SETTLEMENT POSSIBILITIES IN DENMARK: CULTURAL AND LEGAL CHALLENGES

- MASTER'S THESIS -

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ABSTRACT

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Implanted in a combined -qualitative and quantitative- framework, this research investigates the two settlement possibilities in Denmark, namely the permanent residence permit and the citizenship. The thesis aims to take cognisance of which of these institutions would bring more benefits to the immigrants. Furthermore, it also proposes to unfold the Danish citizenship model based on the main theories of citizenship, namely liberal, communitarian and republican approach. As a result of globalisation, multiculturalism and cosmopolitanism have also emerged, thus, they will also worth mentioning. In addition, the thesis tends to reveal the different methods of preservation of the individuals own culture when being part of a mixed citizenship family, where one family member is Danish. In addition, by considering the immigrants' experiences and their personal approach to this subject, different conclusions can be delineated. In the interest of this, the data is composed of primary collected data, such as interviews and social surveys, as well as of secondary data, like articles, books and legal regulations. For the examination of the interviews a grounded theory approach is utilised, and the surveys are evaluated with content analysis.

This thesis is conducive to the extant researches in this topic by reflecting the advantages and disadvantages of the permanent residence permit, as well as of the consequences of obtaining the Danish citizenship. These institutions can have different effects on the different migrant groups. As the analysis confirmed, while for the EU citizens the permanent residence permit can be satisfactory, for the Third Country Nationals the citizenship is more advantageous. Furthermore, by presenting the preservation of the foreign cultures in Denmark, not only an insight to the compatibility of the different cultures is gained, but the explanation of the identity changes can also be found. Finally, it unfolds new approaches and provides ground for further explorations to study the social and economical attitude of immigrants settling down in a new country.

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1. INTRODUCTION

Denmark is one of the European Union's (EU) most preferred destination country for many EU citizens, as well as Third Country Nationals. Among these immigrants there are a great number of people who are living here for many years, even decades. As a consequence of staying a long period in a foreign country as permanent residents, many people might desire to become a citizen of that state. The obtaining of the Danish citizenship involves many challenges, such as embracing distinctive cultural characteristics of this receiving nation, adhering to its legislation and forming into an active member of the Danish society.

During the last century, there were various regulation introduced, modified and cancelled regarding the legal situation of the immigrants; thus, the historical evolution of the Danish Citizenship Law, the Immigration Law, as well as the different conditions for obtaining the permanent residence permit and the Danish citizenship are worth to be investigated. Furthermore, the citizenship ideal can vary from state to state, depending on which elements of the citizenship are promoted in the certain country. These components have their roots in the theories of citizenship, mainly in the liberal, communitarian and republican approach. Nevertheless, due to the globalisation and the interchange of worldviews, the multiculturalism, as well as the cosmopolitan perspective is increasingly coming to the front. Hence, the aim of this study, having also some historical elements, is to answer the research question **"What characteristics does the Danish Citizenship model show in perspective of the basic citizenship ideals, what are the similarities and differences of the Danish citizenship in comparison to the permanent residence permit and what is the attitude of the immigrants towards these two institutions".** As part of this thesis, I will also try to unravel and examine **"How the immigrants from different countries and social backgrounds manage to preserve their cultural identity after obtaining Danish citizenship and becoming active members of the society"**. One objective of the thesis is to analyse the Danish citizenship regulations, giving also a historical insight in their evolution, and make a comparison with the permanent residence

permit. The thesis will present how these regulations apply to the various immigrant groups and what is the difference between acquiring the citizenship for a person from a member state of the EU and for a Third Country National in contrast to applying for the permanent residence permit. Another aim of the thesis is to provide some details about how different people, already Danish citizens or people cohabitants with Danish citizens, manage to preserve their cultural background and identity while being an active participant of the Danish society.

There are many people, however, originating mostly from an EU member state, which not even intend to apply for the Danish citizenship. Until now, one powerful argument behind this it could be the impossibility of having multiple citizenships in Denmark. By the newly introduced Dual Citizenship Law in 2015, the people have the possibility to keep their original citizenship and to acquire the Danish citizenship simultaneously. In addition, those who have lost their Danish citizenship as result of obtaining another one, have now the opportunity to re-take their original citizenship. It is interesting to investigate in which direction the immigrants' approach changed due to this law. Another reason for not aspiring for becoming a Danish citizen could be the European legislations which permit the free residence of an EU citizen in another member state of the EU without being its citizen. Furthermore, there can be situations where the immigrants are culturally still very strong attached to their original identity, although they live in another country.

A distinctive case represents the category of those who live in mixed citizen families, where one member is a Danish citizen. It is intriguing to discover how is the parents' stance towards the children's citizenship and cultural attitude; do they raise their children to be uni-cultural persons or they see the benefit of being bi-cultural. Furthermore, many people cannot secede from their originality, their culture and traditions, even though living in a foreign country and cohabiting with a 'foreign' nationality. Therefore, the situation and the personal equation of the immigrants towards this subject will be also investigated.

In order to get a better overview about the intention of applying, about the reasons for not requesting the Danish citizenship, as well as about the mixed citizen

families, primary data collection is needed. Accordingly, interviews and social survey results will constitute the foundation of the analysis. In the interest of unfolding the differences in the rights and benefits of the permanent residence permit and the Danish citizenship, the adherent legislation will be examined. As it is important to determine the Danish citizenship model, the theories behind the concept of citizenship will be shortly presented.

After the Introduction of the thesis the Methodology part will follow, which will contain the considerations behind the choice of theories, the choice of case study, the empirical material and the choice of data collection. The Theoretical Framework chapter will present the theories used for modelling the different aspects of the citizenship. The Important Background Information part will give a short description about the definitions for the citizenship and residence permit – the two main concepts of the thesis. In the same chapter the legal framework of the topic will also be presented. The Danish Citizenship chapter will analyse the practical applicability of the main concepts and theories. The Analysis and discussion chapter will examine the Danish citizenship in the perspectives of the main theories for the citizenship models, summarise and compare different aspects of the problem and evaluate the results obtained throughout the interviews and surveys. The last chapter will conclude the work and enumerate different future work possibilities.

2. METHODOLOGY

This chapter aims to present the methodology of the thesis, as well as the considerations behind the choice of theories. It will be briefly described the choice of topic, the empirical material, the choice of data collection, the difficulties of the research and the critical reflection on the methodological choices.

As it was already mentioned in the introduction, the purpose of this thesis is to examine the residential possibilities that foreigners have when deciding to settle down in Denmark. As my main theme, I would like provide basic information on the advantages and disadvantages of the Danish permanent residence permit

compared with the advantages and disadvantages of the Danish citizenship, as well as on the conditions of obtaining the citizenship. I will focus, therefore, on foreigners living in Denmark, both from the EU and Third Countries. Furthermore, the EU and the Danish legislation on the institutions of the residence permit and citizenship, as well as the laws regarding the immigration will be reviewed. In the process of my investigation I would also like to look at the mixed (Danish and another) citizenship families' culture conformation in Denmark. The relevance of this topic is to highlight the people's perception of the Danish society, the social and political structure, the foreigners' opportunities far from their native land, and to obtain knowledge of their integration processes. By providing basic information on the history of the Danish citizenship, the actors' (the immigrants and the Danish government) position towards becoming a full member of the Danish society, as well as significant laws, a general overview on the pros and cons of becoming a Danish citizen is possible to be obtained. In the case study and analysis sections I expect to get a clear idea about the immigrants' possibilities in Denmark, and to understand the challenges and benefits of acquiring the Danish citizenship, the expectations and obligations, as well as the restrictions it reserves. Additionally, I forecast to find the differences between the EU and non-EU citizens' chances of living in Denmark definitely.

2.1. Choice of topic

This subject was chosen because my personal concern in this affair. Ever since I came to this country due to my studies, I became interested in the foreigners' situation in an unfamiliar medium. This interest deepened in me when I decided to further build my life in Denmark, with the desire of settling down permanently. Many unacknowledged questions conceived of in me about the gravity of the future choices, thus, I decided to try to find answers to them.

Being a foreigner myself in Denmark and being implicated in the subject, makes me an insider-researcher. This position has both advantages and disadvantages. The

advantage which primarily has to be mentioned is that the insider-researcher has a deeper understanding of the situation that is being investigated; the insider can better perceive and explain the challenges of being an immigrant than an outsider-researcher. Moreover, the insider-investigator can easier address people and the common tone can be found without any special impediment. Hence, the insider-researcher consistently possesses that type of intimacy with the environment that is being investigated which is challenging for an outsider-researcher to gain. (Unluer, 2012; Bonner and Tolhurst, 2002) Studying a subject from inside has also some discommodities. Having considerable knowledge about different histories and backgrounds may issue in partiality or in neglecting crucial facts and details. Furthermore, it can occur that the insider-researcher has to confront the dualism between his role in the analysis theme and the researcher itself. (Ibid) During the research and in the process of elaborating data, some norms and rules concerning ethical issues and anonymity have to observed, as it can happen the insider to gain insight to delicate information. In the interest of obtaining a genuine accomplishment of the research, these menaces have to be avoided.

2.2. Choice of empirical material

While my primary data will consist of interviews and of the results of two social surveys, as secondary data I will consult academic articles, books and official Internet websites. The analysis of the topic of Danish citizenship and permanent residence permit cannot be done without a closer examination of the relevant legislation; thus, I will focus on the laws and regulations concerning these two institutions, as well as on the international treaties regarding the field of migration in general. Furthermore, since experiences and opinions can be better understood by personal contact with the concerned people, I decided to address directly these persons and gather testimonies from them. The utilisation of both primary and secondary data makes it possible to obtain a more extensive outline of the topic.

By virtue of many people wishing or deciding to pursue their lives in Denmark, I became interested in discovering what reasons are behind their legal decisions about settling down in this country. Therefore, I contacted three people to tell me about their reasons. One of them came to Denmark in 1986 with her one year old son to reunite their family with her husband who came as a refugee in 1985. She and her family have Danish citizenship. The second lady came almost 10 years ago, as she married a Danish citizen. She has a pending citizenship application. The third woman came around 30 years ago for study purposes and stranded, as she established a family with a Danish man. She does not want to acquire the Danish citizenship.

Interviewing is one of the mostly utilised research methods within the field of the qualitative techniques. This method is often used due to its flexibility; it can be easily adjusted to the interviewee's alleyway during the interview. Regardless the fact the entire procession of the interviews - including the draft of the questions, the transliteration of the conversation, and the parsing of the data- makes great demand of time, this tool of research is highly appreciated. Concentrating on individuals' real experiences more than common beliefs and assumptions (King and Horrocks, 2010) makes the interviews important especially in social researches. This is because these explorations are conducted in order to investigate and understand the human behaviour (Corbetta, 2003). Hence, by giving the opportunity to the interviewees to tell about their personal experiences, realisations, the various angles of an issue can be observed. For instance, I could notice how the same regulation can have dissimilar effects on different people.

The interview, as research method, has three main types, *videlicet* the unstructured, the semi-structured and the structured interview; the latter is not frequently used. The interview is unstructured interview when it has no defined format; it is rather a conversation. There is usually one initiative question on the beginning of the discussion whereon the respondent speaks without restriction. The interviewer intervenes only when the information heard requires further reconnaissance. The semi-structured interview demands a list of questions and fields of discussion

previously defined which serve as a guideline to the interviewer. The phrasing of the questions and their sequence throughout the interview can alter. Nor yet different questions can be also included next to the predetermined questions. What has to be remembered is that intrinsically likewise questions have to be asked from every interviewee. Since the interviewees themselves can disclose new issues which were unheeded in the initial set of questions, the course of these interview types is flexible. (Bryman, 2008; King and Horrocks, 2010)

In this thesis the semi-structured interview was used. Considering the basic components of the interview (Bryman, 2008, pg. 442), I framed the questions in a form which will assist me in answering the study's research question. In addition, the wording of the questions had to be precise and clear in order to get the exact answers. The word order and the structure of the questions relied on the received answers. The interviews were conducted mostly in Danish, as the respondents were more comfortable with this language than with English; one of them speaks uneasily English. The frame of the interview contained the principal stages which are crucial to this research. The questions concerned some of the personal information of the interviewees, the time and motivation of coming to Denmark, their difficulties, their reasons for acquiring the Danish citizenship against the permanent residence permit, or for not acquiring it, as well as their identity and culture preservation. In the interest of not harming their personality rights, the real names of the interviewees will be changed. The first interview was conducted on the 3rd of April, 2016 in Aalborg with an Iranian woman, Zarrin Khoda, age 53; the second one took place on the 12th of April, 2016, also in Aalborg, with Britt Redmond, age 65, who came from the Netherlands; the third interview has been cancelled, but Liliana Mărinescu, a Romanian woman, age 34, sent her answers in writing via electronic letter. For the safety's sake, I sent the questions also to the before mentioned two women and asked them to summarise their answers for every question, as I was worried not to miss something important due to my middleware Danish knowledge. As I spoke with the interviewees in person previously, I sent the questions all at once, despite the fact that some authors suggest that it is preferred to send them in segments (Bryman, 2008, pg. 642).

When it came to the sampling of the respondents, I used a selective method as I had a defined target group, namely Danish citizens by naturalisation, or immigrants living permanently in Denmark, but who categorically rejected the obtaining of the citizenship. Since I do not know the older immigrant generation, I selected the 'snowball sampling method', which deals with naming other possible actors by the current interviewees (Schuh and Associates, 2011); the Iranian woman introduced me the Romanian respondent and some others also who finally denied answering.

The interviews within this thesis were adopted in consideration of supplementing the other sources of data. By means of them I was able to obtain first hand information about the interviewees' opinion about the advantages and disadvantages of acquiring the Danish citizenship, as well as to closer examine the effects that migration had on them. During the conversation those reactions can also be noticed which can be hidden other forms of data gathering, yet, which can add an additional meaning to what has been said.

At the same time, I decided to make two online social surveys in order to be able to build this study upon many opinions. The first survey referred to the Danish citizenship and the advantages and disadvantages of it, the second one dealt with the mixed citizen families including the Danish citizenship and a member with another citizenship. This latter survey aims to find out how is the identity and the culture of the foreigner person preserved within the family and within Denmark. The surveys were posted on a social networking website – in different Facebook groups concerning immigration themes - and for the citizenship survey I received 79 complete and 76 partial answers. For the survey about the mixed families I got 19 complete and 21 partial responses. The first survey about the Danish citizenship was composed of 11 questions and contained both closed and open questions; the second one was formed of 6 open questions only. Closed questions are those where the respondent has to elect one or more from fixed answers in form of radio buttons or pull-down menus; for the open questions s/he can key in his/her own answer. (Bryman, 2008, pg. 645) Likewise the interview questions, these questions were

also designed to unfold, among others, the immigrants' sense of citizenship, of the permanent residence permit, of their identity and culture.

The surveys helped this thesis by providing insight to the people's knowledge about the legislation concerning both the permanent residence permit and the citizenship, to their attitude towards acquiring the Danish citizenship, and to their methods of preserving their culture in the destination country, Denmark. Furthermore, they made it possible to address many people, and by converting the data into percentages the different opinions could be easily compared. Being completely anonymous, the surveys gave the possibility to the respondents to answer without any restrictions.

2.3. Choice of research methods

Qualitative research methods engage, first of all, in investigating the individuals' impression and viewpoints of a specific phenomenon. The data gathering process involves usually an interference with people. Although together with this research method an inductive approach to the relation between theory and research is used for the majority of cases, for validating or negating the hypotheses it can be combined with a deductive approach. (Bryman, 2008) Quantitative methods, in turn, deal mostly with numerical measurements and their evaluation. This type of method includes, for instance, the social survey, different experiments, official statistics and content analysis. Depending on what kind of research it is done, both methods are valuable, but in different ways; while quantitative methods are acknowledged as being objective, the qualitative methods are characterised by the researcher's subjectivity. (Silverman, 2010)

Allowing for the previously mentioned, I conceived of merging the two methods, and using a combination of them, as the numerical data knowledge is also important in this study. By the help of this mixed approach I will be able to apply the strength of each method, describing the real world and recognising the consequences of human experience. (Niglas, 2000; Östlund et. al., 2011) As some scholars

(Bryman, 2008; Greene, 2007, Denzin 1970) consider, the simultaneous utilisation of the two methods gives more extensive potentials in the interest of the effectiveness of the research. The advantage of merging the approaches is that "sociologists can hope to overcome the intrinsic bias that comes from single-method, single-observer, single-theory studies" (Denzin, 1970, pg. 313). This combination of different research methods and data sources is labelled triangulation (Greene, 2007). There are four types of blended methods, namely data-, theory-, investigator- and methodological triangulation. Two different techniques were identified which are used alongside triangulation; the assortments of the same methods are used when applying the 'within-method' and the contrast of various research methods are employed by the 'between-method'. (Bánki, 2009) In order to support the utilisation of the combination of both qualitative and quantitative methods within this thesis, the between-method triangulation was adopted.

With reference to the epistemological position, I adopted interpretivism. This approach is important in the investigation of this subject, as it states that because the subject element of the social sciences alters from the natural disciplines, the examination of the social world requires a specific research procedure. This study has to demonstrate that the individuals, owing to the human peculiarity, are in contradiction with the natural precept. Interpretivism reveals and analyses, thus, the social actors' understanding, experiences and their sense of the ambience. Furthermore, due to its characteristic of dealing with people's sense of the world, the intellectual tradition of phenomenology gives assistance in the understanding of people's perception of the new life in a different country, the challenges of the integration of social, cultural and political strata. Constructivism is my ontological perspective, as it affirms that social phenomena are in continual modification, thus, the social reality can be equivocal. (Bryman, 2008, pg. 3-33)

2.4. Choice of theories

The collected data was examined with a multi-method; while for the scrutiny of the interviews the grounded theory was used, the surveys were evaluated by applying

content analysis. As the grounded theory aims to notice and examine the people's life experience and their stance to different situations and circumstances (Oliver, 2012), and content analysis is used in the interpretation and explanation of a text or a document (Bryman, 2008), the association of these methods appeared to be suitable for this research.

Some scholars devoted to research methods, *inter alia* Alan Bryman (2008), state that the grounded theory and the analytic induction are the qualitative data analysis' two common approaches. By the use of the analytic induction, the researcher is trying to elucidate a particular phenomenon by pursuing for compatible data. If an inconsistent data appears, the researcher has either to re-evaluate the theory in the interest of excluding the incoherent model, or to reword it completely; thus, it is a very rigorous strategy. Moreover, it has an inadequacy: it does not regulate how many cases are required in order for the validity of the presumption to be approved. (Bryman, 2008) For the preceding reasons, I selected grounded theory, which is a more flexible strategy.

Grounded theory aims to establish new theories depending on systematic data gathering and analysis. This theory it is one of the most utilised qualitative research method in social sciences. (Oliver, 2012) This approach was presented in the work of Glaser and Strauss (1967) and it is a worthwhile strategy for intercultural studies, like this thesis. The strength of it resides in its intention of endeavouring the researcher to pay respect to every detail and possible meanings of a phenomenon by alienating him/her from the preconceptions and stereotypes. Accordingly, the investigator has to steadily set the data against each other for being able to identify the typical features of every point and to inspect how different circumstances act upon them. (Glaser and Strauss, 1967)

Grounded theory protects the participants and confers anonymity; "while the final theory is rooted in participants' experiences, it is constructed by the researcher and contains the researcher's words and thoughts, not those of participants" (Oliver, 2012, pg. 384). Furthermore, this concept is capable of creating such theory which

represents the participants' observations, reveals the significances which were presumed, and helps people in specifying and elucidating their treats. (Oliver, 2012)

When the analysis and the interpretation of the documents and surveys come into question, content analysis appears to be the prevailing approach in social sciences. There are two other frequently used approaches, semiotics and hermeneutics, but as semiotics is engaged with signs and symbols, it is excluded. Hermeneutics aims to interpret the texts and documents from their authors' perspective (Bryman, 2008); this characteristic is important, but as I seek general causes and justifications, this characteristic will be used within a broader strategy. However, hermeneutics were helpful while interpreting the texts of the laws and regulations; law is a particular form of hermeneutics (Sherman, 1988). Considering the above mentioned, I used content analysis.

Content analysis has "great potential for studying beliefs, organisations, attitudes, and human relations" (Woodrum, 1984, pg. 1); exactly what this thesis investigates. By the means of this method the significations and the relation between the repeatedly concomitant words and concepts can be detected and examined. After the information is embraced, the investigator has to interconnect them with the writer, the culture and the era when these happened. In the beginning of the content analysis process the text has to be segregated into different strata, such as words, phrases, sentences or topics. After this stance is completed, the text can be explained with either the conceptual analysis or the rational analysis method. (Mayring, 2000) When using conceptual analysis, a notion is separated for examination, and then it is stamped and counted in order to verify the numerical occurrence of the selected idioms or concepts within the text. These expressions can be explicit, in this manner simple to observe, as well as implicit, which demands a profound searching. Relational analysis, conversely, goes onwards than the link between the words and investigates semantic coherence. It is argued that concepts solely have no intrinsic signification; in order to capture the 'meaning', the concepts' connection with the other emblems in the text has to be analysed. (Busch et al., 1994-2012)

2.5. Difficulties of the research

First of all, my primary intention was to write only about those people, who settled down in Denmark, yet, not want to obtain the Danish citizenship. During my research process I realised that it is difficult to find those individuals who are willing to talk about their decisions, because some of them might feel that this is a personal matter about which they do not want speak to the world, especially to strangers. Or another reason could be that they do not want to lighten that they are not 'real' Danes, while all their acquaintances think they are. Furthermore, there is a very limited amount of data about this topic, the authorities do not give information about this due to personal data protection, and the statistics cannot be found. These are the reasons why I decided to include all the possible "attitudes" towards the Danish citizenship into this research, namely those who do not want it, those who are in process of getting it, and those who already have it.

Secondly, I encountered obstacles while searching for information on the conditions for naturalisation and its process, as well as on the various conditions that individuals have to fulfil in order to obtain the permanent residence permit. Many of the articles I found were not updated, nor had date on them, so they were often misleading. Furthermore, the articles do not contain the articles numbers of the laws when referring to it, not even the name of the regulation. Although my Danish proficiency is not that high yet, I tried the best possible to obtain the relevant data from the official Danish laws, as the English versions have no legal validity. In addition, there is no information about the citizenship on the Ministry of Justice (in Danish *Justitministeriet*) official website, where some – very few – of the articles guide.

Lastly, I came across some people who were not willing to speak with me, as I mentioned before. The explanation of it can be perhaps the mistrust in a foreigner or the persuasion as this affair being too personal. Moreover, I hoped to obtain more answers to the social surveys. Although they were opened many times, the process of completion was not always finalised; therefore, I have many partial responses. In addition, the number of those, who did not even begin to complete them, is

abundant. In the analysis section of the surveys the exact percentages will be presented.

2.6. Critical reflection on the methodological choices

I am conscious of some critical reflection in the selection of the methodology in this thesis. I am also aware of some bias that might occur on account of using existing empirical material also. As these were created for another purpose, they had to be carefully interpreted. Additionally, in the interest of gaining a complete and broad image of the reasons behind different choices of the individuals, repetitions can be observed.

Within the confines of this chapter the research methods of the thesis were introduced. Furthermore, the clarification of the topic choice, the theoretical framework and the gathering of the empirical material were described. At the end of the chapter the difficulties of the research, impediments and restraints, as well as the critical reflection on the methodological choices were presented.

3. THEORETHICAL FRAMEWORK

This chapter deals with the main theories of citizenship. Firstly, the liberal ideal of the citizenship will be detailed. Then the communitarian point of view is presented, which is followed by the republican approach. Lastly, the multicultural citizenship concept will be introduced.

In order to examine the idea of citizenship, the theories behind the concept have to be observed. Theoretical frameworks offer various perspectives throughout which a particular subject can be researched. In accordance, these frameworks emerge from different disciplines, such as social-, political science, economics or others. Considering that a topic can be studied from different angles, there are no right or wrong approaches. Yet, there are some theories which are more suitable than others related to the specific field in question. These frameworks are precise theories

interrelated with the diverse aspects of human existence. According to some sociologists, theories are "inter-related concepts and ideas that have been scientifically tested and combined to magnify, enlarge, clarify, and expand our understanding of people, their behaviours, and their societies". (Hammond, et.al., 2015, n.pag.)

The theories of citizenship can be divided into two categories, namely normative and empirical theories. While the normative theories try to establish the rights and obligations the citizen should have, the empirical theories intend to define how citizens obtained those specific rights and obligation they have, resulting in a particular context or case study. Normative theories investigate history in order to find the model of the "good citizenship" as the past events have contoured the humanity's opinion about citizenship. The contemporary citizenship theories try to break down the earlier points of view by highlighting the inconsequence and replacing certain aspects with novel, more pertinent elements in order to find the most appropriate denotation of citizenship. Empirical theories, contrarily, analyse the different economical, political and social procedures which assisted to the appearance of citizenship in distinct times and places, as well as the manners in which the citizenship was acknowledged in different societal communities. By means of these theories, authors try to comprehend the reasons and methods behind the appearance of citizenship in those specific structures it did emerge. Nevertheless, these theories are not exclusively analytical; they are guided by specific normative models. (Bellamy, 2008; Sheldon, 2001; Leopold and Stears, 2008)

Three dominating theoretical perspectives can be identified in the contemporary literature on citizenship, each emphasizing distinct identities: the liberal approach accentuates individual identity in the political community, the communitarian perspective highlights the cultural and ethnic identities, and the republican viewpoint underlines the civic identity (Kartal 2001). Thereinafter a brief summary of these approaches will follow.

3.1. The liberal approach of the citizenship

The liberal ideal arises from the Roman Empire and it is the glint of the early-modern Roman law (Leydet, 2011). Liberal theories consider citizenship a status which provides individuals with a set of equal rights assigned by the state (Jones and Gaventa, 2002). The individual identity - individualism and freedom - is accentuated in these theories; in their sight citizens act logically in order to achieve their goals, and the state's task is to defend them in the exercise of their rights (Lister and Pia, 2008). These freedoms are applied mainly in private sphere rather than in the political strata (Leydet, 2011). Citizenship in this context means, thus, the status of being protected by the law, and not the assistance in the creation and/or implementation of it (Ibid). This means that in the liberal point of view the individual enjoys priority in contrast with society; the society is created by the individual and not conversely.

In the liberal view liberty is associated with property; the protection of it is considered an essential virtue (Lister and Pia, 2008). According to a famous early liberal thinker, John Locke (1690), as long as it does not harm the rights of other people, individuals are entitled to defend their "life, health, liberty, or possessions" in the pursuance of the law of nature (Chapter II., Section 6, Second Treatise of Government). He considers that the only responsibility individuals have is respecting other people's rights to life, liberty and property; all the other obligations are based on agreement. Furthermore, "the enjoyment of their [people's] properties in peace and safety" is the reason why people should enter society (Lister and Pia, 2008, pg. 10). This approach seems to be in contrast with the concept of community; individuals promote their own interests and reach their goals without intervention from other people or the society in its entirety. Examining the concept of liberty from this angle, a negative approach of it is perceptible; the absence of boundaries signifies the freedom.

Thomas Humphrey Marshall is one of the most famous liberal sociologists, well-know also for his essay *Citizenship and Social Class* from 1950. He represents the positive view of freedom, which is also acknowledged to be the classical

understanding of the liberal citizenship. According to him, citizenship is "a status bestowed on those who are members of a community. All who posses the status are equal with respect to the rights and duties with which the status in endowed" (Marshall, 1963, pg. 87). He divides these rights into three categories, namely civil, political and social rights (Turner, 1993). Marshall argues that these types of rights evolved in distinct moments in time, as each type relied upon different institutions (Kartal, 2001). In accordance with Marshall's parsing of the British welfare politics, the civil rights appeared firstly in the 18th century and were possessed by the adult members of a community. This set of rights is composed of personal freedoms, the right to possess property, as well as other rights related to the personal liberty. Initially, the concepts of 'freedom' and 'citizenship' were considered commutable, but further on 'freedom' enhanced to be universal and 'citizenship' became a national institution. Despite the fact that these institutions had legal power, their use was hindered by the "class prejudice and lack of unity" (Kartal, 2011, pg. 104). When the political rights, which allow the individuals to engage in the political activity, began to be altered in the beginning of the 19th century, civil rights together with 'freedom' were interconnected to the status of citizenship. In the 20th century the social rights emerged, but they were not clearly recognised as an inhering element of the citizenship. The social rights concern the individuals' right to education, to social services, to a certain level of financial welfare and a quota in the society. Marshall states that *social citizenship*, and within it education, is a crucial element of citizenship; he thinks it should be considered "not as the right of child to go to school, but as the right of the adult citizen to have been educated" (Marshall, 1965, pg. 89). During the 20th century a significant contrast evolved between citizenship and the capitalist class system, as the political rights threatened the system: it allowed people to jointly utilise their civil rights by trade association. In order to decrease the economic difference between the societal groups, the integration of social rights in the status of citizenship was needed. Thus, a common right for real income was established. Furthermore, the illegitimate inequalities between the more and the less prosperous were adjusted. Hence, as it was mentioned above, in Marshall's approach the foundation of modern citizenship is

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framed by the equality of status. (Buckmester and Thomas, 2009; Turner 1993, Bellamy 2008; Kartal 2001)

The criticisms, both theoretical and empirical, brought to Marshall's view were numerous. Among these there can be noticed critiques towards the connection between the various types of relationships, as well as against the conceptual vagueness; the validity of the unidirectional progress of citizenship rights is also queried. According to some scholars, such as Lister and Pia (2008), Marshall failed to observe other forms of exclusion besides the economical diversity, like race or gender. As a result of disregarding race, ethnicity and foreigners in general, Marshall could not anticipate a scenario where people would be stint of complete membership in the future. As phrased by the notion of 'denizens' used by Tomas Hammar (1990), this refers to foreigners who reside in the destination country for many years without becoming citizens by naturalisation, but nevertheless having significant rights. Marshall expected positive evolution of the rights being inclusive of all aspects of it. Bryan Stanley Turner (1990), a British-Australian sociologist, considers that Marshall's theory was not adequately expounded in the pursuance of state theory. Furthermore, in Turner's opinion, Marshall did not describe how the essential resources for prosperity are produced and distributed from the state to pretenders. Additionally, he did not indicate the function of violence in the development of citizenship. It is recognisable, however, that a particular period of capitalism was underlying for Marshall's work. Nevertheless, "he developed his theory with reference to a nation-state immune from global pressures. His account of citizenship is a typical *passive* or *private* citizenship guaranteed by a liberal democratic welfare system" (Kartal, 2001, pg. 105).

3.2. The communitarian approach of the citizenship

As it was noted before, in the liberal approximation the membership in a community is established by means of rights. In communitarian point of view, the accent is on the obligations of citizenship, and membership is seen as a precondition for rights. In order for these responsibilities to be perceptible, an existent

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community is needed; otherwise, individuals will not feel the significance of observing the obligations which citizenship implies. Thus, as it can be observed, evolving membership and belonging is made in consideration of citizenship to testify the community. For the communitarians the community takes precedence contrary to the individual. Communitarian view is an expansive criticism of liberal ideology, and as many modern communitarian intellectuals have historical and philosophical past, it might happen to exist more than just one communitarian standpoint. (Kartal, 2001; Lister and Pia, 2008)

The communitarian approach emerged as an antagonism to a notorious American philosopher, John Rawls' work labelled *A Theory of Justice* from 1971. In order for a better understanding of this viewpoint, a short review of this doctrine will follow. Rawls aims to transform liberal democracy in the interest of being more sensible to cultural distinctness. He considered this necessary as there was a significant controversy on the inclusion of the ensured fundamental rights and liberties of citizens in the constitutional democracy. This was comprehended as a conflict between two democratic traditions: "the liberties of moderns" and "the liberties of ancient" (Kartal, 2008, pg. 106). These expressions come from Benjamin Constant in his work *The Liberty of the Ancients Compared with that of the Moderns* from 1816, and while the first one refers to the particular basic rights of individuals and property, the latter indicates the identical political freedom and the advantages of public activity. "Justice as fairness" (Kartal, 2008, pg. 16) tried to adjudge between these approaches.

Rawls proposes the idea of justice as being the solution for the diminution of the opposition between people and for the preservation of social partnership. The author endeavours to generate a new hypothesis, the theory of justice, which to serve as an alternative to the traditional perceptions of justice. (Kartal, 2008) This theory raises the classical understanding of the social contracts to a "higher level of abstraction" (Ibid, pg. 106). He suggests an "original position" (Rawls, 1971, pg. 118) of equality where the individuals do not have any data about each other's class status, economical or political background, nor information about their societal

belonging. According to the theory, individuals at this initial position accept the principles of justice which would govern all their additional conventions (Lister and Pia, 2008). This recognition of principles is labelled by him "justice of fairness". As it can be noted, the image of an impartial cooperative society is this concept's guiding principle, where every contracting person is free and equal, and the society is organised towards promoting the good of its participants. The communitarian approach, in turn, states that this theory is erroneous because these moral principles cannot be understood beyond an existent moral society. As some communitarian authors summarise this subject:

> "For the communitarians, morality is something which is rooted in practice – in the particular practices of actual communities. So the idea of looking to uncover abstract principles of morality by which to evaluate or redesign society is an implausible one. There are no universal principles of morality or justice discoverable by reason. The foundations of morals lie not in philosophy but in politics." (Lister and Pia, 2008, pg. 16 quoting Kukathas and Pettit, 1990, pg. 95)

Rawls' theory is criticised, among others, by Michael J. Sandel, an American philosopher, who is well-known precisely for his critique of Rawls' perception of the 'self' in his book *Liberalism and the Limits of Justice* from 1982. He claims that this theory is inaccurate, as the notion of the person is immoderately individualised; hence, it has the wrong social ontology. Furthermore, he states that the application of this theory has various negative effects. Firstly, the citizens are revoked from distinguishing characteristics and universal distinctness. Secondly, all members are degraded to one and identical rational human being and, thus, the picture of a political organisation with a plurality of individuals cannot be observed. (Lister and Pia, 2008; Kartal, 2001) Additionally, he considers that these individuals have no conception of belonging in a community - are "incapable of constitutive attachment" and are lacking "constitutive ends" (Sandel, 1998, pg.

179). This is called the "unencumbered self" (Ibid); an idiom which became a part of the political philosophy's *lingua franca*[1].

Communitarian citizenship was also criticised. The communitarian thinkers state that re-accentuating the obligations may bring the citizens into an unstable situation. In case supremacy is given to the obligations, and the liberal beliefs are partially or totally refused, communitarianism can be indicted of collectivism, or of favouring responsibilities before rights. In this kind of system the individuals who disagree can be constrained into obedience. In addition, the communitarian view is condemned for not discussing the role of the state, or for drawing near the voluntarism (Lister and Pia, 2008; Kartal, 2001)

3.3. The republican approach of the citizenship

The republican approach, similarly to the communitarian view, it is sceptical regarding the "privatism of liberal citizenship" (Lister and Pia, 2008, pg. 22). Yet, the two approaches do not share the same views; while communitarianism rests on an existent cultural and/or ethnic community, the republican citizenship emphasises the role of the obligations in the community and it depends on public involvement in the society. The reason behind these encounters is to motivate people to take into consideration the public good beyond the pale of their own personal life. Even though republicanism does not share the opinions of liberalism, yet, it is also interested in the personal freedom. However, republicans, contrarily to the liberal's negative interpretation of 'freedom', promote the positive sense of the concept in the interest of establishing the possibilities of self-governing for the citizens. Thus, in republican thinking the active attendance in the public matters creates and maintains the liberty and the membership. (Lister and Pia, 2008; Leydet, 2011)

Republicanism has its origins in the ancient Greek and Roman societies, where only those people who participated in the governance of their societies were considered citizens. In those communities this was considered a requirement and not a right.

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[1] It is "a language that is adopted as a common language between speakers whose native languages are different." (Oxford Dictionary)

The classic republican belief derives from the writings of the ancient Roman philosopher, Cicero, through Machiavelli, who along with other authors encourage the self-governed administration of the society, the rule of law and the segregation of authority. According to an ancient Greek theorist, Aristotle, humans are designed to live political life, which means that man forms into man by living in a community ruled by laws and habits. He calls man *zoon politikon*[2] –social being-, a term used by Aristotle in his work *Politics* from the 4th century BC, which is still cited in political debates. Further on, these traditional ideals were re-identified in the contemporary authors' literatures. (Lister and Pia, 2008; Kartal, 2008; Dagger, 2002; Jones, 2004)

As already stated, citizenship in the republican approach aspires to support individuals' freedom by liberating them from dominance, which engages self-government. It is argued that only by active participation in the public affairs can man truly be free. Considering the civic virtue, which has the role of preservation of the classical Roman political ideal of combating corruption (Lovett, 2014), two different opinions can be noticed. Rawls (1988), a liberal thinker, states that the reason behind fostering civic virtues is that in such way personal liberties are advanced. As he formulates:

> Classical republicanism I take to be the view that if the citizens of a democratic society are to preserve their basic rights and liberties, including the civil liberties which secure the freedoms of private life, they must also have to a sufficient degree the political virtues (as I have called them) and to be willing to take part in public life. (...) The safety of democratic liberties requires the active participation of citizens who possess the political virtues needed to maintain a constitutional regime. (Rawls, 1988, pg. 272)

The other point of view, which is adverse to liberalism, is sometimes mentioned as 'Aristotelian republicanism' (Lister and Pia, 2008, pg. 25). This declares that civic virtues and political participation are significant, as people materialise their inner

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[2] 'Political animal' – word for word translation

nature through civil commitment. From this perspective, participation is rather a good *per se* than a means for guaranteeing freedom. The republican approach of citizenship gives the impression of vacillating between these two attitudes. Nevertheless, there were some authors who tried to merge the two sights. In the opinion of a British intellectual historian, Quentin Skinner (1992), the enjoyment of the individual freedom can be fulfilled only if people do not situate its value superior to the aspiration of the common good. This can lead to the conclusion that the civic virtue and the personal freedom are compatible and jointly relevant. According to the republicans, public participation can be prompted and maintained through three different ways. Firstly, it can be reached by forcing people to acquit their civic obligations. This approach draws the most criticism; yet, there are countries where this method is adopted. Secondly, representative democracies should give more opportunities to citizens to participate in the public affairs, as they are by nature interested in politics. However, people should demand this political ground. Thirdly, civic virtues can be promoted by the education system. Some authors see citizenship education as a prerequisite for a free society. Therefore, they argue that this education should go deeper than the simple civil knowledge. This approach has also been criticised. (Lister and Pia, 2008; Kartal, 2001; Leydet, 2011; Lovett, 2014; Dagger 2002)

Republicanism considers, thus, public and civic participation the basis of liberty, of citizenship, which has an educative and integrative influence. This integrative effect of participation realises by bringing individuals together, whereupon grants society a more efficiently functioning. The educative impact is in connection with the integrative element, as by participating in the public matters individuals can use different skills and competences than in the other segments of their life. Therefore, republican citizenship is considered a "practise" (Lister and Pia, 2008, pg. 29, quoting Oldfield, 1994); it is not a right, it is something that individuals do. (Lister and Pia, 2008; Dagger, 2002)

Neither the republican conception is free of criticism. First of all, this approach of citizenship is sometimes believed to be unrealistic because the identity of

contemporary individuals stem from their interference in their private area, and not in the public one. Another criticism refers to the lack of information about how the participation should be encouraged and whether or not citizens should be constrained to participate. Furthermore, it is argued that those people who are distinct in not accentuating the public and the civic good may be ignored or expelled beyond the society. This criticism is amplified by the feminist critique, as this danger threatens especially women, then ethic- and religious minorities. Dagger (2002) highlights republicanism's quintessence, namely that it does not require citizens to neglect their personal situation, but to aim to find "common ground as different people" (Lister and Pia, 2008, pg. 29), thus "to find unity in diversity" (Dagger, 2002, pg. 155). (Lister and Pia, 2008; Kartal, 2008; Leydet, 2011; Dagger, 2002)

Considering the past years' flow of immigration and the foreigners' permanent settling down in the destination countries, it can be observed that the governments commenced to take the immigrants' cultural difference into consideration. Based on the fact that the policies of Western democracies relating immigrants have altered in the past three decades from 'assimilation' to 'multiculturalism', the European Union seems to try to fall into line with it. Multiculturalism is restricted by the fundamental liberal-democratic principles, but it is stated that it is legitimate and has prosperous effects on the community. The limitations create a systematic idea of immigrant integration. (Kymlicka, 2001) Approaching it from this angle may create the impression that multiculturalism is the answer for Europe's social problems. However, as it can be observed nowadays, many consider that exactly multiculturalism is the main cause of the issues. Thereinafter, a brief insight in the multicultural citizenship will follow.

3.4. Multicultural citizenship

Multiculturalism refers to the presence, admission, or advancement of multiple cultural customs within the same jurisdiction. This can evolve when an area of authority is developed from two or more various cultures, or through immigration

from different countries with distinct cultural backgrounds. Multicultural beliefs and procedures are much diversified, including the encouragement of equal dealing with the different cultures within a society, or stimulating the cultural variety, as well as containing policies in which the members of specific ethnic or cultural groups are accosted by the authorities as the parts of the communities in which they are affiliated with.

Even though the Western countries, such as the United States of America, Canada or Australia, can glory in the successful integration of a large number of immigrants from all over the world in the last 150 years, today it can be noticed an increasing tendency of concern about this process being in danger. There is a reasonable suspicion that today's immigrants will not be willing to integrate, and as a result of this the society will become progressively 'balkanised' (Kymlicka, 2001, pg. 152). Despite that it is clear that they are less disposed to integrate than the previous flow of immigrants, rather are the modifications in governments policies accused, than the immigrants themselves. It is argued that the 'multicultural' policies hinder the integration of the immigrants by means of creating a more inclusive and equitable society. (Kymlicka, 2001)

Kymlicka and Banting (2006) approach the subject of multiculturalism by separating it and analysing it as 'policy' and as 'ideology'. They argue that problems arise if the ideology entails that the immigrants are allowed to demand rights in order to emplace their difference without conceding any civic obligation to conform and integrate themselves into the society. According to the writers, one way to define this problem is as a strain between two sides of the liberal paragon of equality. On the one side, modern liberal thinkers believe in the concept of equal citizenship, including all the social and economic rights which are enjoyed identically by every member of the community. On the other side, liberals are also devoted to equivalent treatment of citizens as members of cultural collectives. As many have stated, this could be achieved by multicultural policies that defend and assist the cultural minorities. The discord between the two views will emerge if it unravels that the chase of multiculturalism weakens in some extent the equal

citizenship, especially the social and economic rights. In this scenario the liberals would have to elucidate on what equality means, and make a severe choice: to forsake the ideal of multiculturalism in the interest of the welfare state, or to persist in multiculturalism at the expense of the welfare state. After analysing the critics brought to multiculturalism, the authors led to the conclusion that it cannot be automatically deduced that ratifying multicultural policies will cause the collapse of the welfare state in an imminent manner. Nevertheless, it is crucial to contrive how integration policies and multicultural policies can function abreast. This is important in order for people to respect each other's differences, but at the same time to feel themselves as being part in the same community, enjoying equal rights. The recent terrorist atrocities are the demonstrations that individuals and groups are seriously estranged from the communities they live in. This indicates that the solution of the policies needs immediate attention. (Kymlicka and Banting, 2006; Kymlicka, 2001; Kymlicka, 1996)

4. IMPORTANT BACKGROUND INFORMATION

This chapter deals presents the basic legal regulations concerning migration, as well as the basic conditions for obtaining the permanent residence permit in Denmark. In addition, the definition of citizenship will be also introduced.

4.1. Legal framework

Purposely to analyse the Danish citizenship, as well as the different types of residence permit, it is necessary to examine the various laws and regulations concerning these institutions. First of all, the *Constitutional Act of Denmark* from 1953 has to be indicated, as it is the supreme legislative document of the state, and therefore, every law and regulation has to be in concordance with it. The legal framework for the Danish nationality is the *Consolidated Act of Danish Nationality* from 2003 with amendments from 2004. Regarding the immigrants' status in Denmark the *Aliens Consolidation Act No. 863* from 2013 is the legal frame. Beside this, the European Union (EU) universal policy for migration has to be also

considered. The *Treaty of Functioning the European Union* from 2009 is, thus, common for all the member states of the EU and formulates the rules concerning both EU and non-EU immigrants. This set of norms includes, among others, the requirements for legal residency of the migrants in an EU state, the procedure of issuing long-term visas and residence permits, or the rights and obligations of the migrants. The *Directive 2004/38/EC of the European Parliament and of the Council on the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States*, which is incorporated in the Danish national law, is an additional legal regulation that is also important in terms of migration. This Directive assures the basic right of the free movement of the EU citizens on the territory of the Union. The Aliens Consolidation Act enunciates in Article 2 (3) that "The limitations provided for by this Act only apply to aliens falling within the EU rules to the extent that it is compatible with those rules." which again highlights the importance of the European common legislation.

4.2. Definition and types of the Danish residence permit

The foreigner citizens' entry and stay in Denmark is regulated by Part 1 of the Aliens Consolidation Act from 2013. According to Articles 1-3, the citizens of Norway, Sweden, Iceland and Finland can enter and stay in Denmark without any particular authorisation. The citizens of the member states of the EU or those incorporated in the Agreement of the European Economic Area (EEA) can stay in Denmark for 3 months from the date of their entry, or respectively 6 months, if they are seeking for employment. The third-country nationals can stay the same amount of time, as EU/EEA members, with the condition that their passport or travel document is verified, certified and provided with visa before entry. However, the Minster of Refugee, Immigration and Integration Affairs can release some third-country nationals under this obligation. Those people who have a residence permit

from a Schengen country[3] can stay in Denmark up to 3 months in a 6-month period calculated from the date of their first entry in Denmark or in another Schengen country, other than the one which emitted the permit.

In order to stay legally in Denmark after this short period stipulated by the law, it is necessary to apply for a residence document. This permit is labelled registration certificate for the EU citizens/EEA nationals and residence card for third-country nationals. The residence permit is, thus, an official document which allows a foreigner to live in a specific state. There are two main types of authorisation, namely the temporary and the permanent residence permit. While the temporary residence permit group includes the study and work permits, the permanent residence permit entitles one to stay in Denmark for an indefinite period of time.

As the distinct denomination suggests, there are differences between the EU/EEA citizens and the third-country nationals in terms of the conditions of requirement of this document. An EU/EEA citizen can freely come and study in Denmark under the EU rules on freedom of movement. However, they will have to apply for an EU residence document –the registration certificate- as evidence that being EU citizens they are entitled to reside in Denmark. This certificate does not have a specific time limitation; it is valid until the conditions on which it was emitted still exist. After obtaining this document, the civil registration number (CPR) and the health security certificate has to be requested (Statsforvaltningen, 2009). According to Article 11 [3 (i)] of the Aliens Consolidation Act, those EU/EEA citizens who have been living legally and uninterrupted in the country for more than 5 years can opt for the permanent residence certificate. These stipulations are not applied to the citizens of Norway, Sweden, Iceland and Finland, as they have the right to inhabit in Denmark without any approval. Contrarily, the non-EU citizens must have the residence and work permit before arriving. When submitting their application, their biometric

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[3]Schengen countries are those states which affiliated to the Schengen Convention of 19 June 1990 implementing the Schengen Agreement of 14 June 1985 "on the gradual abolition of checks at their common borders as subsequently amended" (Article 2a, Aliens Consolidation Act).

features[4] will be digitally recorded. The law states that a visa can be emitted for one or more entries within a specified extent of time in all Schengen countries, but it is possible to require a long-term visa only for Denmark which has a validity of maximum 1 year. After receiving the permit, the citizens outside the EU/EEA have also to register in the CPR system.

4.2.1. *The essential requirements for obtaining the permanent residence permit*

There is a set of fundamental requirements what has to be met in order for receiving permanent residence permit. Besides the basic ones, two of the secondary conditions have also to be fulfilled. Regarding the basic requirements, according to Article 11 (3) of the Consolidation Act (2013), the person who wishes to receive the permit must:

- Still meet the requirements for the current residence permit the person possesses.
- Be over the age of 18 years old.
- Have had a legal residence in Denmark for at least five years. If the person meets all of the four supplementary requirements, s/he only has to have resided legally in Denmark for at least four years.
- Not have committed certain types of crime.
- Not have any overdue public debts unless the person has been granted an extension of the repayment of the debt.
- Not have received public benefits within the last three years under the terms of the Active Social Policy Act or the Integration Act.
- Accept a Declaration of integration and active citizenship in Danish society.
- Have passed the Danish language test 2 (Prøve i Dansk 2) or a Danish language test of an equivalent or higher level.
- Have had a regular full-time employment or been self-employed for at least two years and six months within the last three years.

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[4] Facial image and fingerprints

- Still be working or enrolled in education at the time when the Danish Immigration Service decides the case.

In addition, either two of the following four conditions have to be met. The applying person has to:

- Have passed an active citizen exam test or have exhibited active citizenship in Denmark.
- Have held a regular full-time employment or been self-employed for at least four years within the last four years and six months.
- Have had a yearly taxable income that over the last two years has been DKK 270.000 (2016 level) or above on average.
- Have passed the Danish language test 3 (Prøve i Dansk 3) or a Danish language test of an equivalent or higher level.

However, there are some specific groups who are justified from one ore more of these conditions. These are the pensioners and early age pensioners, persons between the age of 18 and 19 years old, individuals with strong connections to Denmark, or persons with disabilities. (New to Denmark.dk, 2016 a.)

These conditions are important to be mentioned, as they will be compared with the conditions of the citizenship, further on.

4.3. Definition of citizenship

The concept of citizenship alters in direct ration with the modification of the nature and of the values of society (Institute for Citizenship, n.d.). The concept of citizenship consists of three principal aspects (Kymlicka and Norman, 2000; Marshall, 1963). First of all, citizenship is a legal status and it is determined by civil, political and social rights. In this status the citizen can act afield in accordance with the law and it is entitled to require the protection of it (Leydet, 2014). Secondly, citizens are perceived as political agents, who are effective attendants in

the political organisations of the society (Kymlicka and Norman, 2000). The third dimension indicates the citizenship as fellowship to a political society that provides different origin of identity (Leydet, 2014). This latter element, the identity, is the most equivocal as there is a tendency towards including under this idea various individual and collective components of identity, as well as social integration aspects (Ibid). It is, at some extent, the psychological dimension[5] of citizenship which has a considerable effect on the political community's mutual identity (Sindic, 2011). Furthermore, a powerful civic identity can stimulate individuals to take an active part in their country's political life (Lydet, 2014). If there are groups within the same society who do not share similar sense of political identity, can lead to disagreement in regards to a distinct distribution of rights (Ibid). This can happen in those societies where a minority community is present.

In some languages, and thereby national contexts, there is a difference between the political and the social citizenship. When using the word 'citizenship', it often refers to the political citizenship, while the social citizenship in this context denotes the 'nationality'. These distinct appellations can be encountered in various European languages, for instance, in Danish language – "statsborgerskab" and "medborgerskab" -, in German – "statsbürgerschafft" and "mitbürger" -, in Hungarian – "állampolgárság" and "nemzetiség" or in Romanian – "cetăţenie" and "naţionalitate". Thus, even though the notions 'citizenship' and 'nationality' have different meanings, they are often misused as synonyms. There is no conformity between the definitions and articles regarding the signification of these words either. What it can be deduced from the many definitions is that *citizenship* refers to the legal status of a person within a country; this means that the person has been registered with the government of a state. Thus, a person becomes a citizen of a state only if s/he is approved in the state's policy framework through legal terms (Ruffer, 2012; Sindic, 2011). *Nationality*, in contrast, is acquirable by descent (*jus sanguinis* – right of blood), by birth or by adoption in the state (*jus territori* – right of the soil), by marriage or a combination of these three. While according some

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[5] It refers to the citizen's subjective, emotional sense of belonging. (Lydet, 2014)

definitions it is the status of being born in a specific country, in accordance with others it refers to an ethnical minority living on the territory of a state. These definitions also enunciate that nationality and ethnicity are both minority-markers, indicating the sense of togetherness of populations with common language, culture and traditions. The difference lies in the fact that ethnicities live in smaller communities, nationalities, in turn, live in a broader geographic areas. These notions are generally interlocked, as in many cases the individuals are born on the territory of the nation in which their parents belong. Nevertheless, nowadays, due to the continuous migration, many people are born in countries where their parents have no political tie. Or, in other cases, on the ground of historical events, people are born in countries where they have political bonds, but their nationality is not corresponding with their citizenship. In these circumstances, many people can go through internal hesitation as regard to their political and social identity.

To the term of citizenship has been given different definitions in the past, as well as in present. According to Aristotle (350 BC, Book III., Part 1), it can be called citizen the individual "who has the power to take part in the deliberative or judicial administration of any state is said by us to be a citizen of that state (...)". Emer de Vattal (1797, pg. 166), a Swiss political philosopher, defines citizenship in his work *The Law of Nations* as "the members of a civil society bound to this society by certain duties, subject to its authority and equal participants in its advantages".

Contemporary authors define citizenship as:

> a legal status that bestows equal membership and rights, including the right to political participation, and gives rise to duties relating to citizens of a bounded community. As such, citizenship indicates some type of belonging or identification between the citizen and her community. (Kennedy-Macfoy, 2013, pg. 141)

Some theorists, such as Ruth Lister (2003) or Richard Bellamy (2008), argue that this concept embraces more than just rights and duties. Others, particularly Nira

Yuval-Davis (1999), suggest that citizenship should be considered a 'multilayered' concept as citizens' rights and responsibilities are located on a multi-scale system which consists of, among others, local, national, religious, ethnic, and international societies.

5. THE DANISH CITIZENSHIP

In this chapter the different ways of acquiring, as well as the ways of loss of the Danish citizenship will be presented. Throughout the chapter the actual legal conditions of naturalisation will be elaborated, and the dual citizenship will also be introduced.

As every state diverges from the other, the legislations regarding the attainment of the citizenship vary from state to state. However, there is an approximately standardised regulation in the member states of the European Union, which includes, among others, the legal residence within the given country, the general knowledge about the state and the situation of the non-EU members. Hereinafter, the various manners of obtaining the Danish citizenship, as well as the manners of forfeiture of it will be presented.

5.1. Different ways of acquiring the Danish citizenship

According to the *Consolidated Act on Danish Nationality* from 2004 (in Danish *Bekendtgørelse af lov om dansk indfødsret*), there are various ways of becoming a Danish citizen. The law enunciates that the Danish citizenship can be received at birth, adoption or by naturalisation. The important information regarding this theme can be found on the official website of the Ministry of Immigration, Integration and Housing (2016).

5.1.1. Citizenship at birth (Article 1 and 2)

As in Denmark the principle of *jus sanguinis*[6] is applied from 1st of July 2014, it is the parent's nationality which influences the child's citizenship. If at least one of the child's parents born on or after this date has Danish citizenship, the child will automatically be a Danish citizen. The automatic acquisition of citizenship of the children born before this date was subject for continuously changing rules; the rule in power was applied at the date of the birth. Previously, the child whose father was Danish and mother had another citizenship, got the Danish citizenship only if s/he was born on the territory of Denmark. In the case the parents got married after the birth, the child automatically acquired the Danish citizenship. Pursuant to the new legislation, those born between 12th of October 1993 to 30th of June 2014 may acquire Danish citizenship by application.

The law also enunciates that the child who was found in the country will be a Danish citizen, unless otherwise stated.

5.1.2. Citizenship by adoption (Article 2A)

A foreign child under the age of 12 years adopted under the Danish adoption rules will become a Danish citizen by adoption if s/he is adopted by a married couple where at least one of the spouses has Danish citizenship, or by an unmarried Danish citizen. The same regulation applies if the child is adopted under foreign decision recognised by the Danish legislation on adoption. If the child does not automatically get the citizenship, the child can apply to become a Danish citizen.

These previous forms of acquiring the Danish citizenship were the situations in which the citizenship is allocated automatically if the conditions are met. Whenever the necessity of proving some of the requirements arises, the official documents, such as the birth certificate, the adoption document or the marriage certificate, are the evidence. In the following the obtaining of the Danish citizenship by applying to the competent authorities will take place.

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[6] *Jus sanguinis* (a Latin notion which can be translated as *'right of blood'*) is a principle of nationality law by which citizenship is not determined by place of birth but by having one or both parents who are citizens of the state.

5.1.3. Citizenship by naturalisation (Article 6)

The law enunciates that the Danish citizenship can be acquired by naturalisation. This means that the citizenship it is not obtained automatically, but only if the application for it was considered legal and, thus, the applicant is eligible for acquiring the citizenship. For this, a set of conditions has to be accomplished.

On the 5th of October, 2015 the Liberal Party, the Social Democrats, the Danish People's Party, the Liberal Alliance and the Conservatives entered into an agreement on the future general guidelines about citizenship. The text of the amendment can be found in the Immigration, Integration and Housing Ministry's Circular Letter no. 10873 of 13/10 2015 (in Danish *Udlændinge-, Integrations- og Boligministeriets cirkulæreskrivelse*). The Act came into force on the 15th of October, 2015, thus, it is applicable in the present.

First of all, the Agreement touches the subject of the Danish language competence and states that the requirement for it is tightened; hence, from now on the candidates have to pass the Prøve i Dansk 3 (PD3) instead of Prøve i Dansk 2 (PD2). The seekers who have been financially independent for eight and a half years out of the last nine years can demand for a release if they passed PD2. Furthermore, passing the 9th or 10th class' exam with a minimum grade of six or a 'passed' *Studentereksamen or Højere Forberedelseseksamen (HF)* is also sufficient. Children under the age of 12 are exempt from this requirement.

Secondly, applicants must also pass a new citizenship test (*Indfødsretsprøve*), which demonstrates their knowledge of the Danish society, culture and history. While the previous test (*Statsborgerskabsprøve*) consisted of 30 questions from which the seeker had to answer 22 correctly, this new one requires at least 32 right answers from 40 questions. Similarly to the previous condition, children under 12 years of age do not have to participate in this examination.

In addition, the new regulation involves the raising of the self-support period; thus, applicants in the future must have been self-supporting for four and a half years in

the last five years. This means that the applicants cannot be registered as recipients of social security benefits under the terms of the Active Social Policy (in Danish *Lov om aktiv socialpolitik*) or the Integration Act (in Danish *Integrationsloven*). The receivers of grants from the State Education Fund (SU), unemployment benefit (in Danish *dagpenge*), sick leave (in Danish *syedagpenge*) and parental leave (in Danish *barselsdagpenge*) or housing benefit (in Danish *boligstøtte*) are considered as self-sufficient, because these benefits are not referred to under the clauses of the previous laws. (New to Denmark.dk, 2016 b.)

Furthermore, the penalty periods for criminal offenses are extended by 50 percent; hence, the applicants who have committed crimes have to wait longer before they have the opportunity to obtain Danish citizenship.

Another change that was introduced with the Agreement is that it will be harder to obtain dispensation when a person is not able to meet the conditions due to mental illness. Henceforward a statement from the psychiatrist will be needed. Here can also be mentioned the modification regarding certain documentation requirements in those cases where the application has to be submitted to the Parliamentary Citizenship Committee (in Danish *Folketingets Indfødsretsudvalg*) due to the applicant's health conditions; in these situations the Committee decides whether to waive the rule of the language test and the Citizenship test.

The Agreement also contains an amendment concerning the residency demand for candidates who have resided abroad because of the spouse's employment abroad for Danish interests but subsequently re-established residence in Denmark.

Finally, the bill ensuring easier access to citizenship for children born and raised in Denmark passed by the previous government in 2014 it is now revoked, and it is specified that children over the age of 12 have to meet the same criteria as adults.

All applicants wishing to acquire Danish citizenship have to correspond to the new requirements stated in the Agreement. However, the new law on the Citizenship test is expected to come into force from June, 2016, thus, there will be a transitional

period for the applications received before the 15th August 2014 and those who received an admission letter regardless of the new guidelines will be treated by the Circular Letter no. 9253 of 6/6 2013 on naturalisation, as Article 33, paragraph 2 of the new regulation states. The participants will have free access to the new test's preparation material three months before the test. Furthermore, according to Article 33, paragraph 5, the applicants for citizenship, as well as applicants for revision submitted before the 1st of July, 2016 have to prove that they passed the previous citizenship test.

There is a set of requirements which remained unchanged. These conditions are as follows:

- The applicant must have permanent residence permit in Denmark.
- The applicant has to sign an oath statement of loyalty towards Denmark.
- The applicant has to have nine years of legal residence in the country. Refugees have to have eight years, and those married to a Danish citizen can apply after six years of legal stay in Denmark.
- Those young people who came to Denmark before the age of 15 can apply for obtaining the citizenship after they turn 18 years old, if they completed a Danish education.
- If an individual has completed a Danish education which lasted for minimum three years can apply after five years of legal residence in the state.
- In case of criminal offenses, individuals receive their penalty period in relation with the seriousness of their crime, but they can also be excluded from receiving the Danish citizenship permanently.
- It is not allowed the applicant to have overdue debt to the state.
- The applicant has to be self-supporting - in accordance with the new regulation. Furthermore, the seeker cannot receive state allowance (in Danish *kontanthjælp*) during the last year or more than six months over the last five years before application.

- The applicant has to pass the Danish language test - in accordance with the new regulation.

- The applicant has to pass a test about the Danish society, culture, history and politics.

- Stateless children and young people under 21 years of age have special access.

- As from 1st of September, 2015 multiple citizenships are allowed, the applicant is no longer required to resign his/her former citizenship. (See the next subchapter.)

- The fee for applying is 1 000 Danish Kroner, and the form is available at the applicant's local police station.

As regard to the procedure, after the applicant makes certain that s/he meets all the conditions regarding acquiring Danish citizenship, can submit the application to the Ministry of Immigration, Integration and Housing. The Minister introduces a naturalisation bill in April and October every year to the Parliament. Before the Act to come into force after its adoption, the Queen must sign the naturalisation bill (Ersbøll, 2013). As a guideline, the complete process between submitting the request and finalisation it takes roughly three-four months, but it can take longer.

5.1.4. *Dual citizenship*

On the 18th of December, 2014 the Danish Parliament adopted new rules on dual citizenship. The rules are set by the Act no. 1496 of 23rd of December, 2014 amending the Danish Nationality Act with *The Law on (Double) Multiple Citizenships* (in Danish *Lov af dobbelt statsborgerskab*). The Act came into force on 1st of September, 2015. The law means that Danish citizens who wish to acquire a foreign citizenship may do so without losing their Danish citizenship. They must in this regard take no action in relation to the Danish authorities. It will depend on the law of the country in which they wish to acquire citizenship, if dual citizenship is accepted or if it is required the resolution from the Danish citizenship. Danish citizens can henceforward apply to be released from their Danish citizenship.

The Act also means that foreign nationals wishing to acquire Danish citizenship will no longer be forced to resign their primary citizenship. It will depend on the law of the country where the individual already has citizenship, if dual citizenship is accepted, or whether s/he will lose the citizenship of that country by acquiring Danish citizenship.

The Act, furthermore, contains two transitional arrangements to acquire Danish citizenship by making a declaration.

❖ Recovery of Danish citizenship for former Danish nationals

Former Danish citizens who have lost their Danish citizenship under the now-repealed Article 7 of the Nationality Act may, in accordance with Article 3 of the Act on Multiple Citizenships, for a period from 1st of September 2015 and by 31st August, 2020 reacquire the Danish citizenship by making a declaration to the State Administration (in Danish *Statsforvaltningen*).

There are important conditions for the different situations that have to be met:

- It is a condition for the reclaim of the Danish citizenship that the former Danish citizen to be not sentenced to imprisonment in the period between the loss of Danish citizenship and issuing the declaration.
- It is a requirement for former Danish citizens born abroad to meet the conditions under Article 8 of the Danish Nationality Act, namely that they lost the citizenship by attaining the age of 22, and they never lived in Denmark, nor been staying in Denmark under circumstances indicating some association with the country.
- Danish citizenship is given also for the child of the individual, including an adopted child, unless it is expressly stated that the child should not be covered. It is a condition that the petitioner shares custody of the child, the child is unmarried and that the other parent who has custody right has given his consent. For adopted children, it is also a condition that the adoption is

valid under Danish Adoption law. It does not matter whether the child has previously been a Danish citizen or not.

❖ Foreign citizens applying for Danish citizenship

According to Article 4 of the Act on Multiple Citizenships, foreign citizens, who have been subject of an Act of naturalisation adopted in December 2012 or later, demanding the renunciation of their previous citizenship, can make a declaration for a period from 1st of September, 2015 to and including 31st of August, 2017 to the State Administration, after which they acquire Danish nationality without being released from their previous citizenship. The children, including adopted children, of the person making the declaration will also acquire the Danish citizenship starting from 1st of March 2016. It is a condition for the applicant to share custody of the child, the child to be under the age of 18, to reside in the country and to be unmarried. For adopted children, it is required that the adoption to be valid under the Danish Adoption law.

Statements made between September 2015 and February 2016 does not include the claimant's children. This is the case even if the petitioner's children were originally covered by the application for Danish citizenship by naturalisation. For this group of children the preparatory work for amending the law no. 111 of 6 February, 2016 indicates that from 1st of March, 2016 a special one-year transition period is introduced.

❖ Special transitional arrangements for the children of persons who in the period from 1st of September, 2015 to 29th of February, 2016 have made declarations pursuant to Article 4 of the Law on Multiple Citizenship

Children, who do not have the opportunity to become Danish citizens with their parents -included in the parent's application-, must meet the common conditions for admission in a naturalisation bill. The conditions stated in the Circular Letter no. 10873 of 13th of October, 2015 on naturalisation.

Those applications for Danish citizenship by naturalisation of children, including the adopted children of persons who, in the period between September 2015 to February 2016 have issued a declaration to the State Administration in accordance to Article 4 of the regulation on Multiple Citizenships, which are submitted to the Immigration, Integration and Housing Ministry by February 2017, could be proposed to the Parliamentary Naturalisation Committee. This Committee will decide whether to grant the applicant an exemption from the general naturalisation conditions that s/he fails to meet.

5.1.5. *Authentication of acquiring the Danish citizenship*

Individuals, who have acquired Danish citizenship by birth, by marriage of the parents after the birth or by adoption, have the possibility to apply for proof of their citizenship. The Danish citizenship can be justifiable with a so-called national legal proof or 'evidence of Danish citizenship' (in Danish *bevis for dansk statsborgerskab*). The application can be submitted to the Danish diplomatic mission or directly to Immigration, Integration and Housing Ministry.

Persons, who have acquired Danish citizenship by declaration or by law (naturalisation), will also receive authentication in connection to their declaration or naturalisation. If a person once obtained a license for Danish citizenship - regardless of whether Danish citizenship is acquired automatically, by declaration or by law - will not be provided with a new national legal proof. Instead, the Ministry of Immigration, Integration and Housing may issue a 'certificate of confirmation'. The request for the confirmation document of the Danish citizenship has to be submitted to the same Integration, Immigration and Housing Ministry.

5.2. Different ways of loss of the Danish citizenship

5.2.1. *Acquiring another foreign citizenship (abolished by allowing dual citizenship)*

As the regulation has been recently changed, the forfeiture of the Danish citizenship because of acquiring of another citizenship happened only before September 1,

2015. The Danish citizenship was revoked from the individual who has acquired foreign citizenship by application or explicit consent, or by entering the public service in another country. Additionally, Danish citizenship was taken from the unmarried child under the age of 18, who became a foreign citizen by the fact that one of the parents who has custody or part of it, acquires foreign citizenship in one of the methods described above, unless the other parent retains the Danish citizenship and they share custody.

As it was already mentioned, this rule was repealed by the Act no. 1496 amending the Danish Nationality Act. By this new regulation the dual citizenship is accepted in Denmark, and it came into effect on 1st of September, 2015. Therefore, former Danish citizens, who have lost their Danish citizenship by acquiring foreign citizenship, are allowed to make a statement at the State Administration about their situation, if they meet some specific conditions.

5.2.2. *Conservation of the Danish citizenship (Article 8)*

The legislation states that the person, who was born abroad and never lived in Denmark nor have stayed in the country under circumstances indicating some relation with Denmark, will lose his/her Danish citizenship at the age of 22, unless this makes him/her become stateless. A request for retaining the citizenship can be submitted before the person's 22nd birthday. Furthermore, the children of this person having acquired the citizenship through him/her will also lose it, unless this makes the children stateless. The condition for 'residence in Denmark' for at least 3 consecutive months has to be fulfilled at the moment when the applicant requires the certificate. Residence in another Nordic country for a total of at least seven years is equivalent to residence in Denmark.

5.2.3. *Withdrawal of the Danish citizenship by judgment (Article 8A to 8E)*

Danish citizenship can deprived by legal judgment if in connection with its acquisition has been demonstrated fraud, including intentionally giving false or misleading information or withholding relevant data, if the attitude exhibited was

decisive for the acquisition. This applies regardless of the individual becoming stateless thereby.

The citizenship can also be retracted by judgment if the person is convicted for one or more provisions of the Penal Code, chapter 12 and 13, *inter alia* for treason or other crimes against state security, unless this would result in the individual becoming stateless.

6. ANALYSIS AND DISCUSSION

This chapter deals with analysis and discussion about different aspects, requirements of the Danish citizenship and the attitude of the people towards it. Firstly, it will contain a presentation of the modifications in the requirements for obtaining the Danish citizenship with the changing of the different governments. Secondly, the people's perspective in relation to the citizenship will be presented through interviews and social surveys. It will focus on the argumentation of coming to Denmark of the three interviewees as stated in their declarations, as well as their reasons behind the aspiring or not for acquiring the Danish citizenship. Then, the results of the surveys will be presented. Lastly, it will contain a presentation of the Danish citizenship from the perspectives of different citizenship models.

The requirements for obtaining the Danish citizenship are constantly changing, depending on which political party is in force. Thereinafter, a short presentation of these modifications will be elaborated.

6.1. Citizenship requirements – a controversial issue throughout the history

Generally speaking, Denmark was following a quite mild naturalisation policy along the history. At the end of the 1960s and beginning of the 1970s a gradually stronger policy frame emerged with the appearance of an increased number of guests or foreign workers. At this period Denmark joined the European Union and the oil crisis began in the mid '70s. The new policies were the outcome of the dissatisfaction of the Danish society with labour market management of accepting

foreign workers at the time when the unemployment rate in the country was high (Jørgensen and Thomsen, 2012). The immigrants were much more treated as workers who will leave Denmark after the certain time and their integration was not an important issue. The changes in the classical political structures, the appearance of new progressive political parties and the composition of the parliament have also affected this attitude towards the immigration. While earlier the naturalisation acts have gone through the parliament without serious discussions, in the new situation the traditional political parties had narrower parliamentary base, and with new parties new concepts came into discussion regarding the naturalisation and induced severe debates and disagreements. While the left wing parties proposed new regulations for integration, against discrimination and equal treatment, the right wing parties saw the immigration as a problem to the Danish society and managed to create an anti-immigrant atmosphere with populist manners. At this time mainly the status of the Nordic Country citizens represented the main topic of the debates.

In 1982 Social Democrats lost the elections, a new Conservative coalition government came into power. The naturalisation topic and problems appeared again when the opposition managed to get through a new law, the new Aliens Act with very liberal admission criteria (Ersbøll, 2015). As a consequence, the immigration and refugees came into the centre of discussion again.

In the 1990s Social Democrats gained power again and made an agreement with the Liberals and Conservatives to tighten again the requirements for the naturalisation. Different bills were introduced which would ordain the applicants to be able to read and write in Danish to some extent, to not have public debt and criminal records for a number of years. At the end of the '90s it seemed that the political debate on naturalisation will calm down, although there were disagreements among the Liberals, Conservatives, Progress Party and the newly founded Danish People's Party. Denmark also signed the Act on Danish Citizenship in 1997 in order to implement the international convention on children protection and inter-country adoption (Ersbøll, 2015). This solved some issues on facilitating Danish citizenship to children born in or out of wedlock in mixed families (where one parent is Danish) inside Denmark or abroad.

The inflow of foreign workers increased again when 10 countries from the Eastern European block joined the European Union in May, 2004. The mobility of EU workers was supported by almost all the political parties except the Danish People's Party. New regulations regarding the incorporation of the foreign workers into the Danish society were only focusing exclusively on the labour market, similarly to the regulations from the 70s. As a consequence, Denmark did not introduce serious reforms in its citizenship law until the middle of 2000s, similarly to other European countries. The crisis in 2008 resulting in high unemployment made the politicians to focus more on integration of the immigrants in the society and propose restrictions for obtaining social benefits (Jørgensen and Thomsen, 2012). Having a Central Right with the support of the Danish People's Party, the country did not follow the European trends in law harmonisation and accepting multiple citizenships. Instead of making it easier to access Danish citizenship, the conditions became much stricter in the new millennium: an examination certificate has to be obtained to show the knowledge of the Danish language, history, culture and society, answering 28 correctly out of 40 questions. Furthermore, the applicants had to sign a declaration of loyalty and faithfulness to Denmark and the time period of residence was increased with two more years. The proof of self-supporting had also to be shown, and the condition of not relying on social benefits for a certain amount of time in the last five years from the date of applying had to be fulfilled.

This period lasted until the Social Democrats leaded coalition came into power in autumn 2011. Since then new trends started regarding the facilitation of citizenship. In 2014 the Citizen Act was changed in three major points: all children born of Danish parents will obtain citizenship automatically, children of immigrants born in Denmark are eligible to Danish citizenship with certain conditions and after September 2015 the "multiple citizenship" is fully accepted. The last amendments allow a longer time period for receiving social support in the last five years. Even though the regulations have been changed in the past years, Denmark has still the toughest naturalisation system in Scandinavia, as the criteria are not written in laws but are the result of negotiation and agreements between the different political parties (Ersbøll, 2015).

With the new elections in 2015 another Conservative coalition formed the Government and new restrictions are being set in the Citizenship Law. Major contribution has to this the immigration wave that reached Europe from the Middle East.

6.2. Case studies

Notoriously, people can have several reasons, such as economic, social, personal motives, to feel prompted to make the decision of migrating from their accustomed ambience which gives them certain security to an unfamiliar environment which can hide many challenges and obstacles. When finding the attractive and comfortable surrounding and deciding to settle down in the given country, the dilemma follows. Should one melt into the majority and abandon its roots or assume the risk of remaining an outsider by adhering to its identity? How is the milieu reacting on this? Where is the golden means and is it possible to achieve it? Can one preserve its identity and yet, be a full member of the 'new' society? The answering of these and similar questions was the aim of the interviews and the social surveys.

6.2.1. Interviews

As it was mentioned above, three women agreed to answer my questions through interview. They come from distinct countries with different regimes, with dissimilar reasons, and they all have different positions towards the subject of acquiring the Danish citizenship. There is yet one thing in which they agree: Denmark changed their lives.

The first woman, Zarrin Khoda, was born and grew up in Iran – Tehran. After the Islamic Revolution between 1978 and 1979, on the 22nd of September, 1980, the Iran-Iraq war erupted and lasted for eight years. In this war Iran used children and teenagers to clear the minefields by running in front of the military troop's stripe. During this period Iran prohibits the any discourses which would be against the Islamist principles, stifling completely the freedom of speech. Furthermore, 30

thousand political prisoners, including children under 13 years old, were executed in an atrocious mode. (BBC News, 2016; UN, nd.) From these circumstances repaired Zarrin's husband and arrived to Denmark as a refugee in 1985. Zarrin and her one year old son at that time came in 1986 by the help of the family reunification program. As she unfolds, she had no difficulties, but challenges: "Every beginning has its challenges. It may well be said that I had to learn to 'walk again' as an adult woman. For me it was very important to learn the Danish language very quickly." Instead enumerating the challenges, she emphasises the importance of the Danish language, alluding to this several times:

> I was aware that the language is the only way I could achieve my goals in Denmark, and also that the language is the key to better understand the society and to integrate myself into the Danish community, while being able to help and understand my child/my children.

Given that their situation was uncertain as refugees, "and we did not know how our futurity will look like", they decided to apply for the Danish citizenship; it was in June, 1998, when they submitted the documents in order to "secure our future in Denmark". Similarly to the current conditions, it was established a minimum number of years during which they had to continuously reside in the country; it was at least seven years in that time, today the requirement for the refugees is eight years. Furthermore, they could not have any debts towards the state, and could not have committed criminal offenses. What is surpassingly different from the present conditions is the absence of the language requirements: they had to fulfil the above mentioned three conditions and did not have to pass any language tests. She, however, felt the importance of it, as it was previously mentioned. As already 18 years passed since they became Danish citizens, she does not remember what advantages or disadvantages the permanent residence permit had at that time compared with the citizenship; they focused on the obtaining of the citizenship.

When it comes to the present, she proudly relates that she is a teacher graduated at *Aalborg Seminarium* in 2006 with main subject in Danish, Danish as a second language, crafts and history. In 2014 she obtained her Master's degree in Danish, as

a second language. Now she works as Danish teacher in a communal language school for foreigners (in Danish *Sprogcenter*). This study choice also emphasises her commitment to the language. When I ask her about Iran, she only says that she loves her homeland, but unfortunately the country has been ruled by a medieval and totalitarian theocracy in the last 37 years; it cannot be compared to Denmark. Thus, she has many advantages being now a Danish citizen, but the most important is that "we have the same rights as the rest of the Danish population by law". I was interested how she preserves her identity, but she revealed that although they speak Persian language within the family, she does not believe in a fixed and unalterable identity in the global world. She continues:

> Our identity is developed in interaction with other people. Therefore, I have never thought about what and how I should conduct myself to maintain my own identity. I do what makes sense for me and for my contact with other people in my everyday life.

As she obtained Danish citizenship many years ago, when double citizenship was not recognised in Denmark, she had to renounce to her Iranian citizenship. When I ask her about the possibility of retaking the lost citizenship, she only smiles. Then, she adds "I am a Danish-Iranian, who actively contributes to the Danish society".

This first interview presented the life of a person and a family coming from outside the EU. For her there was no question of choosing between permanent residence permit and the Danish citizenship. As soon she fulfilled the requirements of those times she applied and obtained the citizenship without complications. Her story reflects the milder legal and political atmosphere of the mid-end 90s, as mentioned also in the previous sub-section. When asked about preserving her Iranian identity, her answer reveals that she feels more Danish now and she does not believe in a fixed identity: she lives her life according to her actual conditions.

The second interview's subject was the almost 65 years old Britt Redmond, who came in her early twenties from the Netherlands. She attended a strict, religious school, after which she decided to take her chance in Denmark. Thus, she came in 1973 to Aarhus for study purposes, and there she met her husband, a Danish citizen,

with whom they moved to Aalborg. Thus, she was transferred to Aalborg University and she graduated as civil engineer; now she works in a renowned firm in her specialty, but she will retire in pension soon.

When the difficulties encountered when she moved to Denmark come into question, she unfolds:

> Everything was so different... I mean in relation to how I have been living before in the public school. Strictly, after regulations, we had always precise schedules. Here suddenly everything was allowed. As I was occupied with my freedom, I did not notice any difficulties. In addition, I met my love very early, and he helped me a lot. Everything was magical.

Certainly, when the "pink cloud got pallid", she started to notice some challenges, for instance when searching for a job, but these obstacles were not impossible to be overstepped. Furthermore, she did not have problems with learning the language, as she thinks it is in many ways similar to her mother tongue, Dutch. Mainly because they spoke and still speak in Danish with her husband, it took only one year to learn the language appropriately.

As we start to talk about the citizenship, she clearly pinpoints:

> I love my country. I also love Denmark; this country gave me a lot. But I never considered applying for the citizenship. I am fully satisfied with my possibilities as a permanent resident in this state. Although I feel myself half Danish, half Dutch, I could not relinquish my Dutch citizenship.

Even now, when the dual citizenship is allowed, she does not want to acquire it. She feels herself accomplished just as she is, being a Dutch in Denmark. She also adds that she is not interested in politics; it is enough for her to be able to vote in local elections. She does not feel any distinction because of her origin, maybe this is also a reason for not desiring the attainment of the citizenship. Being Danish would benefit her when receiving the superannuation allowance, but as she states: "I am not ambitious. I have all what is valuable: nice life, caring and loving family, sweet grandchildren."

Regarding the preservation of her identity, she mentioned that her children, as well as her grandchildren speak Dutch, they frequently visit their relatives in the Netherlands, and they keep the Dutch traditions. She wants to highlight that she is not a nationalist; her ancestry is important to her, but it does not mean that she would be a radical Dutch person. Again, she feels herself half Danish, the only thing she refuses is the legalisation of it. Speaking Danish in everyday life is one proof of that.

In the second interview a person originating from an EU member country, the Netherlands, is presented. Even though she has been living in Denmark for more than 40 years, she is satisfied by having only permanent residence permit. Her ignorance for politics, like voting at the parliamentary elections, and her current life makes her renounce the possibility of demanding the Danish citizenship.

A comparison can be made after summarising these two interviews regarding the two legal acts: the permanent residence permit and the Danish citizenship. On one hand, it is disclosed that for people originating from an EU member country it does not make much difference to have only permanent residence permit. As Denmark signed the corresponding EU directives, people from these countries can live and work in Denmark with minimal legal and administration constraints. On the other hand, for someone from a Third country the importance of the citizenship is much higher compared to the permanent residence permit, because it gives more possibilities and less administration and legal restrictions. It also reflects how the legal system evaluates and compares the people to people in different ways according to their origin.

Lastly, Liliana Mărinescu accepted to answer the interview questions. She has 34 years old and comes from Romania. She is also a language didactic, she teaches English and Danish. She came to Denmark in 2007, as she got married to a Danish man. She remembers having difficulties in adapting to the new lifestyle, including food culture, silence, transport possibilities, but when she got to the labour market everything started to take a positive turn.

She decided to apply for Danish citizenship in 2015 when, as she expresses herself "at last", double citizenship was accepted by the Danish government. This is important to her, because "I would like to keep also the Romanian citizenship, as I consider that I'm half Danish and half Romanian. I can not deny my roots". As she applied for the citizenship recently, she had/has to conform to the conditions presented in Chapter 5., subchapter 1.3. In reference to the advantages of the citizenship, she says that for her there is not much difference compared to the Danish people's rights, as she is an EU citizen. She is not interested in politics, although as a Danish citizen she would have voting rights for parliamentary election. What is important to her is that "I can easily get my husband's surname, and it will not be difficult for me to travel with my children abroad. The children have only their father's surname (...)". It can be observed that she is very positive when talking about getting the citizenship. Even though she did not get it yet, she will be very "proud to have them both", and she will consider it as a "great experience" of her life.

As she notes before, she is adheres to her ancestry, hence she speaks Romanian with their children. She explained: "I think it is important in a globalised world that we speak several languages, and it is also important for my children to have contact with the family in the mother's homeland." Furthermore, she tries to protect her Romanian identity by being

> [a] member of a Romanian association in Aalborg, which unfortunately is dissolved today, and I have Romanian friends here in Denmark, who are well integrated just like me. In addition, I keep some of the Romanian traditions and we go annually to Romania on vacation.

The last interview presents a woman also from an EU country. She considers herself half Danish and half Romanian, but she did not want to apply for Danish citizenship only just after the new regulation was promulgated that allows dual citizenship in Denmark or abroad. Her words reflect her strong connection to her roots, which is the reason she did not want to renounce to her first citizenship.

By the new law there is the possibility for many people living in Denmark to apply for a second citizenship and request the Danish one without renouncing fully their former identity. This will also encourage those, especially EU citizens, who came to Denmark studying and working and have been living in Denmark for many years, but did not want to give up their former citizenship. It could also help in preserving their national identity and culture while living abroad, as it will mean that they are accepted by their new home country, but they are still active members of their home country. A multicultural society will be rich and powerful with the condition that the people respect each other and live according to the norms of the country they came into.

6.2.2. Social surveys

Denmark is a favoured country to come to; while some are fascinated by the gratis and high-toned education in universities, others come to work for short or long term. Finally, many of them are attracted to settle down, as the living standard is higher than in many other European or Third countries. To observe the immigrants and their knowledge about the legal side of the habitation, as well as the conservation of their identity, two questionnaires were created and, building upon particular questions, divergent data was gained; these will be visualised on charts. The questionnaires were spread on a famous social media channel in order to reach many people. The questions were written in English, but the respondents had the possibility to respond also in Hungarian, Romanian or Danish; the consideration behind this was to avoid the possibility of not filling out the surveys because of an eventual weak expression in English. While the first questionnaire could be filled out by any immigrant, the second one was addressed only for those who cohabit with a Danish citizen. The first questionnaire was composed of 11 questions among which there were personal information concerning ones, such as age, gender, educational background, occupation, citizenship and personal insight related, like their knowledge about the legislation of the Danish citizenship, their opinion about the advantages and disadvantages of the citizenship compared with the permanent

residence permit, their willingness to apply for the citizenship. The second questionnaire, with six questions, was oriented only towards personal viewpoints, concerning the preservation of the respondents' culture and identity in a foreign country, cohabitating with a dissimilar individuality. Although the links were scores of time accessed for the Danish citizenship survey, there were only 79 complete responses and 76 unfinished answer-sets. For the mixed family one 19 complete and 21 incomplete answers were achieved. The examination of the two questionnaires, looking at the questions and answers seriatim, will be presented in the following. With the intention of avoiding generalisations, the results will be commented in regards to the respondents of the surveys, and not expanded to the whole group of immigrants.

6.2.2.1. Survey about the Danish citizenship

The first questionnaire, dealing with the Danish citizenship, was completed mostly by immigrants between the ages of 20 and 29 years old (Figure 1). This age range represents more than the half of the respondents, which suggests that the young generation is the most interested in the subject of citizenship, they are preoccupied whether to acquire for the citizenship or not. The second biggest group is the age range of 30 to 39, which also suggests that people in this age are concerned in this topic. Those under 19 years old and those above 50 are the less interested, according to the survey, perhaps because the first group is too young to reflect on it, and the latter class is satisfied with its situation in Denmark: maybe they are already Danish citizens, but it can happen that they do not want to become 'Danes'.

The second question of this survey reveals that almost two-third of the respondents are female (Figure 2). This underlines the aspect of self-government of the republican theory of citizenship, which states that only by active participation in the public affairs can people only be free. In this era of globalisation and rise of feminism, it can be noticed that women are more and more concerned with their political and civic situation in the world.
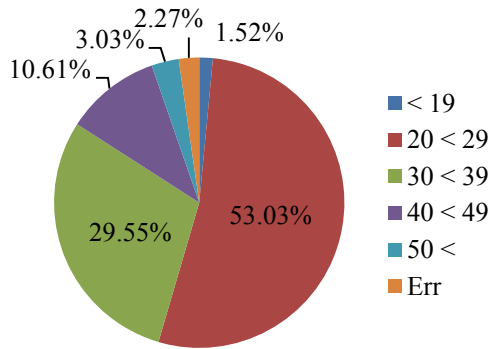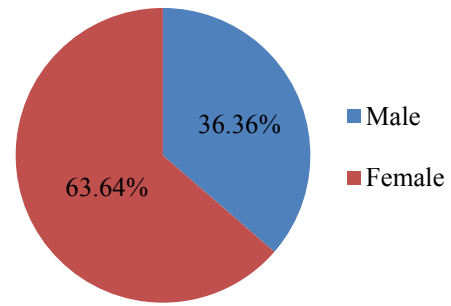
Figure 1. Age (years)

Figure 2. Gender

From the next question of the survey it can be seen that the educational background of the respondents is predominantly bachelor degree, and the second biggest group is the people who possess Master's degree (Figure 3). This means that, among the respondents of this survey, immigrants attending higher education are the most concerned with the topic of citizenship in the receiving country. This fact seems to allude to the liberalisms' social citizenship, because in that viewpoint the education is very important; it is the right of the citizen to be educated and hereby to be free.
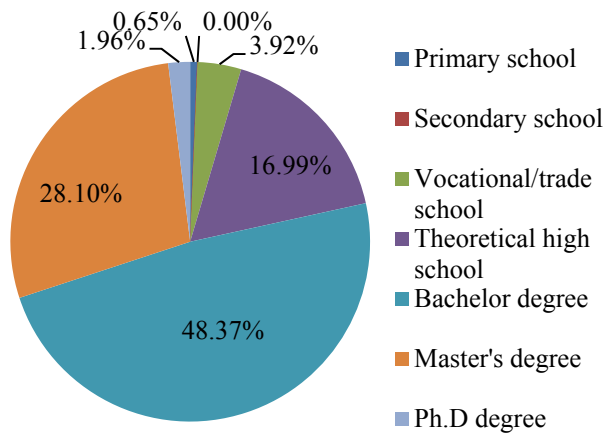

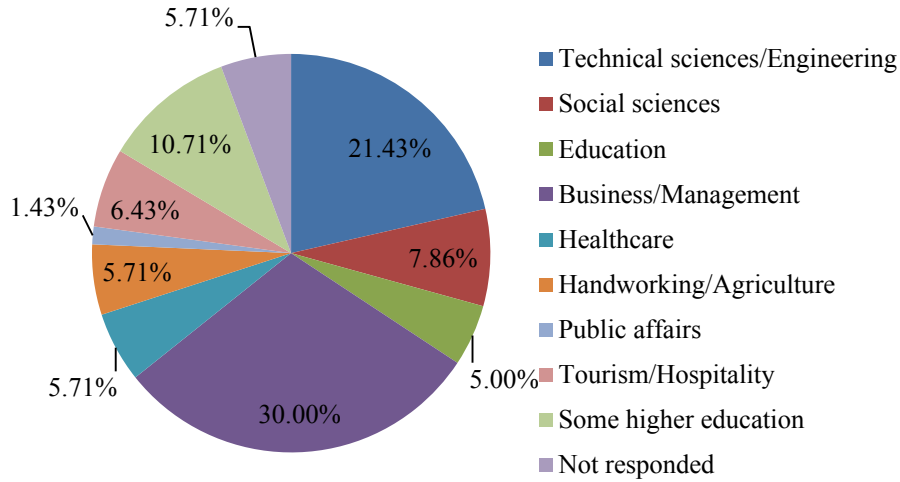**Figure 3. Educational background**

Figure 4. Study qualification

The following question dealt with the respondents' study qualification (Figure 4). The most part of them has either business/management education, or technical science/engineering background.

Regarding the primary citizenship of the respondents it can be observed that the major part of them is Romanian (Figure 5). This can be explained by the close collaboration of some universities in these two countries, due to which many Romanians come to study. The Hungarian citizens are also represented in a high percentage among the respondents.
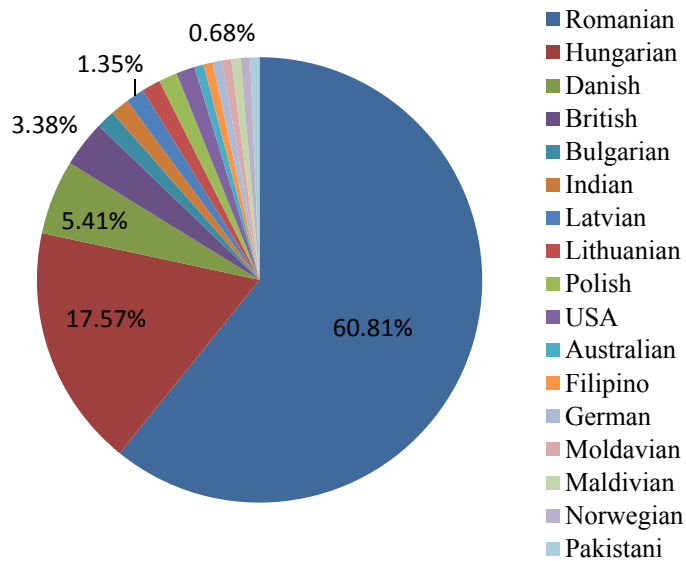

Figure 5. Citizenship

As it can be noticed, the majority of the respondents have been living in Denmark between 1 and 4 years (Figure 6). The second biggest group came between 5 and 9 years. This result suggests that the most concerned in the topic of citizenship are those who recently came to Denmark, those who are now building their life after finishing their education.

The next question was about the respondents' knowledge of the Danish legislation regarding the citizenship (Figure 7); more than the half of them has basic familiarity with the rules and norms. This can mean that they might be interested in obtaining the Danish citizenship.
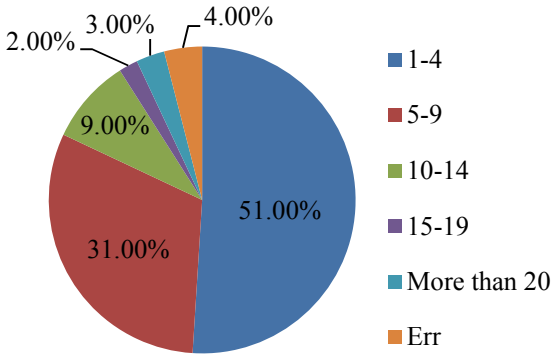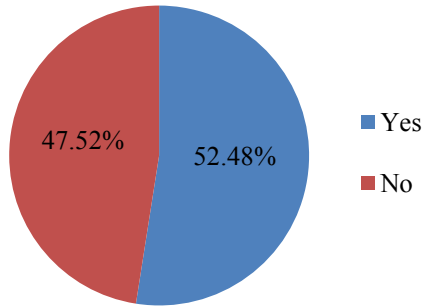

Figure 6. Living in Denmark (years)

Figure 7. Do you have knowledge about the legislation regarding the Danish citizenship?

The following question's aim was to reflect the advantages of the Danish citizenship compared to the permanent residence permit in the respondents' opinion (Figure 8). The majority of them answered that they have no idea about this. This can suggest that they actually have no knowledge about this, but it can also mean that they consider that there is no prominent benefit of the citizenship compared with the permanent residence permit. A considerable number of respondents think that the Danish passport is an advantage and makes travelling easier. The third group sees the influence of the citizenship in social benefits/pension; the capital is higher. The respondents also consider that the right to vote in the parliamentary elections is also an advantage; those having the permanent residence permit can only vote for local elections. However, this percentage of those who consider

political rights important is vanishing; only 16 percent of the respondents consider that the active membership in the community, and hence, "having a say" in the matters of the governance of the country, is crucial. Accordingly, it is typical only of this few respondents that they recognise the significance of republican approach of the citizenship in order to attain the personal freedom. Another benefit of the citizenship is in the labour market; the smallest group of respondents considers that is easier to find a job being a Danish citizen than being a foreigner. According to these percentages, for the majority of the respondents the benefits coming with the obtaining of the citizenship are important, they seem to put their own prosperity forward than the common good of the community, which could be achieved by taking an active part in the decision making process, for instance by voting. Thus, this suggests that they profess the liberal approach of the citizenship, which emphasises the individual identity, and not the republican one, which underlines the role of the obligations in the society, neither the communitarian theory, according to which the community takes precedence in contrast to the individual.
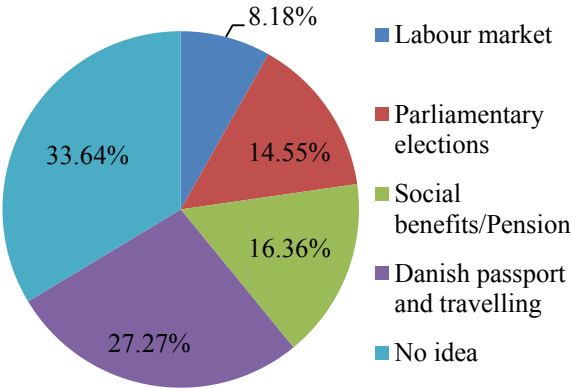

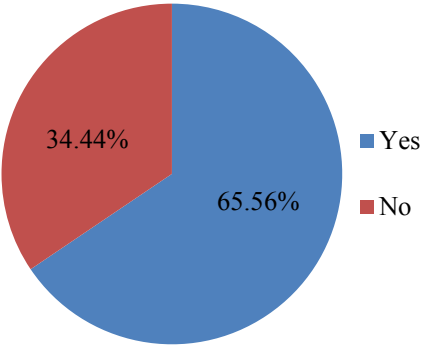**Figure 8. Danish Citizenship vs.| Permanent Residence Permit**

Figure 9. Would you consider applying for the Danish citizenship?

As it can be observed, approximately two-third of the respondents would deliberate on applying for the Danish citizenship (Figure 9). This can signify that they consider the previously enumerated advantages so important that they would like to partake in them.

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The answers for the next question were more expressive; the respondents were asked to motivate why they would apply for the citizenship or why would they choose not to. Due to the complexity of the answers, the presentation will also contain some quoted explanations. The respondents who do not want to acquire for the Danish citizenship can be separated into three categories. The first group contains those who are not willing to obtain the citizenship because of their national identity. They expressed themselves like this:

- "I am Hungarian and will remain Hungarian!"
- "(...) Taking other country's citizenship for me would be claiming for something that I'm not. I'm not Dane."
- "I do not want to give up on my citizenship!"
- "I do not care; I do not want to be a Danish citizen!"

The second category has the reason of not seeing the benefit of it behind:

- "I don't consider it to bring me any extra benefit at this point."
- "No need for it."
- "(...) unnecessary lose of money."
- "Permanent residence is more then fine for me."
- "I am EU citizen; I don't really know any reasons why a Danish citizenship will help me (...)"

This last opinion is worth to be analysed, as it points to a cosmopolitan identification; which perceives a post-national type of identity. The notion derives from a Greek word and it means "citizen of the world". This idea, which attaches to Immanuel Kant, a German philosopher from the 18th century, defines substantial visions in moral and socio-cultural philosophy, and categorises the nations by examining the state-based identity. While the traditional approximations to citizenship, such as the liberal, communitarian and republican theories, affirm the rights and duties which the members of bordered sovereign states have, the cosmopolitan approach repudiates this angle and emphasizes, contrary to the previous theories, that citizenship has significance when is detached from the

national state. According to this approach, the individuals have moral responsibilities towards every other human being and European countries should be observant of the Third Country Nationals' independence. Cosmopolitans, as this latter respondent, declare that people belong to a single community which is established on common morality. Cosmopolitanism has three strata, namely cultural, philosophical and political/institutional. Cultural cosmopolitanism is correlated with those who have relish for cultural diversity; philosophical cosmopolitans obey certain principles towards achieving global social justice, and political cosmopolitanism aim is to discover how the innovative types of governments and political institutions can be correlated to a more cosmopolitan regulation. (Guibernau, 2007; Linklater, 2007; Kleingeld and Brown, 2013) This post-national approach can be explainable, among others, in the EU citizenship, as it "represents a multitiered form of membership" (Soysal, 2011, no pag.), which is confirmed also by this response, the respondent being an EU citizen. Hence, from this answer received to the survey, can be deduced that this individual sees Europe as a territory without boundaries where every citizen enjoys equality; he perceives no differences between the member states' policies. Considering the type of the question he answered to, it can be stated that his cosmopolitan identification refers primarily to the philosophical cosmopolitanism, as s/he does not consider that the Danish citizenship would bring any extra benefit than the European citizenship; therefore, s/he alludes to the social justice. As it can be noticed, cosmopolitanism is the opposite of the communitarian citizenship approach according to which individuals' obligation to fellow citizens supplants any responsibility to profit humans as such, or that there are duties only when there are close, collective relations (Kleingeld, 2013).

The third group is represented by the respondents who are not sure about what to do; they will probably leave Denmark for returning home or to another state:

- "Not intend to stay in Denmark very long."
- "I will move back to Hungary."
- "I don't know yet."

- "(...) but I might change my mind."

The reasons behind the willingness for obtaining the citizenship are various. As two respondents formulated:

- "I think it's one of the most valuable passports is the world!"
- "Because I deserve a better life!"

This second answer is a vigorous liberal statement, as it seems to hint at the state's duty to assign and defend the rights of the individuals. After obtaining the citizenship, the state has to secure the undisturbed exercise of people's rights in this viewpoint. Thus, the state is for the people and not vice-versa. As it may be supposed, this welfare is desired to be obtained in the private sphere of his/her life, and not in the political field.

There are many people who answered that they want it because they established family in Denmark and they intend to stay in the country. One respondent stated:

- "I want a better future for my children (...)."
- "I am considering living the rest of my life in Denmark. I am actively involved in the Danish society, educational and workforce. My children are born and will be raised here so I find it natural for them to obtain the Danish citizenship. My family and I have invested in this country."

This last answer reflects the republican ideal of the citizenship, as it clearly states the importance of the active membership in the society. "Investing" in the country by public and civic participation leads to personal freedom. In this approximation, the integrative effect of participation can be observed, which brings people together and assures a better functioning of the society.

- "Among the other benefits, being interested in politics, I could work in that field. However, this is only possible if I become a full member of the society."

This is an excellent example of the republican participation's educative impact, which involves practising citizenship by the utilisation of abilities and proficiencies which cannot be applied in other domains of life. In these two last answers it is recognisable the republican principle pursuant to which citizenship is rather a practice, than a right.

For others, the belonging in the Danish community is important:

- "Being an accepted part of the Danish community adds to my personal life."
- "Becoming a real Dane means that social relationships will be built with Danish people and the society will accept me. If I will be a part of them I will feel good, because relationships mean a lot for me. I just want them to accept me as one of them."

These answers reflect the communitarian perspective of the citizenship; this people place accent on the belonging in the community. Communitarians state that one's identity and personality evolve owing to the relationship with the other members of the community; this fact is being underlined also by these responses.

Furthermore, a great number of the respondents consider Denmark a more organised and stable state compared to the country they come from. Similar to these responses, there are the British citizens who would like to become Danish in order to be able to keep the EU citizenship if the United Kingdom decides to leave the EU. In addition, some people are afraid of the changes that might occur in the immigration law and they would be forced to leave the country; therefore, they would like to secure their life in Denmark. Among the responses there are many that would like the Danish citizenship in the interest of escaping discrimination. For instance:

- "(...) I avoid small occasional discriminations in contact with Danish society and Danish authorities, because of being X[7]-an. Xs have an unfavourable reputation in Denmark."

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[7] X referring to a state or a nationality in Eastern Europe.

- "When people hear that you are Danish they get a different reaction, compared to when you say you are from X."

Danish citizenship is also an advantage when talking about job opportunities:

- "It may give me better job opportunities (e.g. in the political or public sector) and may give a more positive image of me for Danish employees if they see that I'm a full citizen of their country - it means a lot to Danes if they see officially or unofficially that you like them. A Danish citizenship and passport may also give more easy access to various countries and international opportunities."

Here the liberal tradition of the citizenship is in the forefront. S/he appears to refer here to Rawls' 'justice of fairness', meaning that by accepting the 'original position' the equality can be achieved and social partnerships can be maintained.

Other respondents also consider the Danish passport a great benefit:

- "Wider visa possibilities."
- "Because it will be easier regarding passport, identity."
- "(...) travelling to USA without applying for visa."

Moreover, some respondents said that they already consider themselves Danish. They are integrated well in the society and they would like to make it legal:

- "After living so many years in Denmark you start to feel Danish in a way. This will help further with my integration."
- "I have been living here for 4 years and I feel like a half-Danish so I want to one and it makes all application easier too - job, social support etc."

Additionally, there can be noticed from the replies that many people started to consider applying for the citizenship only after the dual citizenship law has been introduced in 2015:

- "I'm only considering it now that dual citizenship is introduced."

- "Only if I can get to keep mine as well. I have nothing to lose by having both."
- "I wasn't considering it when I had to give up my Romanian citizenship. But if I can hold both, I would like to be able to vote in Denmark and I'd like to have 2 passports."

The example of those who desire to have double/multiple citizenship indicates the significance of the multicultural citizenship to these people. For them it is important the preservation of their identity and the possibility of maintaining their culture, but at the same time they want to be accepted as a full members of the new community.

When it came to the next question about preserving the identity, there have also been various responses given. Only a few people replied that they do not maintain their origin:

- "I do not care about the sin I was born with." – meaning that s/he considers his/her nationality equal with a crime.
- "I am not interested in these aspects."
- "I am a world citizen. National identity and culture are outdated irrelevant and useless concepts; citizenship is only to qualify for benefits and advantages."

This last answer can allude to the cosmopolitan identification; the citizenship connected to national states is worthless. As s/he considers the culture also insignificant, it can be deduced that s/he aspires after a homogeneous world where everybody is uniform. Fortunately, Europe is not homogeneous; even though its borders are open, every country retains its uniqueness by culture, traditions, language.

There were a few answers which highlighted that not the origin is important, but being a human being. Such as this reply:

- "My identity is who I am, not who wants others me to be. I am first a person then a citizen. Due to this I do not judge a person based on her/his origin but

on her/his attitude and skills. Keeping an identity is just for me to remember from where I came but not for others. It is a personal value different from person to person."

This answer also reflects a cosmopolitan worldview, where the origin and identity are not important. In turn, the principle of hospitality and morality represent the base for the relationship between the people.

There are some common activities that can be noticed almost in every response. Every individual who is preserving his/her identity uses the mother language on daily basis, teaches his/her children the language, follows the cultural traditions, prepares national dishes frequently, speaks to others about his/her the national background and has friends from the same state s/he comes from. Furthermore, the respondents also celebrate the specific holidays of the state of origin, as well as they also visit the home country regularly. Additionally, many of them are parishioners in their religion or are members of different organisations. Some of the respondents believe that it is also important to participate at the elections in the country of the origin and not to resign to the disadvantageous fate of it.

According to a respondent it is crucial to find the middle-course between the cultures:

- "I believe in Interculturalism; which means a blending of cultures. One can not live in a country and not be influenced by its norms, values, and lifestyle. At the same time, I think it is not healthy for the individual to loose his origins. By denying one's background or by refusing to adapt to the new environment (e.g. a new country) an individual can not live a fulfilling life and the society functions poorly as a divided organism."

This response reflects a communitarian approach, as it emphasises the diversity within the unity. It is clearly visible the communitarian value affirming the connection between the individual and the community. In consonance to this viewpoint and considering this answer, it can be enunciated that as a result of the

individual identity being partway created by culture and social relations, the rights can be developed only in connection with these social contexts.

The questionnaire was accessed by 728 people on the social media and other forums, not responded 582, partly completed 76 and fully completed by 70 people (Figure 10).
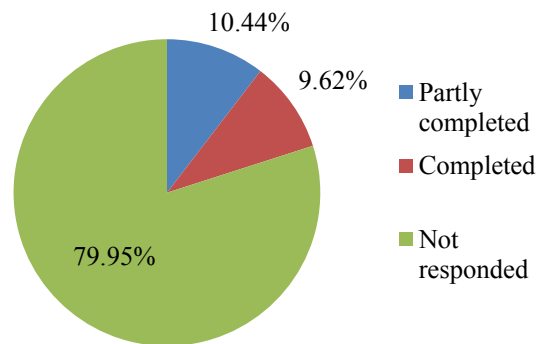

Figure 10. Status

6.2.2.2. Survey about the mixed citizenship families

The second survey aimed to reveal how the different cultures are preserved in a family which is composed by two various citizenships, Danish and another. This fact is interesting to explore as by living in Denmark with a Danish spouse it might natural that the 'foreigner' to melt into the Danish folklore, disregarding his/her own culture. Yet, as it can be observed in the received responses, almost every immigrant aspires to preserve also his/her identity, culture and traditions.

There are many, different citizenships among the respondents; this variety can be seen in the following charter.
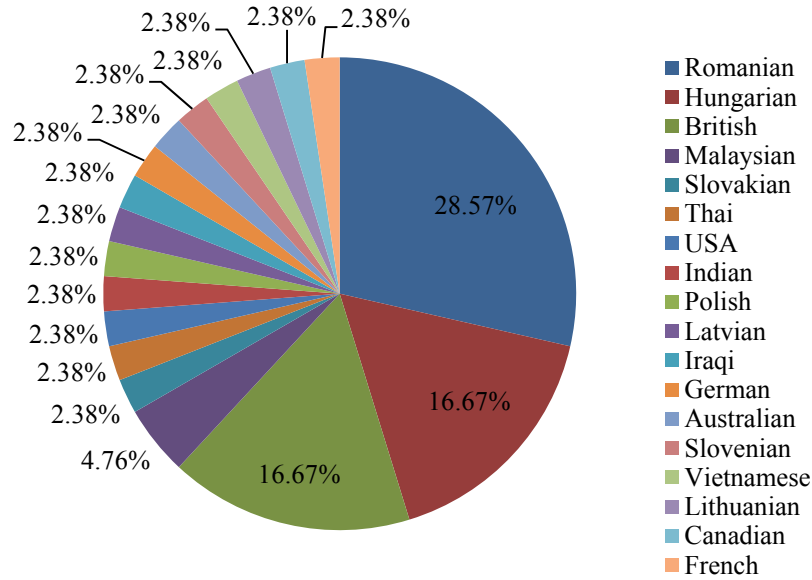
Figure 11. Different citizenships in the family

The next question referred to the communication language in the family (Figure 13), as well as to the level of the language knowledge of the respondents' children (Figure 12). It is surprising to discover that among the respondents there are more in number those who communicate only in English in the family, than those who use Danish. The second biggest group uses both languages. To the question if the children speak both languages at the same level, almost half of the respondents answered that they do not have children or they did not answer this question at all. The other little more than half of them can be divided into two groups. It can be noticed that the number of those families where the children speak both languages is higher, which also shows the intention of maintaining both cultures within the family.

Initially, the intention was to quote the responses for the following question alluding to the actual preservation forms of the own culture, but the answers were so much alike that it was possible to 'translate' them into a chart (Figure 14). As it can be noted, the most prevailing forms are for preserving the own culture is the utilisation of the mother language, preparing and eating national dishes, celebrating the traditions of the country of origin, as well as visiting the family 'home'.

Furthermore, reading books, watching entertainments and films, and listening to music in the certain language is also common.
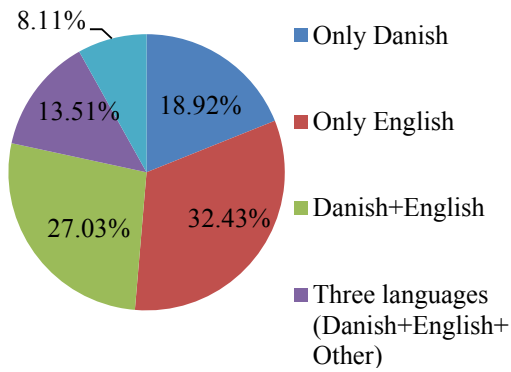
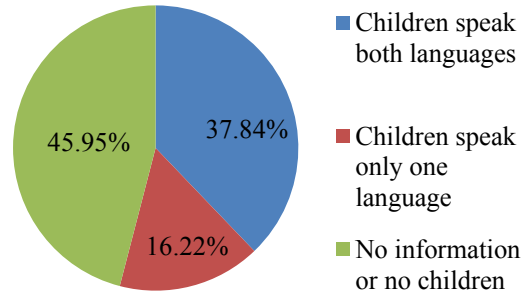**Figure 13. What languages do you speak in the family?**

Figure 12. What languages do children speak?

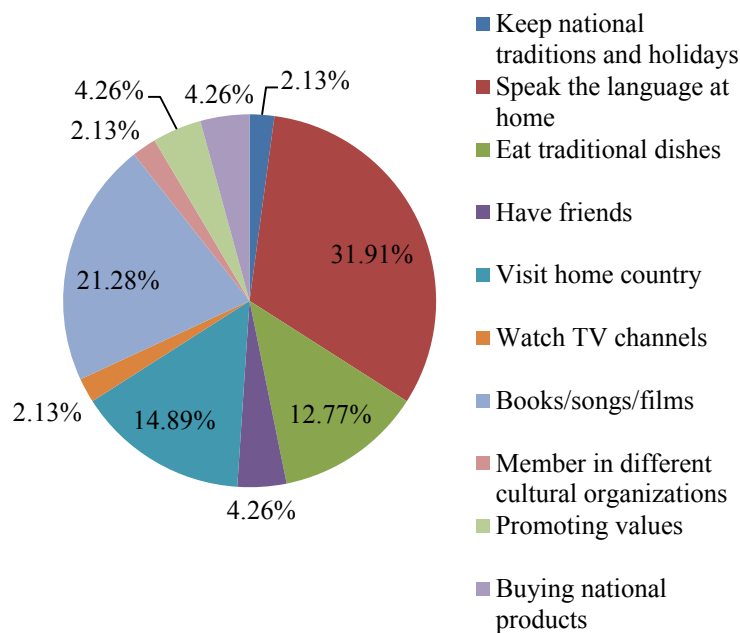**Figure 14. Preserve the "other" culture in the family**

The purpose of the next question was to find out the parents' approach towards the uni- or mixed-cultural rearing of their children. Those who do not have children answered that they would like their children to be raised as mixed-cultural persons, because they think it is important to have knowledge about both cultures of their parents:

- "No children in my family yet. The plan is towards a multicultural identity, through language first and contact with both cultures (and not just Romanian and Danish)."
- "I don't have any children, but the plan is that they would speak both languages and have knowledge about both cultures."

Among the total number of responses, only two were towards the uni-cultural up rearing of the children. They motivated this as follows:

- "Danish as I have little connection to England myself."
- "Not educated to be either, just Danish."

There were also some answers with nuance:

- "My children are not directed one way or the other. They are very normal Danish people with the additional aspect that they have Australian family and can speak English very well."
- "Probably more directed to British at home because they get so much Danish influence at school. Their home life is British and their school life is Danish."

The majority, yet, unequivocally stated that in their opinion the mixed-cultural rearing is the best choice on behalf of the children:

- "Mixed-cultural; feels and comes naturally."
- "Totally mixed. It always mattered to us that they grew up understanding both cultures and both traditions. Yes, they are different although it is just Germany and Denmark we are talking about."
- "Mixed cultural. It is important they feel that way because that is their identity. Although it is not always easy as in Denmark sometimes people do not accept being different is a good thing."

Similar to this previous answer, there was another one which points to the fact that some Danish people 'vaunt' Denmark:

- "Mixed, mainly because I myself grew up all over the world and cannot stand nationalism for nationalism's sake and especially the extremely irritating Danish version (we are the best at everything, the happiest, etc.)."

The majority of these answers suggest that for these people the multiculturalism and, together with it, the multicultural citizenship is important, and they promote the protection of the distinctiveness of diversified cultures. At the same time, they see the interaction and communication vital between the different cultural backgrounds; these people want to create a link between the cultures present in their families. This approach is often referred to as 'interculturalism'. Yet, this last answer seems to point to the cosmopolitan worldview.

It is visible from the next chart that the majority of the respondents' children have double, even triple citizenship, and merely a few (one quarter) have only the single Danish citizenship (Figure 16). The double/multiple citizenship can involve the multicultural perspective, as the more citizenship one has, the wider approach of the world can engage.
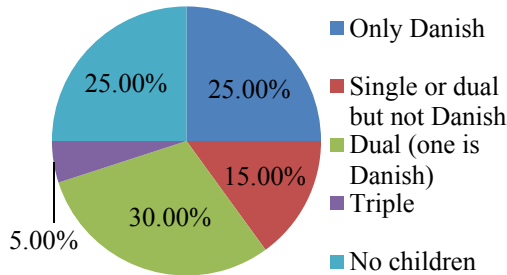
Figure 16. What citizenship do your children have?

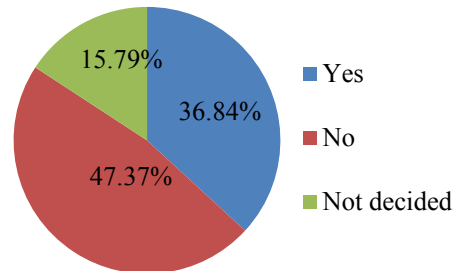**Figure 15. Has the one of you who has 'the other' citizenship considered to apply for the Danish citizenship?**

The last question concerned the respondents' tendency to apply for the Danish citizenship (Figure 15). For the majority of them it is not important, and it does not matter in their life:

- "No, keeping your roots is important."
- "No, we do not see the need for obtaining Danish passport."

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- "No. Legal citizenship makes no difference to our life. As long as the European project is alive and there is no threat of forced separation, there is no particular interest for citizenship."

A vague form of the cosmopolitanism is again represented in this last answer. Here again is mentioned Europe, as a common territory where the state-based identity is insignificant.

There were also people who responded the contrary:

- "Yes, I want to be a legal part of this country."
- "Yes, because that would make me feel fully integrated, as well as bring some extra benefits."
- "Yes. As I have no plans to return to UK. Haven't done so yet as it was advantageous for my children to be dual citizens."

The questionnaire was accessed by 43 people on social media and other forums, not responded 3, partly completed 21 and fully completed 19 (Figure 17).
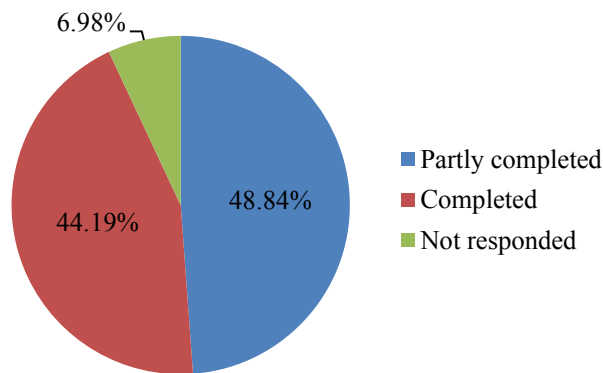

Figure 17. Status

After examining the interviews, the survey responses, as well as comparing them with the theoretical framework earlier presented, it can be stated that in the Danish

citizenship model all three theories are discernible. In the following this model will be presented.

6.3. Citizenship model in Denmark

In the followings the Danish citizenship model is analysed from the perspectives of the three main approaches presented in the theoretical framework. The Danish citizenship model can be considered as a *liberal* model if considering the thoughts of Marshall (1963). In his perspective all that possess the same status being citizen of the same country are equal and have equal rights. The Danish society is also based on equality, citizens or simply residents are treated equally (education, health care, work and tax rights). This leads to personal freedom. Similarly, the social protection system of the country points towards equality by ensuring a decent lifestyle even for the poorest layer of the population and imposing higher taxes (tax system with many steps) to the layer with higher income. This self-supporting behaviour of the society on the other hand is out of key with the liberalism of Locke (1690) according to whom the individuals have only one responsibility, namely to be observant of other people's rights to life, liberty and property; all the other obligations are established by accord. The Danish society is structured so that it is supported by the individuals in form of paying high taxes and being organised in a powerful social support network. In contrast to this, in some other societies the individuals are supporting themselves by having different private insurances and not caring about the rest of the society. In these cases the public social support is very weak.

By analysing the criteria of obtaining the Danish citizenship, it underlines the *communitarian* character of it. It emphasises rather on the obligations, such as speaking and writing/reading the language, being self-supportive, having no criminal records, etc., than on the actual rights that might come with obtaining the citizenship. This also reveals from the fact that the all-time governments do not consider a priority the promotion of the advantages of applying and receiving Danish citizenship but impose different obligations to those who intend to apply for

it. The communitarian character of the Danish society is also reflected by the integration model of the country.

The requirement of being active member of the society within different associations for obtaining residence permit or citizenship highlights some aspects of the *republican* character of the Danish society model. The structure of the taxation system which is explained with and the income is visibly used for public welfare is a good example to stimulate people take into consideration the public good beyond the pale of their own personal life. By obtaining work/residence permit or citizenship in Denmark one instantaneously faces the characteristics to this welfare system. Republican thinking is visible already from the kindergarten where children and supported to take actively part in the decision taking and develop their opinion at an early age on different matters. This is well summarised in Rawls' quote, presented earlier, where he explains how the liberalism and the republicanism should be merged; the Danish society is a good example of following these ideas by encouraging people to think individually and in the same time give the possibility to each member of the society, especially if having Danish citizenship, to take actively part in the decision making process and political debates.

With the increased number of foreigners settling down in Denmark in the past few years, the governments started to pay attention to the cultural differences which now interfere in the country. In these new tenors emphasis is put on supporting the cultural identity and recognition of the newcomers to find their place in the society. Nevertheless, the *multicultural citizenship* has advantages but also has some hazards. If the immigrants are original from similar cultural background and have similar ethic moral rules as the destination state, the integration is easier because they have many things in common, only their mother tongue and some local cultural habits will differ. In case when the immigrants have different moral and ethical values originating from their home country's culture and cannot or do not want to accept and obey the rules and laws of the receiver country, their integration will be very limited or it will never happen. As a result, they will be landing and living in parallel communities in the destination country, will feel segregated by the

society and that might lead to radicalisation, could end with criminal acts and expulsions from the country. The regulations must consider these factors and try to prevent the marginalisation and segregation of these ratings of the society mainly by educating them the characteristics of local society and make it attractive for them. Regarding multicultural citizenship a border must be placed between the liberal approach of citizenship - considering the freedom of the individual and letting him/her manifesting his/her former life in the new country - and the republican/communitarian approach of imposing obligations – fully integrating or assimilating the immigrants in the society.

This chapter examined Denmark nationalisation policy with its different requirements, which were in permanently modification with the changes of the governments. Furthermore, the interviews and the social surveys were presented and evaluated in relation to the different approaches of the three main theoretical frameworks, namely the liberal, communitarian and republican perspectives. In addition, the multicultural approach, as well as the cosmopolitan belief was also explored in relation to the answers. At the end of the chapter the Danish citizenship model was presented, which includes all the three theoretical perspectives.

7. CONCLUSIONS

The purpose of this thesis was to answer the research question "**What characteristic does the Danish Citizenship model show in perspective of the basic citizenship models, what are the similarities and differences of the Danish citizenship in comparison to the permanent residence permit and what is the attitude of the foreigners towards these two institutions"**. In order to gain a broader picture about immigrants and their social lives in Denmark, **"How the immigrants from different countries and social backgrounds manage to preserve their cultural identity after obtaining Danish citizenship and becoming active member of the society"** was also examined. In the interest of finding the pertinent and relevant answers for these questions, distinctive research

methods, a combination of both qualitative and quantitative techniques, were used to unravel the immigrants' legal situation in Denmark.

According to the Global Legal Monitor (2015), Denmark has one of the toughest naturalisation legislation in Europe, even though the requirements for applying were constantly changing as the governments varied; the stricter conditions were softened and then stiffened again, together with the inclusion of new demands. Today the stringent requirements are in force; the applicants for acquiring the Danish citizenship have to accomplish various severe requirements regarding their ability to speak the language, their knowledge of the state's society and history, their residency, as well as in regards to the quarantine time for their criminal behaviour, if it applies.

As by living many years in the destination country, people might desire to become citizens of that state. Therefore, the aim of this thesis was to investigate the immigrants' opinion about choosing the Danish citizenship or remaining with the permanent residence permit. This, in both cases, implicates many challenges, for instance adopting different cultural characteristics of the hosting nation, accepting its legislation and becoming a fully active member of that specific society. The utilised data for this thesis was a combination of primary and secondary information. The primary data was collected through interviews and social surveys. While the interviews were analysed by grounded theory, the surveys were interpreted through content analysis. After reviewing what had been said in the interviews, as well as the results of the surveys, it can be concluded that, although the Danish citizenship has more advantages for immigrants living in Denmark, the majority of them coming from an EU member state considers that the permanent residence permit is sufficient enough. These benefits refer, *inter alia*, to the capacity of voting in the parliamentary elections, to the ability of occupying certain political positions, to the incapacity for deportation for serious crimes, to the preservation of the residency after staying a longer period abroad, to some social benefits, such as the superannuation allowance, which is lower for the permanent residents, or to the easement of travelling. Certainly, there are people who prefer

the obtaining the citizenship for various reasons. Those who incline towards applying for the citizenship do so mostly in consideration of securing their future; many of them think that in today's unpredictable political situations it is better to belong to a more stable, stronger, nation than the nation of origin. This was, for instance, a primary argument for the British citizens; they are pessimistic regarding the United Kingdom's status in the EU. They would like to keep their EU citizenship, which is only possible if a member state's citizenship is also possessed. Furthermore, not only security and the wherewithal are important for those who apply; the sense of belonging, dignity, and acceptance mean a lot to them. Many of the applicants are not satisfied with their national affiliation, they do not feel any attachment to the country of origin; as it could be noticed also from the surveys that there are some people who feel themselves discriminated by others due to their origin. Obtaining the Danish citizenship would help them to feel comfortable in their everyday life.

Contrary, as the examination of the different laws and regulations demonstrated, the Third Country Nationals face a few distinction when it comes to the conditions that have to be fulfilled in order to get the permanent residence permit or the Danish citizenship. As these stipulations are similar, the acquiring for the Danish citizenship in long term is more beneficial for them. Otherwise, they will have to confront with more severe administrational and legal constraints. When asking them by means of the interview or survey, almost all of them choose to acquire the citizenship.

From the data obtained it also lightened that one can peacefully live in Denmark and preserving his/her identity and culture, as long as respects the rules of the country and other people's origin and culture. It could be noticed that the Danish citizens cohabiting with other citizens do not hinder them in the exercising of their values; nor yet they assist their partner in doing so. From 2015, when the law of dual citizenship came into operation, those who aspire after becoming also Danish citizens do not have to give up their original citizenship, and simultaneously their identity any more. For these people the multicultural perspective is very important,

as they aspire to be accepted as full members of the society, but at the same time to be able to preserve their identity and culture. This law concerning the dual/multiple citizenship is retrospective, which means that those who have lost their original or Danish citizenship may now claim it back. This change in the policy can encourage many immigrants to apply for obtaining the Danish citizenship.

Citizenship, in general, can be explored from the perspective of three main theories, *videlicet* the liberal, communitarian and republican sights. The Danish citizenship it is approachable from all three perspectives: it is based on equality, therefore it promulgates the liberal point of view; the criteria for obtaining the citizenship have a communitarian nature, as they are more based on the obligations than the actual rights that might accompany the citizenship; the active membership in the society is a requirement of the republican thinking. As the primary data also reveals, people have different viewpoints in regards to the theoretical perspectives of the citizenship. Many of them consider citizenship as being a liberal concept, and although not in that radical way as in history, but yet think that the state is subordinated to the individual, and its task is to support and defend the individual in the exercise of its rights. Those who promulgate this approach are mainly concerned with their own life and benefits, disregarding the community, being passive towards the political matters. The communitarian perspective was not very represented in this research; it was not placed much pressure on the community belonging. However, there were some people who, alike the communitarians, consider that individuals' social identity and character are more formed by community relations than by individualism. By being an accepted member of the community one can have freedom. The republican approach was also typified among the answers. These respondents see the value of the citizenship in being an active member of the society, holding popular sovereignty. This means that the authority of a country and its government is constructed and maintained by the agreement of its members, through representatives.

As it can be concluded, active citizenship is one of the most substantial steps in the interest of healthy societies. Instructive programs need to be expanded in order to

develop communication and cooperation, to decrease prejudice, to rear patience towards each other and to be more open to diversity. At the same time, these characteristics have to be representative also among the permanent residents, as being sympathetic to each other benefits the whole country.

As the thesis unfolds new approaches to study the social and economical attitude of immigrants settled down in Denmark, possibilities open for further exploration on the topic of how fast the immigrants manage to acquire the cultural standards of the hosting country, in what extent do they experience a cultural shock and what can explain an eventual rejection of living according to the rules of their new home. Another important question could refer to the possibility of monitoring the process of integration. If it is feasible, how and in what extent could it be observed without interfering too much in a persons' personal life? It could also be worth to investigate how and what could be improved at governmental and local level to create the proper conditions in order to stimulate the immigrants to take part more actively in the society.

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