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# Chapter 1: Introduction

The concept of citizenship is a recurring phenomenon whether it is in the field of academia or in the political world. Citizenship related to women is no exception.

In recent times, the debate (public and political) often includes comparisons between women and men and between women within a country or cross-countries. When the debate includes the citizenship of Arab women it often tends to focus on the poor and oppressive conditions particular when compared with e.g. Danish women. I want to study this comparison by comparing Danish and Tunisian women's citizenship[1] (well aware that Tunisian women do not represent the entire Arab female population). The point of departure is from an equality perspective, thus the perception that citizenship is an instrument to achieve gender equality. However, the perspective also includes the notions of participation and belonging.

From the time of Aristotle (384-322 BC), the notion of citizen and citizenship have been subjects to discuss, study, interpret, and define. A common public understanding is that a citizen is one who has rights granted by the state, which constitute rules of behavior. Rules or rights that are defined in the Constitution or legislation. A citizenship do also consists of obligations such a voting, pay taxes, obey the laws etc. some addressed in laws and some are part of the expectation of normal behavior in the given society (Mathiason 1998:2-3). As a citizenship confers rights, it also sets criteria for inclusion and exclusion. Rights can be limited to certain groups however; the social norms of a society can also impede the practice of citizenship, thus creating a feeling of exclusion. Exclusion, which often applies for women, minorities, poor, and disabled. This make inter alia the notion of citizenship continues to be of interest, as it constitutes a "momentum concept", which according to professor John Hoffman means "'*unfold' so that we must continuously rework them in a way that realizes more and more of their egalitarian and anti-hierarchical potential*" (Hoffman cited in Lister 2007:49).

The basic elements of citizenship and rights have different interpretations dependent on political ideologies. The most dominant traditions are liberalism, civic republicanism, and communitarianism. The liberal tradition stresses the more passive citizenship within the minimal state, which presupposes a minimal citizenship. It focuses on the civil and political rights of the individual and equality between citizens, hence an individualist perspective in which every member of the human race have the same

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[1]In Denmark, there exist two types of citizenship: one in relation to the legal status (statsborgerskab) and one in relation to identity and affiliation (medborgerskab). In the thesis the two types are addressed as one combined.

value. The republic tradition is community-centered and within the community, there shall be a common bond between the citizens. The individual citizen must be involved in politics and the community, and in some part set aside its own private interest in favor of the common good. Citizenship in a republican view is not just about rights but also a matter of participation. A contrast to liberalism is communitarianism, which emphasizes solidarity and the sharing of a common understanding of what makes a community good this foster common values and obligations towards the community. Citizens are social members of the community rahter than indivudals (Korsgaard 2007:30-31; Bussemaker & Voet 1998:284-91). In 1950, the British Sociologist Thomas Humprey Marshall (1893-1981) introduced citizenship as an analytical concept in his classical work: "Citizenship and Social Class". In the essay, Marshall defines citizenship as a status given to those who are full members of a community and divides a citizenship into three rights spheres: 'political', 'social' and 'civil' (Marshall 1950:8,18). Marshall's definition have since been redefine and modified with elements such as affiliation, violence (including sexual), identity, reproduction (including the right of abortion), discrimination, gender, recognition, inclusion/exclusion, and equality in the political, social, economic spheres. Thus, the concept of citizenship has become an interdisciplinary, contested, and contextualized concept, with different definitions and related subjects (Siim 2013:757-62 Meer & Sever 2004:9). In addition, many different actors from academic researchers, politicians and organizations have shown an intense interest in the notion of citizenship related to gender (e.g. Phillips 1994, 1998; Friedman 2005; Lister 1997; Pateman 1988; Siim 2000; UN Women). One of the reasons that women's rights continue to be a focal point is the fact that the glass ceiling is not broken. However, progress has been made. Two milestones are the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW) (adopted in 1979 by the UN General Assembly). CEDAW requires all countries, who have ratified it, to eliminate all hindrances for citizens, regardless of sex, to have equal possibilities and equal rights in all aspects of the society (UN Women 2009). The other main declaration is the Beijing Declaration and Platform for Action (adopted in 1995 at the UN's Fourth World Conference on Women) in which among other the promotion of women's (political) citizenship and the so-called "critical mass" are addressed. The latter refers to the objective of having minimum 30 % women in positions at decision-making levels (UN 1995:79). These conventions and declarations, among others, have made important progress on the view of women's citizenship and emphasized that the state must promote and provide gender equality. The work of ensuring gender equality and gender justice worldwide are also to ensure the opportunities of the women to be an equal part of the society in the labor market, the educational system, and in the family and thus to

eliminate all forms of discrimination against women. Equal rights and equal opportunities are the central of a "full" citizenship (at least in this study) many countries around the world are step-by-step closing the gender gap. However, women are often *de facto* limited in their opportunities to be a full citizen in their own societies or in the words of Marshall "to be a full member" and are therefore not being perceived as equal citizens. Women experience being denied rights and opportunities in the public sphere simply because they are women (Andersen 2002:164-165; McLaughlin 2003:37). As researchers, Shamim Meer and Charlie Sever express in the Bridge Gender and Citizenship report (2004): "*The status of citizenship is not enough without the conditions to enable such citizenship to be experienced or practiced. Formal − i.e. legal − equality is not sufficient to ensure women can access rights*" (Meer & Sever 2004:19).

## 1.1 Denmark and Tunisia

The point of departure is the citizenship of Danish and Tunisian women. Denmark and Tunisia are two very different countries based on socio-cultural factors such as religion, culture, history, politics of gender equality etc. Furthermore, the two countries are also both recognized as role models concerning women's rights and gender equality. The trajectory to this status have been differ. This is inter alia why it is interesting to study the citizenship and practice of the women in these two countries.

In 1849, Denmark became a democracy with a written Constitution, which became the breakthrough for the undramatic fight for women's rights. 66 years later, 1915, women achieved the right to vote and the struggles for women's formal rights were a reality. The fight was strongly promoted by women's movements however; the rights and the women friendly policies could not have been achieved without the collaboration of politicians, parties and unions (Dahlerup 2013:147). The Danish case is opposite of Tunisia. Tunisia's proclamation of independency from France in 1956 began the state building process in which women's rights were expanded (in some aspects developed). The first wave of women's rights was as adopted by a top-down approach. In the 1980s, women's movements became an important role in advocating of rights and further liberalization of women (second wave of rights) (Gold Mercury International 2015:1; Charrad 2007:1515-26) (elaboration on the development of women's rights in Denmark and Tunisia see Ch.5). Legislation is one important factor concerning the citizenship of women however, the perceptions of gender roles are assessed essential in the practice of women's citizenship. Gender roles, which may reinforce the so-called public-private divide. The public-private division refers to perceptions on women and men's roles in the society.

The role and responsibilities of the woman is within the private, thus placed in the family, caring and child rearing. Whereas the role and responsibilities of the man is in relation to decision-making, formal politics, economics and the workplace (Meer & Sever 2004:18). This thesis includes the public-private divide in order to clarify if traditional views on women and men still are actual and if these have an impact on the citizenship. Denmark and Tunisia are respectively a Christian and Islamic country, which do not quite have the same view on the woman. However, common to both religions is the public-private divide, which in general terms place the woman in the private and the man in the public sphere. Religion is included in the thesis as a "supplementary explanatory factor" primary within the scope of gender roles. As gender roles often are rooted in religious interpretations on men and women and their interactions, as they are expressed in the sacred scriptures (this is indeed influenced by how the text are understood; allegorical or literal) (Fibiger 2016).

## Chapter 2: Problem formulation

The thesis aims to study women's citizenship with a focus on rights, participation, and belonging. It seeks to compare the citizenship of women in two different contexts however, in two countries that both are characterized as role models concerning gender equality and the liberalization of women. The comparative design provides the framework to clarify which differences and/or similarities there may exist despite differences in the historical, cultural and political culture of the countries, as a citizenship is dependent on. The aim of this thesis is to contribute to a broader and diversified understanding of citizenship and gender, and aims at emphasizing the women's point of view.

The problem formulation of the thesis is:

*What are the differences and similarities between Danish and Tunisian women's citizenship when the analytical focus is rights, participation, belonging, and which factors affect these elements?*

The problem formulation is complemented by two hypotheses:

- The public-private divide in Tunisia and Denmark is determinant for the *practice* of women's citizenship.
- The citizenship of Danish and Tunisian women differ due to the Tunisian society relics from a patriarchal structure in which the laws privilege men.

The first hypothesis concerns whether the gendered public-private divide determines the women's practice of their citizenship. I seek to test if the perceptions of gender roles within the division affect and/or impede women's maneuver room. The perceptions being that the women belong in the private sphere and the role of the men is in the public sphere. The public-private divide covers often the unequal relationship related to rights based on gender (and race, class, ethnicity). This hypothesis concerns the *practice* of the women's citizenship, as Denmark and in large part Tunisia have formal equality. However, reports e.g. World Economic Forum's report *The Global Gender Gap Report 2015* shows inequalities in e.g. economic participation and political empowerment in both countries, thus reflecting inequalities in opportunities and practice based on gender (World Economic Forum 2015:8,9).

The second hypothesis expresses the fundamental differences that exist in the two societies' structures. In addition, the issue of patriarchal structure in which women have a subordinate status is a frequent factor, which is emphasize when women are compared between Western and Arab countries. I want to study if the Tunisian society has "active" remains of such structures (kinship/kin contract)

and if so, whether they affect the citizenship of women. The kin contract is a factor, which do not exist in Denmark, thus it creates a possibility to study the effect of this on women's citizenship and practice.

## 2.1 Disposition

The first chapter was a short introduction to the subject of the thesis following by the problem formulation and hypotheses. The following section will briefly introduce the structure and content of the thesis. *Chapter 3* outlines the methodological framework of the thesis. The research design is the embedded single case design in which the method is comparative. The structure of the case study design includes strength and weakness (validity and reliability), which will be described including how to work with the potential limitations. The answer of the problem formulation is through a feminist research ethic and gender perspective, which have an effect on the interpretation of the empirical foundation and the preparation of the analysis this, is elaborated in the chapter. Chapter 3 also includes considerations concerning the selected theory and empirical material, as the majority of the empirical data is secondary, which should be taken into account. The data also include a self-completion questionnaire (primary data), which is elaborated in relation to the rationale for the questions and the implementation of the results in the analysis. The content of *Chapter 4* is the theory of the project being *citizenship* in which Marshall's perspective is the starting point and the elements *participation* and *belonging* are included. Chapter 4 concludes with the applied definition of citizenship and the operationalization of the theory. The focal point of the thesis is women's citizenship in two different context: Denmark and Tunisia. The countries is outlined in *Chapter 5* in order to provide the reader with some basic information regarding the development of women's citizenship. The former chapters provide the knowledge and analytical instruments to conduct the analysis of women's citizenship in Denmark and Tunisia presented in *Chapter 6*. The main objective of the analysis is to be able to conduct the conclusion and thereby answer the problem formulation of the thesis, hence *Chapter 7*. Finally, *Chapter 8* consists of a reflection of the overall process of the thesis.

Chapter 3: Methodology

3.1 Research design: Case study

To analyze the citizenship of women in Denmark and Tunisia this thesis applies the case study as research design. The American social scientist, Robert K. Yin (1941- ) defines a case study as: *"(…) an empirical inquiry that investigates a contemporary phenomenon in depth and within its real-life context, especially when the boundaries between phenomenon and context are not clearly evident"* (Yin 2009:18).

The reason for applying this design is due to the analytical focal point, which is the citizenship of women in Denmark and Tunisia with an analytical focus on rights, participation and belonging. This is best viewed in the context the women are part of (the "real-life context"). The context will inevitably affect, or in some aspects might determine, the women's citizenship and their opportunities to participate in the society (Sweetman et al. 2011:350). The comparison is between two different countries, thus the research design operates with "most different" design in which the countries share the same phenomenon (citizenship) but differ in socio-cultural settings such as traditions, values, history, and life style etc. These differences are assessed to be of relevance in the study, thus the specific design within the framework of case study is the embedded single case design. The choice of type of design means that this thesis operates with two different sub-unit of analysis being Denmark and Tunisia having the same overall analytical focus being the single case and phenomenon: Women's citizenship. Embedded units create the possibility to study the case of women citizenship in more detail i.e. the analysis includes factors, which are assessed to have an influence on women's citizenship more specific on the analytical focus elements of rights, participation, and belonging. Factors such as the legislation, social policy, norms, gender roles etc.  In addition, the embedded units enable the need for understanding the different intermediate units in order to understand/explain "the whole" functioning. This approach allows for a differentiated analytical understanding of the citizenship of women in Denmark and Tunisia. The research process follows the deductive research approach, as the data collection and the analysis are guided by theory. In addition, two hypothesis will be tested. The applied theory and existing research are used to understand the case of women's citizenship in Denmark and Tunisia – not to discuss the notion of citizenship from a theoretical standpoint. Although, the theory guides the research process there will be room for the so-called "deliberative moments". These make it possible to reflect over e.g. the interplay between data, theory and the different

outcomes in the research process, which can result in revisiting the different decisions (Ackerly & True 2010:43; de Vaus 2011:223-24).

## 3.1.2 Comparative method

The thesis is conducted as a comparative study, which applies a comparative method in order to study women's citizenship including potential similarities, differences, and which factors that affect the citizenship to differ. Comparative method as approach involves comparing and contrasting cases, which share some characteristics but differ on the analytical focal point women's citizenship (dependent variable), hence the selection of Denmark and Tunisia. The study becomes a search for patterns or the opposite – different outcomes in similar places or similar outcomes in different places to gain a greater understanding of the social reality in different national contexts. The purpose of the two hypotheses is to support the search for factors that causes potential differences of women's citizenship and their practice in both countries. The relic of a patriarchal structure in Tunisia and the public-private in both countries are considered as influential variables, the former only in a Tunisian context (cf. Ch.2). Conducting a comparative study create the possibility to study both the specificity within Denmark and Tunisia, and potential cross-national patterns (Samuels 2013:6; Ackerly & True 2013:151). The research logistic process is as follows: First comparative analysis then understanding of the outcomes and finally interpretations of the outcomes resulting in a conclusion. In statistical terms when a comparative study is conducted, attention must be drawn to experimental-, error- and extraneous variance. The design aim to maximize the experimental variance, minimize the error variance, and control the extraneous variance. Transferred to this project, the experimental variance is attempted maximized by the selection of Tunisia and Denmark, which differs in the independent variables such as legislation, cultural values, norms, participation, identification etc. The error and extraneous variance are attempted ensured and minimized by carefully selecting the data in the same way guided by theory and previous research in order to minimize variance in the women's citizenship from unknown sources (Peters 1998:8,30-33).

In order to compare the citizenship of women in their "real life context" comparisons between women and men in Denmark and Tunisia will provide the basis to compare the citizenship between Danish and Tunisian women. These analyses within the countries, where the comparison is between women and men are completed with a perception of gender as the primary category. This point of departure results in an application of intersectionality in which the approach is the *intercategorical* (developed by the American Sociologist Leslie McCall (McCall 2005)). I recognize the relevance and the benefits

of applying an *intra-* or *anticategorical* when study women and their citizenship (or the combination of several approaches). However, the intercategorical approach is found advantages due to the focus of this thesis. I have chosen to study the citizenship of women from an equality perceptive and from a more quantitative view, which is due to interest and available data. Qualitative data will however supplement the quantitative data (cf. 3.3.1). This point of departure, make that I study the (unequal) relationship between Danish women and men and Tunisian women and men. These relationships are dynamic, ever changing and contextual. The aim is to explicate the relationships, study the citizenship *between* the categories (being women and men). The relationship between women and men will clarify if and how the structural conditions of the countries' affect women's citizenship and their practice. Hereafter, a comparison between Danish and Tunisian women's citizenship will be made in order to answer the problem formulation (McCall 2005:1784-85; Jensen & Christensen 2011:81).

### 3.1.3 Validity and reliability related to case study and comparative method

Validity and reliability are factors, which should be taken into consideration when conducting a comparative case study. The first issue (in some views criticism) concerns the case study design and the issue of external validity. Due to the design and the small number of N, the external validity is lacking. It is not possible to make a statistical generalization in which the results and produced knowledge can achieve the status as universal and valid. However, case studies are generalizable to theoretical propositions, *analytical generalization*, in which the results can be indicative to other studies with the same research field (Yin 2009:15; Bryman 2012:47,71). Connected to the external validity is the small number of N, which often have many variables. Many variables can create another important issue concerning the validity of one's results. Many variables can become too overwhelming, thus affecting the possible relationships among the dependent variable (women's citizenship) and the independent variables by making them confusing. This situation will affect the internal validity and reliability by affecting the clarification of the results (in statistical terms: the risk of confounding factors and spurious relationship). This is minimized by focusing on key variables selected on the basic of the theory (rights, participation and belonging) (cf. Ch.4; 6.1) (Lijphart 1971:685). Furthermore, the internal validity is strengthened by creating sensible and plausible account of 'events'. Thus, creating a full picture of women's citizenship in the context they occur in, Tunisia and Denmark, resulting in a strong foundation for conducting the conclusion (de Vaus 2011:236).

## 3.2 Feminist research ethic & gender perspective

As the thesis objective is to study the citizenship of women it makes it inevitable not to look at the conditions of women in Tunisia and Denmark separately as well as comparably. The conditions of women here refer to the equality or inequality of women and men from legislation to gender roles. Therefore, is the thesis illuminated through a feminist research ethic and gender perspective, which emphasize the importance of attention to the relational context. A gender perspective on citizenship goes beyond the state by including factors such as women's opportunities, the perception of gender roles, and traditions all of which presumably affect the perceptions of the women's citizenship. The study of citizenship becomes more complex but more contemporary and realistic. Key elements in feminist research is to maintain a critical reflection on the unequal power relationship, which exists between women and men, and the exclusion of women in some part of the society (Ackerly & True 2013:136; Sweetman et al. 2011:348-349). This critical reflection will be applied throughout the thesis in order to study if these factors affect women's citizenship related to rights, participation and belonging whether the context is Danish or Tunisia. Feminist research ethic also requires some attention to the epistemology in which "it" perceives that knowledge is produced (construct) and the factors, which produced this knowledge (truth) shall be studied and critiqued if necessary (Acklery & True 2010:22,27). Furthermore, it is viewed, based on the epistemology, that the recognition of the social world is a construction. Thus, making the concept of citizenship a construction, which is affected by the perceptions of individual and the surroundings, which affect how citizenship is "performed" and perceived. Distinction can be made between "legal status of being a citizen" and "doing a citizenship"[2]. The latter, the citizenship is seen as social role and behavior. This thesis takes the approach of including both perspectives in the theoretical definition of a citizenship (cf. Ch. 4). In the ideal world (at least from a gender perspective), equal rights are universal and all human beings are to be treated equal however this is not the reality. Therefore, "doing a citizenship" is essential as it opens up the possibility to study if the citizenship as more than a legal status, and to study differences and similarities between the citizenship of women and men but also between women across nations. One must study the equality of outcome (in this study the women's experience of outcomes) and not just focus on whether men and women starts (are born) from a position of equality or inequality (Sweetman et al 2011:348-351). As journalist Caroline Sweetman and co. state: *"For many, the civil law is inaccessible because to use it would be so shocking and challenging to the norms of society*

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[2]Inspired from the notion of "doing gender" in which gender is something the individual does. Gender becomes an interaction and is created within the social-historical context and/or in the discourse.

*that to do so is actually an impossibility"* (Sweetman et al. 2011:351-352). The norms of a society affect the maneuver room, hence the importance of including the specific context, which in this thesis especially focus on the perceptions of gender roles and the relationship between women and men (gender as primary category cf. 3.1.1).

## 3.3 Data collection

### 3.3.1 Sources

This study applies quantitative and qualitative data. The primary data stems from the conducted questionnaire. The secondary literature is of both quantitative and qualitative research. It would be too fragile to base the analysis exclusively on the collected quantitative data (questionnaire), hence the application of multiple sources or triangulation. The foundation of the thesis is a broad range of secondary sources from academic articles and books to reports conducted by different organizations. The applied literature also includes news media and Danish and Tunisian legislations to give a more objective and nuanced analysis. The qualitative data are supplemented by quantitative data; my own conducted self-completion questionnaire (cf. 3.3.2) and statistical reports from national and international organizations such as UN and Inter-Parliamentary Union. The triangulation is assessed to strengthen the analysis of women's citizenship, as the findings can be cross-checked, which support the reliability and validity of the findings.

It should be emphasized that by applying secondary data it is a constraint that the data has been produced and interpreted for a different purpose than this thesis and therefore, the risk of that the data do not fit perfectly. Hence, the included critical view on the use of the data obtained through secondary sources. Furthermore, by applying secondary data as the main source there is a risk that it is not possible to find fully updated data, which is one of the reasons for the use of triangulation. Triangulation makes it possible to compare data from different sources within different perspectives, which enhances the corroborating evidence and thus the validity of the argument (conclusion) (Bryman 2012:313-18).

### 3.3.2 Self-completion questionnaire

In order to collect primary data within my resources and time (and due to my interest in quantitative method) I decided to conduct a self-completion questionnaire (questionnaires see appendix A and B).

By choosing a self-completion survey as method to collect the Danish and Tunisian women's perceptions of citizenship[3] the aim was to reach out to many potential respondents thus getting a diverse perspective on citizenship. This was assessed best possible with this type of questionnaire, as it is easy and free to disturb and it is convenient for the respondents; they can complete it when they want to. A disadvantage, in my view, to this type of survey are that the respondents cannot receive help if they have difficulties answering a question and the interviewer cannot ask the respondents to elaborate on certain questions (as in an interview). In order to 'optimize' the questions (clear and common understanding), the flow of the questions, and the length of the questionnaire pilot questionnaires were sent out to women with different age and educational background followed by short validating interview. The questionnaires were distributed on the social media Facebook. I chose to share it on Facebook, as this was assessed to be a quick way to reach out to many women and especially a way to reach out to the Tunisian women. Furthermore, an advantage of the distributing on Facebook is the possibility for a snowball effect, as users of Facebook have a tendency to share "things" on their own account, which make that their friends on Facebook can see the link to the questionnaire. This happen with the Danish questionnaire, which I assessed to have resulted in more respondents. I shared the Danish questionnaire on my own Facebook page and on different women/gender related groups, the Tunisian version was shared on several pages and groups related to gender, women rights, youth, human rights etc. In addition, I contacted different Tunisian organizations by email with the aim that they could provide me with advice on how to disturb the questionnaire and if they wanted to share it among their members. Thus, being as sort of gatekeeper to the field. These emails were unfortunately never replied. 163 Danish women and nine Tunisian women responded the questionnaires. The distribution of the questionnaire did not meet the requirements of representativeness (Linde 2013) and the collected sample do not in any way reflect the population studied being women in Denmark and Tunisia who hold a Danish/Tunisian citizenship. Thus, the results cannot be generalized. This was however, never expected due to the distribution (Bryman 2012:187; Linde 2013).

The thesis theoretical fundament of the project, citizenship, and the gender perspective are attempted captured in the questionnaire, and therefore the questionnaire is divided into the following topics: 'Democracy and rights', 'Participation', 'Belonging', 'Gender roles' and 'Trust' (cf. Ch.4). Furthermore, question 5,6, 7,8,9, 15, and 16 (the numbers refer to the Danish questionnaire, however, the

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[3]In combination with existing literature and research.

questions are also in the Tunisian version) are either inspired or from the survey *Citizenship II* version voted April 30, 2013 questionnaire from the International Survey Programme[4].

| Topic | Question* |
|---|---|
| Democracy and rights | 1-4 |
| Participation | 5-7 |
| Belonging | 9-10 |
| Gender roles | 11-14 |
| Trust | 15-16 |

*The question numbers refer to the Danish questionnaire, Appendix A

Five background variables were selected in order to be able to divide the sample population into certain groups, thus creating an opportunity to study if there are any trends among women based on one of the following five variables:

Gender (female/male).

Citizenship (Tunisian, Danish, Other, but have been living in Tunisia/Denmark the past 3 years).

Age.

Occupation (4 options).

Highest completed education (8 options).

Gender was incorporated in the questionnaire to eliminate the potential of men who responded it i.e. "men" was coded as "not included in respondents" in order to only capture women's perceptions (cf. Ch. 2). The rationale for "Other, but have been living in Denmark/Tunisia the past 3 years" derives from Danish legislation in which a foreign citizen is allowed to vote in local elections if she/he has lived in Denmark the past three years (Ministry of Social Affairs and the Interior 2016). In addition, the years may increase the level of practice e.g. be volunteer, demonstrate, and vote. I characterize the respondents by citizenship and not nationality is to target respondents who are permanent residents (or at least for the past three years) in Denmark and Tunisia and thus can practice the citizenship at local and national level.

*Rationale for the questions*

Please refer to appendix A and B to see the questions.

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[4]The ISSP is a continuing annual cross-national collaboration on surveys, which cover topics within the social science research. The questionnaire can be downloaded from http://www.issp.org/page.php?pageId=4

All questions (except question 4, in the Tunisian version) were constructed as closed questions with fixed alternatives and questions with a battery of options/questions. It was chosen to construct closed questions, as this enhance the comparability of the answers between the respondents. Furthermore, it is easy to process the answers, as the fixed-choice answers are pre-coded in SurveyXact. The design of the questionnaire (self-completion) increases the possibility of the respondent sits alone answering it, which requires that the questions must be easy to understand and answer. The fixed alternatives is assessed to enhance this, as the respondents have certain options in their responses. Disadvantages to closed questions are that they lack the possibility of spontaneity and elaboration and clarification in the respondents answers (Bryman 2012:249-50).

The two first questions in the questionnaire are concerning gender equality and whether it is important to the individual woman (Q1 and Q2, likert scale). The questions are included to give a general overview about the perceptions of the degree of gender equality in Denmark and Tunisia. Women's citizenship supports the ideal of a gender equal society (gender justice). Women in Denmark and Tunisia are by law equal with men and protected by discrimination based on gender (cf. Ch. 5) however, *de jure* is not always followed by *de facto*. The aim of the following questions is therefore, to identify how the Danish and Tunisian women assess the level of gender equality in their countries and how important an issue it is for them. The results will be compared against each other and also compared with existing research and reports on the degree of gender equality in the two countries.

The next topic is "Participation", which consist of three questions (Q5 battery question, likert scale, Q6 battery question and Q7 likert scale). The objective of the questions is to explore how the women perceive what a good citizen is in their country and to give an indication of how they have participated, thus exercise their citizenship. A citizenship provides the individual with rights, obligations and the opportunity to be participative, however this is not forced (violations of rights and avoidance of some obligations such a tax can be sanctioned). Therefore, it is found interesting to see how important the participating dimension is assessed by the women and if the women themselves are political active. The final question in this section is concerning how the women perceive the opportunities of women to candidate and campaign compared to the male candidates. This is included to study if Danish and Tunisian women experiences a difference in the way the media (printed, picture, sound, social) and the public perceive a male and female candidate running for election. Women in both the countries have the right to stand for elections (in Denmark in 1915 and in Tunisia in 1959). In addi-

tion, both countries are placed over the global average of female representations of 22,1 % with respectively 37,4 % and 31,3% (IPU 2015:1). However, critics claim that women face more challenges than men do (e.g. Petre 2015; Seeberg 2016).

Theoretically, a citizenship provides the individual with a feeling of belonging (emotional attachment) and has an impact on the identity of the individual (cf. 4.2.3) hence the three questions in the "Belonging" section (Q8, Q9, and Q10). These questions will explore if a citizenship provide the individual woman with a feeling of belonging to either the Danish or Tunisian society (Q8) and if the citizenship status has an impact on the identity (Q10). The question about the respondents feeling of belonging to certain groups (Q9) cover the theoretical aspect of social locations within the scope of *belonging*.

The thesis is conducted with a feminist research ethic and gender perspective, which encourage one to look at the public-private divide and how gender roles are perceived in the society. Gender roles are rooted in religion more or less explicit. A report from Pew Research Center (2013) concluded that Islam has a strong influence on how the role of the Tunisian woman is perceived. However, Tunisia is perceived as one of the most liberal countries in the Arab world. Hence, the two questions about the role and impact of religion in related to the perception of genders role and making life choices (Q11 and Q12). Following by two questions about the perception of gender roles in the society in regards to women's opportunities in the labor market and politics, and concerning the impact of gender roles in achieving equality (Q13 and Q14).

The final section in the questionnaire is 'Trust', which consists of the two questions (Q15 and Q16 both likert scale). These two questions are included, as a citizenship requires trust to the political principles, institutions and ultimately the politicians, which the citizens have trusted to represent them in the decision-making. Furthermore, a society is built on trust between citizens as few relationships are based entirely on what is known about the other citizens (the elected included). A society will disintegrates itself it the citizens do not have trust in each other, as very few relationship are based entirely upon what is known about the other citizen. Thus, trust between citizens, the politicians, and the political principles are important in order to maintain a stable society in which the citizenship is practice (Henriksen 2011:48-9).

The thesis operates with most different design, which indicates that the sub-units of the case being Denmark and Tunisia are different in factors, which are assessed to have influence on the object of studied being women's citizenship. Therefore, the two versions of questionnaire have been produced,

which contain some questions specific to the Danish respondents and some questions specific to the Tunisian respondents.

In the Danish questionnaire, the two "special" questions are Q3 and Q4 under the topic "Democracy and rights". These two questions are added to clarify if the respondents agree with scientists such as Drude Dahlerup (2013), who finds that the discourse in Denmark has changed into a understanding that "equality is achieved – why keep talking about it" (Dahlerup 2013:165). In continuation of this, five NGO's wrote an open letter (March 2016) to the Ministers of Foreign Affairs and Gender Equality claiming and criticizing that gender equality is no longer a priority by the Danish politicians (Phillipson et al. 2016).

The Tunisian questionnaire contains of four "special" questions, Q3, Q4, Q5, and Q16. Question 3, 4, and 5 are within the section "Democracy and rights". The Tunisian women were well represented in the Jasmine revolution and in the aftermath, women's organizations pressured the politicians in the making of the new Constitution in order to ensure equal rights, thus making the Tunisian citizenship more inclusive and equal. With question three and four, I want to study if the individual Tunisian woman actually feel that her rights have been strengthen and if so in what way. Question 5 is included to clarify how the women experience the political debate and the promotion of women's rights in a society, which not necessarily is compatible with gender equality (relics of a patriarchal structure and religious culture that promotes a more traditional division of gender roles) (Dahlerup et al. 2012:9). Question sixteen concerning, which law the respondent subdues – the Islamic law or the laws conducted by the politicians. Tunisia has taken a highly secularized approach to rights. However, the role of the religion is strong and Islamist parties exist, which are in favor of Islamic law.

*Implementation:*

The data extracted from the questionnaires are implemented as descriptive statistics, where the aim is to provide view on how the women have responded the questions. It must be emphasized that the descriptive statistics only describe the data – it cannot be generalized as it derives from questionnaires that do not meet the requirements of representativeness. The descriptive statistics provide an overview of the data. Thus, the approach to the data is of a more explorative in which the data "reveal itself". The summarization of the main characteristics are presented in frequency tables (percentage) (appendix C and D).

When relevant, cross-tabulations will be conducted in order to identify if there are trends in the answers/view on citizenship based on selected background variables and/or the asked questions. The

results is cross-tabulations with a two-dimensional table, which show the frequency of respondents that represent the specific selected characteristics (Clement & Ingemann 2007:43-45). Not all questions are implemented in the analysis, as this is dependent on the existing literature and research. Due to the low amount of respondents and the lack of representativeness, the questionnaire is a supplement to existing theory and literature. In addition, the implementation of questions is also dependent on the "deliberative moments", which result in that some of the asked questions seem less relevant, thus not included in the analysis. It is attempted to include the same questions from the questionnaires in the separate Danish and Tunisian analyzes in order to make a direct comparison between women's citizenship in Denmark and Tunisia. The different tendencies will be seen in the view of the applied theory and existing literature and thus contribute to answering the problem formulation.

### 3.3.3 Validity and reliability related to the data collection

The collection of data in this thesis raise issues related to validity and reliability of the forthcoming analysis and conclusion, which must be taken into consideration. The application of secondary data, which often are produced with a different purpose or in another context than the scope one's study affect the internal validity of the results. The different researcher's results are therefore indicators of the phenomena, not necessarily truths. It is attempted to increase the credibility of the results by applying triangulation in which the empirical foundation stem from both qualitative and quantitative, academic and non-academic sources, and the conducted self-completion questionnaire. The different sources can thus be cross-checked with each other in order to enhance the validity of the arguments within the analysis and conclusion. Application of secondary sources presupposes a critical reflection concerning the content but equally important on the author/s of the publication/s, as the liability of the sources are dependent on the sender. The official statistics concerning gender equality, women's representation etc. are mainly taken from independent institutions and organizations such as the IPU, Pew Research Center, the UN, Arab Women's Leadership Institute, National Democratic Institute, and Statistics Denmark, which make the data reliable, as these organizations are international recognized.

The questionnaires consist of issues connected to validity and reliability as well. As mentioned, the population of the samples are not representative of Denmark and Tunisia, thus the external validity is non-existing. The objective of the thesis is to study and compare women's citizenship in Denmark and Tunisia. The questionnaires constitute an opportunity to compare Danish and Tunisian women directly against each other, as they have answered the same questions. However, these women have

different socio-economic backgrounds, which can affect their perceptions and therefore must be taken into consideration in the comparison (analysis), as this can affect the internal validity if not recognized (the different backgrounds can however, also provide interesting and relevant results on the studied phenomenon). Furthermore, the skewed distribution (163 Danish respondents, 9 Tunisian respondents and the skewness within the respondents) is an internal validity issue, as the skewness make it difficult to make a valid comparison although the implementation of data only is descriptive and used in frequency tables.

The questionnaires were shared on Facebook (on my own page, gender equality, youth, rights, and women pages/groups), which naturally creates an exclusion of all women whom do not have a Facebook account. Furthermore, a bias is that women who already "like" such pages/groups have an interest in the subjects of the questionnaire. Therefore, there is a risk that the women who responded the questionnaire are more interested in the subject of women's citizenship than those who did not respond. However, the questions concerns personal opinions to different issues related to the concept of citizenship, which are valued despite more or less knowledge and interest of the subject. In addition, it may provide a more diverse perspective. My experience was that the most of the respondents are from the distribution of the questionnaire on my own account and the people who shared it on their own Facebook account. I can naturally not exclude respondents from certain women's rights/youth/gender equality groups on Facebook have answered.

## Chapter 4: Theory

The following chapter presents the theoretical framework of the thesis, which consists of the notion of *citizenship*, which constitutes the framework to study the citizenship of women in Denmark and Tunisia. The chapter begins with the section 'theoretical considerations', which includes reflections about Marshall's perspective and the rationale for applying his perspective as starting point and for the following additional elements to it (participation and belonging). The chapter concludes with the applied definition of citizenship and the operationalization of the theoretical citizenship.

### 4.1 Theoretical considerations

The concept of citizenship has been discussed, revised, interpreted and redefined in the social and political field for the last decades in order to, among others, be adaptable in the contemporary societies (Cherubini 2011:115; Lister 2007a:49). This thesis' definition of citizenship takes its starting point from Marshall's (1950) point of reference, whose classical essay stems from the British liberal tradition. Marshall's essay has been widely debated and discussed, as the essay do not provide a genuine consensus concerning the definition. However, Marshall's conceptual work is widely appreciated and often used as the general framework for the understanding of the modern citizenship. Thus, Marshall's perspective is the fundament in which one can rethink and redefine the concept of citizenship in order to conduct an analysis of citizenship (Jærger 2000:220).

A main lack in Marshall's perspective is the absence of women and other marginalized groups, which have been meet with critique (critics see e.g. Lister 1997, Bussemaker & Voet 1998, Walby 1994). As Professor of Social Policy Ruth Lister (1997) states, Marshall was so preoccupied with the relation between citizenship and social class that it "*blinded him to the significance of gender (and other) divisions for the history and contemporary practice of citizenship*" (Lister 1997:68). In Marshall's view, women are seen as wives, mothers and "second class" citizens because of their economic and legal dependency. The perception of "second class" citizens supports a patriarchal/androcentric mindset. The understanding of citizenship becomes male dominated and orientated, and related to the public sphere. Several have criticized this view (e.g. Roche 1992, Lister 1997) significantly by Carole Pateman who claims that the patriarchal structure and the male dominated citizenship result in a situation in which women must be like men and give up their interests "as women" in order to obtain full citizenship. A strategy that neglects gender differences. In addition, the exclusion of women is due to the gendered public-private divide and marriage and brothers are viewed as oppressive to women as these relations control and make the women dependent on them (patriarchal

hypothesis). Pateman suggests a normative ideal with a sexually differentiated citizenship that consists of a distinction between men and women as different but equal individuals (critics point to maintenance of gender roles/identification) (Siim 2000:33-34). If the criticism/hypothesis is still valid is debatable, as developments related to the role of the woman have occur e.g. social policy supporting women to enter the public sphere (double breadwinner model). Pateman's criticism has had a significant influence in the analysis of women's citizenship and the fact that the thesis' comparison includes Tunisia, which society is built upon kin-based contracts. Moreover, there is a close association between behavior and family honor, which mean that the free movement of the women may be restricted by the male relative may make Pateman's hypothesis relevant to bear in mind. The thesis is completed with a feminist research ethic (cf. 3.2), thus the study of women's citizenship includes challenging the traditional view on the public-private divide in which the division is viewed as two separate and opposite spheres of individual and collective life. Feminist critique have demonstrated that the public and private sphere are interconnected, which result in that the resources produced and distributed in the private sphere affect access to and position in the public sphere for the women. The development of women's citizenship integrates the private in the public sphere, which create new issues to the notion of citizenship and particular the participation dimension, which must not be ignored. This could e.g. be issues related to the conditions in the labor market, welfare and social service (Cherubini 2011:115-18; Lister 2007:55).

Central in Marshall's essay is rights and the status of the citizens, which should not be neglected however; it is not enough to talk about a citizenship as *only* related to rights and obligations. A citizenship includes opportunities to participate in the society (education, labor, associations, politics etc.), which presuppose that a citizenship is inclusive. Through the social practice (participation), the citizens express their ties with the social and political community. This can then create a sense of belonging to the society the women lives in (Cherubini 2011:115). Hence, citizenship is also about participation and a sense of belonging to a society and will therefore be included in the final definition of citizenship of this thesis (cf. 4.3).

In order to study women's citizenship between Danish and Tunisian women the context must be included. The citizenship of women must be understood within the specific national and political context, which reflect the history, traditions and institutional structures, as such factors still matter (Siim 2000,2005; Sweetman et al. 2011). The context will in this thesis cover factors such as the countries legislation, political culture, perception of gender roles, all which are assessed to have an impact on women's citizenship and the opportunities to practice it. These factors interact, which mean

that they cannot be analyzed in insolation from on another but must be analyzed as whole in order to draw a conclusion. Gender is the primary category i.e. the analysis will focus on if e.g. legislation or the political culture privilege men.

Marshall's perspective on citizenship has and still contributes to the debate on a, if possible, final definition of citizenship. It is a solid starting point of the thesis, as it provides a fundament for the understanding of the modern concept of citizenship. Furthermore, Marshall links citizenship to the principle of equality and recognizes that social actions (i.e. participation and a sense of belonging in the thesis) are integrated within the social structures of society (Lister et al. 2007:27). However, it must be modified in order to be applicable for the purpose of the thesis. Thus, I interpret the perspective of Marshall (rights in three spheres and duties) as an ideal, which in an ideal world are applicable to *all* regardless of gender. The notion of citizenship is contextual and dynamic but related to rights this do not affect that these shall be equal between men and women. Thus, bringing equitable relations between the sexes (gender justice) in which women are defined as equal citizens with equal autonomy and rights. The many related subjects to the notion of citizenship (cf. Ch. 1) have constitute many analytical dimensions. A general understanding is that citizenship consist of three key analytical dimensions being 'status, rights and obligations', 'political participation and citizens voice' and 'identities and belonging' (Siim 2005:3-4). This thesis follows these dimensions, (simplified), as a modern citizenship is more than a legal status and rights. A citizenship enables the citizens to participate, which along with the status enables the citizen to create a sense of belonging. Hence, the analytical focus on participation and belonging along with rights.

## 4.2 Citizenship

### 4.2.1 The classical notion of citizenship (Marshall)

> "*Citizenship is a status bestowed on those who are full members of a community. All who possess the status are equal with respect to the rights and duties with which the status is endowed*"
> (Marshall 1950:18).

The concept of citizenship got its scientific and analytical international breakthrough by T.H Marshall in 1950. Marshall presented the classic and modern paradigm for citizenship. Citizenship was introduced as a personal legal status on those who are full members of a political community, which confers the citizen with rights and duties. The modern state thus provides the citizens with a citizenship based on uniform and equal rights. According to Marshall, a citizenship consists of civil, political and

social rights corresponding to phases in the development of the (British) society/democracy[5] (Marshall 1950:18; Bussemaker & Voet 1998:287). The civil rights refer to the rights, which are necessary for the freedom of the individual rights such as freedom of speech, religion, own property, the right to justice, control over own body etc. Civil rights are an instrument for the citizens, as with these rights the citizens have the possibilities to get their voices heard, be a part of the political/power decision-making, and thereby have the opportunities to improve their social economic status. The political rights provide the individual with the right to participate in the exercise of political power as a voter, candidate, and elected. In addition to join a party, a union and provide the citizen with nationality rights. Finally, the social rights cover economic welfare, security to education and social service and insurance (Marshall 1950:8). The rights are a necessary for the development and maintenance of the civilized society. Rights liberalize, empower and foster self-determination of the individual citizen. Thus, the rights shall be viewed as interrelated (multiple dependent). However, the concept of citizenship can create social inequality if the rights are not accessible for all, which have been (and in some part of the world still is) the case with women and other marginalized groups (ibid.:16-18,26). A citizenship is more than rights, connected to citizenship are duties/obligations, which not necessary are universal but specific to the individual society (hence, the relevance of the context in the analysis). The individual society creates the ideal citizenship a citizenship can thereby, be viewed as a measure for the individual's quest (ibid.:18). Rights and duties/obligations derive from two different traditions. Rights stem from the liberal political tradition, thus citizenship is a status. Civil and political rights are the mean in which the state guarantees freedom and protection of the individual and formal equality. Obligations derive from ancient civic republican tradition of classical Greece in which political participation is seen as a civic duty and being a political being represent the essence of a citizenship (Lister 1997:13-5). Combining the two approaches, citizenship as a status (rights) and as a practice (obligations, participation) make a citizenship a dynamic process in which the participatory dimension presupposes a full citizenship to require an active community involvement (ibid.:41). In continuation to this, citizenship creates the social contract between the state and the citizens but also social relationships between the citizens. This however, require that the citizens have equal *opportunities* in the different spheres (cf. social, civil and political rights) not implying that all citizens have the same capacity in the different aspects of the social, political and economic life, as this is dependent on the individual citizen's life.

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[5] In the 18th century: civil rights, 19th century: political rights, and in the 20th century social rights (Bussemaker & Voet 1998:287).

## 4.2.2 Participation

In the literature, the notion of participation can be found either to be a right, an opportunity or as a concept, which has undergone a development *from* an opportunity *to* a right (Gaventa 2006:57-8). In this thesis, participation is both. Meaning, that with a citizenship follows rights and obligations these presuppose participation or at least the feeling that the individual has the *opportunity* to participate. The rights connected to the citizenship guarantees equal opportunities to be a part of- and influence the society. Participation is voluntary but the citizenship enables the people to act (ibid.). A citizenship becomes something the individual (can) practice, thus a citizenship cannot just be reduce to something bestowed by law (the state provides the possibilities for the individual to be participative). The most direct political participation is voting and running for election. However, participation can also be participation in the local community, being orientated in the society, be a part of the public debate etc. The common element of these participations are that they, more or less directly or indirectly, aim at influencing the present society, politics, and politicians (from local to national level). The main thing is not whether the citizens actually participate but that they do not feel excluded from the possibility to participate[6] (Mouritsen 2015a:215,223-25; Andersen 2002:173). With participation (and the rights connected to a citizenship), follow the opportunity to become empowered. There exist many definitions of empowerment in the literature; a common reference point is that empowerment is a process of change. Change, which results in that women expand their freedom/ability of choices and actions and thereby, have the power and/or capacity to make choices. Not all actions and choices are a sign of power or empowerment, in the scope of empowerment the choices shall have an element of advantage for the individual or the collective (Kabeer 1999:436-37; World Bank 2002:v; Hall 1992:83). It is emphasized that empowerment is not to hold power over others but to hold power over oneself. Empowerment can therefore, be viewed in a therapeutic version, as it is to take control over one's life, thus increasing the individual's autonomy and capacity, which often will have a spillover effect and increase the individual's confidence and resources. Empowerment, when acquired by the individual woman, can also be viewed in a more collectively sense. In such perspective, empowerment entails the individuals to engage with others in the same situation and collectively change their current situation. This can then result in a social mobilization in which the less powerful groups in

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[6] It will always be preferable to have a high level of participation. E.g., turnouts in elections can give a sense of how the democracy "is working" and it are in elections the political system achieves its democratic legitimacy, as the citizens accept the concept of a democracy and confirm the social contract (Bhatti et al. 2016:5).

the society create a voice and demand changes. Empowerment in a collectively sense includes organizations, movements etc. in which there exist a group solidarity, with an objective to bring about social changes in order to create a more social justice and equal society. Therefore, the notion of empowerment can have a political and democratic form, which often stems "from below". It must be emphasized that the notion of empowerment goes beyond the scope of political participation. This definition of participation in the scope of citizenship 'requires' an inclusive democracy in which the participation generates inclusion and for some include the transformation from dispowered to empowered. Participation do also reflect (or depends on) trust and commitment in the political institutions and principles, as without some trust in these it is difficult for the individual to engages in such (Lloyed 2013:122-23; Siim 2000:5; Hall 1992:90; Andersen & Elm Larsen 2011:478-81).

## 4.2.3 Belonging

A citizenship is not only about the legal rights and participation of the individual. A citizenship enables the individual to construct a feeling of belonging and identification with the country The concept of *belonging*[7] covers a dynamic emotional attachment. In this thesis, belonging mainly refers to emotional attachments to the Danish and/or Tunisia society in which Denmark and Tunisia feels like home. Thus, belonging becomes the "emotional dimension" of citizenship. A home is not necessarily equal to positive feelings however, the place where the individual feels at home entails some hope for the future hence, the dynamic aspect of belonging. A sense of belonging and identification with the society do also reflect that the individual trust the principles and values of the society (vertical citizenship) and has trust to others (horizontal citizenship). Trust to others and in the political institutions are dependent on the individual woman's feeling of recognition, respect and belonging to the community (Yuval-Davis 2006:197-99;Yuval-Davis 2011:4; Mouritsen 2015:335).

Professor in Gender and Ethic studies, Nira Yuval-Davis (2006) views the notion of belonging as constructed in relation to three analytical aspects: 'social location', 'identifications and emotional attachments', and 'ethical and political values'. The three levels are all interrelated and are applied in the thesis. Social locations are categories in which the woman belongs to certain 'groups' based on e.g. gender, race, nation, class, age, profession etc. Social locations constitute network of power relationship in the society hence, the individual cannot exclusively "place" herself within certain locations. Furthermore, the position of social locations are dependent on the historical and current context.

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[7] As an independently concept not to be confused with *politics of belonging* (see e.g. Yuval-Davis 2006, 2011).

The woman does not necessary identify with the same social locations as the society identifies her with. The individual will often identify with serval social locations, thus the position of the individual in the society is constructed along many different locations. Some social locations tends to be connected to certain people from a gender perspective the public-private divide can here be mentioned. Gender stereotypes within this are hard to change, as they are highly institutionalized (i.e. the more embedded perceptions on social locations des more challenge to change) (Yuval-Davis 2006:199-200).

Identifications and emotional attachments cover the individual's identity, which means that the woman's identifications and attachments provide the stories/narratives about who she is. The narratives will often relate to how one and/or others perceive what it mean to be a member in a group or in the society. The woman's identity narratives can shift and change, be contested and multiple, related to the past and present, and in relation to others. In relation to women and their citizenship, the state provides a certain understanding based on legal rights and how they address the role of the women in policies. However, the public discourse about the role of the women will, most likely, also have an impact either as a co-understanding or in some cases contradictions (Yuval-Davis 2006:202; Meer & Sever 2004:18). An identification and emotional attachment cover a desire for feeling a belonging, which includes recognition from the group and/or community the individual wants to belong in. There is therefore, often an emotional investment behind an identification. The "profit" of the investment is the feeling of fulfilling the criteria it takes to be a member/citizen in the given context and be recognized for it (Yuval-Davis 2006:202-3; Mouritsen 2015:335,339). The final analytical aspect is concerning the ethical and political values, which are concerning how social locations and identities are valued and judge by the individual itself and others. These judgements are influenced by the general public perception on the different locations. The perceptions related to the different locations are often based on certain attitudes and/or ideologies. Hence, some social locations in certain circumstances are more or less inclusive/exclusive (contextual, relational dependent), which affect the willingness of the woman to identify with the country she lives in (Yuval-Davis 2006:203; Yuval-Davis 2011:5-6; Mouritsen 2015:336).
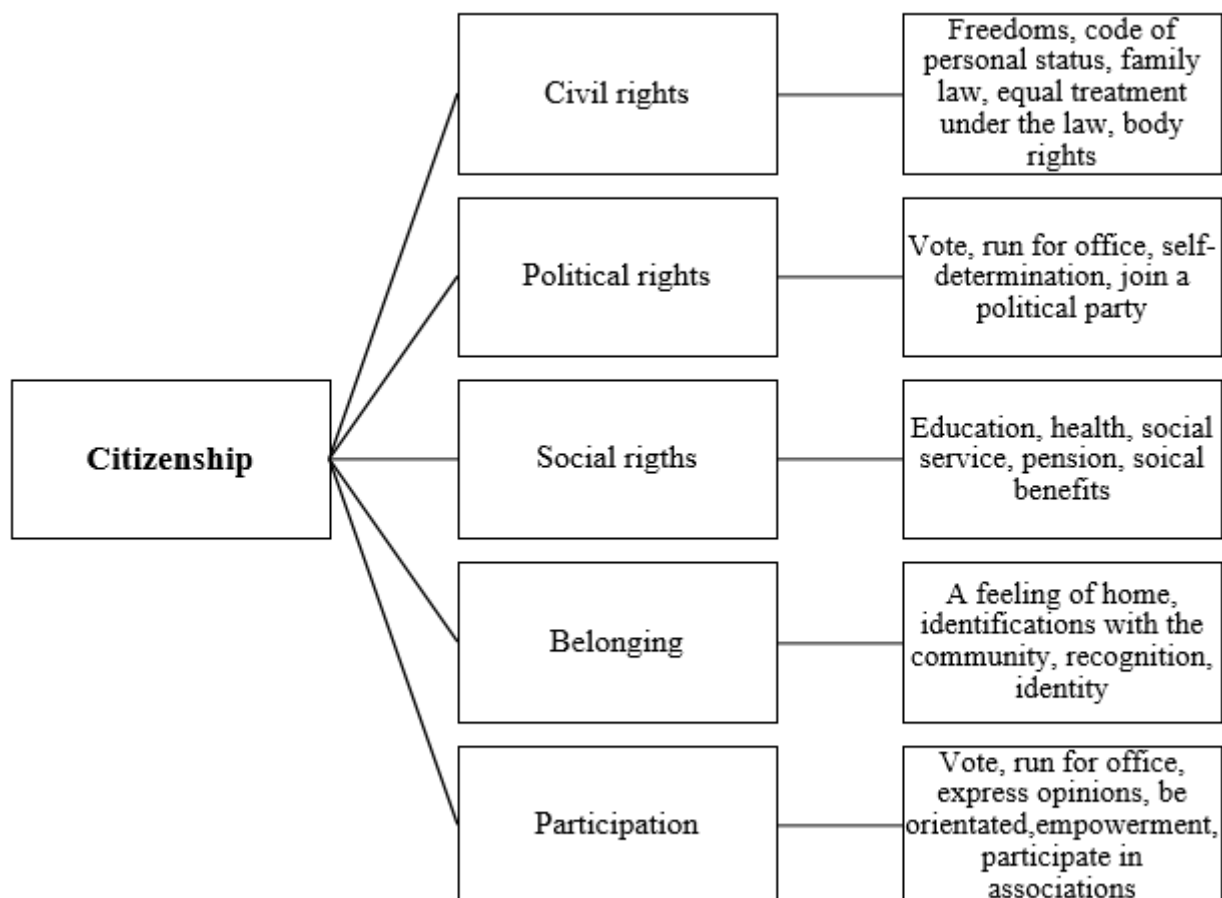
## 4.3 The applied definition of citizenship

Of the above sections, it has been possible to define the definition of citizenship of the thesis as: *1) A membership of a society, which confers certain rights and obligations 2) in which the rights guarantees equal opportunities, regardless of gender, to participate in the society both at local and national level, 3) which enables the individual to construct a feeling of belonging and identification to the community premised on respect and trust, 4) thus making citizenship a status and a practice.*

## 4.4 Operationalization

Figure 1 shows how the theoretical framework of the thesis is operationalized in order to be used analytically in relation to the collected data (questionnaire) and existing literature. The notion of citizenship is contextual, hence the importance of including the specific Danish and Tunisian context in order to analyze the women's citizenship comparative. The context cover factors from legislation, culture, social policies, norms, and to perceptions of gender roles.

Figure 1: *Operationalization*

The figure illustrates the general operationalization of the applied definition of citizenship. With the different rights, follow duties/obligations the most primary being the obligation to comply the laws of the country. Of the more specific obligations, include such things as paying taxes, education (if compulsory), tolerance and respect for fellow citizens and institutions, military service etc. A citizenship presupposes that every citizen contributes in some degree to the society e.g. by work and paying of taxes. 'Participation' is operationalized as voting, expression of opinions, being orientated in the society etc. (cf. 4.2.2) all which aim at influencing the society the citizen live in (from small to big changes, from local to national level). However, participation cannot only foster changes in the society but also for the individual itself hence, empowerment.

The figure does not illustrate that a citizenship can foster inclusion and exclusion. The inclusion/exclusion element is based on the legislation (equal rights) and the perceptions of gender roles, which can affect the status and the possibilities of the women to participate. Inclusion/exclusion is also related to the notion of belonging, as the individual women can feel excluded or included based on whether she feel a sense of belonging to the society she lives in.

It is emphasized that the rights conferred by the citizenship must be equal between women and men furthermore, every citizens must be treated equally under the law and the citizenship confers non-discrimination in all aspects of the society. More relevant and urgent to the Tunisian women are the right to equal inheritance, the right to obtain a passport and travel abroad without permission, and the right to transit citizenship to children or husband (for a good overview see Moghadam 2010).

# Chapter 5: Presentation of Denmark & Tunisia

This chapter consists of a short descriptive overview of the development of women's citizenship related to rights and social policy in Denmark and Tunisia, as it is assessed that these factors have an influence on how the citizenship and participation of women are looked upon.

## 5.1 Denmark

The first democratic Danish Constitution (1849) gave suffrage rights exclusive to certain men. At the time women were perceived as subordinate to the men in the family, marriage and in the legal sense furthermore, the father alone had the child custody. In 1915, women over the age of 29 gain the right to vote in all elections (in 1908 women achieved the right to vote and candidate in local elections, thus women's enfranchisement was won gradually). This changed the structures of the society (special the political and the role of the woman) and was the beginning of the Danish democratization. Prior to this, many parliament debates concerning the citizenship of women debated by male parliamentarians were held and women's movements had demanded equal rights (the main political parties were the Social Democratic, the Radical Liberal, the Agrarian-Liberal and the Conservative). Organizations such as the Women's Progressive Association (Kvindeligt Fremskridsforening) advocated for enfranchisement, the bourgeois Danish Women's Society (Dansk Kvindesamfund) fought for social and civil rights. Umbrella organizations were established to mobilize power in the fight for women's rights such as the United Women's Association (De Samlede Kvindeforeninger) and the National League for Women's Suffrage (Landsforbundet for Kvinders Valgret). The female suffrage was a keystone in women's citizenship. It became a mean to expand the civil and social rights as well as a possibility to influence politics (Fiig & Siim 2007:1-4,10; AU 2015). Despite the different revisions of the Constitution (1866, 1915, 1920, 1953) gender equality is not stated in it but is addressed in legislation in which women's organizations have been an important factor in the achievements. Thus, the mobilization and empowerment of women have taken place through voluntary movements in the civil society ('movement'-oriented model). Women's movements became a catalyst for female cross party alliances in politics, which promoted and demanded equal rights. From the 1849 Constitution, the status of women have been strengthen and the rights expanded step-by-step (incremental track) (Dahlerup 2013:146-50). In the 1960-70s the structures of the Danish family changed fundamentally, the women entered the labor market (earn their own money), more entered higher education and contraception was liberalized. Factors, which had a significant impact in the empowerment and liberalization of the women. In 1963, the establishment of the Commission on Women constituted

gender equality as a policy issue on its own. The 1960-70s especially changed the perception of the role of the women and the demand for equality was no longer just concerning political rights and equal salary but also a fight against social and sexual repression. (Dahlerup 2013:150-55; Siim 2011:182-83).

The development of the society along policy reforms have resulted in that Denmark for years has been considered as a "women friendly" country. The politics in Denmark support women's possibilities to combine motherhood and work by implementing gender equality policy, maternity leave, and expanding daycare possibilities. A main factor in the "women friendly" welfare state is that the social rights are directed on the individual rather on the family. Furthermore, the Danish social policy model is based on the double breadwinner model and universalism, which means that the social rights are for *all* and aim at achieving social equality (social democratic model of citizenship). The gender equality laws have in Denmark all be adopted with a clear majority, thus reflecting the willingness and support of all to include women in the society (milestones in the Danish legislation related to women's rights see appendix E) (Siim 2011:182-94; Sprenger & Andersen 2010:10). In 1999, Denmark got its first Minister for Equality (Jytte Andersen) and by 2000 gender mainstream was written into the Danish laws, which mean that gender equality must be applied in all public administration. In the aftermath, a law on equality was adopted lasted revised in 2013. The aim of the law is to promote equality between gender including equal influence and opportunities in all aspect of the society. Essential in the law is the prevention of direct and indirect discrimination and harassment based on gender (Retsinformation 2013).

A crucial right related to women and citizenship is the right to pass nationality to her child. In 1776, Denmark introduced citizenship, which was based on the concept of *jus soli* (territorial principle) since then law has been revised three times (1950,1978, and 2004). Currently, there are five ways of acquiring a Danish citizenship[8].  From July 2014, the child gets automatic a Danish citizenship if the mother or father hold a Danish citizenship, if the parents are not marriage and only the father is Danish, the child get Danish citizenship only by *jus soli* (borger.dk 2016).

In Denmark, the dominant belief after World War 2 has been that gender equality follow the development of the society (time-lag theory), which, despite some interventions, has contributed to the idea of non-intervention by the state. By the end of the 1990s, (critical) voices have claimed that

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[8]At birth, by marriage after birth, by adoption, by declaration and by naturalization (i.e. applying) (Borger.dk 2016).

gender equality has become a less salient issue, as the general perception is that gender equality has been achieved so why keep talking about it. However, laws and reforms have not eliminated all gender inequality in the society, as e.g. the labor market in some degree is gender segregated and a gender based hierarchy can be found in the society (Dahlerup 2013:165; Dahlerup & Leyenar 2013:167; Siim 2011:183-84).

## 5.2 Tunisia

Since the independence from France in 1956[9] women's citizenship (rights) has been expanded gradually. Prior the independence, Islamic law (the Shari'a) was operative and the society was based on the kin-contract, which constitutes that all citizens belong to the family prior their membership to the state. The family as institution is based on a patriarchal hierarchy, which underpin state's policy, which mean that the state institutions subsidize families. The legislation privilege family above the individual and the men and elder above the women. This structure is a main challenge for the independence of the women (Joseph 2005:149-64). Changes in the structures, perceptions and status of the woman started slowly in 1956 when President Habib Bourguiba entered the presidential office with a mission to build a modern secular state of Tunisia (however, maintains Islam as a specific and significant role of the history and identity of Tunisia). The modernization process included a reformation of the status and rights of the Tunisian woman. The breakthrough came with the promulgation of the Code of Personal Status (CPS) – a progressive family legislation, which, among others, abolished polygamy, established the legal right for the woman to ask for divorce, and increased the woman's right to child custody. With the CPS is became possible for the women to construct an autonomous self with personal rights[10], which marked a shift from being a member of the linage. Tunisian women achieved general suffrage in 1957. A keystone in the first wave of reforms (reforms adopted in the 1950s), which were prompted by a nationalist agenda. The underlying drive for the legislation was of state building and a pursuit of modernization. The promotion of women's rights were unavoidable for the creation of a strong political state in which the government wanted to marginalize tribal or kin-based communities. Hence, the first wave of family reforms was a top-down approach, which was adopted undramatic as there was no political challenger at the moment (due to anti-colonial struggle in which the more conservative political groups were defeated) (Dahlerup et al. 2012:4; Gold Mercury International 2015:1; Charrad 2007:1518). The CPS marked a radical shift in

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[9]Tunisian legislation is largely based on the French code.
[10]This however, also created counter movements (Islamic) who opposed the progressive emancipation of women.

the interpretation of Islamic laws concerning the legal construction of gender roles within the family and it became the framework for further development. In addition, the laws challenged the patriarchal kin-based structures (Charrad 2017:1514-15).

In 1987, the new president Ben Ali continuing Bourgiba's state building approach to women's rights. The expansions of women's rights created an image of a secular citizenship and thereby ensured allegiance of foreign donors (Gold Mercury International 2015:1). However, women's associations emerged in the 1980s[11] and with them came the feminist discourse on the public and political agenda. This resulted in a second wave of reforms (reforms adopted in the 1980s and 1990s), which were more prompted by women's activism, than President Ali. Women's rights advocates got a significant role in the second wave of reforms both in the pressuring and in the making of gender legislation (Charrad 2007:1515,1522-26). Still today, women's organizations promote social networking that raises the public's awareness on women's rights and the benefits of including women as members in the society. Since the 1990s, government structures, political programmers and reforms have been mandated to promote gender equality (supported by international donors), which have strengthen and empowered the status of the woman (Chambers & Cummings 2014:24). Women as political representatives are supported by the electoral system, which operates with a quota system (zipper system) and a new adopted electoral law requires double parity in the forthcoming 2017 local elections (Dahlerup et al. 2012:5; Kvinfo 2016). To be a formal citizen of a country includes the right to transit nationality to children. Four times (1963, 1993, 2002 and 2010), have the Code of National been revised since the adoption in 1957. This have resulted in that the code combines elements of *jus sanguinis* and of *jus soli*. The recent amendment provides all children born of a Tunisian woman to have the right of be given a Tunisian citizenship despite the child is born outside of Tunisia and the nationality of the father. The transition does not require an official consent of the non-Tunisian anymore (Charrad 2007:1523-24; Uniceff 2011:1-2).

The two reform waves made major expansions of women's rights, thus promoted the liberalization of the Tunisian women and promoted gender equality (milestones in the Tunisian legislation related to women's rights see appendix E). The liberalization of women's rights was (and is) supplemented

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[11]Today there exists several women's organizations such as The Tunisian Association of Democratic Women, The Association of Tunisian Women Research and Development, The Center for Research Documentation and Information on Women and several women political committees such as the Women and Development, the National Council of Women and Family (Gold Mercury International 2015:1-3).

by progressive socio-economic policies, which have favor women's access to the educational system, paid employment, raise the minimum age of marriage, and family planning (contraception, abort policies). The self-determination concerning marriage and motherhood are significant in the empowerment of the women (social, political and economic). In addition, the work-life balance measures are equally important. Tunisia are not in the same league as Denmark, as the reforms are in favor of the male breadwinner and female homemaker model (OECD 2015:23). However, the reforms do promote women's participation in the labor market while being a mother e.g. 30 days of paid maternity leave in the private sector (requires a minimum of 80 days insured employment) and two months in the public sector. In addition, the women have the possibility to leave for elder care, specific measure for breastfeeding, childcare solutions, and part-time employment solutions. From the promulgation of the CPS, Tunisia has been at the forefront for women's rights in the Arab region, which got confirmed with the new constitution from 2014 (Dahlerup et al. 2012:x). In this, equality is guarantee regardless of gender and all are equal before the law without any discrimination[12] (Article 21, Tunisia's Constitution of 2014 Constituteprojet.org 2016:6). However, the laws and Constitution of Tunisia do not eliminate all gender inequality in society and relics of kinship structure still exist (Gold Mercury International 2015:4).

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[12]This guarantee required pressure from national and international women's movements in order to change the wording from complementary *to* men to equal (Dahlerup et al. 2012:6).

# Chapter 6: Analysis

## 6.1 Analysis strategy

The theoretical framework of the thesis guides the analysis process, and since the theory is divided into subcategories the structure of the analysis will continues this thematically division in order to answer the problem formulation.

As previously stated, the context is included in the analysis. The application of the context is both as methodological and theoretical. The former, as the design of the thesis is comparative multiple-case embedded design (most different design) illuminated with a feminist research ethic and gender perspective (cf. 3.1,3.1.2,3.2). The rationale for multiple-case embedded design is that it make it possible to study the case, women's citizenship, in two different contexts, which differ in many aspects from history to socio-cultural elements (embedded units). In line with the case study design that study the phenomenon within its real-life context is feminist research ethic and gender perspective, which encourage one to include the relational context the studied phenomenon is within. In addition, to go beyond the state by including factors such as gender roles, family structure, and the notion of belonging. Theoretically, the notion of citizenship is dynamic, contextual and relational. Citizenship is viewed as more than a status, as it confers rights, which guarantee opportunities to participate in the society the woman lives in. This inter alia enables the woman to construct a feeling of belonging and identification to the country. Hence, the theoretical importance of including the context.
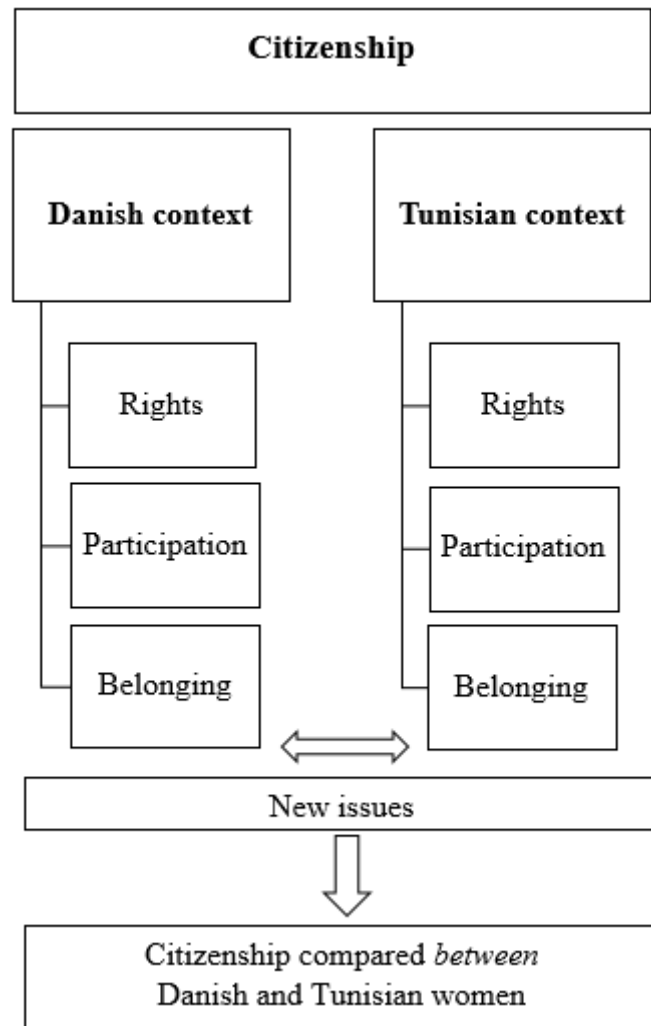
Some factors are seen to constitute basic perceptions of women's citizenship and affect the participation and belonging dimensions. These being the Danish and Tunisian legislation (legislation will be addressed in the theme "rights") and religion. Religion is in this study the majority religion of the respective countries; Christianity (Protestantism) (76,1%[13]) and Islam (99%) (Statics Denmark 2016:156; Pew Research Center 2009:17). It is important to emphasize that religion and legislation *not* determine the perceptions of the women but may affect it. Religion will be included, if not explicitly, then in relation to gender roles and the public-private divide.

The structure of the analysis is that for each theme the two sub units of the case will be analyzed separately in order to make the comparison *between* women's citizenship in the "comparative summary", which follow each theme.

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[13]Based on members of the Danish National Church 1st January 2016 (Statics Denmark 2016:156).

Figure 2*: Structure of the analysis*

Citizenship

Danish context | Tunisian context

Rights | Rights

Participation | Participation

Belonging | Belonging

New issues

Citizenship compared *between* Danish and Tunisian women

"Rights" cover civil, political, and social rights (cf. 4.2.1) and include a general study of these in regards to the egalitarian of these between men and women. In addition, the section include the opportunities the rights confers. "Participation" objective is to study how women exercise their citizenship and what causes the way they participate in. Women's participation cover all from educational, labor and political participation, and the duties/obligations following being a citizen in Denmark and Tunisia. "Participation" includes also the notion of empowerment (cf.4.2.2). Rights and the practice of citizenship can foster a process of change in which the individual woman can become empowered due to e.g. the right and practice of education, work, freedoms and finally to have self-determination in all aspects of life. The final theme "Belonging" is to explore if a citizenship provides a feeling of belonging to the Danish and Tunisia society, and if a citizenship becomes a part of the identity of the woman. The analysis concludes with reflections on some of the new issues that have emerged in relation to women's citizenship, which also is within in a comparative perspective.

The themes are analyzed in relation to the applied theory, existing research, other secondary literature on the subject, and the produced self-competition questionnaire (cf. 3.3.1). The separately analysis of the analytical focal points will be analyzed against each other in order to examine potential differences, similarities, and thus clarify if there exist cross-national trends and to test the two hypotheses in regard to women's citizenship. The hypotheses state that the women's citizenship differ due to the structures of the Tunisian society (patriarchal structure) and that the public-private divide, determines the practice of women's citizenship in both countries (cf. Ch.2).

Denmark and Tunisia are two different countries therefore; it is inevitably to create exact similar analysis, which are to be compared. In addition, the skewness in the questionnaires population (163 vs. 9) and the very little Tunisian population can result in that the sections ('Denmark' and 'Tunisia') sometimes may differ from each other in content. However, it is attempt to base the separate analyzes and thus the comparison on the same factors as possible and include the same questions from the questionnaires.

## 6.2 Rights

A citizenship confers rights. In this study, these rights guarantee equal opportunities, regardless of gender, to participate in the society (cf. 4.3). Rights can privilege some people over others in this thesis the focus on whether this occur based on gender in Denmark and Tunisia in order to make a comparison between the women afterwards. In an analysis of citizenship in relation to rights, one must considered the two terms *de jure* and *de facto.* The existence of laws do not necessarily mean that the content are practiced furthermore the different laws are not necessarily equal accessible between women and men. The norms of a society can entail that it are challenging for the women to exercise their rights and opportunities conferred by their citizenship.

### 6.2.1 Denmark

Denmark is considered as a "women friendly" country in which the politics support gender equality, women's independence and the possibility to combine motherhood and work (cf. Ch. 5). These factors among others make the Danish women and men among the most equal in the world (Christoffersen 2015; WEF 2015:8). Since the 1960s, Denmark has had a high degree of universalism in health, education, and welfare. The social service and benefits are directed towards all citizens independently of income, thus supporting an inclusive and equal perception of citizenship. Women's civil (e.g. discrimination, abortion, property), political (e.g. vote, run for office), and social rights (e.g. education, benefits) are ensured in different laws. In addition, gender equality "has" its own law (gender equality act), which purpose is to promote equality between women and men including equal integration, influence and opportunities in all aspect of the Danish society and prevent discrimination based on gender (Siim 2000:122; §1,Retsinformation 2013). The results from the questionnaire concerning gender equality show that 57,1% of the respondents feel in a high degree that there are equality in Denmark, 5,6 % (not at all + low degree) of the respondents feel the opposite (Q1, appendix C). The questionnaire is not representative, which may be the reason that the percentage is significantly lower than a survey conducted in 2012 by Interresearch for Cevea in which 75% of the Danish population considered gender equality as achieved (Cevea 2012). This is furthermore, supported by the UN's Gender Inequality Index (GII)[14] in which Denmark is ranked in fourth place (UNDP 2015:224). However, the fact that only 57,1% of the respondents feel a *high* degree of gender equality in Denmark tempts one to "go behind" the positive rankings. Thus, follow the 60,1% of the respondents who feel

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[14]Index based on health, empowerment and labor participation. GGI is an indicator in the UN's Human Development Index (HDI).

that there still is need for women's rights and gender equality on the political agenda (Q3, appendix C). Danish women's civil, political and social rights are secured on an equal foot with men, which ideally guarantee equal opportunities whether it is for the women to become business leaders, politicians or scientists. Statistics show a different reality. A survey conducted by Wilke for Avisen.dk in 2015 shows that 25% of the respondents[15] do not believe there is gender equality in the Danish labor market. This confirms that despite the existence of laws securing women (and men) against any discrimination and the act on equal pay (ligelønsloven) differences/inequalities still exist between men and women. One example is inequality in wages. Calculations, which accounts for education and experiences shows a gap on 4-7% between men and women in favor of men. According to team leader of Gender and Equal Treatment at The Danish Institute for Human Rights, Ask Hesby Krogh this is rooted in genuine discrimination (Jeppsen 2015). I do not reject Krogh's conclusion but a part of the explanation for the pay gap may be the wage difference that exists between the private and public sector in which men dominate the private and women the public, which creates a structural divide that splits the labor market based on gender. However, this cannot and is not the whole explanation for the unequal pay. Related to citizenship and the rights dimension the discrimination is illegal and illustrates a lack of respect for women's rights and capabilities (recognition). The discussion is probably more legitimate if it is about how and why women uses their opportunities as they do. Women and men have the same rights and they have the same opportunities related to education, which afterwards constitutes employment opportunities. However, not all women and men have the same capability or the same desires for education and jobs. Women and men (and between women) do not act or make the same choices. Women do also meet barriers in the labor market barriers such as gender stereotypes that maintain women in certain jobs, prejudices that clam that women do not think they are wanted for leadership positions and companies thinking that women are not interesting in such positions (Vestergård & Ildor 2016). Stereotypes that can be traced back to the traditional gender roles, which affect the social norms in the society and then the behavior.

The perception of Danish women's citizenship viewed isolated in relation to rights is like Danish men's citizenship. The Danish laws do not privilege based on gender[16]. Women in Denmark are not perceived as subordinate to men nor are they legal dependent of them and thus viewed as "second class citizens" (women in Marshall's perspective). The gradually expansion of women's rights have

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[15]Representative sample of 1033 Danes (Jeppesen 2015).
[16]The current debate in regards to rights is more on the unequal rights relationship between Danish citizen and immigrants.

change the status and perception of women (and men) along with the development and norms of the Danish society. From the late 1980s, the norm in the family was no longer the male-breadwinner norm in which the man is the provider but a dual-breadwinner norm in which both the father and mother are obliged to work and care. This development has also affected the gender discourse in politics. From the perception "women as mothers and housewives" to "women as equal partner in work, family and society". These factors are reflected in the rights and politics in Denmark, as the focus is on the individual, universalism and promote participation, which result in that the Danish citizenship is within a social democratic model (Siim 2000:123-25; Siim 2011:182-83).

## 6.2.2 Tunisia

When the comparison includes Tunisia, an Islamic nation, family laws is essential to address in relation to women's rights, as it have a huge influence on women lives (possibilities to make free life choices). The Tunisian family laws were liberalized with the promulgation of Code of Personal Status (cf. 5.2). The reforms created a new form of citizenship in which the individual woman and man should distanced themselves from the loyalties within the local kinship/community and towards the nation-state. This was highly beneficial for the women, as they gained individual rights resulting in a less subordinated status (Charrad & Zarrugh 2013). In January 2014, the Tunisian state ratified the new Constitution, which strengthen the role of the woman. Most notably, the identification of women as "equal" with men and not "complementary". Since 2014, formal equality has existed (article 21, Constitution), which is a clear distancing from the patriarchal structure. In the questionnaire, which unfortunately only nine answered, the majority (55,6%) considered gender equality achieved, 33% do not (Q1, appendix D). The results are most likely due to the respondents' social-economic background (university degree, employed, students), the new Constitution and the CPS. The new Constitution secures equal rights, anti-discrimination, equal opportunities regardless of gender to have access to all levels of responsibility in all domains in the Tunisian society. In addition, the state commits, constitutional, to protect women's accrued rights and work for strengthen and develop these rights including the protection of violence against women (article 21 and 46, Tunisia's Constitution of 2014, Constitueproject 2014:6,9-10). All, which follow the theoretical definition of a citizenship (cf. 4.3). Despite positive progress after the Jasmine revolution, it is just nearly half of the respondents (44%) who feel that women's rights have been strengthened (Q3, appendix D). This can be supported by Tunisia ranking as 96 on the GII (UNDP 2015:225). In a "defense" of the state policy, which affects

the GII is the process of implement the existing Tunisian legal framework with the Constitution and with international declarations. However, it is not only the Constitution, which lacks harmonization laws such as the CPS do also. Example includes the denial of women's equal share with men in inheritance, allowing the remarried mother to have her children living with her, and the penal code punished consensual same-sex. Progress have although been made initiatives such as the Constitution (especially article 21 and 46), the Nationality code and the Political code strengthen the position of the woman position in the society (cf. Q4, appendix D). On the question of whether the respondents feel that the Tunisian politicians take women's rights (the promotion of it) serious the answer is clearly "no" (66,7%) (Q5, appendix D). Indicating that the promotion of women's rights has a tendency to be cosmetic and voter orientated (increase votes). Furthermore, deficiencies in the Constitution and the CPS do also represent the continued challenges women face in Tunisia. A major deficiency is the lack of protection against psychological, economic, and symbolic violence ("expand" violence to be more than just physical) (Charrad & Zarrugh 2016). The deficiencies impede the equal perception of women and the fact that some of the Tunisian laws are a part of violating the women's constitutional rights are reprehensible in promoting and achieving gender equality. The Tunisian laws such as women's right to vote, run for office, and the freedom of association (political and civil rights) support the theoretical definition that a citizenship confers rights that shall guarantee equal opportunities to participate in the community at local and national level. In addition, to be an equal part of the society and have the same opportunities require also self-determination over own life and body, which, among others, are secured by available contraception and the liberalization of abortion (civil rights). Furthermore, work is addressed as a right for every citizens in the Constitution (article 40) and education is free and compulsory for all from the ages of 6-16. These rights, civil to political, are essential in the democratic transition Tunisia is undergoing. In the perspective of Marshall, these rights are necessary for the development and maintenance of a civilized society (educated, healthy population with freedoms) (cf. 4.2.1) and if such a society is not to be formed on social inequality, the rights shall be accessible for all.

The laws the 2014 Constitution are major steps towards gender equality. However, laws "outside" the Constitution still recognize the man as the "head of the household" depriving women from having equal power over their lives and over decisions concerning their children. Furthermore, inheritance is an issue in which women are not considered as equal with men, as women by law not are guaranteed to inherit or inherit as much as a man. Inheritance remains a fundamental issue in Tunisia, some of the explanation can be found in Islam, as no area of Islamic laws have as strong paternal male kin as

the law of inheritance. The law favor the man over the woman and grants privileges to agnatic relative (male relatives on the paternal side). Inheritance is a subject, which is treated with cautious by women's rights advocates, as the subject is explicitly addressed in the Quran (Charrad 2007a:205-53). A change in the inheritance law requires a change in the mindset. The National Democratic Institute (NDI) conducted in 2012 a focus group study in which the subject was discussed. The respondents used the Quran as evidence and justifications of why men and women cannot be equal and female respondents expressed that inheritance is a religious issue and such matters should not be changed nor challenged (Borovsky & Yahia 2012:15-19). The strong role of religion and the relics of patriarchal norms in the public and private life impede the process of achieving *de facto* gender equality (Jelalia 2015; Chambers & Cummings 2014). Expressed by a Tunisian man: *"Females have the same rights as men; however, the problem is in the mentality of our society that opposes the presence of women in several fields."* (Arab Women's Leadership Institute 2014:13). The social norms affect the practice of the equal opportunities, which the rights of the citizenship confers. The perceptions of Tunisian women's citizenship viewed isolated in relation to the Constitution are equal with men. The Constitution is a step in the Tunisian democratic transition, which includes the direction of gender democratization. An important element in the process of the writing of the Constitution was the public discussion and engagement, thus showing an exercise of democracy with an active civil society[17]. Women had a chance to express their views and influence the outcome exemplified with the "equal/ complementary" debate (Charrad & Zarrugh 2016). The women's citizenship isolated in regard to the civil, social, and political rights are *de jure* and *de facto* not equal with men, as discriminatory provisions exist. The Constitution promotes women's (equal) citizenship however, laws 'outside' support traditional gender roles, which impede the possibility of genuine gender equality. The development of an inclusive citizenship is a significant step in the process of achieving gender equality and the laws, individual orientated, provides more self-determination to the woman in the family and intimate life, thus more space to construct a self as an autonomous individual (the kin-contract gets less influence).

### 6.3.3 Comparative summary

A comparison between Danish and Tunisian women's citizenship isolated to formal rights show more similarities than differences however, the differences is of significant importance. Both countries

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[17]The nature of the process was a part of the reasons for that the Tunisian Dialogue Quartet received the 2015 Nobel Peace Prize (Charrad & Zarrugh 2016).

have formal equality, thus the citizenship is inclusive; Constitutional addressed in Tunisia and stated in the gender equality act in Denmark. The major differences between women's rights in Denmark and Tunisia are that Tunisian women experience discrimination in other laws such as the inheritance law, which privileges the men and challenges the value of the formal equality stated in the Constitution.

A challenge both to Danish and Tunisian women are the achieving of respect and recognition of their rights; issues of equal pay, equal opportunities in the labor market and violence against women emphasize the existence of structural conditions, which impede the full integration of women in the society. Both Danish and Tunisian women are challenged by traditional gender roles and social norms in the societies. In Denmark, this is not reflected in the legislation as in Tunisia (men as head of the household, unequal inheritance). In some aspects the social perceptions and norms trump the legislation, thus the norms become a challenge for the women to exercise their rights and opportunities. It affects their opportunities in the labor market and in the political sphere, despite rights guarantees otherwise. Women's citizenship becomes dependent on the women's societal positions and roles, which creates an unequal power relationship based on gender. This is highly more prevalent in Tunisia than in Denmark. In Tunisia the gender roles are maintained by the impact of religion (state and religion is separated however, the role of is religion in the society is huge) and the relics of a kin-based society, which support the interpretations that the Tunisian (Muslim) woman is complementary to the man. The perception of women and men having different functions and responsibilities justify the perception that women and men are not equal in all aspect of life hence equal rights are not a prerequisite.

Both Denmark and Tunisia have transformed the concept of citizenship to become more inclusive and equal (the trajectory have differed cf. Ch. 5). This has included changes in the perception of gender and family in the political institutions and social policies. Women, Danish and Tunisian, have left the home/private sphere however; gender roles and gendered norms still structure the private and public spheres. In general terms, the exclusion of women and their limited opportunities (exceptions exists, of course) are somewhat determined by structural inequalities in the family, which becomes the social norm. However, it must be emphasized that the expansions of women's rights, their entering the educational system and the labor market have changed the gender relations in favor of the women. It must also be emphasized that the individual citizen in Denmark and Tunisia consist of her/his own understandings towards others; legislation cannot change that. However, legislation can secure and

promote gender equality and may in the long term have an effect on the perceptions of the traditional gender roles, and thus on the perceptions and practice of women's citizenship.

## 6.3 Participation

With rights, follow obligations and opportunities, which enable the women to participate in the society. The exercise and involvement in the society are voluntary nevertheless, the society creates ideals for the participation e.g. vote, pay tax, obey the laws (civic virtues). The "legal basis" for the Danish and Tunisian women to participate in the different spheres of the society exist (cf. Ch.5; 6.2) however, the legal status is not necessarily equal to that the rights are fully accessible for the women and thus to participate. This is affected by social norms, educational background, experience, and the desire to participate in the political sphere or in the labor market. Concerning participation the essential is that the women do not feel excluded from the possibility to participate. With participation (and rights), follow an opportunity to become empowered. In this thesis empowerment is defined as a process of change from which the women expand their freedoms, ability of choices and actions, thus have the power and capacity to make choices with a positively change. The notion of empowerment can also have a mobilization perspective this includes actions of "the mass" (organizations, movements) in which there are a group solidarity who want to bring about social change in the society.

### 6.3.1 Denmark

In 2011, the government of the time appointed an inter-ministerial working-group to examine citizenship (medborgerskab) among immigrants and ethnic Danes (quantitative study). The study concluded that a good citizen is one who *"keeps her/himself informed about society, vote in elections, report illegalities to the police and support for themselves through work"* (own translation, Ministry of Refugee, Immigrants and Integration 2011:9). Of the questionnaire, conducted five years later, the same civic virtues recur (it emphasized that the questions are different). The Danish respondents view "pay taxes" to be the most important civic virtue (81%), followed by obeying the Danish laws and regulations (80,4%), and vote in public elections (73%). Opposite the conclusion in 2011, the respondents in the questionnaire do not consider "follow the government's actions" as an important element for being a good citizen (counterpart to the governments "informed about society"). The least important civic virtue for the respondents in order to be viewed as a good citizen is to be active in a social or political organization (16%) (The percentage is a merge of indicator 4 and 5, Q5, appendix D). This is interesting as 42 % of the Danish population are volunteers (The National Volunteer Centre 2014:8) and some argue that voluntariness has become a norm and a prerequisite for a living civil

society (e.g. Hartmann & Holm 2013). However, based on the respondents it is not significant for being a good citizen. This can have several explanations; first, I do not know if the respondents themselves are volunteers or active members in an organization, which most likely have an impact on how they perceive it. Second, I cannot exclude the possibility that the respondents thought they should rank the five options hierarchical[18]. In addition, it can be argued that it is "free" *not to* participate in this way, as e.g. tax evasion has consequences (fine or imprisonment). Whereas being active in an organization is driven by lust, energy, and a desire to make changes and/or help others (it cannot be excluded that some see it as career enhancing). 81% of the respondents see the payment of tax as the most important civic virtue. This result is in line with a Gallup survey from 2014, which showed that 88% of the Danish population gladly pay their taxes indicating a huge support for the Danish welfare state (Jensen 2014). Furthermore, tax evasion is viewed as free riding (receive the benefits without contribution) and is frowned upon. Citizens who evade tax do not fulfill the tax obligation (civic virtue) that is a cornerstone in the Danish welfare society and something that connects all Danes, as all contribute to the welfare system. A good citizen, based on the respondents and the ministerial report, participate in the society and work to support herself/himself. Danish women do participate in the society; in the labor market, elections and in the educational system. In some aspects Danish women outnumber the men e.g. as voters and in the level of enrollment at universities (Bhatti et al. 2016:1; Statistics Denmark 2016:143). Women dominate the public sector and men dominate the private sector. This divide constitute a labor market that is gender segregated (Statistics Denmark 2016:192). Related to the notion of citizenship, the segregation reflects inequality in opportunities, which stem from the society's structural conditions in which certain perceptions of gender roles spill-over and create so-called male and female jobs (stereotypes such as men are craftsmen and women are nurses). A segregated labor do have consequences for the individual woman, as it is often connected to a lower pay and fewer opportunities to utilize and develop the capacities of the woman. On a macro-level it affect the possibilities to follow the labor supply and demand negatively and it can maintain the structural conditions of traditional gender roles in the labor market and in the family. Such structural factors affect the women's (and men's) maneuver room or the exercise of their citizenship. In addition, the institutionalized gender roles and social norms manage to trump the enshrined rights, which ensure equal opportunities, as common human behavior is to follow the norms. Women's political participation have steadily been increasing since 1980s from signed a petition to

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[18]In the validating interviews related to the pilot questionnaires this issue did not occur.

demonstrating (Levinsen 2011:189). The results from the questionnaire support the tendency. Participation reflects trust in the political institutions, as trust is a prerequisite for being willing to engage with such institutions. However, participation can also reflect disappointment with the current situation, thus participation can be motivated by the desire to change the conditions. The forms of political activities have changed – a lot can be done, very quick and easy, on the internet such a signing a petition, contact a politician or express own views on Facebook and/or Twitter. Furthermore, petitions, boycotts and demonstrations have become ordinary activities (Levinsen 2011:199). The new and easier possibilities to be politically active (politically active here include petition signing and the expression of views) are reflected in the results from the questionnaire. Many of the respondents have signed a petition, expressed their political opinions and a third have contacted or tried to contact a politician or civil servant. Moreover, many of the respondents have also taken part in a demonstration and attended a political meeting, which are more demanding. Many of the respondents have performed some sort of political activity however; many of them have never done such things (Q6, appendix C). The respondents who have not done the different political activities (five options) can be caused by serval factors. This can be all from lack of political interest, satisfaction with the conditions of the society, not bother or believe that political opinions are personal information. As political representatives, Danish women are rarer. There is a huge skewness both at the municipal and national level. In the 2013 municipal election 29,7% of the elected was women. In the 2015 parliament election 37,4% of the elected was women (Denmark fulfills the critical mass of 30% female representation in the parliament) (Nielsen 2013; Folketinget). Many explanations on the low percentage of female representation have been presented (see e.g. Christensen & Damkjær 1998; Fiig 2009; Kjær & Pedersen 2004; Fiig & Siim 2007). These include impeding factors (as barriers) such as the perception of gender roles (cultural barrier), the electoral system (institutional barrier), and the formal qualifications of women (socio-economic barrier). In addition, the balancing of career and family (women take the largest part of the unpaid work at home) challenges their candidacy. Women still meet these barriers however, the general attitude towards women in politics is more positive than it was in the 1970s, women are well educated, and parties include more women as candidates (Nielsen 2015). Nevertheless, the Danish Parliament do not reflect the population, which is a democratic problem (and a matter of justice – "the justice argument", Phillips 1994). Furthermore, women and men do not have the same interest, which the policy often reflects. This creates a risk of that few women is equal with less attention on certain issues e.g. sexism (the "interest argument", Phillips 1994). The

"interest argument" is to be "played" with caution, as the legitimate rationale that only women should/can manage social issues is vague.

The female suffrage movement has been a significant factor in the mobilization and empowerment of Danish women in the civil society. It created a process of change in which women strengthened their citizenship, changed their societal status and the gender relations were structural changed. In the perspective of empowerment and the "mobilization perspective" (cf. 4.2.2), the Danish women's movement with a group solidarity brought social change a created a more social justice and equal society. Women's movement in combinations with politicians and the trade union expand women's freedoms, improved their ability of choices and actions (social rights). The changes in the political landscape (including women friendly social policy), the labor market, and the achieved rights create opportunities for the women to become more empowered. The rights conferred by the citizenship strengthen the woman's possibility to hold power over herself. The Danish woman has a high degree of self-determination in education, work, spouse, and of her body, which give her the opportunities to change or decide her own economic, social, and political status for some more easily than others. Danish women are highly empowered with a secured economic fundament (in the worse cases a security net provided by the state) and have the opportunities to pursue educational and career desires (exceptions exists, of course). This situation may be the end of women's movements as known from the 1970s in which there were a collectively power who wanted to changes the conditions and the structures for the women (as a collective). Women's right/gender equality do not any longer have a strong mobilizing power, which becomes a barrier to break down the structures which still impede genuine gender equality and the full integration of women in all levels of the society.

## 6.3.2 Tunisia

A good Tunisian citizen, based on the nine respondents from the questionnaire, is one who always vote in elections, never commits tax evasion, and always obey the Tunisian laws and regulations (respectively merged percentage of indicator 4 and 5; 100%, 88,9% and 88,9%) (Q6, appendix D). This definition of a good citizen indicates that the Tunisian citizens are aware of their civic rights and duties. Findings from Pew Research Center report (2013) can supplement the characterization of a good citizen. 93% of the Tunisian Muslim population say a woman always shall obey her husband (Pew Research Center 2013:10,24). The obligation of the women to obey her husband goes beyond the scope of the classical notion of citizenship and indicates the strong role of religion in the Tunisian society. Furthermore, it confirms that it is the individual society, which creates the ideal citizen (ideal

citizenship) (cf. 4.2.1). In 2013, the Arab Women's Leadership Institute asked a representative sample to what extent they feel that women are allowed to freely participate in the society, 50 % of the respondent answered "to a large extent", 39% "to some extent" and 10% "to a limited/not at all" (Arab Women's leadership Institute 2013:16). Indicating that the practice of women's citizenship *de facto* is limited. This can be supported by results from the questionnaire and findings from Borovsky and Yahia (2012). Gender norms are still deeply embedded in the Tunisian society. Perceptions of the women, which prescribe that they shall play a private role in the society and prioritize child rearing and keeping the house neat affects them negatively in the opportunities to participate in politics and in the labor market  In addition, many women do not perceive themselves as playing an equal role in the society. Changes in the mentality are needed and shall include a greater respect for women's rights, capabilities and ideas (Q14, appendix D;.Borovsky & Yahia 2012:6-8,13; Arab Women's Leadership Institute 2013:13). Despite the practice of women's citizenship are limited, the public attitude towards women's education are positive, which is due to secular social policies that improve human development, as they recognize the importance of education in relation to gender equality[19]. Governments programs with a focus on women, young, rural areas, and the poor have been adopted in order to increase female enrolment (Chambers & Cummings 2014:35-37). The access to education in combination with the state's health and reproductive policy (body rights) have contributed to expand women's opportunities and attendance in the labor market (25,3 % of the total labor force was women in 2010 (ibid.:21)). However, there is a clear inequality in terms of equal opportunities for economic empowerment, as for every four men accessing economic opportunities only one woman access (Jelalia 2015). Tunisian women dominant the lower-paid and lower-skilled jobs despite a well educational background. This create a gender segregated labor market. Explanations can be found in the level of women's education[20] and in the societal structure and social norms. It is clear that the positive attitude towards women's education do not continues in to the labor market. The perception of gender roles has a huge impact on women's opportunities, as a Tunisian woman states, "*(...) we learned mom cooks, and dad works*" (Arab Women's Leadership Institute 2013:13). This attitude is highly oppressive to women and creates domestic/private tensions concerning women's freedom to work, as male employment are assessed more important than female employment. In addition, lower-

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[19]The right to education introduced in 1958 was motivated by economic development interest, from the 1990s education was recognize as important to gender quality as well (Chambers & Cummings 2014:37).
[20]There is a significant difference in literacy and schooling rates between the regions and urban-rural areas (Chambers & Cummings 2014:20).

paid and lower-skilled jobs are more accessible to women as this are more acceptable to their husbands. A perception that reflects a hierarchal perception on women and their qualifications compared to men (Chambers & Cummings 2014:37; Borovsky & Yahia 2012:7-8). In the perceptive of Marshall, women are viewed second-class citizens with a citizenship, which 'value' is lower than the men's are.

Women's political participation (from signed a petition, voting to being a representative) occurs and is influential. The results from the questionnaire show high activity within the last five years. 88,9 % have signed a petition, 100% taken part in a demonstration, 77,7 % attended a political meeting/debate, 44,4 % contacted, or attempted to contact, a politician or civil servant, 44,4% expressed political views public and 66,6% have expressed and shared political views on the social media (Q7, appendix D). The high percentages are affected by the small population of nine, the fact that there have been elections within the five years (higher the chance of e.g. political meetings), and the Jasmine revolution in which women were highly represented. However, the participation, the creation of new political parties (pluralism) and NGOs reflect a trust in the political democratic principles, institutions and indicate a more inclusive political sphere (Kostas 2016). Voting in elections is a keystone in a democracy; the general perception in Tunisia is that voting is a civic virtue and it is a pride. In the 2011 Constituent Assembly elections, 75% men and 65% women voted a gender gap of 10 percent. A small gap compared to neighbor countries such as Libya and Egypt. The low gap reflects Tunisia's progressive efforts to promote gender equality (Benstead & Lust 2015). A precondition to vote is political awareness[21] defined as knowledge about elections, parties, events, and campaigns without political awareness civic participation is less likely to occur. American-Lebanese Carla Beth Abdo, with a doctorate in Government and Political science, examined the Tunisians political participation with a focus on political awareness (dependent variable). Abdo (2015) found that the general political awareness in Tunisia is low; only 44% of her sample[22] correctly identified that the NCA elections were going to take place. Among women, the percentage was 35% (men 51%) (Abdo 2015:3-6; Benstead & Lust 2015). The low degree of political awareness creates constraints on female political participation and, thus their practice of the more political dimension of citizenship. Women's low degree of participation constitute the same negatively consequences as in the Danish case. Women's voices and

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[21] This concept was not addressed in the Danish section as there is not tradition to examine political awareness in Danish opinion polls however; Hansen (2007) did studied this in connection with the 2005 national election. Hansen studied the notion of "political knowledge" (politisk viden) and concluded that on an average woman have a lower level of political knowledge than men have (Hansen 2007:260-63).

[22] Stratified random sampling of 1506 with 53,6% male and 46,4% female respondents (Abdo 2015:6).

needs are given less attention and women's issues are left to external actors such as NGOs. Tunisia has however, the highest percentage of women in parliament in the MENA region (33,3%) (IPU 2016). This can, among others, be attributed to the electoral law with gender quota (zipper system). The percentage of women at the top of electoral lists rose from 6% in 2011 to 12,5% in 2014 (Amar 2014:7-8). However, the system prioritizes men; the men dominate the tops spots of the candidate lists. Furthermore, the percentage do not occur in the local levels where there is no female governors or mayors (Jelalia 2015). This is likely to change, as the Parliament has adopted a new law, which demands the parties to put a woman highest on the electoral list in half of the constituencies effective from the 2017 local elections. The parity is both horizontal and vertical, as the gender balance shall apply both for the number of candidates and in the top candidates. This law is unique not just regionally but on a global scale (Kvinfo 2016). Advocates for the new law was women's organizations, inter alia The League of female Tunisian voters (LET). A great example of women's empowerment (feminism activism). With their work, they change and strengthen the opportunities of the women to achieve more political responsibility and power. Furthermore, this can redefine the power relations in Tunisia in ways that help reduce structures of inequality between gender (and social classes, and regions).

Women's empowerment (socio-economic) is supported by the rights of the citizenship, state policies and programs, which promote gender equality. This have supported and promoted structural change in the women's access to resources from education, health service/knowledge to earning own money (paid employment). These factors support women's political, social, and economic empowerment. The empowerment of the Tunisian women provide the women's movements to be watchdogs and demand further changes and more equality. However, the existence of traditional gender stereotypes continue to challenge women's opportunities to participate despite the citizenship enables the women to participate. The relics of the kin-contract and the patriarchal societal structure impede the empowerment of women, which limit their maneuver room in the public sphere. Another important factor concerning women's empowerment and their possibilities to participate in the public and political spheres are the high degree of violence against women in Tunisia. 47% of women in the age of 18-67 have been victims to physical and/or psychological violence and women more than men are anxious for their physical security and sexual harassment both in the street and in the workplace (Mosekilde 2016; Borovsky & Yahia 2012:8).

### 6.3.3 Comparative summary

The citizenship of Danish and Tunisian women enable the women to participate, which the women do (vote, run for elections, work, express opinions, etc.). Both countries have experienced structural changes in the perceptions of women's participation and in the actual participation from forced spectator to recognized participant. It is assessed that the participation of women and the acceptance of it are more institutionalized in Denmark than in Tunisia. Explanations are inter alia that Danish women have being able to participate for a longer time and have good conditions for reconcile motherhood and work (women friendly social policy). Tunisia has adopted rights and reforms with same purpose however; these favor a male breadwinner and female homemaker model. The perceptions of gender roles, which in both countries are dominated by traditional interpretations do not prevent the women to participate in the society. However, it affects the type of participation and involvement in the societies, which result in gender segregated labor markets, unequal wages, few women in politics and in management positions, higher involvement in the local area (schools, childcare institutions) than in the public arena (Siim (2000) refers to this subject as 'small' and 'big' democracy). The public-private divide is in Tunisia more pronounced and explicit than in Denmark, which affects women's opportunities and/or maneuver room as there exists a reluctance against Tunisian women in the public sphere. Furthermore, surveys show that men, in both countries, prefer men as leaders making it even harder to break the glass ceiling in regard to top positions (Santesson 2013; Stelling 2013; Arab Women's Leadership Institute 2013:20). Despite the evidence for structural obstacles for the women in both countries to enter decision-making positions (in politics and business), it is easy to find voices that express the women themselves are to blame. Examples include "W*omen should be more serious about reaching leadership positions"* (Tunisian Male, Arab Women's Leadership Institute 2013:29) and Berlingske chief editor, Tom Jensen's, notorious editorial "Kvind jer op". I will not discuss the legitimacy of these statements but it stresses that laws and political programs promoting and strengthen women's opportunities, rights and empowerment are significant but not enough. Changes in the social mentality (men and women's) is at least as important for women's participation and for the recognition of women.

In terms of political participation, both as voters and representatives, no laws prohibit Danish or Tunisian women from participate in the political sphere on an equal footing with men. When the women enter the political arena, both enter a male dominated world. In Denmark, this occurs without any positive discrimination. In Tunisia, the gender parity law supports women as representatives. The best way to secure female representation will most likely always be a subject of debate. Is it by a mass

mobilization of women as in Denmark or by imposed law as in Tunisia? To a certain degree, the end justifies the means. However, women shall not be elected simply due to regulations but due to their own interest and qualifications. In Tunisia, the social structures are affected by a patriarchal structure, thus a law is most likely a necessary in order to transform the political agenda and institutions. However, it is also a fast track to increase women's representation, which not necessarily institutionalize women's participation. When the women take the decision of running and campaigning for elections it is assessed more challenging for Tunisian women than for Danish women, as Tunisian women experience the barrier of time restrictions in addition to the social and cultural expectations. The expectations hamper the recognition of women as serious political actors and their candidacy goes against the norms despite the fact that women obtained the right to stand for election in 1959 (Petre 2015).

The participation dimension of citizenship for both Danish and Tunisian women are enabled. Participation is voluntary, hence dependent on desire and willingness of the women. However, the participatory opportunities are challenged by the perceptions of women in the public and private sphere (cultural and attitudinal barriers). This division is more explicit in Tunisia, which reflects the impact of the religious interpretations on women and men in which women and men are not born equal in bodies, capacities and responsibilities. In addition, the issue of reconciling career demands with family responsibilities are a challenge in both Denmark and Tunisia.

## 6.4 Belonging

The notion of citizenship contains an emotional aspect in which a citizenship provides a feeling of belonging and identification to the country. This have a spillover effect in the construction of the individual's identity. The feeling of belonging or affiliation to the Danish and/or Tunisian society is also about wish and willingness of the woman to be loyal to the society, to identify with her fellow citizens, and the values of the society.

### 6.4.1 Denmark

A citizenship provides the woman with a legal status, thus a formal belonging to Denmark. In the questionnaire, 81,6% of the respondents feel that being a Danish citizen is a part of their identity (Q10) (98,2% of the respondents hold a Danish citizenship (Q1 appendix C)). Based solely of this, the respondents' identity and citizenship are interrelated. Thus, the respondents' narratives of who there are include their Danish citizenship. In continuation of this, 94,5% have a feeling of belonging/an emotional attachment to the Danish society - they feel that Denmark is like a home for them

(Q8 appendix C). These results support the theoretical perspective that prescribe that a citizenship provides a feeling of belonging and a self-identification with the Danish society. Slightly interesting is it that more of the respondents feel that they have an affiliation to Denmark[23] than there are respondents who express that their citizenship is a part of their identity (respectively 94,5 % and 81,6%) (Appendix C). It must be emphasized, that the difference is small and there are overlaps in the results; 129 of the respondents express a belonging to Denmark *and* an identification with their Danish citizenship. In addition, the majority of the respondents who answered the above mentioned all hold a Danish citizenship (Appendix F). However, based on the respondents, this show that an identification with the Danish citizenship (as a social location) is not a prerequisite for a feeling of belonging to the Danish society. Some explanations for this can be the respondents' associations with a Danish citizenship, which they cannot identify with e.g. the values and politics or simple the fact they perceive a citizenship as a formal status that is not given thoughts. In a broader perspective, the globalization and migration challenge the 'value' of a citizenship, as rights and belonging not are solely dependent on a citizenship. Especially the boundaries of belonging have become more fluent and the national identity is not exclusively based on origins but rather on identifications and emotional attachments. A fact, which also is reflected in the current refugee crisis in which the debate both are based on economic conditions and on a more identificatory and emotional level (political and ethical values related to democracy in order to maintain social cohesion).

The questionnaire included a question related to the women's social locations. The purpose of the question was to capture, which 'categories' the women themselves feel they belong to and thus identify with (options of eight different social locations, the respondents were allowed to thick more than one box). The social location, which the majority of the respondents (58,3%) identify themselves with are their citizenship. Followed by profession 45,4%, gender 39,3% and age 36,3% (Q9, appendix C). Automatically, when the individual identifies itself with certain social locations she position herself in the society along an "axis of power" in which different locations are more or lesser powerful than others (often the power will be fluid and more or less subjective) (cf. 4.2.3; Yuval-Davis 2006:199). The power of these social locations depend on the subjective understanding in addition the power of the profession is dependent the type of profession. However, the citizenship is most likely Danish, thus belonging to the majority of the Danish population, which generate power (and inclusion). More-

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[23]A bias in Q8; "Do you feel like you belong to the Danish society?" is the lack of the option: "Don't know"

over, the majority of the respondents who considered themselves belonging to a group based on profession are those with a minimum of 3-4 years of education in addition to high school, which indicate a certain degree of empowerment, economic foundation and, thus not rank them on the bottom of the "axis of power" (cf. appendix G). Beside profession (and for some the legal citizenship) gender, age and citizenship are locations, which are determined by others and the biological process. There is no significant difference between the respondents' educational background and their identified social locations. The only groups in which it is under 50% of the respondents who see themselves belonging to a certain groups based on their citizenship are the respondents with primarily school and Ph.D. as educational background (33,3% and 42%) (Appendix G). A small part of the respondents, 10,4 % indicate that they do not identify with any of the proposed options. Crossed with "highest completed education" shows that the 10,4 % are spread from elementary school to Ph.D. level (Appendix G). It is a small percentage however, interesting as the suggested social locations are viewed as central in the identity identifications of the individual in which the individual has a basic identity, which evolves throughout life based on factors such as education, gender, and profession. Slightly more of the respondents consider themselves belonging to a certain group based on their political orientation than of their religious orientation and ethnicity[24]. Related to religion this support the Danes strong belief in secular values, democracy and freedoms rights. However, as Professor in Sociology Phil Zuckerman stresses, Danes tend to personify the Christian values and associated them with help and care for the sick, poor and elder, which is assessed as a "belief" in humanism (Beck Pedersen 2013). Zuckerman's results are recovered in the results from the questionnaire in which the majority state that they do not consider religion to have a signification role in the Danish society in relation to gender roles and opportunities to make life choices (such as education, employment, relationships) (respectively 62,6% and 79,1% Q11,Q12 appendix C). This also mean that 18,4% feel that religion have a significant meaning in relation to their life choices (ibid.) This reflects a new form of practice of religion in Denmark in which religion is individualized, existential, and it is the self-development aspect that are exercised. However, the role of the church (folkekirken) may not be underestimated as an institution of identification to Denmark (with being Danish) this is although more related to traditions and festivals than the word of the Bible (Andersen & Lüchau 2011:95; Jenkins 2012:251). A citizenship include, and in line with the theoretical perspective, a feeling of belonging to the Danish society due both to the status and the practice. However, a citizenship is not a prerequisite for an affiliation to

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[24]Ethnicity defined as a fixed 'category' based on a population, who has a common descent in which they share characteristics such as traditions, values, language, norms (collective identity).

Denmark. This is assessed possible without a legal status. The formal equality, women's opportunities in the different domains in the society, and the high level of social trust (2012:78% Madsen (2013), questionnaire: 78,5 %, Q16 appendix C)) are assessed to have a positively influence on the willingness of the women to identify with- and to feel a sense of belonging to Denmark.

## 6.4.2 Tunisia

In the preamble of the 2014 Constitution the wording, *"our Islamic-Arab identity"* is stated and in article 39 concerning education one finds: *"...It* [the state] *shall also work to consolidate the Arab-Muslim identity and national belonging in the young generations (...)"* (Tunisia's Constitution of 2014 Article 39, Constituteproject 2014:8). These statements/articles indicate that a Tunisian citizenship aims at providing the individual with an Islamic-Arab/Muslim identity and a national belonging. Thus, a Tunisian citizenship, constitutional addressed, goes beyond the scope of just being a legal status. Theoretically, a citizenship will often provide these elements; a (national) belonging to the country and become a part (emotionally) of individual's identity without addressing the fact. The NCA with the Constitution creates some boundaries of belonging, as Tunisia becomes (maintains) a country in which the citizen has an Islamic-Arab/Muslim identity. It can seem powerful that notions such as identity and belonging are constitutionally addressed. Attention must be drawn to the time of the writing. The Constitution was written in the aftermath of the Jasmine Revolution, which changed the political landscape and the status quo. Thus, it is viewed as a more "we must unite" statements and a break with the relics that citizens mainly identifies and belong to the kinship or clan/tribal. The boundary of identity and belonging in such cases are primary genealogic, which the Constitution wishes to change by creating an identity based on the country Tunisia and the Islamic religion (roughly speaking). Nevertheless, a Constitution is after all a founding element of a country and with this content it create room for implementation of certain politics of belonging, as it constructs a belonging to a certain collective (Islamic, Arab). Tunisia might thus be an example in which a citizenship as status and the identity of the  individual remain structurally coupled in relation to identification and emotional attachments (the state do not impose an identity as a precondition for citizenship). This can be traced back to the time of independence. President Bourguiba's state-building project included a secular state with a population who all should share the same national identity (cultural, social and historical). He opposed any revival of religion and kinship (Islam, at that time shifted from the public to the private realm). This was remarkable at the time, as it led to an oppression of sub-identities of the population and forced a certain national identity. It is debatable whether it succeed, as by the early 1970s the approach began losing its legitimacy. Tunisians began searching and fighting for a renewal

of Arab-Muslim values. Today, Islam is part of the Tunisian reality (Haugbølle 2015:1,14; McCarthy 2014:734). The results from the questionnaire support the theory, as eight out of the nine respondents consider being a Tunisian citizen to be a part of their identity (all hold a Tunisian citizenship). In addition, all nine see themselves belonging to a certain group based on their citizenship and eight feel like they belong to the Tunisian society, thus having an emotional attachment to Tunisia (Q11, Q10, Q9, appendix D).

To be willing to identify with the society one lives in dependents on several factors. In this thesis, the focus is on whether the citizenship is inclusive, which means that women are a part of the citizenship and defined as equal citizens. This is legally enshrined however, the public opinion do also have an impact and can affect the feeling of belonging of the women. Pew Research Center (2012) identifies that 74% of the Tunisian population believes that women should have equal rights as men, which indicate that the women often will experience support for their rights and status as equal citizens (or at least when asked in research studies) (Pew Research Center 2012). This reinforces the feeling of inclusion and thus the willingness to identify and create emotional attachments to the society. However, gendered stereotypes and norms place women in the private sphere with care rearing and cooking (perceive as respectful duties) impeding women's opportunities to enter the public sphere. From a theoretical standpoint, this creates unequal relationship between the citizens based on gender and give a sense of exclusion. The role of the kin-contract is a keen element related to the feeling of belonging in Tunisia, as the maintenance of kin-based family structure maintains the feeling of belonging to be within the family prior the membership of the state. The family structure and the embedded traditional gender roles shape how the women are valued and judge (ethical values). Tunisian women who criticize or discuss the gendered perception of roles and responsibilities experience to be looked frowned upon both by women and men (Borovsky & Yahia 2012:7,13). With the critique the women opposes the norm of how they "shall" perceive themselves and their roles, which include being proud by fulfilling traditional duties. The negative judgement of the first mentioned women may lead to a situation in which the women feel less included in the near community. However, it can also generate empowerment, changes and break the social norms.

The general role of religion from the private to the public sphere makes it a bit surprising that only three of the respondents identified themselves with religion (Q10, appendix D). The respondents distancing from religion is also reflected in the fact that only three (the same who also identifies with religion (cf. appendix H) feel that religion have a significant meaning in relation to their opportunities

to make life choices (education, job, relationship) (Q13, appendix D). Part of the explanation can be found in the very small population of nine respondents and the evolvement of a more secular identity. After the Jasmine revolution, the traditional Arab-Muslim identity has made resurgence, thus raised tensions between it and the more modern secular identity (aam 2014). The results from the questionnaire indicate that the respondents tend to the more modern identity. The women's citizenship include, in line with the theoretical perspective, a feeling of belonging to the Tunisian society and being a Tunisian citizen becomes a part of the identity of the respondents. The relationship between citizenship and belonging is in Tunisia challenges by the kinship as within such belonging is to the kin rather than to the state, thus challenging the citizenship's "role" in providing a sense of belonging. The impact of kinship is although declining promoted inter alia by the laws focusing on the individual rather on than the family. The fact that the emotional aspects of identity and belonging are written into the Constitution make the formal citizenship status intertwined with the identity of the individual (constitutionally more than empirical based).

### 6.4.3 Comparative summary

Both a Danish and a Tunisian citizenship enables the women to construct a feeling of belonging and identification to the societies. However, affiliation can occur without expressing an explicit identification with the citizenship. The boundary of belonging seems more fluent in Denmark compared to Tunisia, as the Constitution shapes fixed boundaries of belonging by emphasizing that the Tunisian identity is Islamic-Arab (Tunisia do also consist of 99% Muslims). For comparison, the Danish Constitution only states that the national church is Evangelical Lutheran and that the king/queen must belong to this (§4,§6 Grundloven.dk). The Tunisian national identity is still in a transformation from being based on kinship/clans (genealogical self-identification) to a national identity based on the country as a whole and its values (Arab-Muslim). Origins do also have an impact in the Danish national identity however, identifications and emotional attachments to the Danish society are not necessary dependent on Danish origin and thus the national identity is more based on norms and values. It is although assessed that birthplace and nationality have an impact on the individual in order to identify and have emotional attachments to Denmark.

Denmark prides itself to be secular and open-minded (and perhaps more than in Tunisia), which make it interesting that the current government (Liberal party) in their government platform proclaims that Denmark is a Christian country and the Evangelical-Lutheran church has a special status as the na-

tional church (The Danish Government 2015:26). There is no doubt that the Danish society and culture (values, traditions) are rooted in Christianity. However, the explicit priority of Christianity excludes others religions and/or atheists (despite the government in the following stresses that people are free to have their own beliefs) in the same way as the "Arab-Muslim identity" do in the Tunisian Constitution. Interpreted normatively, this creates fixed boundaries of belonging, as "Denmark is a Christian country". However, a government platform is "only" visions and reflections of overall priorities it is not implemented policy and furthermore, the Danish Constitution guarantees freedom of religion.

Denmark and Tunisia are both in a process of changes in relation to boundaries of belonging and the creation of a collective identity. Tunisia is caught in a tension between a modern, secular identity and a traditional Arab-Muslim identity. Denmark is challenges by the increasing migration and whether the Danish identity and citizenship include a multicultural dimension (the question if the Danish society is multicultural or not is a returning debate topic). Despite these uncertainties regarding "how inclusive" and "what kind of identity" a citizenship shall provide it is assessed that a citizenship provides the woman, whether she lives in Denmark or Tunisia, with a sense of belonging and identification to the society. Thus, the citizenship becomes more than just a legal status, which emphasizes the emotional dimension of a citizenship. However, the sense of affiliation is not necessarily exclusively dependent on a citizenship status. Nationality, the birthplace of the individual, the residence of the family etc. are strong identifications factors, as well. The legal status provides the individual to be a formal citizen of the given country and supports the individual to feel included in the national community as being "one of us" and thus creating a "them". This reinforce the sense of belonging.


6.5 New issues

The completion of the analysis made it visible that new issues to women's citizenship have emerged. The struggle is no longer for the rights but the implementations of these in all domains of the society, thus secure *de facto* gender equality. This section will *briefly* addressed *some* of the new issues connected to women's citizenship in Denmark and Tunisia.

In terms of political participation the challengees in both countries are to encourage women to stand for election (and then have them voted in), as no laws prevent the women to run. Qualified women experienced to be excluded from the pool of candidates due to social and cultural barriers (cf. 6.4).

Moreover, when women are voted into the parliament they shall not just hold the more "soft" spokes-person positions or ministries (however, better than no positions at all). The new issue in this case is the increasing attention women in parliaments around the world receive. Media, women's organizations, and international agencies serve as watchdogs and are quick to addressed factors such as the amount of time the women get in the media and publish statistics on the number of female elected. Thus, there is a high awareness on the *number* of women in politics from local to notational level, an awareness on whether the voters have elected more or fewer women, and if the new elected government designated more or fewer female ministers than the former. This is often followed by a debate about whether the number is high or low, which factors that cause the number, and "quality vs. quantity". This issue often reflects the structures of the society in which men fill the powerful positons (in politics and the public and private market), which is a return to the traditional perception of gender roles and the gender segregated labor market. Related to the labor market is the issue of reconciling an active career and the responsibilities of family, which is a recurring issue in the equality debate. The specific content changes from time to time; nowadays it include the fathers and their possibilities to take maternity leave. A reminder that equality concern *both* women and men.

Violence (physically, psychologically, sexually) against women are, unfortunately, not a new issue (more widespread in Tunisia than in Denmark). Both countries have secured the protection of women in the legislation and both countries have ratified different international conventions such as CEDAW. However, the numbers speak for themselves, violence occur. The existence of sexual discrimination, harassment and everyday sexism are clearly a sign that gender equality is not fully achieved. Such violations of women emphasize that women are not respected or recognized as equal citizen by the offenders. In a Tunisian context, the new issue is that the women are being more empowered, thus speaks up. Since December 2014, over 15.000 testimonies have been collected by the Truth and Dignity Commission (l'Instance Vérité et Dignité), which include all from systematic sexual violence, torture and intimidation (Baker III 2015). In a Danish context, the new issue related to violence against women are the so-called "revenge-porn" in which previous partners or hackers without the women's consent share pictures or videos of the women on the internet. The respect for the woman's self-determination over her own body is clearly lacking.

The difference between women's citizenship in Denmark and Tunisia becomes clear when looking at new issues related to the citizenship. The Tunisian women are still fighting with the more "traditional" issues (not to be neglected) such as the recognition of them as equal citizen in the society who participate in all spheres of the society, employment rates, equal treatment on the labor market and in

politics, and violence. In addition, Tunisia experiences a rural-urban division, which cover a divide in women's empowerment, capabilities, opportunities, and practiced rights in the rural and urban areas. Women in the urban areas are more empowered, liberalized, participate more, and are more distanced from traditional perceptions on gender roles. The rural areas have a more conservative nature, which deemphasized women's participation outside the home supporting the traditional gender roles (public-private divide) (Daherlup et al. 2012:10; Abdo 2015:10). Religion do also divide the women in between. A division between the secular and the Islamic women in which the secular perceive women's rights as those expressed by e.g. the UN and fight for the freedom of the individual in all aspect of the life. Whereas, the more Islamic perceive women and men as equal but different, which is why women and men not necessarily shall have the same rights but complementary rights. This division do also occur on a more general level and after the Jasmine revolution, the division became reinforced by strong religious forces. Forces that try to combat the democratic transition including the empowerment and equal perception of women (Mitchell 2013). Many of the "traditional" issues still exist to some extent in Denmark. However, it is as if the topicality of them comes in waves. The battles Tunisian women are fighting today have Danish women (women's movements, politicians) fought years ago, which create space for new issue to occur in in new spheres. Issues such as how many female artists perform at the Danish music festivals, how many Danish films are directed by women or the right to breastfeed public reaches the media.

The globalization and the increasing migration do also create new issues to the Danish citizenship; as new cultures may have other perceptions of women than the general Danish perception, thus the citizenship and the potential difference is examined *between* women, *between* ethnicity, and nationality. This is not just within the individual country but also between regions, and between the north and south. The refugee crisis and the fact that the world is globalized with advanced technology make the geographical boundaries becomes more fluent (separation of time and space), which increase migration and voluntary immigration (settle with love ones, work related or just for the experience). Factors that affect the notion of belonging. Especially related to the refugee crisis it affect the politics of belonging. Questions occur such as who have the right to belong where, what requirements shall it take to obtain a citizenship, and can the Danish social cohesion handle "the newcomers?" These questions or situations support that a citizenship is dynamic, debatable, and in the end reflect that a citizenship is valuable.

## Chapter 7: Conclusion

The objective of the thesis was to compare women's citizenship in Denmark and Tunisia with a focus on rights, participation and belonging.

The citizenship of Danish and Tunisia women related to the rights dimension have many similarities. Both countries have transformed the citizenship to be inclusive (the path thereto differed). It is emphasized that inclusive is not the same as egalitarian, as Tunisian women experiences discrimination within the legislation. Personal rights and political reforms make it possible for women in both countries to construct an autonomous self. A Danish citizenship is egalitarian in all spheres of the rights domain (civil, political, and social). A Tunisian citizenship is differentiated based on gender however; the laws do challenge the kin-based/patriarchal society. The story of women's citizenship is no longer about obtaining rights, with some exceptions in Tunisia, but to ensure respect for the rights. There is a gap between *de jure* and *de facto* citizenship, and a gap between the women's activities and their representation in power positions. Issues such as ensuring equal pay, gender segregated labor market and few women in decision-making positions in politics and business exist in both countries. Legislation and politics that strengthen women's rights, opportunities, and empowerment are essential but not enough to change the social structures with embedded gender roles. There is a need for changes in the social mindset.

It can be concluded that the public-private divide in some degree determines the practice of women's citizenship (hypothesis) when it is related to the opportunities in the labor market including the political sphere. The public-private divide do not specific constitutes inequality in rights however; it can be argued that the Tunisian inequality in rights, which are caused by religious interpretations are forming the public-private divide in a Tunisian context. The social structures and norms affect women's opportunities to enter powerful positions. In addition, perceptions of gender roles create certain "female" and "male" jobs. Resulting in a gender segregated labor market in which women dominate the public sector and men the private sector. Thus, the private-public divide affects the maneuver room of the women in the labor market.

A citizenship enables the women to participate in all levels of the society. Both countries have experienced structural changes in the perceptions of women's participation. Women's participation are socially acceptable supported by changes in the perception of gender and family in the political institutions and social policies. It is found that women's participation are more institutionalized in Denmark compared to Tunisia. A factor, which impedes Tunisian women's participation. The exclusion

of Tunisian women from the public sphere is somewhat determined by structural inequalities in the family related to the roles and responsibilities. Danish women are assessed to be in a better position related to the perceptions of roles and acceptance to follow educational and career desires. Women as political representatives are in Tunisia supported by the gender parity law whereas in Denmark, female representation is without any positive discrimination. In both countries, it can be concluded that the governments, parties and organizations shall encourage women's political participation. A citizenship enables women with a feeling of belonging and identification to the society. There is a link between citizenship and belonging. However, based on the analysis a citizenship is not a prerequisite for a feeling of belonging to the society. A citizenship provides the individual to be a formal citizen and thus to be one of "us", which strengthen the affiliation degree. These factors constitute that a citizenship is more than a legal status, which confers rights. The feeling of belonging to either Denmark or Tunisia are supported by the citizenship however, factors such as identification to the countries' political principles and values, trust in fellow citizens, and the birthplace of the woman, shall not be underestimated in the woman's creation of emotional attachments to Denmark or Tunisia.

The citizenship of Danish and Tunisian women have many similarities. However, the citizenship and practice differs due to the relics of a patriarchal society structure in Tunisia (hypothesis). The close connection between women's behavior and family honor along with social and cultural expectations put restrictions on the full utilization of Tunisian women's citizenship. This is reflected in the attendance in the labor market, politics, and the educational system. The countries historical backgrounds and religious basis affect the present citizenship of women. Tunisia is a country based on kinship in which the norm is to privilege the men. This structure still shapes the gender roles, which also is affected by the strong role of religion in which the Quran perceives the women and men as complementary. The trajectory behind the Danish citizenship in combination with social policies, and the development of the society have made the citizenship egalitarian, thus Danish women are perceived as equal citizens in the society.

# Chapter 8: Reflection

Women's citizenship is a huge field of research, thus the challenge is to limit the field (even more so when there are certain requirements for space and time). I attempted to limit the field by having a focus on the equality aspect in which I included rights, participation and belonging. The latter, which may seem a bit remote from the rights aspect. However, I believe this aspect is linked to citizenship as it provide a sense of inclusion, which is a part of being and feeling as an equal integrated citizen in the society, thus belonging is seen as the emotional aspect of gender equality.

The rights dimension/equality perspective cover many aspects I have perceived it on a more general level and studied whether the women and men have the same rights and opportunities (gender as primary category) in order to make the comparison *between* Danish and Tunisian women. This resulted in limited space (if any) for distinct but related issues to women's citizenship. Issues such as recognition, agency, everyday tasks as a part of citizenship by being a recognized civic virtue (e.g. caregiving), the role of the media, and the different actors responsibilities in promoting women's rights and participation (e.g. the state, civil organizations, political parties, and the women themselves). Issues that confirms that that the notion of citizenship is a momentum concept.

I chose to conduct a self-completion questionnaire in Danish and English with a result of 163 Danish respondents and nine Tunisian respondents. My search on diverse Tunisian Facebook- groups, pages, and internet pages indicated that English is a used and understandable language. In hindsight, the Tunisian version of the questionnaire should probably have been produced in Arab and/or French in order to maximize the amount of Tunisian respondents. At that time, it was too late to have the questionnaire translated to Arab or French, as it also would require a processing of the questionnaire into English afterwards. The small Tunisian sample affects the validity of the results. However, the secondary literature and research of quantitative and qualitative nature produced before and after the revolution along with secondary literature and research on Danish women's citizenship made it possible to carry out the thesis with a solid empirical foundation. Thus, compensating for the primary data and strengthen the internal validity of the thesis (it was not attempt to achieve generalizability). Quantitative data do have shortcomings this became particularly visible in the capture of the notion of belonging. This element would have been better identified through interviews (individual or focus groups). Furthermore, interviews could have provided me with the opportunity to identify how 'ordinary' Danish and Tunisian women's perceive the role and meaning of a citizenship and studied if there is an interaction between the structure of the society and the structure of the identity (narratives

of the citizenship). Such factors would have supported and strengthen the "belonging" section, thus supported the overall analysis of women's citizenship in Denmark and Tunisia. It was deliberately that I started with the questionnaires, as they should serve as starting points for potential interviews. However, the gathering of the questionnaire especially the Tunisian took longer than expected. In addition, my poor experiences with the questionnaire in the Tunisian case and unanswered emails did that interviews with "ordinary" Tunisian women seemed very unlikely. The questionnaires did bring informative and relevant information to the purpose of the thesis.

The comparison between Denmark and Tunisia has sometimes been challenging as it at times felt like comparing apples to oranges. However, as two leading countries in their respective regions with regard to women's rights I do believe a comparison is valid in order to see if leading countries share perceptions, practices and challenges of women's citizenship. Thus, providing a broader understanding of how women's citizenship may varies in different cultures. However, when it all comes to the end the concept of citizenship in relation to women can be formulated short and simple. I will therefore agree with President Ali and conclude with his words:

*" (…) Indeed without women's citizenship the very notion of citizenship will be incomplete"*
(Chambers & Cummings 2014:9).

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# Chapter 10: List of appendix

Please refer to the enclosed USB drive.

A: Danish questionnaire

B: Tunisian questionnaire

C: Frequency analysis – Danish

D: Frequency analysis – Tunisian

E: Milestones in legislation

F: Cross tabulations related to question 8 and 10 (Danish version)

G: Cross-tabulation related to question 9 (Danish version)

H: Cross-tabulation related to question 10 and 13 (Tunisian version)