society (Castles, 1997 : 117). In some cases, the concept of assimilation has been replaced by that of integration, whereby the adaptation assumes a more gradual form. As in the case of assimilation, however, the ultimate goal remains assimilation to the dominant culture. Within the terms of the conceptual framework, this defines national identity in such a way as to preserve the dominant position of the majority group but, unlike the preceding model, it makes participation and equality of rights accessible to all, provided that the citizens give up their distinctive feelings of belonging. According to this model, citizenship is understood solely with reference to the upper triangle of the conceptual framework formed, it should be recalled, by the components of national identity, effective system of rights, and political and civic participation.

The pluralistic model, for its part, is characterized primarily by the recognition that immigrants enjoy the same rights—within limits prescribed by the respect of certain fundamental values— in all social spheres without being expected to give up their various feelings of belonging. Membership in the civil society therefore involves full participation in the nation state (Castles, 1997 : 119). This model is found, according to Castles, in the liberal states with high levels of immigration, such as the United States, Canada and Australia.

These three models are in sharp contrast: they represent societies that differ markedly from one another in their prevailing conception of citizenship. They can be used to characterize the positions adopted in a national discussion on citizenship. For example, in France an influential school of thought in academic circles which is gaining the ear of the populace has developed a radical critique of the French citizenship model. The moving force behind this school of thought is Michel Wieviorka (1997), whose analysis of the French situation shows that the rigid and exclusive model of French national identity works to exclude diversity, which inevitably leads to socio-economic inequality. We can situate this model with reference to the upper triangle of the conceptual framework to show that the horizontal axis of rights and participation is strongly under the domination of the definition of national identity. In opposition to this concept Wieviorka presents a vision open to diversity, opting for a resolution of the inequalities linked to ethnic identity through political participation rather than through multi-ethnic rights or positive discrimination. Using the terms of the conceptual framework, he seeks a better equilibrium between the two components of the vertical axis—national identity and distinctive feelings of belonging—through a redefinition of the form of political participation on the horizontal axis, but without involving the component of rights in such a way as to favour the excluded minorities through a form of reverse discrimination. This example is instructive in showing that public discussion of citizenship in France, from

this perspective, can call for reference to Castle's models, but that the conceptual model remains useful in clarifying the type of pluralistic model proposed there.

It is only to be expected that the differences among the six societies chosen will not be as clear-cut and that, in the context of internal debates, it is not so much different models that will be debated but rather variants of the same model. We should therefore also pay attention to the different versions of the pluralistic model which are giving rise to numerous debates.

Analysis of the similarities and differences between conceptions of citizenship in six liberal democracies

The conceptual framework presented here can be used to describe the liberal democratic conception of citizenship as embodied in societies that claim to be liberal democracies. Moreover, the conceptual framework was developed for the purpose of targeting the main aspects of citizenship that have to be considered in comparing and highlighting the similarities and differences in conceptions of citizenship in liberal democracies. This we will do by drawing on studies carried out to determine, based on the conceptual framework, the key issues in the debates over citizenship that have taken place in recent years in the United States, France, Australia, Great Britain, Canada and Canada (Quebec)[9]. We have opted to focus more specifically in our analysis on the following points of comparison: 1. the configuration of the national identity of each society and its relationship to the specific identities that exist within that society; 2. the rights of citizens and public policies adopted to apply those rights, especially as they relate to minorities; 3. the structures that permit political and civil participation and the level of public involvement.

We will therefore underscore in this analysis the most meaningful ways the Canadian conception of citizenship is similar to or different from the conceptions of the other societies under study. The societies will be compared on two levels. First, each of the four macro-concepts will be contrasted. We found that the macro-concepts of the conceptual framework, defined in each society by the specific meaning ascribed to the subconcepts, reveal similarities and differences that are of great interest; for example, the definition of national identity in some societies may be based primarily on civic culture, as is the case in the United States, yet on societal culture in others like France and Great Britain. We will also compare societies on the basis of their description of the interplay between the various components. In the following pages, we will combine these two approaches for each of the three levels of the comparison.

Configuration of the national identity of each society and its relationship to the specific identities within that society

In most discussions of national identity, the term has two different meanings:

First, it refers to the inner structure and the organizing or constitutive principles of a community; that is, to the way it is constituted and its different parts are integrated into a coherent whole. Secondly, the term national identity is used to refer to what is unique, peculiar or specific to a community and distinguishes it from others. (Parekh, 1994 : 502)

That is why our conceptual framework has two types of element to describe the national identity component (see figure 2): one type relates to the constitutive principles of the society and is embodied in the civic culture (1.1), and the other type expresses the uniqueness of the society, represented by the societal culture (1.2) and heritage (1.3). Comparison of the national identities of the subject societies brings to light differences in the importance attached to each type.

In Canada, the interplay between national identity and identities rooted in specific affiliations, national minorities in particular, is characterized by a system that recognizes specific identities; in such instances, the basis of unity within the community of citizens can hardly be found in a national identity defined

[9] Country profiles detailing citizenship debates in these countries are included in Volume II of this study.

primarily by a societal culture and a heritage that bear the unique stamp of one segment of that society, even if that segment constitutes the majority. As Charles Taylor (1992) and later Kymlicka (1995) so clearly felt and explained, Canada's national identity reflects the "deep diversity" of Canadian society. All segments of society can find in that diversity the common elements of identity that are shared by all Canadians and the specific elements of identity that distinguish among groups with different affiliations. Margaret Atwood and Anne Hébert, for example, are two prominent figures in Canada's literary heritage. Many Canadians love and read both authors. Many others, more probably, read only one of them, depending on the linguistic group to which they belong. The citizens in each group can find in this aspect of heritage a figure in whom they see their specific identity reflected. The same can be said of the contribution to literary heritage made by authors associated with the Aboriginal minority and authors from ethnocultural groups.

So great is diversity in Canada that there is no *one* societal culture. The dominant societal culture is English Canadian culture for the vast majority of immigrants who settle in provinces with an Anglophone majority and Francophone Quebec culture for most of the immigrants who integrate into Quebec society. In contrast to most other countries, Canada does not have a single, universally spoken language that stands as the most prominent feature of national identity. The country has two official languages and defines itself as multicultural. The most important aspect of Canada's national identity therefore lies in civic culture and the system of rights established by the Constitution, in particular equal rights, which are thought of as the constitutional instrument that minimizes the differences reflected by national identity.

Like Canada, the United States has a national identity that is based primarily on civic culture. American national identity is essentially characterized by the idea that all citizens, no matter where they are from or what their affiliation, are fundamentally equal — "all men are created equal" — and by the individual freedoms guaranteed by the constitution. National identity in the United States also seeks to represent the diversity of the American population. Its unifying vision does not amount to ignoring diversity, but rather to clarifying the elements, diversity among them, that ensure consistency in the representation of what it is to be American. The United States is different from Canada in that respect because the place specific affiliations hold in American society continues to be determined by the very strong unifying vision of the national identity. Diversity is recognized as a feature of the national identity that is unique specifically because it unifies diversity: what the American motto actually means is that there are a number of founding legends and a history that help establish a national feeling that brings citizens together and fills them with a common sense of belonging. Despite this strong tradition of affirming unity over diversity, American society is currently at a point when ethnocultural groups and sociological minorities are expressing a very strong desire to see their specific identities recognized in a public way. That desire is bringing about changes in the unifying elements of the national identity, which are clearly beginning to pull in all directions. For example, the teaching of history underwent major changes in the 1990s and now reflects in a far more visible way the diversity of American society and the struggles of years past. The title of Nathan Glazer's latest book is very telling in this respect: "We are all multiculturalists now."

The basic difference between American national identity and Canadian identity lies in the stock they place in founding legends and heritage; the components of Canadian heritage are less inclined to seek common references than to present a revealing image of the diversity that is recognized and accepted. No effort is made to force unanimity over what constitute the founding legends of Canada, because it is acknowledged that those legends differ from one component of society to another. For example, the conquest of North America by England is the founding legend preferred by a large number of Anglophone Canadians, but their interpretation of the event is different from that of Quebecers and Aboriginal peoples. The political events that led to the birth of the country we know today do not carry a great deal of weight in the public's mind: Confederation, for example, was negotiated by an assembly of first ministers and the people did not vote for the constitution at the time Canada was founded.

The configuration of Canada's national identify is different not only from that of the United States. The importance of a common historical heritage and a linguistic and ethnic legacy in defining national identity that we see in the United States can also be found in France, where, for example, people's understanding of citizenship is tied in with their understanding of "nation," a concept that French society has always worshipped (Schnapper, 1998) and on which, it can be argued, modern-day France was built.

The symbolic vision of the French nation is built on a multitude of legends which, depending on the whims of the particular period in history, were more or less abandoned in favour of new epics and the decision by historians to focus on some events and not others.

On the other hand, ethnic heritage is not an equally dominant factor in the definition of national identity in all societies. In Great Britain, for example, national identity is very difficult to pin down because even though "British" culture has a strong grip and the symbols of royalty are still very present in the minds of the British people, their role is increasingly being challenged in the definition of British national identity. In fact, British identity wavers between an identity defined primarily by civic culture and one that is steeped in the typically "British" societal culture. More recent documents on citizenship, such as the report *Encouraging Citizenship,* promote a conception of national identity that is based on a political culture. The Citizenship Commission reported in 1990 on the importance of standards in defining the British political community and knowledge of those standards in fostering a sense of attachment among citizens. The fact that Great Britain, like Australia, has no written constitution is a distinguishing feature of British civic culture; it confirms the supremacy of the parliamentary system.

Aside from this trend to rely mainly on civic culture to define national identity, discussions of citizenship increasingly tend to reflect citizens' specific affiliations more clearly in the components of national identity, such as societal culture and heritage. This has happened in Canada, where, as a result of the multiculturalism policy, representation of the various components of society in heritage is desirable; cultural heritage has to reflect the full spectrum of ethnic cultures, heritage languages and cultural products that express the different identities present in society. The integration of immigrants is in that respect compatible with the preservation of their affiliation with a specific ethnocultural community. Even integration into the societal culture, whether in Quebec or elsewhere in Canada, does not imply assimilation that forces people to give up their specific identity. What this means is that if we are to encourage integration into existing political and economic institutions, those institutions have to be changed so that immigrants can be accepted with their own identities.

Australia has also begun a process of change that tends to give its societal culture a composition more in line with the diversity of internal identities. We noted in our study of Australia that the societal culture is very much characterized by its Anglo-Saxon heritage. Because Australia was for many years governed under the "White Australian Policy" based on British tradition, that policy had some impact on institutional standards. In recent years, however, efforts have apparently been made (multilingualism, adaptation of institutions) to reduce the impact of the dominant "British" culture. This movement does not have any bearing, however, on the linguistic context; Australia is unilingual.

The tendency to turn to civic culture in order to define the collective identity of a political community and ensure that the other components of national identity better reflect the range of affiliations is currently a phenomenon in the societies we studied, with the exception of France, where multiculturalist thinking is still largely confined to academia. Quebec is quickly moving in that direction, as Quebec society has also made the transition from an "ethnic" conception of the nation to a "civic" conception (Juteau, 1993). The common core of Quebec's collective identity is now presented as "civic"; the French language, which is the nexus of the societal culture, is perceived not as an instrument to achieve the ethnocultural assimilation of minorities, but as an instrument of public communication through which minority identities can express themselves in a truly legitimate way. In other words, the effective rights that make all citizens fully equal has gradually led Quebecers to adopt a collective identity in which the plurality of society is recognized and which clearly sets the standards that govern common public life.

The allegiance and patriotism aspect (1.4) that is also part of the definition of national identity refers to citizens' loyalty and emotional attachment to their political community. In that connection, we found that the acceptance of dual nationality in the subject societies other than the United State gives people the opportunity to combine loyalty to their original culture and, at the same time, the culture of their adopted country. Moreover, obtaining citizenship does not mean that people have to give up their cultural heritage or identity. A great many Canadian citizens hold two passports and therefore have a non-exclusive relationship with their adopted country.

The requirement of loyalty is made very clear in some societies. In Australia, for example, the preamble to the constitution states that Australian citizenship demands loyalty to Australia and its people. Loyalty is presented both as an emotional commitment to the Australian nation and as a civic virtue, attachment to democratic government and its structures. In Great Britain, British citizens have a duty to swear allegiance to the Crown that stems from the obligation of subjects under common law to obey and serve the sovereign. The duty of allegiance is also made clear in the oaths that must be taken in some contexts.

It is important to note that, in Canada, linguistic duality and the diversity of ethnocultural identity do not necessarily diminish association with the national identity. Francophone Canadians outside Quebec by and large have a very strong link with Canadian identity, in which their uniqueness is recognized. Most Quebecers also embrace Canadian identity. Citizens whose roots lie in ethnic groups probably feel a stronger connection with Canadian identity because it recognizes the things that make them different. We found that the other societies tend to grant less official recognition of specific identities in order to cultivate a strong relationship with the national identity. The process at play here is familiar: the more people see their uniqueness reflected in the national identity, the stronger their link with that identity will be. When specific ethnocultural identities are overshadowed or denied by the national identity, people feel excluded and ill at ease in their relationship with the nation, as is the case in France among citizens whose roots lie in the Maghreb. In the United States, many Blacks have also had trouble coming to terms with the national identity and felt it excluded them; the multiculturalist movement is rightly working to include Black identity in the American national identity. Inversely, ethnic minorities of European origin have a stronger connection with American identity because it has never ignored their background.

Mere recognition of different identities does not, therefore, weaken the connection with the national identity. On the contrary, it fosters the connection; the relationship has no, or at least less, unifying impact. When, as in the United States or Australia, citizens link their relationship with the national identity to their unique characteristics, they make their distinct identity subordinate to the national identity. Their relationship with the national identity becomes a unifying one because their identity reference is the same as that of their fellow citizens. In Canada, because linguistic duality and the Aboriginal fact are part of the national identity, the national components retain a clear link with that identity, in which they are recognized.

Canada is also different in that it relies heavily on its system of social and economic rights to ensure national unity. The Canadian welfare state and its universal programs, the system of transfer payments, the social union and, above all, the complete equality of the provinces are all things that keep the country together far more than the reference to a unifying national identity. There are social security systems in the other societies, but their scope is different from Canada's system.

The rights of citizens and public policies adopted to apply those rights, especially as they relate to minorities

In Canada, the recognition of specific identities is guaranteed by the system of rights. Canada's multiculturalism policy also aims to reconcile the unique cultural traits of Canadian citizens with their equality by recognizing every person's right to identify with the cultural heritage of his or her choice and still participate fully in the social, political and economic life of Canadian society. By that reasoning, their specific ethnic or cultural characteristics need not stand in the way of individuals exercising their citizenship and enjoying the same rights and freedoms as all other citizens. Changes in that policy over the years have produced a policy that is now more clearly focussed on citizenship and building the Canadian nation and seeks to instil a sense of belonging and attachment in all Canadians, encourage Canadians to become socially involved and build a society that is fair and equal.

The multiculturalism policy is supported by the *Canadian Charter of Rights and Freedoms* and its provisions on the equal rights of citizens. In addition to protecting the rights and freedoms of citizens, the *Canadian Charter of Rights and Freedoms* recognizes the multicultural and multinational character of Canada (sections 25 and 27).

Australia, like Canada, is recognized as a multicultural society, yet it does not have a declaration of rights that sets out in specific terms the rights of the people. Citizens' rights in Australia are based on the tradition of common law and on the political and social institutions that are created by and dependent on democratic parliamentary institutions. Rights are not recognized as a result of their interpretation by the courts as they are in Canada, and there are no specific measures associated with ethnic groups.

Great Britain, like Australia, did not have a declaration of citizens' rights until very recently. In October 1998, the British government tabled legislation to incorporate the European Convention on Human Rights into the British legal system. Until now, British citizens who wished to claim rights had to bring their case before the European Human Rights Court in Strasbourg, a long and costly process. Under the new legislation, judges will be able to ensure that United Kingdom courts respect rights. However, British judges, in contrast with their Canadian counterparts, will not have the authority to strike down laws that contravene the Convention. Still, they will be able to declare statutes incompatible with the Convention in the hope that the government and Parliament will amend them accordingly. Some critics have expressed their dissatisfaction by saying that the new legislation gives judges too much power at the expense of the sovereignty of Parliament.

A similar argument is used in Australia by those who oppose the adoption of a declaration of rights. The objections to a declaration of rights clearly illustrate some of the elements that make Australian national identity unique, in particular the Australian tradition of parliamentary sovereignty and protection of individual rights by common law and the emphasis on regional differences. While the limits on the expression of affiliation in Australia are clear, the policies and legislation related to their protection and expression are wide ranging and vary considerably from one part of the country to the next. Anti-discrimination legislation, for example, varies depending on the territory in which it applies.

The existence of multiple social policies in Australia and Canada seems to have helped avoid the situations that arise in the United States, namely the withdrawal into community groups and the presence of physical violence. The changes that have taken place in recent years in Canada mean that Canadian multiculturalism policy will in future champion social justice and the civic participation of citizens.

In Australia, public policies are intended to ensure the political and socio-economic participation of all citizens. There is a significant logical connection between cultural rights and social justice. If the members of some ethnic groups can preserve their culture only by remaining socially disadvantaged (high unemployment or low socio-economic standing), there are no equal rights to speak of (Castles, 1997). The adoption of policies to combat racism and discrimination in access to social security, housing, welfare and social security is intended to guarantee the full participation of citizens. In Great Britain, social rights also play a lead role in legal culture.

To our knowledge, France has no "affirmative action" programs in the North American sense insofar as such programs are considered incompatible with the constitution. In France programs which address social inequalities do not specifically target identifiable ethno-racial populations, as is the case for the affirmative action programs. The French constitution clearly establishes the equality of all individuals and necessarily implies equal treatment as the sole means of respecting that principle of equality. Affirmative action programs that recognize equal rights but infer the existence of unequal needs and direct or indirect structural discrimination based on the social, ethnic or sociological affiliation of individuals would in France threaten the balance of the rights that govern democracy and form the very foundation of the Republic.

French society is first and foremost based on a split between the private and public worlds: the public world is where the unity of the citizens comes into play and individuals have to follow the same rules; the private world is the world of expression of freedoms, where all individuals are free to practise their religion, speak their language, and maintain some of their loyalty to a specific culture provided they do not, in the process, challenge the freedom of others or undermine public order. The official recognition of particularities and of particular communities is limited to historical circumstances, as is the case of Alsace or in particular instances such as family law provisions for Algerians residing in France (Haut conseil de l'Intégration, 1991). For example, the fact that the French state provides financial support for the construction of structures reserved for ethno-religious groups does not call into question the secularity and neutrality of the state.

At the other end of the spectrum, specific affiliations in the United States are taken into account in many different ways in effective rights, primarily in the form of special rights and institutional recognition of diversity. American society does not, however, have any collective rights intended to permit the preservation and expression of specific ethnocultural identities. Voluntary pluralism is the norm. Individuals are perfectly free to associate with each other in civil society in order to live their separate cultural identities, and it is that freedom of association that is accepted and recognized. In Canada, meanwhile, the restriction of freedom in the name of equality is put forward in some cases, particularly with respect to the guarantee of a set of socio-economic protective measures. Inversely, the deep-rooted logic of American society based on the value of individual freedom demands a minimum system of social rights for the disadvantaged alone. Affluent Americans do not want a universal health care system that would, for example, undermine their freedom of choice. They prefer the free choice afforded by a program of social and economic protection that they pay for themselves to being forced to participate in a public program that imposes the same conditions on everyone.

The French model of integration is different from that of the other subject societies in that it can be described as assimilationist: its aim is to facilitate the acculturation of immigrants and to encourage them to embrace the culture of the majority through socialization by common institutions and institutional non-recognition of diversity. The adoption of French culture by immigrants is essential to their integration into society. That policy is especially important for immigrants or descendants of immigrants who, it is hoped, by giving up the things that define their uniqueness, will undertake of their own accord the process needed to express their desire to be part of the national community, embrace its principles and enjoy the privileges it offers, in particular the rights of citizens. Citizenship is therefore manifested through direct reference to the national state (Touraine, 1994).

In France, the goal of the dominant conception of citizenship is to resolve the country's ethnic dilemmas through public policies derived from republican ideas. Great Britain is dealing with similar problems in terms of multiculturalism and management of race relations. Canada approaches them from the perspective of management of diversity, human rights, multiculturalism and participation. These three conceptions are based on different readings of such notions as citizenship, nationality, pluralism, equality, public order and tolerance. France focuses on the idea of complete integration, the transformation of immigrants into full French citizens; Great Britain looks at integration as a way of managing public order and relations between the majority and the minority and enabling cultures and ethnic practices to help mediate the process; in Canada, integration is meant to ensure that newcomers feel they are full members of society and accordingly have equal opportunity to attain success and participate in the economic, social and political life of their new political community (Favell, 1997: 3-4-5).

The definition of a specific identity, which is always mentioned in France when discussing Canada or the United States as examples, is considered a threat to social cohesiveness because it would lead to society being split into a large number of stand-alone communities that try to use institutions to defend their own interests and not the common interest. It is therefore unthinkable that individuals would define themselves first and foremost in terms of the elements that comprise their essence limited recognition of specific affiliations sets the equilibrium point on the vertical axis very close to national identity, especially from the standpoint of legislation and participation; the system of law does not reflect these specific affiliations, nor does political representation. The lack of legal and political accommodation of social and cultural affiliations shows that citizenship in France is still very much linked to the national identity.

In Australia, in contrast, the multiculturalism system balances specific affiliations and national identity, which is being defined more and more clearly in a civic, non-Anglo-Saxon way. Australian identity therefore lies at a midpoint on the vertical axis that is a compromise, and the legislative and political system assures that compromise between specific affiliations and national identity. Beyond the legal system, Quebecer relies on political participation to maintain the balance. The Quebecer is based on the premise that all Australians must have a strong and unifying commitment to Australia. Individual obligations and responsibilities imposed on citizens counterbalance the rights they enjoy. Examples include acceptance of the principles and basic structures of Australian society, recognition of the rule of law, tolerance and equality, parliamentary democracy, freedom of speech and religion, and the equality of men and women, and recognition of English as the official language.

The identity axis of the conceptual framework (national identity and social, cultural and supranational affiliations) is not as closely linked to the equality axis (effective rights and political and civil participation) for Australia as it is for Canada, for example. In Australia, rights are based on parliamentary tradition; but in Canada, the provisions of the *Canadian Charter of Rights and Freedoms* and the Canadian constitution protect rights independently of the legislative process. Those provisions are part of the “supreme law” of Canada, which Parliament is bound to respect. What this means is that both the system of rights and multiculturalism policy guarantee a place for specific identities. In Australia, in contrast, the approach is related more to social policy; measures taken in response to demands from ethnic groups are aimed at individuals and implemented in the areas of social protection, education and services (Castles, 1997: 128).

The structures that permit political and civil participation and the level of public involvement

The conceptual framework highlights political and civil participation in order to reflect the importance attached to this element in debates over citizenship in the subject societies. In democratic societies, the fashion is to encourage citizens to fulfil their duty to vote, an action through which they confirm their faith in the political system in which they live. Moreover, the legitimacy of elected officials is a function of the number of citizens who take part in the selection of governments. That is the essence of self rule. Further, public participation in the entities of civil society is considered the performance of a common duty to the extent that in exercising their freedom, citizens have an obligation to take a hand in organizing their community on a number of levels that are freely left to their initiative by governments.

Participation is a necessary element of any conceptual framework used to characterize citizenship in a liberal democracy, in a sense the active counterpart to the other element located on the same axis, namely effective rights, which are the rights enjoyed by citizens. For many, a system of rights is not completely meaningful unless it is accompanied by obligations, one of the most important of which is the obligation to assist in electing governments, carry out elected mandates in some cases and actively contribute to the well-being of the civil community. The level of public participation in a society is generally viewed as an indicator of the state of democratic and community life in that society. Hence the need to make room in the conceptual framework (see Figure 5) for two broad forms of participation (4.1), political (4.1.1) and civil (4.1.2). The following passage from a public document cited in our study on Great Britain could, based on our analysis, be endorsed by the other subject societies:

[. . .] citizenship is not only about formal rights, but also about the everyday participation in our society; and not only about our own rights, but also about the rights of others. It is this conception of citizenship as both theory and practice that we wish to encourage. (Encouraging Citizenship, 1990: 42)

To take into account that aspect of the citizenship debate, the conceptual framework includes an element related to duties and responsibilities (4.3).

This third level of the synopsis of the studies undertaken is meant to show that the different subconcepts that define political and civil participation can be used to adequately describe the state of participation in the subject societies and compare them on the basis of criteria that are deemed to be important. It also shows how vital it is that a conceptual framework be able to take into account the interplay between participation, effective rights and differentiating affiliations.

<u>Political participation</u>

Our study of the six societies brought to light the fact that, within the entire body of discourse on citizenship, there has been significant movement away from the traditional contrast between active and passive citizenship that for a long time was used to justify a somewhat elitist tradition whereby it was desirable for only the elite in society to play an active role in political life and for the bulk of the citizenry to have faith in that elite and forever be passive and trusting. Generally, a common thread in discussions of citizenship in the subject societies is that a community of citizens who actively participate in political life must be considered the normal state of affairs in a democracy. The distinction is therefore no longer made between active and passive, but between the different ways citizens participate actively. For that

reason, the conceptual framework deals separately (4.1.1.1) with the forms of participation that make it possible to take into account the different levels of active participation. It is very clear that the studies on liberal democratic societies do not simply look at quantitative data on voter turnout rates, but also examine the various forms of participation; this observation, especially applicable to Canada, the United States and Australia, also holds true for the other three societies under study.

Yet this consensus on the need for political participation in its many forms is expressed in dramatically different ways in the subject societies. In Australia, voting is mandatory; penalties are imposed on citizens who fail to vote. Officials in Canada, Great Britain and France take pride after each election in the high voter turnout rates, but also say they could be still higher. In the United States, the recurring theme in public discourse is criticism of too-low voter turnout rates, which then undergo all sorts of analyses and studies that often say Americans are not interested in politics.[10]

It is normal in studying societies that accept large numbers of immigrants as new citizens to take an especially close look at the level of interest in participation among immigrants and immigrants' voting behaviour, in particular their preference for one party that can considerably alter the tone of the race for public office. Our studies mention the concerns raised within the Republican Party in the United States by the preference of many large ethnic groups for the Democratic Party. The heavily concentrated ethnic minorities in England and Wales tend to cast their votes for the Labour Party rather than other candidates, a phenomenon that has a significant impact on the distribution of seats in Parliament. That is why the link between participation and the range of specific affiliations in society is drawing more and more attention among participation analysts. These are the facts covered by the voting behaviour element (4.1.2.2) of the conceptual framework.

The findings of Black's 1998 study show that in Canada, the United States and Australia, the rates of immigrant participation in elections are not appreciably lower than the voter turnout rates among longstanding citizens who are accustomed to the workings of their country's democratic structures.[11] A general conclusion Black draws in his study captures the essence of this point:

As thin as the literature is, it has nonetheless produced some important empirical studies that demonstrate substantial, if variable, levels and forms of political activity on the part of immigrants. That this is true in each of the three traditional immigrant-receiving countries – Canada, Australia, and the United States – adds a considerable degree of robustness to this positive interpretation of immigrants as political actors, and highlights the finding as a major literature characteristic of note. (1998, p. 25)

Some studies of various societies show a positive correlation between conscious affiliation with a minority group and a propensity to become politically active in some way. The same is true of the perception held by some citizens who are victims of discrimination, which may explain why American Blacks are by and large as involved as Whites in political affairs.

These societies also show general evidence of a slow but steady progression in the representation of ethnic minorities within elected political bodies. In Canada, studies show that the multiculturalism policy has not only strengthened the multicultural character of the Canadian community, but has also provided minorities with another political forum in which to assert themselves and take their place on the political stage. As Black writes:

[. . .] the increasing presence of traditionally underrepresented groups in the legislature is of some note. At a minimum, this development has considerable symbolic implications, implying not only a greater openness in the Canadian polity, but as well an increasing recognition of, and fuller membership in the polity achieved by, new groups. On the other hand, it is by no means clear that a greater legislative

---

[9] Our study of political participation in the United States refers to some of the most representative ideas expressed in public debate over the issue.

[10] Black's study (1998), despite repeated comments by the author pointing out that the role and actions of minorities and immigrants in the democratic system have still not been studied sufficiently, refers to the results of major studies conducted in Canada, the United States and Australia on the political activity of groups with specific affiliations, in particular ethnic minorities and immigrants.

presence readily translates into 'substantive representation', understood as concrete responsiveness to what may be group concerns. (Black, 1998: 8)

Means to increase the representation of ethnic minorities that consist in drawing electoral boundaries so as to ensure that a particular ethnic group is the majority in a given district probably foster political representation wherein group interests could overshadow the interests of the electorate as a whole. When those running for public office have to seek votes from a wide range of groups in their district, there is a greater chance of avoiding this split in ethnic representation, which Canada and Australia try to do.

Another area in which Canada stands apart from the other subject societies is brought to light by a review of the distribution of votes. Regionalisation of voter support for the national political parties has emerged as a phenomenon in Canada in recent years. The Reform Party does not win majorities outside the western provinces; the Liberal Party draws most of its support from Ontario and English-speaking Quebec; the New Democratic Party has been revitalized by voters in two of the eastern provinces; and the Bloc Québécois wins all its seats in Quebec. What this means is that there is no national political party in Canada that wins significant majorities in all regions of the country, and because of the large number of Bloc Québécois members in the House of Commons, the division of Canada not only is regional, but also reflects the country's duality. Major national parties controlling the entire electorate remains a very definite trait of the political systems in the United States, Great Britain and Australia and even in France, where coalitions of parties with similar platforms offset the splintering of votes that has occurred for a number of years.

The conceptual framework also includes an element (4.2) related to required skills which takes into account individual variables that have a positive correlation with observed participation rates. This issue comes into play on two levels: first, in studies of forms of participation and voting behaviour and the extensive debate in these societies; and second, in studies on citizenship education, where the primary concern is the skills citizens need to be active. In the United States, the establishment of national standards in the subject referred to as "civics" is a major breakthrough reported in our study on that country. In all six societies, government studies report testimony or data that contend that the civic education of young future citizens will always be ongoing; there are references in all quarters to insufficient knowledge of the political system and the limited ability of schools to provide experiences conducive to learning the skills needed to become active.

The required skills element (4.2), with the three subconcepts that clearly identify those skills in the conceptual framework, makes it possible to take into account the interplay between different affiliations, minority affiliations in particular, and the participation of new citizens in the political system. Studies in this area have focussed primarily on the aspects that set ethnic groups apart in terms of motivation to participate and the extent to which members of those groups have the necessary skills. The experience newcomers acquired in their country of origin is considered a particularly determining variable. Element 4.2 of the conceptual framework is also essential in determining the considerable effort newcomers have to make to understand the workings of a new political system that in many cases is very different from the one they used to know, an effort that is often analysed closely by participation experts (Black, 1998: 16).

It is interesting to note that the link between participation and different affiliations is not just a function of ethnic affiliation. Many studies have looked at the issue of political activity among women, especially in public office. The experts generally believe, according to the large number of studies on the active participation of women in politics, that the liberal democratic model opposes intrinsic barriers to the participation of women in many of the countries that we are dealing with (Black, 1998: 11-12).

The link between participation and rights is highlighted by the high level of activism among ethnocultural minorities in Canada, which staunchly defended the recognition of minority ethnocultural identities in the *Canadian Charter of Rights and Freedoms*. Section 27 was included in the charter as a result of political pressure from ethnic minorities (Black, 1998: 7). This phenomenon establishes a relationship between three elements of the conceptual framework, probably specific to Canada, which is the only one of the

subject countries that has adopted a charter of rights with a determining effect on citizenship because it is entrenched in the Constitution.

Another link that merits comment in connection with the interplay between participation and rights relates specifically to Canada and underscores the considerable difference between Canada and the other societies being compared. This point is raised by Black (Black, 1998: 8), who notes that many political science authors criticized the entrenchment of the Charter in the Constitution because it put too much political power in the hands of the legal profession and the judiciary, a segment of society that, because it is not elected, does not represent the people (Black, 1998: 8). The same can be said of the American justice system, as indicated by our study of the United States.

Civil participation

In all the public debate over citizenship, a great deal of attention is paid to civil participation, which is defined by Helly as the body of forms of active, voluntary affiliation with groups outside the family and the body of forms of collective activity unrelated to political organizations, voting and lobbying (Helly, 1997: 76). That definition certainly captures what civil participation is not, but it also has the advantage of casting a wide net for what participation is; participation runs the gamut from one-time involvement in loosely organized structures to long-term activities carried out within highly structured organizations whose social and community missions are known and expected.

Our studies of societies show that it is this broad meaning that is usually attributed to civil participation. In none of the subject societies is the importance of civil participation to the harmonious and egalitarian functioning of liberal democracies underestimated or diminished. That is especially so given that in all these societies, the United States and Great Britain in particular, there has been a significant withdrawal of government from the social security systems that developed with the welfare state. Community solidarity aimed at the disadvantaged now takes shape through civil society, and that is an important perspective that has been a focal point of debate in recent years and goes a long way toward promoting civil society. In Canada, civil participation has been discussed as part of the continuum of Canadian social life. In the United States, however, the debate is driven by the urgent need to revitalize American civil society, which in the eyes of all observers is dying. In Great Britain, the important document *Encouraging Citizenship* (1990) acknowledged that the role of citizens in ensuring that their society functions smoothly extends far beyond the formal structures of political participation; the Citizenship Commission that produced the document drew attention to the important contribution of the “numerous forms of independent and voluntary contribution to society and its citizens.” (EC, 1990: xvi) Studies on participation show citizens are often more involved in non-governmental organizations than political parties; on that front, our studies of societies indicate that while concerns related to minority identities are very important in matters pertaining to citizenship, other concerns that have no bearing on identity are also very important, such as those related to preservation of the environment in particular. The commitment of large numbers of citizens to the environment is a phenomenon in all the subject societies.

Participation in civil associations is another aspect of citizenship where there is an obvious relationship between two macro-concepts of the conceptual framework , namely specific affiliations and participation. As Helly writes about Canada, “[TRANSLATION] [. . .] research on community structure, social and political function and the organization of ethnic institutions is very advanced” (Helly, 1997: 89). Ethnic sports clubs are one area where ethnic participation has been studied extensively; the results show that while they do not constitute a factor that makes ethnic groups more inward looking, because membership in many clubs is not restricted, participation in that type of association contributes nonetheless to the preservation of ethnic identities (Helly, 1997: 83). Helly also shows that volunteerism and recreational activities carried out on an ethnic basis are a very popular way of experiencing the group solidarity that has long been felt strongly by the members of many ethnic groups. Participation by members of minority ethnic groups in non-ethnic — that is, universalist membership — associations has been studied far less extensively than the former in all of the societies in question. Close observers of participation share Breton’s view that building bridges between different communities, especially ethnoreligious communities, is very important in civil society. The intercommunity links that develop through social participation and interpersonal relations that extend beyond ethnic boundaries are key to the

development of social trust among members of different ethnic or racial groups (Breton, 1997: 9). In all of the subject societies, discussion of citizenship addresses the development of intercommunity links as defined by Breton. Because there have been fewer studies of this form of civil participation in associations with universalist membership, it is hard to say how widespread it is in these societies; the study on France noted an abundance of anti-discrimination initiatives arising from that approach. In Canada, the study by Sears *et al.* (1996) points out that a number of initiatives designed to foster closer relations between Anglophones and Francophones have been developed in the past several years.

The Canadian studies are unable to show the extent to which participation in ethnic associations is linked to religious practice. In contrast, the study of American society indicates very high rates of participation in ethnic associations linked with religious practice. Religious associations are known to be a very important part of American life: in the United States, faith is the primary factor in volunteer activities; half of all Americans spend two to three hours of their time each week volunteering, mostly through religious institutions (Helly, 1997: 89).

That American civil society survives because of religious associations is in itself a sign of vitality, but we must be careful not to downplay the fact, widely reported by observers, that that form of association can actually encourage communities to not look beyond their own circle. In the United States, while it is clear that worship is a key motivator for participation in ethnic associations, other factors, such as solidarity, cannot be ruled out. Even in France, ethnic and religious associations, whose right of association is guaranteed by a 1905 statute, are thriving.

It is relevant to note that despite the strong connection that must be established between the participation of minorities, ethnic and religious minorities in particular, and civil participation, civil life in contemporary liberal societies provides a range of motivating factors far wider than ensuring the survival of ethnic identities and solidarity among immigrants in the same groups. The phenomenon is very widespread in all of the subject societies, as noted by Breton:

[TRANSLATION] Society includes a multitude of communities: cities, towns and neighbourhoods, religious groups, ethnic communities and all sorts of associations. It also includes groups defined in more abstract terms, in particular social movements, age groups, social classes and ideological groups such as "the right" and "the left". (Breton, 1997: 5).

All these groups are part of civil life, but they are also given over to political forces. Consequently, the links between affiliations and participation extend far beyond the question of the survival of ethnoreligious identities, and those links are not limited to civil life to the extent that in all societies political movements often take on the colours of recognizable affiliations.

One of the basic features of participation in all of the liberal democratic societies under study is that citizens' identification with and participation in civil society must always be voluntary. Freedom to participate is always respected when citizens are urged to contribute to civil society: people are free to choose the type and extent of their involvement and the associations in which they wish to be active.

Conclusion

The points of comparison we identified with respect to citizenship clearly illustrate, in our view, that despite the many commonalities between the subject societies, the target liberal democratic societies differ in their approach to citizenship in ways clearly brought to light by the conceptual framework. Can these differences be entirely attributed to time-specific historical, political, demographic, geographic and other circumstances, or to different views of liberal democracy? Australia, for example, refused to be bound by a charter of rights that it says would make political power subordinate to the judiciary; Canada opted to entrench a charter of rights and freedoms in the constitution. Does this mean that Canada is more attached to equality than Australia? Or should Australia's decision actually be interpreted more as a desire to preserve other values on which Canada places less importance, such as the predominance of the will of the people over court rulings? Our comparative analyses offer no answers to these questions. The questions still serve a purpose, however, as they reflect the potential value of conducting more analyses and further exploring the aspects of citizenship that differentiate among the six societies in question. By the same token, the descriptive and comparative objective of the conceptual framework leads us to wonder whether a society can learn new ways of seeing things and of tackling its own problems or new strategies for designing and implementing its programs, by studying the experiences and choices of other societies.

References

Borel, M.-J., J.-B. Grize and D. Mieville. (1983). *Essai de logique naturelle*. Bern, Frankfurt/New York: Peter Lang.

Castles, S. (1997). " Multicultural Citizenship : The Australian Experience ", in V. Bader, *Citizenship and Exclusion,* England: MacMillan Press, 113-138.

Encouraging Citizenship (EC). (1990). Report of the Commission on Citizenship. London: HMSO.

Frideres, J.S. (1997). *Civic Participation, Awareness, Knowledge, and Skills*. Lecture delivered at the Second National Inter-Centre Conference, Montréal, November 1997.

Hall, S. and Held, D. (1990). *Citizens and Citizenship*. New Times. London: Lawrence & Wishart.

Haut Conseil à l'intégration (1991). *Pour un modèle français d'intégration*. Rapports officiels, La documentation française, Paris.

Juteau, D. (1998). "Les enjeux de la citoyenneté : un bilan sociologique", in J. Black, P. Glenn, D. Juteau and D. Weinstock, *Les enjeux de la citoyenneté* (An interdisciplinary update), Montréal : Immigration et Métropoles, pp. 48-72.

Kymlicka, W. (1992). *Théories récentes sur la citoyenneté*. Report presented to Multiculturalism and Citizenship Canada.

Kymlicka, W. and W. Norman (1994). "Return of the Citizen: A Survey of Recent Work on Citizenship Theory", in R. Beiner (ed.), *Theorizing Citizenship*, Albany: State University of New York Press, pp. 283-322.

Kymlicka, W. (1998). *Finding Our Way. Rethinking Ethno-cultural Relations in Canada*, Oxford: Oxford University Press.

Nevitte, N. (1998). *Attributes of Canadian Citizenship : An Empirical Analysis*. Research paper prepared for Canadian Heritage.

Parekh, B. (1994). "Discourses on National Identity," *Political Studies*, XLII, 492-504.

Schnapper, D. (1998). "Beyond the Opposition: Civic Nation Versus Ethnic Nation" in Couture, J., K. Nielsen, and M. Seymour (Dir.), *Rethinking Nationalism* (219-236). *Canadian Journal of Philosophy*, Supplementary Volume 22.

Stasiulis, D.K. (1997). *La participation des immigrants et des membres des communautés ethnoculturelles et des minorités visibles à la vie politique canadienne*. Lecture delivered at the Second National Inter-Centre Conference, Montréal, November 1997.

Taylor, Charles (1992). " The Politics of Recognition", A. Gutmann (ed.), *Multiculturalism and the "Politics of Recognition*".Princeton : Princeton University Press, 25-73.

Theiss-Morse, E. (1993). "Conceptualizations of Good Citizenship and Political Participation", *Political Behaviour*, Vol.15, No. 4, pp. 355-80.

Torney-Purta, J. (1996). *IEA Civic Education Study: Approved Proposal for Phase 2*.

Wieviorka, M. (1997). *Une société fragmentée? Le multiculturalisme en débat*. Paris : La découverte.