



AALBORG UNIVERSITET

CITIZENSHIP, GENDER AND NATIONALISM: THE CASE OF DENMARK AND THE NETHERLANDS

Gaia Cardin

Supervisor: Susi Meret

Keystrokes: 166.377 (69 pp.)

Abstract:

This thesis examines definitions of citizenship in discourses on integration in Denmark's and the Netherlands and how they contribute to inclusionary/exclusionary practices. It looks, in particular, at how definitions of citizenship contribute to the construction of nationalist and gendered borders, understanding citizenship from a feminist perspective as a bordering practice and looking at the intersection between femonationalism, i.e. the mobilisation of feminist issues and gender equality in nationalist discourses, and discourses on citizenship. Danish and Dutch civic integration materials and political discourses on integration have been analysed through critical discourse analysis to identify the main discourses and themes in definitions of citizenship and how these contribute to and legitimise exclusionary mechanisms. Three main discourses were identified which are similar between the two countries. First, in both Denmark and the Netherlands' civic integration materials and political discourses, citizenship is defined as a privilege which migrants need to deserve by fulfilling certain duties. Second, discourses on citizenship and integration in both Denmark and the Netherlands contribute to the construction of the categories of the 'deserving' and 'undeserving' migrants, sustaining social hierarchies between citizens and non-citizens and legitimising barriers to citizenship. Lastly, citizenship is associated with membership to the national community and to normative constructions of the national "Us" and the "Other". This discourse intersects with femonationalism by positing gender equality as national value, while attributing gender inequality to migrants who therefore are seen as a threat to the nation, thereby contributing to the stigmatisation of migrant men and reproducing colonial discourses on Western superiority. Based on the findings I argue that by defining citizenship as a privilege and by legitimising barriers to citizenship, these definitions of citizenship contribute to reproducing social hierarchies, exposing non-citizen to increased precariousness. As citizenship is equated to nationality, it contributes to normative constructions of national identity and processes of Othering. Femonationalism is increasingly institutionalised in civic integration programmes where gender equality becomes a marker of difference restricting access to the nation. Engaging with previous literature on the topic, I argue that civic integration programmes can be understood as a reinterpretation and reproduction of nationalist discourses.

Table of Contents

1.	Introduction.....	1
2.	Literature review	5
3.	Theoretical framework.....	13
3.1.	Citizenship from a feminist perspective	14
3.1.1.	Citizenship and its dimensions.....	14
3.1.2.	Citizenship as a bordering practice beyond the nation	17
3.2.	Gender, nationalism and femonationalism.....	20
3.2.1.	Gender and the nation	20
3.2.2.	The concept of femonationalism.....	22
3.2.3.	Femonationalism and exceptionalism.....	24
4.	Understanding the context	26
4.1.	The EU approach to integration.....	26
4.2.	The Netherlands' integration and naturalisation policy	28
4.3.	Denmark's integration and naturalisation policy	30
5.	Research Design and Methodology	33
5.1.	Defining the object of research	33
5.2.	Critical Discourse Analysis.....	34
5.3.	Applying CDA to the analysis of text.....	34
5.4.	Data collection	36

5.5.	Data analysis	38
6.	Analysis.....	39
6.1.	Defining and contesting citizenship: genres and styles	40
6.1.1.	Learning materials and naturalisation tests.....	40
6.1.2.	The parliamentary debates	42
6.2.	Discourses on citizenship.....	43
6.2.1.	Citizenship as a privilege: the (nation-) state and the individual.....	43
6.2.2.	The ‘deserving’ migrant and ‘undeserving’ migrant.....	48
6.2.3.	Politics of Belonging: nationalist and femonationalist discourses	62
7.	Discussion	73
8.	Conclusion	75
	References.....	78

1. Introduction

The choice of this master's thesis' topic, namely citizenship, nationalism and gender, reflects a growing preoccupation, both within and outside the academic world, with the rise of far-right parties and anti-immigration feelings across Europe and consequently with the relation between citizenship, the nation-state and multiculturalism. In 1993, Huntington famously predicted the so-called "clash of civilizations" arguing that in the future, conflicts would be driven by irreconcilable cultural differences, specifically between Christianity and Islam, the West and the Rest (Huntington, 1993; Pieterse, 1996). Today, many nationalist parties and politicians follow this type of discourse arguing that some groups of migrants, predominantly Muslim ones, are incompatible with their national and European values. (see for example Berg and Lundahl, 2017; Moscatelli, 2024; Olesen, 2025). This kind of rhetoric can be found at different levels, with more or less extremist narratives such as the Great Replacement, the Demographic Winter or preoccupation with 'parallel societies' and clash of values (see for example Ekman, 2022; Feola, 2024; Madsen, Morton and Power, 2024).

This discourse on culture and values can be traced in national and European immigration and integration policies and political agendas. At the national level, many European countries are implementing civic integration programmes where migrants are required to prove their knowledge of the country of destination, including of its values and norms, in order to be granted the right of residence or citizenship via naturalisation (Duyvendak, Geschiere and Tonkens, 2016; Farris, 2017; Mouritsen, Kriegbaum Jensen and Larin, 2019). This has been interpreted by some (most notably Joppke, 2007a, 2007c, 2007b) as a 'liberal convergence' of integration policies where civic integration policies reflect a (neo)liberal logic in which liberal values such as freedom and equality occupy a central space.

In this context, gender and gender equality often occupy a prominent role. Gender equality has come to be defined as a fundamental value of the European Union and of most European countries (European Parliament, 2025). As gender equality becomes an official political objective accepted by all political sides, it is increasingly being mobilised by nationalist actors to promote stricter immigration policies (Farris, 2017). In these discourses, which Sara Farris labels as femonationalist (2017), gender inequality becomes a problem concerning immigrant communities, mostly Muslim communities, which are seen as carriers of an oppressive and patriarchal culture at clash with the one of the nation. Gender equality is thus seen as a value that needs to be taught and accepted by those who want to reside in the nation-state, also through civic integration programmes. In this sense, Farris highlights how gender equality becomes a key factor in determining who is to be considered as part of the national community, and discourses on gender often intersect with anti-immigrants and racist ones. Using gender as a marker of difference is not a new practice, however as this is now done through the lens of gender equality, one may ask what role gender plays in restricting access to the nation-state.

As the process of European integration now seems unstoppable, a question that comes to mind is whether it is possible to imagine a transnational citizenship beyond the nation-state, one that is inclusive rather than exclusive (Lister, 1997; Balibar, 2009). Notions of European citizenship are still grounded in the national dimension and nationality is still a core part of our individual and collective identity, making us “homo nationalis” (Balibar, 2009). Obtaining citizenship in many EU member states is becoming more and more difficult and politicised, given also the rise of nationalism and anti-immigration stances. Non-citizenship, however, leads to increased precariousness and vulnerability (Arendt, 2017), restricting access to welfare benefits, political participation and therefore the enjoyment of human rights.

This thesis wants to explore the evolving relation between citizenship, gender and nationalism and at how this contributes to inclusionary/exclusionary practices by looking at how citizenship

is defined and socially constructed in discourses on civic integration and civic integration programmes. In particular, it will look at two cases, Denmark and the Netherlands, critically analysing their civic integration materials and political discourses on integration including civic integration learning materials and tests, and parliamentary debates. The Netherlands was one of first countries in Europe to introduce a civic integration programme which is now an established element of the country's integration policy (Bonjour and Duyvendak, 2018). Denmark, instead, has quickly become one of the most restrictive countries when it comes to integration and naturalisation, with stringent civic integration requirements (Siim, 2007). Both Denmark and the Netherlands see equality, including gender equality as a key value of their society, which must be respected by individuals wanting to reside within their national borders (Siim, 2007; Farris, 2017). Thus, they represent a prime site for exploring how gender and citizenship intersect. The main research question is:

How do definitions of citizenship in discourses on integration in Denmark and the Netherlands contribute to inclusionary/exclusionary practices?

And more specifically it will ask

- *How are gender and nation(alism) mobilised in discourses on citizenship and integration in Denmark and the Netherlands' civic integration materials and political discourse?*
- *How are borders to citizenship drawn and legitimised in discourses on citizenship and integration in Denmark and the Netherlands' civic integration materials and political discourse?*

These questions have been explored through a feminist approach to citizenship which considers its three main dimensions, rights and responsibility, participation and politics of belonging uncovering the bordering practices at play within and through citizenship (Lister, 1997). The

latter aspect has been explored with a focus on gender and nationalism, through the concept of femonationalism (Farris, 2017). These theoretical frameworks have guided the analysis and interpretation of the data. Based on the findings, I argue that civic integration policies sustain and institutionalise specific constructions of citizenship, where citizenship is defined as a privilege and contributes to the construction of gendered and racialised national borders. In such definition of citizenship, gender equality is mobilised in constructing belonging and in processes of Othering, stigmatising migrant Muslim men. Rather than seeing it as a new phenomenon or as a liberal convergence, I concur with Farris (2017) in viewing it as a reinterpretation of nationalist and colonial processes of Othering.

The thesis is structured as follow: the first section will briefly outline existing research on citizenship and civic integration, focusing in particular on Denmark and the Netherlands. Afterwards, the theoretical framework underscoring the analysis and interpretation of data will be described. This comprises two main theoretical approaches: citizenship from a feminist approach and femonationalism (Farris, 2017), as well as the relation between gender and nationalism in general. It will be followed by a brief outline of the institutional context of integration and naturalisation at the European level, as well as in the Netherlands and Denmark. The next section will instead present the methodological approach for analysing data i.e. Fairclough's approach to critical discourse analysis (Fairclough, 2010, 2012, 2013). The central part of the thesis is the analysis, in which Denmark's and the Netherlands constructions of citizenship are discussed. It is structured in two main parts: the first part discusses the genres and styles, namely the rules and norms of communicating and 'being' in discourse (Fairclough, 2010) and their role in defining citizenship, while the second part discusses the main discourses emerged in definitions of citizenship in Denmark and in the Netherlands and how these contribute and legitimise (in)exclusionary practices and Othering. A discussion on the main

findings and their implications will then follow. Lastly, the conclusion will summarise what uncovered from the analysis in relation to future research.

2. Literature review

The following section will review the existing literature on citizenship and femonationalism, contextualising the choice of the research topic and theoretical framework. Citizenship has been a topic of extensive scholarly research; however traditional analyses of citizenship are being challenged by phenomena such as globalisation and changing migration patterns, advancing new areas of research. Additional research is needed to investigate the links between citizenship, nationalism and gender, especially in relation to the Nordic context.

Ever since T.H. Marshall (2015, first published in 1950) influential conceptualisation of citizenship, academic literature has focused on citizenship mostly in relation to political, civil and social rights, with an emphasis on the interrelations between these three dimensions and the balance between the duties (and rights) of the citizens and those of the state (Lister *et al.*, 2007b; Svensson and Stoltz, 2010). These analyses have traditionally been restricted to the level of the nation-state – seen as the sole provider of citizenship rights. However, phenomena such as globalisation, Europeanisation and migration have underlined the ramifications of citizenship beyond the national dimension. Scholars (Lister, 1997; Joppke, 2007a; Balibar, 2009; Christensen and Siim, 2010; Svensson and Stoltz, 2010) have increasingly looked at citizenship from a transnational perspective, considering the impact of transnational and supranational institutions and movements on citizenship rights and the tension between discourses on citizenship at the national and at the global level.

Christensen and Siim (2010), echoing Yuval-Davis's concept of multi-layered citizenship (2007), call for a multilevel approach to citizenship which looks at: (1) the macrolevel of national imagined communities and the implications of national definitions of citizenship for

groups within and outside the nation; (2) the mesolevel which looks at how citizenship is experienced in social and political organisations, and (3) the microlevel which instead looks at how citizenship is “lived” in everyday life. Such an approach accounts not only for the transnational dimension of citizenship, but also for the way citizenship is experienced differently by different groups and individuals, thus considering also the mechanisms of inclusion and exclusion intrinsic to citizenship.

Christensen and Siim's work (2010) is part of a broader critique to the supposed universality of citizenship, which shifts the focus to barriers to full citizenship and the construction of hierarchies between citizens, partial citizens and non-citizens (Lister *et al.*, 2007b; Sümer, Halsaa and Roseneil, 2014). Within this framework, feminist scholars have criticised traditional understandings of citizenship arguing that these have been defined based on the patriarchal distinction between the public and the private sphere, thereby leading to the exclusion of women from citizenship (Lister, 1997).

While initially the “false universalism” of citizenship was exposed in relation to cisgender (privileged) white women, feminist and critical scholars have now acknowledged the impact of intersectional factors of discrimination on citizenship rights, thus extending their analyses to other marginalised groups (Lister, 1997). Recent literature has increasingly explored the tension between citizenship and difference, criticising the supposed impartiality and neutrality of citizenship, arguing instead that such conceptualisation of citizenship “promotes the particular standpoint of the privileged as if it were a universal standpoint, thereby legitimating their privilege and invalidating as partial the viewpoints of the oppressed” (Lister, 1997, p. 78). Rather than approaching citizenship solely from the perspective of rights and responsibilities, this strand of literature focuses on the politics of belonging at work through citizenship.

The tension between citizenship and difference is also at the core of the literature on civic integration tests and programmes. Since civic integration programmes were first introduced in Europe in the late 1990s and early 2000s, academic literature on the topic has developed into three main standpoints: 1) citizenship tests and civic integration programmes as a convergence towards a liberal common model; 2) citizenship tests from a postcolonial and decolonial perspective; 3) citizenship tests from a Foucauldian perspective as disciplinary tools.

The first strand of literature finds its roots in Joppke's thesis of liberal convergence. In his works, Joppke (2007c, 2007a, 2007b) analyses the evolution of civic integration programmes in Europe with the introduction of naturalisation tests and mandatory integration courses. He argues that national integration policies have been increasingly converging towards a common approach, and thus that national models of immigration and integration are no longer useful categories of analysis. In *Transformation of Immigrant Integration: Civic Integration and Antidiscrimination in the Netherlands, France, and Germany* (2007c), he looks at civic integration and antidiscrimination policies at the European and national level. He contends that the convergence of national policies across Europe is to be understood as a liberal convergence driven by a search for increased competitiveness through the integration and participation of migrants in the economy. Civic integration programmes, he argues, should not be understood as derived from nationalist interests, but rather as a move towards post-national membership models driven by neo-liberalism. Yet, Joppke (2007b) questions the efficacy of civic integration programmes in furthering integration, highlighting how they can become instruments for migration control, targeting specific groups such as family reunification migrants.

Joppke's thesis of liberal convergence has been highly contested. In particular, Mouritsen (Borevi, Jensen and Mouritsen, 2017) uses the case of Scandinavian countries to challenge this idea, arguing that civic integration programmes in this region have been influenced by national factors reflecting specific national contexts, rather than by external factors such as globalisation

and Europeanisation. Furthermore, he calls for a broader understanding of ‘civic integration’ which is not limited to policies, but which takes into account also the ideological dimension of the phenomenon (Mouritsen, 2013; Mouritsen, Kriegbaum Jensen and Larin, 2019; Jensen *et al.*, 2021). Based on this understanding, he contends that the spread of civic integration programmes represents an ideological turn and a “re-orientation of policy making” towards an expanded understanding of citizenship which encompasses not only political and civil rights, but also the personal sphere, and in which the responsibility of integration falls on the individual, while the state occupies a more central role in terms of disciplining and overseeing the integration processes (Mouritsen, Kriegbaum Jensen and Larin, 2019, p. 601). This, however, should not to be understood as an overcoming of national models (Mouritsen, 2013; Mouritsen, Kriegbaum Jensen and Larin, 2019; Jensen *et al.*, 2021).

In *The Culturalization of Citizenship: Belonging and Polarization in a Globalizing World* (2016), Duyvendak and others also identify a common trend in citizenship policies which they label “the culturalization of citizenship”- although they do not claim the superseding of national models. They argue that, both in the Global North and in the Global South, culture – including norms, values, and cultural practices – is increasingly used to define citizenship in opposition to traditional definitions based on political, civic and social rights. By looking in particular at the cases of the Netherlands, France and the UK and the impact of their citizenship policies on immigrants in these countries, they identify a global trend in which prospective citizens are now increasingly required to adhere to national norms and values to be considered legitimate members of the community. They contend that this is based on *essentialist understandings of culture*, put forward also by integration tests, in which culture is seen as something fixed, thereby contributing to exclusionary practices. While they do not adopt a specific gender focus, they note the centrality of sexuality and gender in their study of the culturalization of

citizenship, highlighting how discourses on *gender and sexuality* are increasingly *central in definitions of citizenship*.

Postcolonial and decolonial accounts of civic integration programmes also analyse the inclusionary/exclusionary mechanisms at play, looking at how civic integration tests and programmes contribute to the construction of an “Us” in opposition to an “Other”. In *White innocence: Paradoxes of Colonialism and Race* (2016), Wekker analyses the Dutch cultural archive, exposing contemporary dynamics of colonial power in the Netherlands. Her analysis also covers Dutch integration policies in which, she argues, there has been a shift driven by “a preoccupation with the unassimilability of the different and backward cultures of migrants [... where] the culturally inferior Other has increasingly come to be embodied by Muslim men and women” (p. 55). Thus, Dutch integration policies are increasingly aimed at educating migrants to “Dutch” values, and the adoption of the latter is seen as indispensable for successful integration and naturalisation.

Similarly, Blankvoort et. al. (2021) and van Oers (2008) look at the case of the Netherlands and argue that mandatory integration programmes contribute to the reproduction of a colonial discourse in which the modern “Us” is hierarchically opposed to a backward “Other” who represents a potential threat in case of unsuccessful integration. Specifically, Blankvoort et al. (2021) critically analyse documents and texts encountered by refugees when participating in the formal integration programmes. Based on their analyses, they argue that civic integration programmes constitute a practice of Othering and call for the need to decolonise civic integration. While their analysis focuses on the Netherlands, they contend that this is not limited to the Dutch case but can be seen in other European countries as well.

While not explicitly adopting a postcolonial/decolonial perspective, De Waal (2020) also discusses the construction of a national “Us” and the exclusion of the “Other” in citizenship

policies. Using a social equality lens, she investigates the symbolic implications of mandatory language and civic integration programmes and tests to obtain permanent residency and citizenship across EU member states. In particular, she argues that by creating a binary opposition between the native “Us” and the migrants - building on a discourse of ‘universal values’ that must be protected from external threat -, these policies have negative impacts on social equality, reinforcing hierarchies and exclusionary practices.

The last main strand of literature on civic integration programmes and tests looks at the latter from a Foucauldian perspective, discussing their significance in relation to the concepts of discipline and power. In *Power and Examination: A Critique of Citizenship Tests* (2009), Löwenheim and Gazit investigate citizenship tests as instruments through which states reaffirm and legitimate their power. They look in particular at the spreading of citizenship tests in Western Europe, arguing that the proliferation of such tests “constructs a network of surveillance and discipline across many neoliberal countries” (p. 158). For Lister et al. (2007b) and Kiwan (2008), however, the disciplinary character of citizenship tests is disputable. Kiwan (2008), for example, looks at the case of the United Kingdom arguing that here citizenship tests and civic integration programmes are empowering rather than disciplinary as they give immigrants the tools to fully enjoy their rights and to participate in society.

The link between femonationalism and civic integration programmes has been made by Sara Farris herself in Chapter 3 of her book on femonationalism: *In the Name of Women's Right: The Rise of Femonationalism* (2017). Here, she looks at integration policies in the Netherlands, France and Italy and at how femonationalist discourses have been “discussed and concretely implemented” within these policies (p. 79). Farris argues, as opposed to Joppke, that the adoption of civic integration programmes by several European states, rather than demonstrating the supersession of national models towards a liberal model, works to reinforce nationalist discourses. Furthermore, she investigates the gender dimension of civic integration

programmes by critically analysing relevant policies, visual materials and didactic materials – including citizenship tests, as well as through in-depth interviews and participant observations, in civic integration programmes. She finds that civic integration programmes reproduce femonationalist discourses in which gender equality is mobilized to exclude the immigrant Other from the national community and to construct a racist conception of the Other as backward.

Apart from Sara Farris (2017)'s own research, there is a lack of literature that investigates naturalisation tests and civic integration programmes from the perspective of femonationalism, as literature on femonationalism tends to focus on political and party discourses rather than on the institutionalisation of the latter in policies (see for example Sager and Mulinari, 2018; Wigger, 2019; Colella, 2021; Möser, 2022). The aim of this research is therefore to expand on Farris' work by analysing the case of Denmark in comparison to the Netherlands, as the two countries have some of the most restrictive civic integration programmes.

While civic integration programmes in the Netherlands have been researched from different perspectives (as outlined above), Denmark's civic integration programme remains understudied. Nevertheless, a few studies exist on the topic. An analysis of Denmark's civic integration programme can be found in the works by Mouritsen (2013; Borevi, Jensen and Mouritsen, 2017) who engages in the debate on liberal convergence vis-à-vis national models. Here, the Danish case is compared to that of other European countries, highlighting national factors shaping national integration policies. Mouritsen, however does not explicitly adopt a gender perspective, and only limitingly discusses the gendered implication of integration policies (see for example Bech, Borevi and Mouritsen, 2017).

Another analysis of Denmark's civic integration programme can be found in *Bodies and Boundaries* by Hvenegård-Lassen and Maurer (2012). In this work, the authors look at how

Danish identity is constructed in the 2007 booklet 'Citizen in Denmark', distributed to newcomers by the Danish Ministry for Refugees, Immigration and Integration Affairs. They argue that the booklet contributes to the reproduction of binary opposition between the native "Us" and the immigrant "Other" based on ideas of Nordic Exceptionalism which is also defined in terms of gender equality.

As for Denmark's naturalisation test specifically, this has been analysed by Munkers's in her Master's Thesis (2010) using the perspective of banal nationalism which refers the 'ideological habits' which allow for the nations to be reproduced and sustained in everyday life (Billig, 2010). However, a gender dimension is still missing from the analysis, and her work does not take into consideration recent developments such as the migration crisis in 2015 and the recent rise in Islamophobia.

Femonationalism in Denmark, and more generally in the Nordics, has been investigated mostly by Siim (see for example Siim, 2007; Christensen and Siim, 2010; Stoltz and Siim, 2014; Siim and Stoltz, 2024) who looks at femonationalist strategies across Scandinavian countries and how gender equality and women's rights are used in these contexts to construct exclusionary understanding of the nation and national citizenship. Her work, however, looks more broadly at Denmark's integration regime in relation to right-wing party discourse, rather than focusing civic integration or naturalisation specifically. Further research is thus needed on Denmark's civic integration programme from a gender and femonationalist perspective.

By comparing Denmark's civic integration programme to the one of the Netherlands using the lens femonationalism, this paper wants to fill this gap and contribute to the literature which analyses the tension between citizenship and difference. The Nordic welfare state model, in fact, has been praised for promoting equality, especially between genders, yet its ability to embrace diversity has increasingly been questioned (Christensen and Siim, 2010; Siim, 2021).

Adopting a femonationalist perspective may help uncover novel mechanisms of inclusion and exclusion at play in the Danish and Dutch civic integration programmes, as well as further the debate on civic integration and nationalism.

To sum up, there is a lack of research exploring how femonationalism is institutionalised and reproduced in civic integration programme. In particular, more research is needed when it comes to the Nordic context, where Denmark -while having one of the most restrictive integration regimes in Europe- remains understudied. By comparing Denmark's civic integration programme with that of the Netherlands, this thesis aims to provide new insights into the transformation of citizenship within and beyond the nation and into its (in)exclusionary mechanisms, looking at the relation between gender, nationalism and citizenship.

3. Theoretical framework

The following section will present the theoretical framework which will guide the analysis of Denmark and the Netherlands' discourses on citizenship and integration. The first part will present feminist theories on citizenship, discussing the main dimension of citizenship and focusing in particular on its inclusionary/exclusionary mechanisms. The second section will instead outline the concept of femonationalism with a focus on the Nordic context and Nordic exceptionalism. These theories have been chosen because they acknowledge the differentiated impacts of citizenship on diverse groups and emphasise the gendered dimension of nationalist discourses. The theoretical framework forms the basis for the analysis of the data which has been coded based on the different dimensions of citizenship to uncover dominant discourses and themes at play in definitions of citizenship. It also functions as an interpretative lens for making sense of the data and investigating how citizenship acts as a (gendered) bordering practice.

3.1. Citizenship from a feminist perspective

In this section, feminist (critical) theories on citizenship will be presented, with a focus on citizenship as a bordering practice. The section will present the main dimensions of citizenship and discuss them following mainly Etienne Balibar (2009) and Nira Yuval-Davis's (Yuval-Davis, Anthias and Kofman, 2005; Yuval-Davis, 2006, 2011) reflections on citizenship and the politics of belonging. Citizenship is approached from a critical point of view as a contested and evolving concept, interrogating – in the sense of not taking for granted – the universality of citizenship and the relation between citizenship and the nation. Thus, the analysis of the social construction citizenship will investigate which discourses are dominant when defining citizenship and how different dimensions of citizenship intersect and are mobilised to include/exclude certain groups.

3.1.1. Citizenship and its dimensions

Citizenship is one of the foundational concepts of political science, defining the relationship between an individual and a political entity. Feminist approaches to citizenship have distinguished between three interrelated dimensions: rights and responsibilities, political participation, political identities and politics of belonging (Lister *et al.*, 2007b; Christensen and Siim, 2010) which together contribute to inclusionary and exclusionary processes.

The dimension of rights and responsibilities has often been the focus of traditional approaches to citizenship. Here, the debate is mainly between two schools of thought: liberalism and civic republicanism. Both approaches are concerned with the balance between rights and responsibilities in relation to the state and the individual. On the one hand, the liberal tradition privileges the dimension of rights, seeing citizenship as the granting and protecting of individual rights. The role of the state is thus limited to protecting the rights of the individual and guaranteeing the exercise of citizenship rights (Lister, 1997; Lister *et al.*, 2007c).

On the other hand, the civic republican tradition sees citizenship as an obligation towards the state and believes that with citizenship come individual responsibilities to participate in the political life of the state and contribute to the common good. Civic republicanism, which finds its roots in Ancient Greece, underlines the collective dimension of citizenship, thereby shifting the burden of responsibility from the state to the individual (Lister, 1997; Lister *et al.*, 2007c). Stemming from this tradition, communitarianism then takes it a step further by underlining individual's responsibilities towards a community with shared identity, cultural norms and values, thereby intersecting with the dimension of belonging (Lister *et al.*, 2007c). Building on the civic republican tradition, Putnam (Putnam, Leonardi and Nanetti, 1994) argues that active citizenship and participation are instrumental for a well-functioning democracy. He appeals to the concept of 'civic virtue' and argues that it is in 'civic communities' characterised by horizontal trust, social networks, equality and cooperation that representative, democratic institutions thrive.

Both liberalism and civic republicanism assume the universality and impartiality of citizenship, where citizenship is understood mainly as a legal status: "all who possess the status are equal with respect to the rights and duties with which the status is endowed" (Lister, 1997, p. 14). However, obtaining citizenship rights *de jure* does not necessarily mean enjoying these rights *de facto*. Thus, feminist scholars have criticised liberal and civic republican understandings of citizenship, arguing that by assuming the universality of citizenship, they contribute to excluding certain groups and sustaining unequal power relations (Lister, 1997).

Feminist scholars have increasingly turned their attention to different experiences of citizenship, distinguishing between formal citizenship and substantive citizenship, where the latter investigates barriers to the exercise of citizenship rights and human agency, uncovering the mechanisms of inclusion and exclusion at play within and through citizenship (Lister, 1997). In particular, Yuval-Davis (2007) has introduced the notion of 'multi-layered

citizenship' which looks at how "people's lives are shaped by their rights and obligations in local, ethnic, religious, national, regional, transnational and international political communities" thus considering different layers of citizenship in both state and non-state polities and how "intersecting social divisions" affect experiences of citizenship (p. 562).

This brings us to the third dimension of citizenship, namely that of political identities and politics of belonging. Citizenship does not only define rights and responsibilities but also determines who belongs to a certain political community and who does not. It does so not only from a legal perspective, but also from a political and cultural one, as definitions of citizenship become entangled in definitions of national identity (Siim, 2007). Indeed, while citizenship and nationality are two distinct concepts, the dominance of the nation-form over other political systems has led to the de facto translation of citizenship with membership to the national community, making citizenship an important instrument in constructing national identity. Citizenship acts therefore as a bordering practice contributing to the construction of boundaries between the national "Us" and the foreign "Other" and regulating access to the nation-state (Balibar, 2009).

In this regard, Yuval-Davis (Yuval-Davis, Anthias and Kofman, 2005; Yuval-Davis, 2006; Yuval-Davis, 2007) has investigated how citizenship is implicated in the *politics of belonging*. She distinguishes between 'belonging' and 'politics of belonging': while the first term refers to feelings of safety and emotional membership to a community, the latter refers to political projects for the construction of national borders. In particular, "the politics of belonging comprises specific political projects aimed at constructing belonging in particular ways to particular collectives that are, at the same time, themselves being constructed by these projects in very particular ways" (Yuval-Davis, 2006, p. 197). Yuval-Davis (2006) identifies three main analytical levels which are mobilised for the construction of belonging: social locations in terms also of social hierarchies; individual's identification and emotional attachments; and

ethical and political systems of values based on which individuals draw the distinction between 'belonging' and 'not belonging'. Citizenship, by defining who is entitled to belong to the national community and on what conditions, takes part in these politics of belonging.

Recent phenomena such as globalisation, Europeanisation and mass migration have further highlighted the exclusionary dimension of citizenship as there is a growing tension between the supposed egalitarianism of citizenship and recognition of diversity. Access to citizenship is increasingly restricted, often on the premise of protecting the national community and national values from outsiders (Lister, 1997; Duyvendak, Geschiere and Tonkens, 2016). The exclusionary mechanisms of citizenship contribute to reproducing hierarchies between citizens, partial citizens and non-citizens, drawing new boundaries not only at the level of the nation-state, but also at the regional and global level. (Lister, 1997; Balibar, 2009). This underlines once again that citizenship, rather than being universal, is experienced in different ways from different groups and individuals, and thus the need to adopt a multi-layered approach (Lister, 1997; Yuval-Davis, 2007; Christensen and Siim, 2010).

3.1.2. Citizenship as a bordering practice beyond the nation

Globalisation, Europeanisation and mass migration have challenged traditional understandings of citizenship, forcing us to re-consider and interrogate its national dimension. Etienne Balibar (2009) uses the notion of "transnational citizenship" to highlight the evolving relation between citizenship and the nation. He argues that, while in modern states citizenship and nationality have often come to mean the same thing, the link between citizenship and the nation has been constructed, and as such it is always evolving. Nations are historical entities, and the nation-form is one of the many ways in which to organise political, economic and symbolic structures. Nationalism - which according to Balibar is an integral part of the nation - has contributed to establishing the dominance of the nation-form over other political models by presenting national ties and the national community as natural. However, both the nation and the

dominance of the nation-form should be understood as historicities. Citizenship as a bordering practice is involved in the construction of the nation and the national community, yet recent phenomena have increasingly challenged national models of citizenship.

Europeanisation constitutes a first important challenge to the national analysis of citizenship. Indeed, the nation-state is no longer the only actor which has a say in matters of citizenship as international and supranational actors play an increasingly important role (Balibar, 2009). The establishment of EU citizenship changed the way in which citizenship is lived, creating new hierarchies which are no longer tied to the nation but extend beyond its borders, as well as within. Paradoxically, the opening up of borders among EU countries has led to harsher exclusionary practices towards non-EU citizens, often reproducing global hierarchies and power imbalances in terms of Global North and Global South (Lister, 1997; Lister *et al.*, 2007a; Balibar, 2009).

Balibar (2009) provocatively speaks of 'European Apartheid' arguing that the institutionalisation of European citizenship as an extension of national citizenship has contributed to new practices of exclusion: "this "citizenship" is defined as the simple addition of the national citizenships of the member countries of the union, transforms the status of the foreigner. In each particular country the foreigner is only the national of another sovereign state, enjoying an equivalent "belonging," which is the object of reciprocal recognition. But at the level of the newly instituted union, he or she becomes the object of an internal exclusion" (p. 171). There exists a new divide between EU-citizens and third-country nationals who become "second-class citizens". This can be seen also in the naturalisation policies of EU's member states: EU-citizens face lower requirements and have easier access to political, civil and social rights, as well as welfare benefits (Blitz, 2014b).

There is thus an increasing tension between a universal discourse on human rights and citizenship rights granted at the national level. At the international level, human rights are recognised beyond the dimension of citizenship as “inalienable” rights and freedom of movement is enshrined and protected in international treaties such as the UN Declaration of Human Rights (Balibar, 2009; Blitz, 2014a; Arendt, 2017). However, the hegemony of the nation-form and the equation of citizenship with nationality has meant that fundamental rights are “modulated as a function of national membership” (Balibar, 2009, p. 36). As citizenship is still tied to the nation-state, becoming a national citizen is a precondition for enjoying human rights (Balibar, 2009; Arendt, 2017). As Hannah Arendt (2017) has highlighted, while the nation-state is considered accountable for ensuring citizenship rights, there is no authority truly accountable for ensuring ‘inalienable’ human rights are guaranteed, leaving many in state of precariousness, lacking ‘the right to have rights’. National laws often restrict individual rights, and harsher immigration and integration regimes, by making it more difficult to obtain citizenship, can impact the exercise of human rights for certain groups (Lister *et al.*, 2007a; Svensson and Stoltz, 2010). In this context, “citizenship remains a common basis for differentiating between groups and for allocating state entitlements” (Blitz, 2014a, p. 3).

While the relation between citizenship and nation is often taken for granted, the present paper adopts a feminist, reflexive understanding of citizenship, considering it as a contested and evolving concept which is constantly redefined through practice and discourse and which affects different groups differently (Yuval-Davis, 2006). Accordingly, the critical analysis of civic integration materials and political discourses on integration examines how specific meanings and dimensions of citizenship are constructed and legitimised and how citizenship acts as a bordering practice and contributes to constructing (or challenging) the nation. This involves identifying which discourses are privileged and how borders of inclusion and

exclusions are drawn. A particular focus on the gendered dimension of borders is adopted based on the concept of femonationalism which will be presented below.

3.2. Gender, nationalism and femonationalism

As demonstrated above, because of the inclusionary/exclusionary mechanisms intrinsic to citizenship, the latter has had a close relation with nationalism, often occupying a central role in the national project and in limiting access to the national community (Yuval-Davis, 2011). The following section will discuss the relationship between gender and nationalism from a feminist perspective, introducing the concept of femonationalism developed by Sara Farris (2017) and its links with Nordic exceptionalism. Femonationalism sheds light over the contemporary construction of racialised, and gendered borders, helping to interpret the politics of belonging at play in Dutch and Danish definitions of citizenship.

3.2.1. Gender and the nation

Theories on nationalism and nations are usually divided into three main schools of thought which differ based on how they understand nations and their origin. Primordialists sees the nation as a 'natural' part of human societies and therefore nationalism as firmly embedded in human associations. Ethno-symbolists, instead, believe nations are a modern phenomenon which however stem from pre-modern ethnic cores. Nationalism reinterprets these pre-modern ethnic cores to construct the modern nation. Lastly, modernists argue that nations are modern 'inventions', or as Benedict Anderson famously defined them 'imagined communities', constituting a new form of interaction between culture and power reproduced through nationalist discourses (Spencer and Wollman, 2002, 2005; Özkırımlı, 2003).

The theoretical debate over the nation and nationalism has contributed to challenging the nation-form itself and to a deeper understanding of nationalism. Yet, these theories have overlooked the intersection between the nation and gender and the impact of nationalism on

gender and vice-versa. Thus, this thesis will build on feminist theories on nations and nationalisms. The latter draw on a modernist understanding of nations as ‘imagined communities’, but adopt a more critical approach, uncovering the gendered dimensions of nationalist politics of belonging and the impact of nationalism on gender (Thapar-Björkert, 2013; Thomson, 2020).

As a gendered project, nations relate to women and men differently where women's role within the nation has traditionally been tied to their role as mothers. Indeed, nationalist discourses often compare the nation to the heterosexual nuclear family where men and women occupy different roles based on patriarchal conceptions of the family (Anthias and Yuval-Davis, 1989; Sinha, 2016). As members of the national family, men and women have familial duties to fulfil for the common good and hierarchies within the nation are presented as natural as women occupy the role of wives, mothers and sisters (Sinha, 2016). The gendered dimension of membership to the national community has meant that for a long time women have been excluded from formal citizenship -understood as being granted political and civil rights – and their relationship to the state was largely mediated through their relationship to a man (Lister, 1997). Within the national project, women act as biological and cultural reproducers of the nation, where they are responsible for the physical survival of the nation by producing children and are expected to transmit the national culture to their children, thereby maintaining the cultural identity of the nation (Anthias and Yuval-Davis, 1989; Yuval-Davis, 1996).

Furthermore, the family trope functions to restrict access to the nation. National ties are presented as “natural” and inevitable, thereby justifying the exclusion of certain groups from the national community. Presenting the nation as a family provides a historical genesis to the nation and acts as an exclusionary practice by establishing clear rules for membership to the national community (McClintok, 1993). Indeed, genealogy is identified by Balibar (2009) as a key symbolic structure regulating belonging to the national community. This has impacted

citizenship policies, leading to two main models for acquiring citizenship: *jus sanguines* where citizenship is granted on the basis of blood ties, reflecting an ethno-nationalist view of citizenship; and *jus soli* which links citizenship to the territory of birth (Siim, 2007).

The gendered dimension of the nation also comes forward in nationalist discourses as gender is used as a marker of difference to distinguish the national “Us” from the “Other” (Thomson, 2020). National identity and the construction of the “Other” rely on gender and sexual stereotypes where the Other is associated with, for instance, ‘inferior’ feminine qualities, and/or abnormal/deviant forms of sexuality (Nagel, 1998; Pryke, 1998; Thapar-Björkert, 2013). Thus, gender and sexuality are implicated in practices of nation-building and in the definition of national identity. At the same time, nationalist discourses contribute to the construction and reproduction of ideal definitions of masculinity and femininity, legitimising gendered power structures (Sinha, 2016).

3.2.2. The concept of femonationalism

As patriarchal gender relations are increasingly being challenged and women's role in society is changing, the way gender is mobilised in nationalist discourses has also transformed. Indeed, women are no longer only mothers or wives, and gender equality has become an official objective of most countries' governments across the world. In some cases, gender equality has come to be defined as a national value, replacing nationalist discourses based on patriarchal definitions of gender and gender roles (Sifaki, Quinan and Lončarević, 2022).

Femonationalism is a concept developed in relation to the European context which describes these new trends in nationalist discourses, specifically the co-optation of gender equality and feminist themes to further the national project (Farris, 2017). The term was developed by Farris (2017) to indicate what she calls “feminist or femocratic nationalism” which “refers both to the exploitation of feminist themes by nationalist and neoliberals in anti-Islam [...] campaigns

and to the participation of certain feminists and femocrats in the stigmatisation of Muslim men under the banner of gender equality” (p. 4).

In femonationalist discourses gender equality and women's rights are increasingly being used to restrict access to the national community by presenting gender equality as a national value and positioning gender inequality as an external threat (Farris, 2017). Gender equality becomes a marker of difference between the nationals who are committed to gender equality and women's rights, and non-Western migrants who are carriers of a patriarchal and oppressive culture and who must, therefore, be kept outside the national borders (Farris, 2017; Sifaki, Quinan and Lončarević, 2022). This discourse affects predominantly Muslim immigrants as Islam is constructed as an oppressive religion towards women, while gender equality is associated with secularity. Thus, femonationalism can be seen as a convergence “between the nonemancipatory forces of Islamophobia and racism on one side, and the emancipatory struggle against sexism and patriarchy, on the other”(Farris, 2017, p. 9).

Additionally, femonationalism can be understood also as an ideological formation which constructs and reproduce the dichotomy West vs. Rest (Farris, 2017). Building on colonial discourses of Western superiority, gender equality is presented as a civilisation issue which must be taught to non-Western migrants, thereby representing “a form of European saviourism” (Sifaki, Quinan and Lončarević, 2022, p. 16). Therefore, femonationalism is not a departure from traditional nationalist and colonial practices of Othering, but rather a reformulation of them under different terms: femonationalism can be interpreted as “a contemporary face of a well-known western topos, namely that of the “white men [claiming to be] saving brown women from brown men”(Farris, 2017, p. 11).

Lastly, femonationalism can be understood as a 'neoliberal political economy' contributing to neoliberal interests (Farris, 2017). According to Farris (2017), femonationalism puts forward

specific understandings of gender equality and emancipation in which the latter is translated into participation to the labour and consumer market. Femonationalism supports policies for the participation of migrants in the job market and promotes policies which targets the emancipation of migrant women who are constructed as oppressed. Additionally, by presenting gender inequality as an external problem which does not belong to the national community, femonationalism overlooks issues of gender inequality within country, thus justifying the allocation of funds to other areas.

While this thesis mainly adopts femonationalism to interpret the data and the exclusionary and inclusionary mechanisms at play in definitions of citizenship, the concept of homonationalism developed by Puar (2017) is also relevant. As in femonationalism, homonationalism looks at the intersection between the non-emancipatory forces of racism and the emancipatory forces of feminist and queer movements, looking in particular at how LGBTQ+ rights enter nationalist discourses to construct the Muslim Other as oppressive and restrict access to the national community (Farris, 2017; Puar, 2017).

3.2.3. Femonationalism and exceptionalism

A central theme in femonationalism is that of exceptionalism. While Sara Farris does not elaborate on exceptionalism specifically, this has been discussed by Puar (2013, 2017, 2022) in relation to homonationalism. Puar identifies as a key manifestation of homonationalism 'sexual exceptionalism' which refers to two distinct but interacting concepts of 'exception'. On the one hand, 'exception' points to the construction of the nation as "exceptional" in the sense of different from the Others. Puar highlights how some nations present themselves as haven and protector of queer rights and individuals, positioning themselves as exceptional compared to others. On the other hand, Puar links sexual exceptionalism to Agamben's "state of exception" which countries use to justify exceptional measures and policies. In homonationalist discourses, nations are framed as exceptional haven of queer rights which however are under

exceptional threats and must therefore take exceptional measures to protect themselves (Puar, 2017).

The concept “(sexual) exceptionalism” (Puar, 2017) can be extremely useful when investigating femonationalism. Similarly to homonationalism, femonationalism constructs the nation as exceptional in protecting women's rights and it does through processes of Othering, as seen above. At the same time, femonationalist discourses present the nation as being under “exceptional” threats due mostly to increased immigration and therefore justify the adoption of measures to protect the nation's exceptionality (Farris, 2017).

Exceptionalism in relation to femonationalism is even more central when analysing the Nordic region where some speak of ‘Nordic exceptionalism’ arguing that Scandinavian countries’ external and internal identity is tied to this idea of being “exceptional” compared to other European countries, especially in terms of gender equality (Browning, 2007; Loftsdóttir and Jensen, 2012). Nordic exceptionalism is said to have emerged during the Cold War where Nordic countries distanced themselves from both blocks and instead represented themselves as peace-builders (Browning, 2007). Indeed, peace is a central theme in the construction of Nordic exceptionalism as Nordic countries present themselves as peaceful societies based on the ideals of cooperation, solidarity and democratic values (Browning, 2007; Loftsdóttir and Jensen, 2012). Another central element of Nordic exceptionalism is that of equality as Nordic countries’ national identity is tied to the self-conception of Nordic societies as more equal compared to other countries thanks also to the ‘Nordic model’ of welfare state (Larsen, Moss and Skjelsbaek, 2021; Stoltz, Mulinari and Keskinen, 2021). The construction of Nordic exceptionalism can be seen as a form of politics of belonging where belonging is constructed mobilising specific ethical and political value systems upon which individuals draw the borders of the national community (Yuval-Davis, 2006).

4. Understanding the context

Civic integration materials and tests are part of national integration policies and therefore understanding the institutional context in which they are rooted is fundamental for adequately framing them within the wider framework of integration at both the European and national level. The following section will outline the development of integration policy in the EU, in the Netherlands and in Denmark.

4.1. The EU approach to integration

Integration policy remains a responsibility of the Member States, however a common European approach to integration has been emerging, driven by the recognition that successful integration benefits all Member States (Council of the European Union, 2004). In November 2004, the Council of the European Union (2004), under the presidency of the Netherlands, adopted the *EU Common Basic Principles for Immigrant Integration Policy*. These common basic principles were - and are - meant to provide guidance and support in the development and implementation of national integration policies, recognising the crucial role of integration in the management of migration and in strengthening EU's cohesiveness.

The eleven EU Common Basic Principles for Immigrant Integration Policy (Council of the European Union, 2004) are based on the view of integration as both a responsibility of migrants and host-communities and point to some key aspects which should be taken into account in national integration policies. These include, among others, the importance of protecting the European Union's fundamental values stressing that "successful integration policies and practices preventing isolation of certain groups are a way to enhance the fulfilment of respect for common European and national values" (p. 19). Additionally, education and employment are seen as key means for fostering the integration and participation of migrants in the host society. Here, civic integration programmes are seen as "indispensable to integration" as

“pursuing such programmes will allow immigrants to quickly find a place in the key domains of work, housing, education, and health, and help start the longer-term process of normative adaptation to the new society” (p. 20).

The Common Basic Principles for Immigrant Integration Policy adopted by the Council of the European Union constitute the basis for the 2005 European Commission's *A Common Agenda for Integration* which identified key actions for enhancing the implementation of such principles ('European Commission Communication COM(2005) 389 final', 2005), as well as the more recent *Action Plan on Integration and Inclusion 2021-2027* ('European Commission Communication COM(2020) 758 final', 2020). Unlike previous action plans and integration agendas, the current one addresses both migrants and “EU citizens with a migrant background”, therefore seeing integration as a long-term policy (p. 1). In the Action Plan, integration is defined as “both a right and a duty” (p. 1) for both the migrants and the host-society. It sees integration policies as complementary not only to migration policy, but also to anti-discrimination ones, thus reaffirming the principle of integration as a “two-way process” (p. 2). Furthermore, once again the Action Plan stresses the importance of protecting the EU's fundamental values (p. 1).

The Action Plan ('European Commission Communication COM(2020) 758 final', 2020) promotes civic integration stating that “gaining an understanding of the laws, culture and values of the receiving society as early as possible, for example through civic orientation courses, is crucial for migrants to fully participate in the receiving society” (p. 9). Additionally, employment is identified as a key area for promoting integration and as a central dimension of citizenship. Indeed, it points to the *Citizens, Equality, Rights and Values Programme* as a key instrument for supporting the participation of migrants and naturalised EU citizens in the labour market (p. 12).

Since 2004, the EU approach to integration policy has remained more or less the same, although, as seen, it has expanded to include not only newcomers but also already naturalised citizens. EU legislations do not challenge the dominance of the nation-state, but they do highlight the transnational dimension of integration. Furthermore, they tie integration and citizenship to the EU fundamental values, seeing civic integration as central for educating migrants to equality, including gender equality, and democracy. Thus, the EU promotes civic integration programmes which are presented as empowering rather than disciplinary.

4.2.The Netherlands' integration and naturalisation policy

The Netherlands was the first country in the European Union to implement a civic integration programme in the late 1990s. Although, the Netherlands had been an immigration country already since the 1920s with people coming from the colonies (European Commission, 2025b), the first Dutch integration policy was introduced in the 1990s as there was a growing recognition that migrants would not return to their country of origin (Farris, 2017). In 1998, the Dutch government adopted the Law on Civic Integration of Newcomers which introduced mandatory integration courses for newcomers on Dutch language and knowledge of the Dutch society, marking a shift toward civic integration (van Oers, 2008; Bonjour, 2013). Integration programmes were seen as a way for non-Western migrants to participate in the Dutch society and become active citizens. The responsibility of integration was attributed to the individual migrant who was expected to learn the Dutch language, culture and values (Farris, 2017).

In 2006, the Law on Civic Integration was adopted which introduced civic integration exams, requiring migrants – and not only newcomers- to pass an integration test comprising knowledge of the Dutch society and Dutch language knowledge at an A2 level to obtain a permanent residence permit (Bonjour, 2013). Additionally, the Dutch government introduced the Civic Integration Exam Abroad aimed mostly at family migrants. The latter were required to pass the test before being granted a temporary residence permit (Farris, 2017). Today, participation and

completion of the civic integration programme is mandatory for all third-country nationals residing in the Netherlands for a longer period of time and must be completed within 3 years from arrival (Government of the Netherlands, 2019).

The current civic integration programme comprises three different parts: knowledge of the Dutch language, knowledge of the Dutch society and an 'orientation' module on the labour market and employment in the Netherlands (Government of the Netherlands, 2019). In 2022, a new Civic Integration Act entered into force. This, while maintaining the overall rationale behind previous policies, increased the role of municipalities in integration and established three tracks for civic integration: the "B1 pathway" for migrants to achieve a B1 level of Dutch language knowledge, the "education pathway" in preparation for enrolment to educational programmes, "the self-reliance pathway" aimed at providing the basic knowledge needed for participating and being active in the Dutch society (European Commission, 2025b).

The process of civic integration starts with the receipt of a letter in which the municipality informs the newcomers that they are required to integrate, explaining that this entails understanding Dutch society and values including equality and religious freedom (Government of the Netherlands, 2023). Municipalities are then tasked with selecting the most appropriate route for each migrant based on their specific background and provide assistance in the process of civic integration comprising one of the three learning pathways, the Labour Market & Participation module and the participation statement process with which migrants commit to integrating and respecting the laws and values of the Dutch society (Government of the Netherlands, 2022).

Obtaining Dutch citizenship via naturalisation is contingent on having passed the civic integration exam, thereby proving knowledge of the Dutch society and of the Dutch language. Other requirements to be eligible for naturalisation include having resided in the Netherlands

for at least 5 years, possessing a valid resident permit which entails meeting economic self-sufficiency requirements, not representing a threat to the public order and national security and signing the 'declaration of solidarity' to the Dutch state and Dutch society (Government of the Netherlands, 2011).

Passing the civic integration test is also a requisite for accessing some welfare benefits. Citizenship in the Netherlands gives access to a more comprehensive social protection. Third-country nationals, in general, do not have access to social assistance, except for supplementary benefits including childcare benefit and rent benefit. The enjoyment of some of these benefits, however, is contingent on having participated in the civic integration programme (Dutch Council for Refugees, 2024). For receiving other types of social assistance such as those under the Participation Act, third-country nationals must have a permanent residence permit – which requires having passed the civic integration exam - or prove to be economically active (Immigratie-en Naturalisatiedienst, Ministerie van Asiel en Migratie, 2025).

Dutch integration and naturalisation policies reflect the one at the European level, establishing the centrality of education, language and employment as means of successful integration. Furthermore, through these policies civic integration becomes a means for regulating the presence of migrants in the national territory and access to the welfare state.

4.3. Denmark's integration and naturalisation policy

Denmark's first integration policy was adopted in 1999, making integration a policy on its own separated from social affairs. The official objective of this policy was to promote the participation of foreigners in the Danish society, to get them acquainted with Danish values and to promote their participation in the national labour market (Siim, 2007). According to this policy, the Ministry is tasked with coordinating the overall national integration policy, while local municipalities are responsible for its implementation (European Commission, 2025a).

Since then, additional policies have been adopted, gradually turning Denmark towards a civic integration model. In 2002 Denmark introduced the language test as a requirement for obtaining citizenship, while in 2006 it introduced the civic naturalisation test on Danish culture and society, and the signature of a contract where migrants are to confirm their commitment to respecting Danish values, norms and laws (European Commission, 2025a).

Similarly to the Dutch one, Denmark's civic integration programme is based on two main elements: knowledge of the Danish language and society and labour market activation. These two elements are seen as crucial for the integration and participation of migrants in the Danish society, as well as conditional for their legitimate presence in the national territory. Both knowledge of the Danish language and employment have become a requirement for obtaining a permanent residence permit and impact access to welfare benefits (European Commission, 2023, 2025a).

In 2020, the Danish government introduced the 'Self-Sufficiency and Repatriation Programme or Introduction Programme' (*Selvforsørgelses- og hjemrejseprogrammet eller introduktionsprogrammet*) which replaces the previous 'Start Help' (*Starthjælp*) package. This programme provides newcomers with Danish language classes and employment programmes so that they can integrate in the labour market and become self-sufficient as soon as possible (Udlændinge- og Integrationsministeriet, 2025a). Newcomers who have resided in Denmark for less than 9 years are entitled to self-sufficiency and repatriation benefits (*selvforsørgelses- og hjemrejseydelse*) contingent on their participation to this programme. Non-compliance with this requirement may lead to a reduction of benefits (Udlændinge- og Integrationsministeriet, 2025b, 2025a).

Under this system, newcomers who have resided in Denmark for less than 9 years receive almost half of social assistance benefits compared to long-term residents who are instead under

the 'Cash-benefit' system (*kontanthjælp*), although migrants in this last group must still fulfil an employment requirement (Udlændinge- og Integrationsministeriet, 2025b, 2025a). As can be seen, important distinctions exist between citizens, permanent residents and newcomers as belonging to one category rather than another can lead to improved social assistance and security.

Citizenship in Denmark is granted via a legislative act, through a naturalisation bill (Folketinget, 2017). Currently, in order to obtain citizenship, a person must fulfil a list of requirements including, among others, the signature of a declaration of allegiance and loyalty; having no significant debt towards Danish public authorities; having had 9 years of continuous residence in Denmark; being self-sufficient; having committed no substantial criminal offences; fulfilling the employment requirement; and having passed the Danish language test – at a B2 level, significantly higher compared to the Dutch language requirement - and the naturalisation test (Udlændinge- og Integrationsministeriet and Integration, 2025). In 2021, the Danish government adopted stricter requirements in terms of criminal offences and introduced five additional questions to the Naturalisation test concerning Danish values (Udlændinge- og Integrationsministeriet, 2021a). Such stringent requirements have led to a decline in number of naturalised citizens and an increase in number of individuals residing in Denmark without citizenship (European Commission, 2025a).

The Danish model of civic integration is in many ways similar to the Dutch one, yet with the new Civic Integration Act, the Dutch model allows for more differentiation taking into account the specific needs of the migrants. Furthermore, the Danish model establishes higher requirements in terms of language knowledge and residence status and therefore might be perceived more as a barrier compared to the Dutch one. Both models, however, reaffirm the centrality of national culture and values, employment and education for effective and successful integration.

5. Research Design and Methodology

5.1. Defining the object of research

A fundamental step in every research methodology is establishing and defining the object of research. As Fairclough (2010) states, following Bourdieu, this must go beyond using pre-defined and fixed categories of objects, but must entail interrogating the object itself. In this case, researching citizenship “must involve recognising and researching the dialectic between pre-constructions of citizenship and the performance of citizenship in everyday practice” (Fairclough, 2010, p. 416), thereby approaching citizenship, and the relation between citizenship and nation, from a reflexive perspective, as seen in the theoretical framework (see Section 3).

The starting point for this research methodology is therefore the view of citizenship as socially constructed which is defined and enacted through social interactions and meaning-making processes. Thus, the research methodology is concerned with uncovering assumptions and discourses underscoring the concept of citizenship and the tension between different dimensions of citizenship. It does so by conducting a comparative case study of civic integration materials and discourses in Denmark and the Netherlands. The comparative case study approach allows for an in-depth analysis of the issue at hand, while simultaneously looking at potential connections across cases (Bartlett and Vavrus, 2017). Comparing the cases of Denmark and the Netherlands can therefore shed light on common trends and discourses when it comes to citizenship, as well as diverging tendencies.

The following section will present the methodological approach for the analysis of the research topic, namely critical discourse analysis, and how it has been applied in practice, including data collection and data analysis.

5.2. Critical Discourse Analysis

In order to analyse how citizenship is constructed and contributes to (gendered) bordering and Othering practices, a critical discourse analysis approach is adopted, specifically that developed by Fairclough. Critical discourse analysis sees discourse, in the sense of semiosis, as inherently part of social processes in that it is both informed by social processes and contributes to their construction (Fairclough, 2013). A central element of Fairclough's approach to critical discourse analysis is the dialectical relation between discourse and non-discoursal elements, between *meaning* and *materiality* (Fairclough, 2012), or, as Balibar (2009) would put it, between 'symbolic' and 'material' structures. This relation is dialectical in the sense that while discourse and material structures are distinct, they cannot be completely discerned as discourse is influenced by and draws upon material structures, but at the same time it contributes to their constructions, evolution and transformation (Fairclough, 2010, 2012). Social phenomena are thus the result of the dialectic interaction between discourse and materiality, as the way in which we interpret and act upon social phenomena and material reality is influenced by the way in which these are conceptualised and constructed in discourse (Fairclough, 2013). The aim of critical discourse analysis is therefore to uncover and investigate the way in which social structures are maintained or contested in discourse, looking at the relation between language and power (Bloor and Bloor, 2007; Fairclough, 2010).

5.3. Applying CDA to the analysis of text

CDA is concerned with the analysis of discourse understood in a broad sense as a meaning-making process enacted in specific discursive events, i.e. written, visual and spoken text (Fairclough, 2010). When analysing a discursive event, CDA looks at three main dimensions which capture the dialectical relation between discourse and materiality. A first category is that of genres, "ways of acting" (Fairclough, 2010, p. 75), which are socially conventional ways of doing discourse/communicating, in this case for example a parliamentary debate or a civic

integration test. These comes with conventions regarding the ways information are communicated between the different subjects involved, norms and rules. A second dimension is that of styles, “ways of being” (p.75), referring to both how subjects re-enact a particular identity in discourse and how they represent themselves. Lastly, discourses, “ways of representing” (p. 75), refers to how social phenomena are constructed in discourse, reflecting a particular point of view in the way the phenomena are interpreted and acted upon. All these dimensions are analysed considering their relation to power as the way subjects act, interact and communicate is contingent on their power status and their location in social structures of power (Fairclough, 2010).

When analysing a discursive event, it is also important to acknowledge that this is never isolated, but is linked to other discursive events, discourses, genres and styles. Thus, three central concepts of CDA are *intertextuality*, *interdiscursivity* and *recontextualisation* (Fairclough, 2010, 2013). Intertextuality refers to the relation between different texts, how these relates to each other and drawn upon each other to create meaning (Fairclough, 2010). The concept of interdiscursivity, which can be seen as part of intertextuality, is used to describe the relation between a single discursive event/text and wider genres, styles and discourses, looking at which genres, styles and discourses are reproduced and challenged in the text. Finally, recontextualisation refers to how meaning is reproduced, maintained and challenged when moving from one text to another, including changes in genres, discourses and styles (Fairclough, 2013).

In the case of this research, for example, the single text of a civic integration/naturalisation test (which constitutes a discursive event) refers to previous versions of the same test, but also to other discursive materials which have contributed to defining Danish or Dutch citizenship such as educational and informational products. At the same time, parliamentary debates on integration are directly linked to the Constitution which provides their legal basis and

establishes its objective, as well as to previous debates on the topic. Both naturalisation tests and parliamentary debates then reproduce specific genres, styles and discourses in terms of who is allowed to take part in the discursive processes, how information is organised and what understanding of the social reality it reproduces. Finally, the meaning of citizenship is constantly transformed and challenged as it travels between different discursive events, genres, styles and discourses. The aim of this research will be precisely to uncover how the meaning of citizenship, in relation to gender and the nation, is socially constructed in different texts and how it contributes to (in)exclusionary practices.

5.4.Data collection

As mentioned, the research will involve the analysis of Denmark and the Netherlands's civic integration materials and political discourses on citizenship and integration. The choice of focusing on civic integration materials and political discourses stems from their role as prime sites where citizenship is defined and contested. Indeed, civic integration materials are intended to explain to migrants what it means to be a Danish or Dutch citizen and what it takes to become one. Political discourses on integration instead contribute to the construction of definitions of citizenship and to their contestation, discussing citizenship in relation to difference and often leading to changes in integration policies and practices. Analysing both civic integration materials and political discourse allows us to move beyond party discourse and investigate how certain definition of citizenship are translated in practice. Moreover, the civic integration programmes constitute a barrier to citizenship thus highlight the mechanism of exclusion/inclusion of citizenship.

In the case of Denmark, the analysis will cover previous Naturalisation Tests (*Infødsretsprøver*) - including both winter and summer versions, for a total of 10 naturalisation tests (Udlændinge- og Integrationsministeriet, 2020a, 2020b, 2021b, 2021c, 2022a, 2022b, 2023a, 2023b, 2024a, 2024b). Additionally, the analysis will include the learning materials for the 2024 naturalisation

tests (Udlændinge- og Integrationsministeriet, 2024c) and the Parliamentary Debate held on the 7th of November 2024 for the granting of citizenship via naturalisation, “L 63 Proposal for a law on the granting of citizenship” (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024). The Danish Constitution establishes that citizenship through naturalisation can only be granted through a legislative act. Therefore, twice a year – although this is expected to change for 2025- the Parliament approves a new bill on naturalisation (Folketinget, 2017)¹.

As for the Netherlands, the analysis will cover part of the self-tuition package for the Basic Civic Integration Examination Abroad which certain groups, such as family-sponsored immigrants (hereafter “family migrants”), must pass before obtaining a provisional residence permit (Ministerie van Sociale Zaken en Werkgelegenheid, Bureau ICE, 2014). Specifically, the film *Naar Nederland* (n/a) will be analysed. This film is meant to provide knowledge of the Dutch society in preparation of the Knowledge of Dutch Society test. It is available in English, as well as other languages, on the official website for the Examination. Additionally, the analysis of the Netherlands’ discourse on citizenship will rely on secondary literature analysing other civic integration materials such as materials encountered by participants of the civic integration programme (Blankvoort *et al.*, 2021) preparation and guidance materials for municipalities and teachers providing civic integration courses (Kirk and Suvarierol, 2014; Suvarierol and Kirk, 2015; Blankvoort *et al.*, 2024) including observations from the Participation Declaration workshops (Oomen and Leenders, 2020), the indicators underscoring the development of civic integration tests (van Oers, 2013b), as well as parliamentary debates and political discourse, including a policy note (van Oers, 2013a; Jones, 2016; Bonjour and Duyvendak, 2018; Rem and Gasper, 2018).

¹ All translation from Danish to English included in this thesis were performed by me and checked by a native Danish speaker

The choice of relying on secondary data to analyse the case of the Netherlands has been guided by two main reasons. First, most of the materials related to the process of civic integration in the Netherlands are in Dutch and thus - unlike in the Danish case - could not be analysed first-hand. Second, in order to understand how citizenship is defined and constructed, it is important to understand the wider context of citizenship and integration in the Netherlands. As I only have limited familiarity with the Dutch context, secondary literature allowed for taking into consideration these different aspects. Compared to Denmark, the secondary literature analyses Dutch civic integration across a wider time frame, however a continuity has been identified in Dutch discourses on civic integration since the 2000s till today (Blankvoort *et al.*, 2024).

5.5.Data analysis

The analysis of the data aims at uncovering the social construction of the concept of citizenship, identifying which discourses are mobilised when defining citizenship and how these contribute to (in)exclusionary practices, especially when it comes to gender and nationalism. Thus, building on Fairclough's approach (2010, 2012, 2013), it focuses on the three dimensions of discourses i.e. genres, styles and discourses and on processes of intertextuality and interdiscursivity, analysing the individual discursive events as part of a wider context of discourses of citizenship.

The data has been coded multiple times with the use of the software Nvivo based on four main codes. Three of the codes follow the three dimensions of citizenship identified in the theoretical framework: rights and responsibilities, participation, political identities and politics of belonging, which also covered femonationalism, (see Section 3) and aim at identifying dominant discourses on citizenship. Sub-codes were then developed reflecting the specific discourses in relation to citizenship emerged from the analysis of the data. As discourses often intersect, reinforce and inform each other, texts' parts have often been coded under more than one code and sub-code. The remaining code identifies parts in the text where the role of the

genre/style is evident i.e. where subjects challenge the roles/norms of the style or underlined how they are following them. The codes were interpreted based on the theories, considering how different dimensions of citizenships construct social hierarchies and function to include or exclude certain groups.

6. Analysis

The discourses emerged from the analysis of the data contribute to constructing citizenship, both in the case of Denmark and the Netherlands, as a privilege for few deserving migrants where discourses on gender and nationhood are used to construct belonging (Yuval-Davis, Anthias and Kofman, 2005; Yuval-Davis, 2006, 2011) and to regulate access to the national community.

The following section will present the main findings emerged from the analysis of the data in regard to how citizenship is defined in discourses on citizenship and integration and how it contributes to (in)exclusionary practices. The section is divided in two main parts based on the three dimensions of discourse identified by Fairclough (2010, 2012, 2013). The first part reflects on the role of the *genre*, as socially conventional ways of communicating, and *styles* as “ways of being” in discourse (Fairclough, 2010, p. 75) in constructing definitions of citizenship. The second part, instead, will present the main *discourses*, namely “ways of representing” (Fairclough, 2010, p. 75) and constructing citizenship, emerged from the analysis of the data.

Specifically, the second part will discuss the discourses emerged in relation to theories in order to understand how definitions of citizenship contribute and legitimise exclusionary practices and construct gendered borders. The discourse emerged have been coded under the three dimensions of citizenship presented in the theoretical framework: rights and responsibilities, participation and political identities and politics of belonging (see Section 5.5). These three

dimensions interact to form specific constructions of citizenship, reinforcing and informing each other and are mobilised to put forward and legitimise exclusionary mechanisms. In particular, the section discusses three main (exclusionary) discourses: 1) the definition of citizenship as a privilege and the role of the state and the individual, 2) the construction of the categories of the 'deserving' and 'undeserving' migrant which work to justify and legitimise barriers to citizenship, 3) the construction of belonging in discourses on citizenship in relation to nationhood and femonationalism. The analysis is followed by a discussion which reflects on the main findings of the analysis and their implications.

6.1. Defining and contesting citizenship: genres and styles

The genres and styles of the discursive events (texts) analysed have important consequences for how citizenship is defined and contested. The discursive events analysed fall into four main genres: 1) written learning materials for the naturalisation test, 2) the integration/naturalisation test, 3) learning materials in the format of a film developed in preparation for the Dutch Civic Integration Exam Abroad (*Naar Nederland*, n/a) and 4) parliamentary debates. Additionally, the secondary literature taken into consideration analysed guidance materials for the Dutch civic integration programme, indicators guiding the development of the Dutch Civic Integration Exam and a policy note on integration (see Section 5.4.).

6.1.1. Learning materials and naturalisation tests

In the learning materials (Udlændinge- og Integrationsministeriet, 2024c; *Naar Nederland*, n/a), both the written and video formats, the meaning produced is controlled by the state, which puts forward a static, one-sided definition of citizenship, leaving little space for contestation. The state's understanding of citizenship is presented as a neutral, objective view, reproducing the genre of educational material. The migrant is a recipient of knowledge who is supposed to accept and trust what communicated in the materials. As the manual accompanying the Dutch

film and practice tests specifies, the migrant should not interpret the information given, rather they² are expected to “practice the questions until you [the migrant] have *memorized* all the answers” (Ministerie van Sociale Zaken en Werkgelegenheid, Bureau ICE, 2014, p. 15). This is then reflected in the format of the naturalisation tests where the migrant is expected to give one, very specific, correct answer to a multiple answers’ questionnaire, thereby adhering to the definition of citizenship put forward by the state. Failure to comply entails punishment by affecting the granting of citizenship in the country, as well as leading to fines in the case of the Netherlands (Blankvoort *et al.*, 2024). Similar considerations can be made for the guidance materials, the Civic Integration Exam indicators and the policy note which reflect the view of the state/government and leave no space for contestation. Yet, in the case of the guidance materials, they are implemented by individuals such as trainers or municipalities employees who might, in this process, not only reproduce but also recontextualise and reinterpret the discourse put forward by the state. This aspect, however, is outside the scope of this thesis.

While both the written learning materials and the film reproduce the perspective of the state, in the film (*Naar Nederland*, n/a) different subjects participate in the meaning-making process. Two main characters appear in the film: a white, Dutch woman who acts as the presenter and narrates and explains to the viewer the topics of the film, and a migrant man with whom (supposedly) the viewer should identify with. Throughout the film, the migrant man takes part in everyday events in the Netherlands, such as attending a birthday party, going to the doctor, attending a job interview etc. In all these situations, the migrant man shows confusion or amazement when learning Dutch traditions and norms. His lack of knowledge often gives rise to ‘silly’ misunderstandings as he seems to show the ‘dos’ and ‘don’ts’ of integrating. As de Leeuw and van Wichelen (2012) rightly underline, the contraposition between the authoritative

² In this thesis, “they” is used as neutral pronoun

Dutch woman and the silly/confused migrant man gives an “infantilizing” tone to the film (p. 197), while also constructing the migrant as clueless and in need of education.

Apart from these two main characters, different migrants intervene in an interview-like format throughout the film (*Naar Nederland*, n/a). As they recount their experience of integration and dispense advice to the viewer, they seem to represent ‘successfully integrated’ migrants. Through them, the discourse of the state is reinforced and legitimised: it is not only the perspective of the native Dutch woman on citizenship and integration, but one also shared by migrants like the viewer. The viewer ought to follow the rules and norms presented in the video if they want to succeed in the Netherlands.

6.1.2. The parliamentary debates

It is in the parliamentary debates, instead, that citizenship is and can be contested. The subjects – i.e. the parliamentarians - who participate in the process of meaning-making still follow some strict rules depending on their role, e.g. party spokesperson, speaker or deputy speaker, minister etc... However, due to the interacting nature of the genre, they can question each other and challenge the definition of citizenships put forward during the debate. The subjects sometimes struggle to stay within the lines of the genre and style and therefore must be reprimanded by the speaker or must control themselves. For example, spokesperson Anders Kronborg (Social Democratic Party - *Socialdemokratiet*), when answering to a provocative question posed by Mikkel Bjørn (Danish People's Party – *Dansk Folkeparti*), admits: “Now I have to find an expression that I can use from the podium of the Danish Parliament - I actually think that will be difficult, because in relation to what the citizen says, it is very, very difficult, so I kind of want to say something that *I am not allowed to say*, but I can say that to Mr. Mikkel Bjørn next door afterwards” (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024, 10:12 ff.). As can be seen, the genre, as well as the style constrict the way citizenship is defined as he struggles to stay within their limits and norms.

Migrants are still mostly excluded from this process of meaning-making and typically appear as objects - rather than subjects - of discussion. Yet, in the Danish parliamentary debate ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024), the perspective of the migrant enters the discourse thanks to two parliamentarians who are naturalised citizens themselves. When intervening in the debate, they oscillate between their identity as naturalised citizens and that of parliamentarians, although the last one tends to prevail.

6.2. Discourses on citizenship

6.2.1. Citizenship as a privilege: the (nation-) state and the individual

At its most basic level, citizenship is a relationship between the state and the individual (Lister, 1997). Yet, as seen in the theoretical framework (see Section 3.1.1.), this relationship can be understood in radically different ways, underlining either the rights of the individuals and the duties of the state or vice versa. In both the Dutch and the Danish case, obtaining citizenship is no longer defined as a right, but rather a privilege contingent on the fulfilment of some duties. The individual is responsible for their own integration and well-being, while the state fulfils an oversight role. This seems to reflect a civic republicanism approach to citizenship which emphasises the obligations of the individual towards the state (Lister *et al.*, 2007c), although a liberal focus on individual freedom also emerges. This discourse on rights and responsibilities intersect with the dimension of politics of belonging (Yuval-Davis, Anthias and Kofman, 2005; Yuval-Davis, 2006, 2011) by normalising barriers to citizenship and overlooking the multi-layered character of citizenship (Yuval-Davis, 2007).

In the Netherlands, during the second Balkenende government (2003-2006) when the Civic Integration Act was first discussed and approved, the Dutch Minister of Aliens Affairs and Integration, Verdonk, referred to Dutch citizenship as “the first prize” (van Oers, 2013a, p. 13), justifying the introduction of civic integration courses and tests as citizenship was something

to be deserved (van Oers, 2013a). Although her specific words have been contested, the analysis of Dutch political discourse on integration shows that a general agreement has been achieved over the years across the political spectrum over the need to 'select' migrants who are admitted in the Netherlands thus reinforcing the conception of citizenship as something to be earned (Bonjour, 2013; Bonjour and Duyvendak, 2018).

The same discourse can be found in the Danish parliamentary debate ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024), where many parliamentarians, such as Bonnesen E. (10:30 ff.) and Bøgsted K. (10:48 ff.), use the word "gift" (*gave*) or "privilege" (*privilegium*) when referring to Danish citizenship. This is no longer only the case for right-wing parties who are usually associated with selective integration policies, but also for more leftist and centre parties. For example, Serdal Benli from the Green Left (*Socialistisk Folkeparti*) states: "It is a colossal *privilege* to become Danish citizen, and therefore the path to Danish citizenship is not easy" (10:59 ff.). The Social Democrat Anders Kronborg echoes this discourse, affirming that: "I will not, and never will, hand out citizenship like you can find sand in the Sahara. *It should be difficult to get Danish citizenship.*" (10:05 ff.). This view is also shared by Sandra Elisabeth Skalvig from Liberal Alliance who refers to Danish citizenship as "*the biggest gift*" (11:04 ff.) and underlines that Liberal Alliance "[does] not see citizenship as a right that a foreigner living in Denmark is entitled to. *It is a privilege...*" (11:10 ff.).

All political parties seem to agree that citizenship is not a right, although they might disagree on the "selection process". For example, Peter Hvelplund from the Red-Green Alliance (*Enhedslisten*) argues that the process to obtaining citizenship should be made easier because citizenship is necessary to exercise political rights ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024, 11:54 ff.). Yet, he also admits that "it's perfectly reasonable to demand that you have some knowledge of what kind of society you're becoming part of." (12:03 ff.), thereby legitimising some barriers to citizenship.

The discourse that emerges from the learning materials (Udlændinge- og Integrationsministeriet, 2024c; *Naar Nederland*, n/a) over the rights and duties of the individual is more balanced in terms of the reciprocal responsibilities of the individual and the state in relation to citizenship, putting forward a liberal understanding of citizenship where the state is responsible for protecting individual freedom (Lister, 1997). Yet, this approach also reinforces a discourse in which citizenship comes specific duties and responsibilities. In particular, both the Danish and Dutch learning materials underline that, while the state protects the rights of the individuals, there are limitations to individual rights. For example, the Danish written materials specify that: “Every freedom is exercised under responsibility. Thus, there are certain limits to political freedoms.”(Udlændinge- og Integrationsministeriet, 2024c, p. 95). This is reinforced by the naturalisation tests in which the migrant is tested about their knowledge of the Danish Constitution with a focus on individual responsibilities and laws restricting individual freedom (see for example Udlændinge- og Integrationsministeriet, 2020a, pp. 3, 6, 2021c, p. 6).

The Dutch film *Naar Nederland* (n/a) also addresses the rights and duties of the citizens, emphasising that while the Dutch Constitution protects individual rights, the individual must also do their part. Interestingly this is also framed with reference to gender equality underlining that equality between men and women is protected by the Dutch constitution: “There is every opportunity in the Netherlands to be an active citizen and to speak your own mind. There’s a lot of freedom, but there are limits to this freedom. The Constitution states that men and women are equal. So, it’s against the law and punishable to discriminate against women” (46:54 ff.).

The Danish learning materials (Udlændinge- og Integrationsministeriet, 2024c) also specify that the individual must uphold its duties to enjoy their rights: “The Danish welfare society is based on the principle that the individual citizen has both rights and duties. Citizens who meet certain conditions are entitled to the benefits of the welfare society” (p. 104). The use of the

word “welfare society” rather than “welfare state” underlines the dimension of community, where the duties of the individual are framed as duties towards the collective, reflecting a communitarian view of citizenship (Lister, 1997; Lister *et al.*, 2007c). This is also emphasized later where it is stated that “the individual citizen also has a duty to contribute to the community” (Udlændinge- og Integrationsministeriet, 2024c, p. 104) and by the use of the word “*medborger*” (which literally translates to co/with-citizen) which underlines the collective dimension of (active) citizenship and the duties of the individual towards the community.

The film *Naar Nederland* (n/a) emphasises the migrant’s own responsibility to integrate and become part of the Dutch society. Addressing the viewer, the Dutch presenter warns against the difficulty of integrating in the Netherlands and asks: “You’ll come to the Netherlands, a different culture. *How are you going to deal with that?*” (16:08 ff.). A migrant woman warns the viewer not to expect any help from the Dutch and that instead “you need to be independent here, and that’s not possible for everyone” (1:37 ff.). The presenter reinforces this advice warning that viewer that while their family or partner can help them with the process of integration “you’ll still have to do most of it yourself” (7:33 ff.). The analysis of the film echoes previous analysis of civic integration programmes which see it as a turn towards the neoliberal responsibilisation of the migrant and a withdrawal of the state in the process of integration (Suvarierol and Kirk, 2015; Bonjour and Duyvendak, 2018; Rem and Gasper, 2018).

So, what is the role of the state in granting citizenship? The Danish political discourse, as emerged from the parliamentary debate (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024) builds on the fact that according to the Danish Constitution, granting citizenship is a legislative act. The role of the state is discussed mostly in relation to a new proposal by Liberal Alliance to introduce a screening process of those applying to Danish citizenship via naturalisation. Sandra Elisabeth Skalborg, the spokesperson of Liberal Alliance, states:

No foreigner can be granted citizenship without a law. This is the wording of § 44(1) of the Danish Constitution, a single paragraph of enormous importance. It means that we, the 179 members of the Danish Parliament, have the enormous responsibility to give the greatest gift you can receive, namely the right to call yourself a Dane and become part of the best and most beautiful community in the world. [...] It is up to us to decide; it is up to each of us to vote according to our own convictions and therefore up to us to assess whether the people who want to become citizens of Denmark deserve it. ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024, 11:04 ff.)

Here, she appeals to the Constitution to legitimise the monitoring role of the state and further restrict access to citizenship. Her view in relation to the state's responsibilities is challenged by other parliamentarians, especially from the leftist parties who question whether a screening process falls within the legal limits sets by the Constitution (see for example 'Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024, 10:42ff. and 12:52 ff.). However, as mentioned before, rather than questioning the monitoring role of the state itself, they question the extent to which the state can control and discipline. Indeed, all parties seem to agree that the state should refuse access to citizenship to individuals who display behaviour that goes against Danish culture and values, as will also be discussed later.

The definition of citizenship as a gift – and therefore the monitoring role of the state - is not a new discourse in Denmark, but is rooted in the ideas of the Danish thinker N.F.S. Grundtvig, who are often mobilised by politicians on both the left and the right (Larsen, 2015). Grundtvig is seen as a central figure in the establishment of the Danish nation with its reflections on “Danishness”, people, and freedom (Hall and Korsgaard, 2015). In particular, especially since 2001, Grundtvig's ideas have been mobilised in discourses on immigration and integration to construct Denmark as a liberal, democratic country whose national culture and values must be protected, reaffirming the monitoring role of the state (Larsen, 2015). While Grundtvig is not mentioned explicitly in the parliamentary debate ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024), his ideas have been central in the construction of Denmark's national identity and in legitimising barriers to citizenship (Larsen, 2015).

A similar discourse on the role of the state is found in Dutch parliamentary debates where Bonjour (2013) finds that all parties agree that the state should restrict access to citizenship in case of socio-cultural differences to guarantee social cohesion, performing a monitoring role. More disagreement instead emerges when it comes to the duty of the state in financially supporting the process of integration and whether this should be delegated to private entities or local municipalities. Recent changes to the Dutch Civic Integration Law have reinforced the role of the municipalities in providing civic integration courses, yet it is still considered a responsibility of the individual migrant to integrate (Blankvoort *et al.*, 2024).

6.2.2. The ‘deserving’ migrant and ‘undeserving’ migrant

Defining citizenship as a privilege leads to an understanding of citizenship as something to be deserved. This is stated rather explicitly in the Danish parliamentary debate (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024) where citizenship is something “one has to earn” (for example, Bonnesen E., (10:30 ff.); Rona M., (11:29 ff.)). Yet, this can also be inferred by the construction of the categories of the ‘deserving’ and the ‘undeserving’ migrant which emerges from both the learning materials and the parliamentary debates and which has also been explored by other authors (see for example Ingram and Schneider, 2004; De Waal, 2020; Oomen and Leenders, 2020; Jensen and Loftsdóttir, 2021).

Constructing the categories of ‘deservedness’ and ‘undeservedness’ in both policy and public discourse has been instrumental to justify social hierarchies and unequal power relations, as well as to legitimise policies in which privileges are granted to certain groups while others are punished (Ingram and Schneider, 2004). In this context, the categories of the ‘deserving’ and ‘undeserving’ migrants provide a rationale to barriers to citizenship and civic integration policies (De Waal, 2020). Citizenship in this discourse acts as a bordering practice regulating access to the national community and contributing to normative construction of the national

“Us” and the Other. Discourses on citizen’s duties and participation are mobilised to construct belonging and define who can become a member of the nation, creating social hierarchies between native citizens who represent the model to be followed; ‘deserving’ migrants who strive to become like native citizens, and ‘undeserving’ migrants who deserve to be punished (De Waal, 2020; Oomen and Leenders, 2020; Jensen and Loftsdóttir, 2021). The construction of these categories also emphasizes the multi-layered character of citizenship (Yuval-Davis, Anthias and Kofman, 2005) as they intersect with assumptions and discourses on religion, gender, nationhood and class.

The characteristics of the ‘deserving’ migrant – and by opposition those of the ‘undeserving’ migrant - are very similar in the Dutch and Danish discourse and also reflect the EU’s approach to integration outlined in the EU Common Basic Principles for Immigrant Integration Policy (Council of the European Union, 2004) where there is a focus on education, employment and knowledge of the norms and values of the country of immigration. The key characteristics of the ‘deserving’ migrant are summarised in the table below and discussed in detail in the following sub-sections.

The deserving migrant
Learns the language and is familiar with national culture and history
Participates and is an active citizen
Respects the national values
Wants to be part of the nation(-state)

6.2.2.1. Language and the national culture and history knowledge

The film *Naar Nederland* (n/a) stresses the importance of learning the Dutch language and dedicates a whole section to language alone. The importance of learning the language is underlined by all subjects of the film, especially by the ‘successfully integrated’ migrants who

advise the viewer of the importance of learning the Dutch language to succeed in the Netherlands and of refraining from talking their native language. Learning the Dutch language is framed as a necessary step for the migrant to communicate with other people and become a member of the Dutch society (see for example 50:59 ff. and 51:24 ff.).

In the film (*Naar Nederland*, n/a), language is also defined as a key characteristic of mankind which elevates humans from the status of animals. For example, the ‘successfully integrated’ migrants join together to read the following quote: “Language is mankind’s unique gift. When language serves mankind in speech, in written word and gesture. When we can call things by their name, and plants and animals lack the knowledge of these things, this commands respect” (48:50 ff.) and then again “When language dies, mankind dies too” (1:02:10 ff.). Through this kind of rhetoric, the film seems to want to encourage the migrant to learn Dutch as a way to maintain their humanity. This kind of discourse reproduces colonial discourses on civilisation and evolution and contributes to the construction of the Other as backward and in need of education, in a hierarchical relationship with the native Dutch (Blankvoort *et al.*, 2021).

Learning the language is a prerequisite for obtaining citizenship in Denmark and the learning materials are only provided in Danish. The importance of learning the Danish language is thus implicitly assumed and it is not specifically addressed in the learning materials. Yet, it is stressed in the parliamentary debate (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024) where parliamentarians see it as a basic entry requirement. However, parliamentarians differ on why knowledge of the Danish language is considered important. Erling Bonnesen (10:30 ff.) from the Liberal Party (*Venstre*) and Mikkel Bjørn (12:12 ff.) from the Danish People’s Party link knowledge of the Danish language to Danish values and history and thus see it in terms of becoming part of the Danish community. Peder Hvelplund from the Red-Green Alliance, instead, sees knowledge of Danish as empowering and necessary to exercise

citizenship rights. Therefore, he questions the high language level currently required (12:03 ff.).

Apart from knowledge of the language, the 'deserving' migrant is also expected to be familiar with the national history of the country they migrate to. The historical dimension occupies a central position in both the Dutch and Danish learning materials (Udlændinge- og Integrationsministeriet, 2024c; *Naar Nederland*, n/a) which outline the history of the respective nation-state, thereby also contributing to the construction of the nation. Especially in the Danish case, knowing Danish history is a key requirement and the majority of the questions of the analysed naturalisation tests are related to historical events (see for example Udlændinge- og Integrationsministeriet, 2023b, p. 4, 2024a, p. 3). Compared to the Netherlands, Denmark's history is presented in much more details and answering correctly the questions of the naturalisation tests requires an in-depth study of the learning materials. This raises the question of whether the knowledge of Danish history reflects a genuine expectation that migrants should share common cultural knowledge with ethnic Danes, or if it serves as a barrier to make access to citizenship more difficult and 'select' certain types of migrants, e.g. educated ones.

6.2.2.2. Participation and civic engagement

In both Dutch and the Danish discourses on citizenship and integration, participation is seen as a key dimension of citizenship and of the duties of a citizen. In both cases, participation has different dimension, referring to participation in the labour market, in voluntary work, in education and in parenting. Migrants are encouraged to participate in the national society in order to integrate and contribute, thereby fulfilling their duties as (prospective) citizens. Active citizenship and participation are central in civic republican understandings of citizenship where the individual is expected to take an active part and contribute to the common good but which however ignore how intersectional factors of discrimination may prevent an individual from

participating (Lister, 1997; Lister *et al.*, 2007c). Participation and civic engagement have also been linked to successful democratic institutions (most notably by Putnam, Leonardi and Nanetti, 1994) and thus it is not surprising that they occupy a central space in discourses on citizenship. Yet, being an active citizen is presented as something that both native Dutch and Danes do normally as part of their cultural identity and as something new members of the community should also do to deserve citizenship. This discourse contributes to exclusionary mechanisms and to the construction of social hierarchies where the national 'Us' is opposed to the migrant Other.

Throughout the Danish learning materials (Udlændinge- og Integrationsministeriet, 2024c), participation is framed as a cornerstone of the Danish society which is not only normal but also expected. Following the civic republican tradition (Lister, 1997; Lister *et al.*, 2007c), the Danish learning materials (Udlændinge- og Integrationsministeriet, 2024c) describe the good citizen as someone who contributes to the welfare society through employment, takes part in the political life of the country, performs voluntary work and takes an active part in the education of their children. Participation is seen as the result of Denmark's historical development and therefore is a core value of the Danish nation. For example, the learning materials underline how "there is a tradition for citizens to be involved in setting the framework for their daily lives" (p. 93) and talks about the so-called "Danish model" of structuring working relation where employees take an active part through unions (p. 27). By framing civic engagement as a Danish national value, citizenship is linked to a shared cultural identity, thus putting forward not only a civic republican, but more specifically, a communitarian understanding of citizenship linked to the dimension of belonging. In this regard, Siim (2007) argues that "Danish communitarianism rests upon tension between a strong normative egalitarian expectation and an equally strong expectation that foreign nationals become 'like us'" (p. 498).

The naturalisation tests reinforce the centrality of participation in Danish society by underlining the country's exceptional rate of participation in various spheres for example by asking "How has unemployment in Denmark developed over the last ten years?" (Udlændinge- og Integrationsministeriet, 2023b, p. 5), "What percentage of voters normally vote in parliamentary elections?" (Udlændinge- og Integrationsministeriet, 2020a, p. 6), "Are the majority of employees in the Danish labour market members of a trade union?" (Udlændinge- og Integrationsministeriet, 2022a, p. 4). By presenting participation as something most people in Denmark do, this discourse contributes to normalise such an understanding of citizenship as well as to construct Denmark as exceptional.

Participation is also seen as a key dimension of citizenship in the Danish parliamentary debate ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024) where it is presented as a requirement for obtaining citizenship, one of the duties of the citizen and as a key characteristic of the good and well-integrated migrant who deserves citizenship. As in the learning materials, participation is discussed in relation to different areas such as the labour market, voluntary work, education and parenthood. The Social Democrat Anders Kronborg for example states that to deserve Danish citizenship, "one should have been on their best behavior, one should have made sure their children go to school, and one should have been an active and useful citizen who gets up in the morning, does their job and participates in society" (10:05 ff.). Lack of participation can according to this logic, result in denial of citizenship rights. Therefore, the parliamentarians discuss whether an applicant should be granted citizenship based on an assessment of their participation, including being active in education, volunteering, having a job etc (see for example Anders Kronborg, 10:16 ff.).

Dutch discourses on citizenship are quite similar to the Danish one. The film *Naar Nederland* (n/a) also underlines the importance of participation in different spheres of life and frames it as a typically Dutch trait. When discussing the importance of doing voluntary work, for instance,

a migrant woman states “Voluntary work seems to be a typically Dutch thing because I noticed that in Morocco, for instance, it’s totally unheard of” (54:22 ff.). The viewer is then advised to take up voluntary work in order to meet new people, practice the language and successfully integrate. The female presenter also warns the viewer of the importance of being employed, emphasising that “If you work, you’re part of it all. People take you seriously” (1:18:41 ff.). The female presenter informs the viewer that one of the first questions Dutch people ask is “What kind of work do you do?” (1:18:17 ff.). This is showcased through a conversation between a Dutch man and the character of the migrant man (1:18:17 ff.). The latter looks visibly uncomfortable and tries to avoid answering. The film thus seems to assume that being hardworking is a typically Dutch characteristic, while migrants usually do not make effort in finding a job. This discourse is grounded on the figure of the “hardworking Dutch” which often characterises public discussions on economical redistribution (Bonjour and Duyvendak, 2018).

The indicators behind the development of the Dutch Civic Integration Test reproduce this same discourse, underlining the importance of political participation, seeking educational opportunities, and taking an active part in the children’s education (van Oers, 2013b). Additionally, in the political debates we see the construction of the figure of the ‘underserving migrant’ as someone who is unemployed, has a low education level and relies on welfare benefits (Bonjour and Duyvendak, 2018). This discourse has been put forward mostly by right-wing parties but has become more mainstream. In 2015, the Dutch government published a memorandum underlining the importance for migrants to participate in order to “give back to society and to be as independent (*zelfredzaam*) as possible” (Tweede Kamer der Staten-Generaal. in Oomen and Leenders, 2020, p. 276). This understanding of citizenship also informs recent changes in civic integration policies which reinforce the link between integration and labour market activation (Blankvoort *et al.*, 2024).

6.2.2.3. *Respects the national values*

Respect of national values is, in both the Danish and Dutch context, crucial for deserving citizenship. By implying that these values characterise specifically the Dutch/Danish society and are foreign for the migrants, this discourse reflects one of the key levels of the politics of belonging identified by Yuval-Davis (2006) where ethical and political system of values are used to evaluate who belongs and who does not. The 'deserving' migrants must adopt and embrace these values in order to be recognised as a legitimate member of the national community. Additionally, this discourse implies there is such thing as 'national' values contributing to the construction of the nation.

Both in the Danish and Dutch discourse, these values are seen as stemming from the country's democratic tradition. In both cases what is stressed is individual freedom and equality which are protected by the Constitution. Particular emphasis is placed on freedom of expression and religious freedom which are assumed to be under threat. This reflects a growing preoccupation with the supposedly incompatibility between Danish/Dutch values and Islamic culture (Jones, 2016; Farris, 2017; Bonjour and Duyvendak, 2018). While Muslim migrants are not (always) explicitly mentioned, throughout the materials there are references to events or problematics which are usually associated with Islam and Muslims such as the 'Muhammad Crisis' and terrorism in the case of Denmark (Udlændinge- og Integrationsministeriet, 2024c, pp. 58 and 221) and honour killings in the case of the Netherlands (*Naar Nederland*, n/a, 47:24 ff.).

In the film *Naar Nederland* (n/a), religious freedom is seen as foundational for the evolution of the Dutch nation-state, playing a key role in the establishment of the unified state and in the development of parliamentary democracy (18:45 ff.). However, the film also underlines that religious freedom must be exercised within the limits of the Constitution, placing particular emphasis on Article 1 of the Constitution which prohibits discrimination and establishes

equality among all. The ‘successfully integrated’ migrants underline the importance of *Dutch* democratic values, and a migrant woman highlights the struggle the Netherlands had to go through to become a free, democratic country and admonishes the viewer to respect Dutch core values: “It’s taken us as a country, the Netherlands, 500 years, if it’s not more, to get this far. And I’d like to put in a plea to keep it like this for a very long time” (45:23 ff.).

The importance of respecting national values is reinforced by the indicators informing the Dutch civic integration tests where the majority of them prescribe testing the migrants on some key Dutch values such as equality, non-discrimination, freedom of religion and freedom of expression. In general, many of the indicators relate to social norms or cultural values, grounded on the assumption that those who take the tests are not familiar and do not normally subscribe to these values and often implicitly targeting Muslim migrants (van Oers, 2013b).

This view can also be found in Dutch political discourses where the rationale behind the civic integration policy becomes more explicit. In a 2011 policy note on “*Integration, connection, citizenship*”, the government expresses the intention of restricting access to the nation-state “to promote respect for Dutch norms of liberty, equality, tolerance, and solidarity; and to foster acceptance of the bases for solidarity, seen as shared rules, social commitment, responsibility, and self-reliance”(Rem and Gasper, 2018, p. 25). The policy note also acknowledges “widespread doubts in the Netherlands about the compatibility of Islam with core Dutch values” (p. 26) contributing to process of Othering.

In Denmark, the focus on respect for national values is most evident in the parliamentary debate (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024) where it is a key requirement for deserving citizenship. In relation to the Liberal Alliance’s proposal to introduce a screening process of naturalisation applicants, the parliamentarians discuss how individuals who show ‘anti-democratic’ behaviour or views should not be granted citizenship. As in the Netherlands,

the problem is framed as one of cultural difference, especially with Muslim migrants. For example, when complaining about the permissiveness of Danish naturalisation policies, Erling Bonnesen (Liberal Party) states: “This is not sustainable if Denmark is to remain a country and a society built on democracy and fundamental freedoms. [...] There are groups that do not fully embrace the values of Danish society. We must take this seriously, because Denmark is not just an area or a territory; we are a society united by a common history, a common culture and a common set of values” (10:30 ff.). This kind of discourse is shared by most of the other parties. Only Peder Hvelplund from the Red-Green Alliance (see for example 10:42 ff.) and Serdal Benli from the Green Left (see for example 11:19 ff.) challenge it by underlining that in a democratic society, there should be space for everyone, also those who have different opinions, while Zenia Stampe from the Social Liberal Party (*Radikale Venstre*) questions the arbitrariness of assessing ‘anti-democratic’ behaviour (11:27 ff.).

The naturalisation tests also promote respect for Danish values, focusing in particular on religious freedom and freedom of expression. Thus, some of the questions the citizenship applicant migrant must answer include: “Is it legal to perform a religious marriage of minors in Denmark?” (Udlændinge- og Integrationsministeriet, 2021c, p. 11), “Can Danish law require that meat served in day care centres comes from animals that have been ritually slaughtered?” (Udlændinge- og Integrationsministeriet, 2022a, p. 11), “Under Danish law, can you demand that another citizen must never criticise your religion?” (Udlændinge- og Integrationsministeriet, 2023b, p. 11). As in the Netherlands, the underlying assumptions seems to be that the problematic migrant is Muslim.

The discourse on national values can be seen as contribution to constructing both the nation as exceptional and in “a state of exception” (Puar, 2017). Both the Netherlands and Denmark portray themselves as haven of equality and freedom where everyone subscribes to these values and which are currently under threat due to increased migration (Farris, 2017; Puar, 2017).

Exceptional measures to restrict access to the nation-state are thus necessary to prevent migrants, especially Muslim migrants, from undermining national values. This discourse also carries a gendered dimension, contributing to femonationalist discourses, as will be elaborated in more details later.

6.2.2.4. *Being part of the nation(-state)*

An interesting aspect which emerges from the analysis of the data is that in order to deserve access to the nation-state and belong, one should not only fulfil the requirements established by the civic integration policies but should also “want it”. This aspect further underlines the emotional dimension of citizenship, highlighted by Yuval-Davis in her analyses of the politics of belonging, pointing specifically to the analytical level of emotional attachments (Yuval-Davis, 2006, 2011). Citizenship is not only a formal arrangement between a state and an individual, but entails a political project for the construction of belonging as “an emotional (or even ontological) attachment, about feeling ‘at home’” (Yuval-Davis, 2011, p. 10).

In the Dutch film (*Naar Nederland*, n/a), a migrant man warns the viewer that in order to have a successful life in the Netherlands, they must also “...emigrate internally. That you almost literally move from one culture to the other culture” (16:30 ff.). The migrant is thus expected to undergo a personal change involving their identity which goes well-beyond the fulfilment of formal requirements. Additionally, in their analysis of civic integration guidelines following the 2022 changes to the Civic Integration Act, Blankvoort et al.(2024) argue that under the Dutch civic integration system, “individuals must not only understand and accept modern values but must also absorb them to the point that they become part of their own character.” (p.473). They argue that the new civic integration programme is based not only on the responsabilisation of the migrant, but also on their ‘spontaneous compliance’ where migrants are supposed to proactively want to integrate and show a positive attitude.

In the Danish parliamentary debate ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024), many parliamentarians, mostly of right-wing parties, underline how it is not enough for the migrants to fulfil the naturalisation requirements, but that they should also "really want Denmark". This is an aspect underlined by the representatives of several parties such as Kristian Bøgsted from the Danish Democrats (*Danmarksdemokraterne*) (10:48 ff.), Brigitte Klintskov Jerkel from the Conservative People's Party (*Konservative Folkeparti*) (11:15 ff.), Mohammad Rona from the Moderates (*Moderaterne*) (11:29 ff.). Sandra Elisabeth Skalborg from Liberal Alliance further emphasises the emotional dimension of citizenship and its role in constructing belonging by stating that "we need to ensure that the people we give the privilege of becoming Danes also have the best interests of Denmark at heart [literally "*wish the best for Denmark in the heart*"] and want the values that are the very foundation of our democracy" (11:04 ff.). She is joined by Mikkel Bjørn from the Danish People's Party who contends that "It's about much more than some formal requirements on a list. It's about will, respect and *a heart that beats for Denmark*". (12:12 ff.). He also states that becoming Danish should be understood as "an individual assessment for each Dane, when they meet people at eye level, to assess whether the person they are facing is Danish in their eyes" (12:26 ff.), further underlining the dimension of belonging and shared identity of citizenship.

6.2.2.5. *The undeserving migrant and criminality*

The category of the 'deserving' migrant is defined against that of the 'undeserving' migrant who should be prevented from obtaining citizenship and excluded from the national territory. In the Netherlands and Denmark alike, the 'undeserving' migrant is associated with criminality which is in turn linked to lack of participation, lack of knowledge of the language, and lack of respect for the national liberal values. The figure of the 'undeserving' migrant contributes to the construction of the country as under threat, in a "state of exception" (Puar, 2017), legitimising barriers to entry and citizenship.

In the film *Naar Nederland* (n/a), criminality is framed as a problem of integration (or rather lack of assimilation) and linked to the presence of different cultures. The viewer is warned by the female presenter that if they lack appropriate financial resources, they might end up in social housing where people with low-income, and especially migrants, live. The female presenter then warns the viewer that: “There are a lot of problems in the old parts of the city. People often don’t understand each other because they have different cultures or because they speak different languages. [...] There’s a lot of unemployment, there are drug-related problems, noise problems and, sometimes there are fights” (12:03 ff.). In the film, the viewer is also advised to respect the Dutch Constitution and the Dutch law, or they will be punished. This has also a femonationalist and gender dimension as will be discussed in the section below.

The Dutch political discourse reinforces the construction of the category of the ‘undeserving’ migrant as a criminal and the framing of criminality as a problem of integration. In the 2011 policy note, the government legitimises this discourse by underlining its awareness of the population growing preoccupation with the presence of many migrants, especially Muslim migrants, which are seen as constituting a threat for the “the achievements of a democratic constitutional state” (Rijksoverheid in Rem and Gasper, 2018, p. 31). Additionally, the construction of the ‘undeserving’ migrant as criminal and violent has also been uncovered by Bonjour and Duyvendak (2018) in their analysis of parliamentary debates on integration.

The problem of integration and criminality is also linked to the migrant’s parental duties. The 2011 policy note justifies civic integration policies arguing that in this way migrant children will be given better opportunities, implicitly claiming that migrant parents put their children at risk: “Too many children grow up in dysfunctional families in an environment where unemployment, debts, school failure and criminal behavior are the order of the day” (Rijksoverheid in Rem and Gasper, 2018, p. 30). This kind of discourse is also present in the film (*Naar Nederland*, n/a) where the female presenter advises the viewer to take an active role

in their children's education and to put effort into integrating for the well-being of their children: "Some children leave school too early. This is because they're not coping well with the differences between their upbringing at home, the way lessons are given at school, and how they interact with friends on the street. If they don't have a diploma, they are usually unable to get work. But to get their hands on some money, they may steal or deal in drugs." (1:11:55 ff.). Integrating is thus framed as a duty towards the family where parents – presumably mothers, as most family migrants are women - are positioned as cultural reproducers of the nation (Anthias and Yuval-Davis, 1989)

In Danish political discourse as emerged from the parliamentary debate ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024), criminality is seen as the main factor which should prevent migrants from obtaining citizenship. Criminality is associated first and foremost with 'anti-democratic behaviour' and lack of respect for national values, linking for example the 'undeserving' migrants with the crimes of terrorism, murder and rape. Sandra E. Skalborg (Liberal Alliance), for instance, calls for stricter policies, arguing that citizenship should be denied to: "people who fundamentally do not believe in democracy, who want to fight the freedom our ancestors fought for and whose values belong in the Middle Ages and not in a free and equal society like Denmark." (11:04 ff.). By framing the values of the 'undeserving' migrant as belonging to the Middle Ages, Sandra E. Skalborg also reproduces colonial tropes in which Western superiority and modernity is opposed to the backwardness of the Other who is in need of civilisation (Farris, 2017; Bonjour and Duyvendak, 2018).

From the parliamentary debate ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024), a contrasting perception also emerges between the criminal migrant and the Danish criminal. While the current Danish penal system is based on the principle of re-education, the criminal migrant is portrayed as irredeemable and thus should be prevented from ever obtaining citizenship. Interestingly, this perception extends even to minors: migrant minors who commit

crimes are not regarded as children but as inherently irrecoverable criminals. This discourse is repeatedly emphasised throughout the debate by the spokesperson from the Conservative People's Party. She complains that under current naturalisation policies; the criminal record of minors who acquire citizenship through their parents is not considered during the application process (see for example Jerkel in 'Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024, 11:35 ff. and 11:50 ff.). In Denmark, children under the age of 15 are below the age of criminal responsibility and thus not considered responsible for their actions. However, Brigitte Klintskov Jerkel (11:35 ff. and 11:50 ff.) insists that crimes committed before the age of 15 should still prevent a migrant minor from obtaining citizenship. This position implies that the crimes committed by migrant minors are more serious than the crimes committed by native Danish minors, thereby challenging the democratic principle of equality. While this discourse is put forward by the Conservative People's Party, it is not subject to contestation from the other parliamentarians, who limit themselves to stating that they want to solve this problem but within the limits of the law ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024, 10:20 ff. and 10:40 ff.).

6.2.3. Politics of Belonging: nationalist and femonationalist discourses

The analysis of the data reveals that citizenship is assumed to be a prerogative of the nation, where obtaining citizenship and integrating means joining the "national community/family". This emerges both from the political debates where politicians evoke images of a national community, and the learning materials and civic integration/naturalisation tests which link citizenship to national history and construct a national genealogy. By equating citizenship to nationality, this discourse justifies barriers to citizenship and contributes to bordering practices. Additionally, national definitions of citizenship intersect with femonationalist (and homonationalist) discourses in which gender equality becomes a marker of difference and regulates access to the national community.

6.2.3.1. The national dimension

The learning materials and naturalisation tests draw a direct connection between citizenship and nationhood by requiring the migrant to learn Danish and Dutch national history and, at the same time, by constructing a national history. This is presented as an evolutionary history in which the nation had to overcome several obstacles in order to become a modern, democratic, liberal state.

In the Danish learning materials (Udlændinge- og Integrationsministeriet, 2024c), much of the content is dedicated to describing historical events from the Viking Age to present day. Even the sections which are not specifically on history but on Danish democracy and economy, contain much information on historical events. For example, it is specified that “the Danish society has roots that reach far back in time. The history of Denmark is important to know in order to understand Danish society as it is today.” (p. 5) and that “Danish culture dates back to the time when the first humans settled here [in Denmark]” (p. 140). Most of the questions in the naturalisation tests also concerns historical events, reinforcing the idea of shared historical roots and a national genealogy (see for example Udlændinge- og Integrationsministeriet, 2023b, p. 4, 2024a, p. 3).

National history also occupies a prominent role in the Dutch film *Naar Nederland* (n/a), where the female presenter outlines a brief history of the Dutch nation-state from before the unification of the Low Countries to today. The presenter talks about the “forefather” of the current monarchy invoking the image of a national family, and key Dutch values such as religious freedom are linked to historical events such as the Eighty Years' War (18:57 ff.). Although the historical part in the Dutch film is way less detailed than in the Danish learning materials, it still conveys that the current nation-state of the Netherlands has specific historical roots and traces a linear history of national development. The historical dimension also emerges

from the analysis of the 2011 political note on integration and citizenship where the Dutch society is constructed as having “historically established fundamental features (...). And Those who settle in the Netherlands must adapt to this society” (Rem and Gasper, 2018, p. 26).

6.2.3.2. *The national family*

In Denmark, the construction of citizenship as strictly national also emerges from a discourse in which obtaining citizenship is understood as obtaining access to the “national family/community”. Reference to the idea of a national community can mostly be found in the parliamentary debate (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024), where parliamentarians discuss citizenship in relation to ‘the Danish family’ or compare Denmark to a ‘home’. This kind of discourse enters the debate almost immediately as the first spokesperson, Anders Kronborg from the Social Democratic Party describes obtaining citizenship as “One becomes part of the *Danish family*, our tradition, our values and, not least, our democracy” (10:05ff.). It is then reinforced by Mikkel Bjørn from the Danish People’s Party who defines Denmark as “a home – our home” (12:12 ff.) and, when arguing in favour of stricter naturalisation requirements, states:

And what do you do with your home? You look after it so that it remains both homely and safe. You don't let people into your home who want to stomp through the living rooms in dirty boots, rip pictures off the walls and throw memories in the fireplace. You don't invite people in who will sweep away family values like dirt, and you certainly don't make those same people part of the family if they neither respect the rules of the house nor appreciate the family they have become a part of. (12:12 ff.)

As can be seen, the image of the national family plays a central role in the politics of belonging and in the exclusionary mechanisms of citizenship. The association of citizenship with the trope of the national family legitimises the politics of belonging embedded in citizenship by presenting national ties as “inherited” and by framing the restriction of access to the national community as a familial duty the parliamentarians must fulfil to protect the nation (McClintok, 1993; Balibar, 2009).

While not specifically mentioning the family, other parliamentarians also evoke “familial” images and a more emotional dimension of citizenship by using, for examples, phrases such as “take good care of Denmark” (Bonnesen, 10:42 ff.), “the founding fathers” (Skalvig, 11:04 ff.) and “fatherland” (Kofod, 12:56 ff.). What is significant about these phrases is also the fact that they even find a place in a debate on naturalisation. Citizenship, according to this discourse, is not only the granting of formal rights and duties, but implies a shared identity, shared roots and a shared destiny. The dimension of belonging is central in Danish definitions of citizenship and underscores other discourses on rights and responsibility.

6.2.3.3. Gender, citizenship and femonationalism

In both Denmark and the Netherlands, the gender dimension of citizenship informs and influences the other dimensions of citizenship presented in the previous sections. While it is not easy to disentangle gender from the other themes emerged, this section will focus on the relation between citizenship and gender, and in particular on two interrelated aspects: gender equality as a national value and the gendered construction of the Other. In Denmark and the Netherlands alike, discourses on citizenship frame gender equality as a national value and present the country as a haven of equality both in relation to equality between men and women and LGBTQ+ rights. Gender equality becomes a marker of difference to distinguish between the national “Us” and the Other and to regulate access to the nation-state, reproducing a femonationalist – but also homonationalist, with reference to LGBTQ+ rights – discourse (Farris, 2017; Puar, 2017).

Gender equality as a national value

Gender occupies a central position in the Danish learning material (Udlændinge- og Integrationsministeriet, 2024c) which present Denmark as a forerunner in the fight towards gender equality and as an example to be followed when it comes to the protection of women's

and LGBTQ+ rights. Under Chapter 6, a section is dedicated specifically to gender equality which is explicitly defined as “one of the Danish society’s core values” (p. 223). The section recounts Denmark’s achievements towards gender equality in relation to equal pay, parental leave and sexual harassment. The focus on gender equality, however, can also be found in the other sections of the Danish learning materials (Udlændinge- og Integrationsministeriet, 2024c) which, for example, describe key historical events in Danish history which have contributed to gender equality and key laws and policies which have contributed to furthering women’s rights such as the law on abortion, welfare policies, the law on consent etc. Denmark’s exceptionality is also stressed when it comes to the protection of LGBTQ+ rights where, for example, it is underlined that: “In 1989, for example, Denmark became the first country in the world to give two people of the same sex the right to enter into a registered partnership, which has virtually the same legal effects as marriage” (p. 218).

The Danish learning materials (Udlændinge- og Integrationsministeriet, 2024c) also highlight the role of the Danish welfare state in supporting gender equality. This is framed within the wider context of the Nordic countries which are presented as a model to be followed: “The Danish way of organising the welfare society makes it possible for both men and women to actively participate in the labour market, even if they have children. In Danish families with children, both the father and mother typically work full-time or almost full-time. Here too, European countries have moved in the same direction as the Nordic countries.” (p. 105). This type of discourse reproduces the idea of Nordic exceptionalism (Jensen and Loftsdóttir, 2021) and implicitly provides a rationale for civic integration policies as means of safeguarding Denmark’s exceptional status.

Denmark’s exceptionalism in terms of gender equality and LGBTQ+ rights is reinforced by the naturalisation tests in which many questions are related to Denmark’s achievements in relation to women’s empowerment and LGBTQ+’s rights, asking for example: “Out of 49 European

countries, where does Denmark rank in terms of rights for LGBTI people (Rainbow Map 2024, International Lesbian, Gay, Bisexual, Trans and Intersex Association)?” (Udlændinge- og Integrationsministeriet, 2024b, p. 11) and “What percentage of women in Denmark between the ages of 16 and 64 are employed?” (Udlændinge- og Integrationsministeriet, 2023b, p. 8). The answers to these questions establish Denmark's primacy compared to other countries.

A topic that seems to be especially central when it comes to gender equality in Denmark is marriage. The Danish learning materials (Udlændinge- og Integrationsministeriet, 2024c) underline how marriage in Denmark is a voluntary union between two people and no one can be forced to get married: “Marriages in Denmark can only be entered on a voluntary basis. It is therefore a criminal offense to try to force someone into a marriage that they do not want.” (p. 219). The topic of marriage is also central in the Danish naturalisation tests, many of which contain questions which test the migrants' knowledge on Danish rules regarding marriage, for example the legal age to get married (Udlændinge- og Integrationsministeriet, 2020a, p. 3), the right to divorce (Udlændinge- og Integrationsministeriet, 2021b, p. 4, 2023b, p. 3) etc. Some of these questions also link forced marriage to religious norms, asking for example: “Is it legal to perform a religious marriage of minors in Denmark?” (Udlændinge- og Integrationsministeriet, 2021c, p. 11), “Under Danish law, can you be punished with imprisonment if you illegally force someone into a religious marriage?” (Udlændinge- og Integrationsministeriet, 2022b, p. 11).

The focus on marriage responds to a growing preoccupation in public and political discourse with forced marriages, which has been part of migration and integration debates (Siim, 2007). In this discourse, the problem is framed as one of cultural difference between Danes and migrants where migrant women are constructed as helpless victims of oppressive, misogynistic migrant men. Adopting Danish values is seen as the only way for migrant women to escape their conditions as victims and become emancipated like Danish women. This reflects a

reproduction or reinterpretation within femonationalist discourses of the colonial trope of “white man (claiming to be) saving brown women from brown men” (Farris, 2017, p. 11).

The Dutch discourse on gender and citizenship is very similar to the Danish one. Here too, gender equality is seen as a core value of the Dutch society and the ‘undeserving’ migrant is one who is oppressive towards women and sexual minorities and commits crimes related to gender-based violence, reproducing a femonationalist and homonationalist discourse (Farris, 2017; Puar, 2017). In the film *Naar Nederland* (n/a), gender equality is a central theme addressed especially in the third section on ‘Government, politics and the Constitution’. As mentioned earlier, the section focuses on Article 1 of the Constitution which establishes the principle of equality and anti-discrimination. The focus on gender equality emerges in relation to criminality as the female presenter specifies that “it’s against the law and punishable to discriminate against women” (47:10 ff). We then see the female presenter in a sort of ‘studio’ where the background is made up of a collage of newspaper articles. A male voice and the presenter read out the titles of some newspaper articles as they appear on the screen. The titles describe crimes related to women’s oppression, creating a contraposition between the Dutch law and cultural and religious norms:

(male voice (M) and female presenter (P) reading and commenting on newspaper headlines):

P: A man beats a woman because, according to him, she has behaved like a whore. She flees, but he finds her and kills her. “*Honour killing,*” he says. “*Murder,*” says the Dutch judge.

M (reading the newspaper title): “Man convicted of wife’s murder”

[...]

P: A girl’s clitoris and labia have been partially removed and then sewed together. “*Female circumcision,*” says the proud family. “*Deliberate mutilation,*” says the Dutch penal code. Punishable by law.

M (reading the newspaper title): Mutilated by circumcision.

P: A woman reports her husband to the police because he beats her at home. “*That’s private,*” he says. “*That’s abuse,*” says the police. Proof of abuse shows he is guilty, so punishable by law.

M: Jail term for domestic abuse. (47:30 ff.)

Here, a femonationalist discourse is put forward where respect for women’s rights and gender equality become markers of difference which regulate access to the nation-state and where

gender inequality is associated with different cultural norms and implicitly with migrants (Farris, 2017). In this discourse, the migrant is seen as a potential criminal, reinforcing the construction of gender equality as a national value which migrant do not normally respect.

Gendered Other

In both Denmark and the Netherlands, gender equality in relation to citizenship and integration becomes a marker of difference between Danish/Dutch native nationals and migrants, building on the assumption (and contributing to its construction) of migrants as oppressive towards women and sexual minorities. This is evident in the Danish parliamentary debate ('Folketingstidende 2024-25, tillæg F (L63), møde 15', 2024), where gender inequality and discrimination against LGBTQ+ individuals is linked specifically with Muslim migrants. Like in the Danish learning materials, gender equality and respect for sexual minorities are defined as core Danish values and are implicated in exclusionary mechanisms and used as argument to justify stricter entry and naturalisation requirements. Anders Kronborg from the Social Democratic Party, for example, states:

That's why I and the Social Democrats are fully on board with the idea that we must also continue to carefully comb through and explore means to ensure that those who receive this very valuable and unique passport live up to the attitudes and norms that are characteristic of being part of the Danish family: *equality between men and women, clear rejection of terrorism and terrorist organisations, full acceptance and recognition of sexual minorities* and peaceful coexistence with our Jewish minorities in Denmark. (10:05 ff.)

This statement contributes both to constructing gender equality as a core Danish value and as a marker of difference to distinguish between 'deserving' and 'undeserving' migrant. The underlining assumption is that 'undeserving' migrants are oppressive towards women and sexual minorities. This is framed as problem of cultural difference between Denmark and the culture of the migrant, particularly the Muslim migrant - as can be inferred by the reference to terrorism and Jewish minority, especially considering that the current war in Gaza and current discourses on anti-semitism and attacks on Muslim individuals.

The construction of the ‘undeserving’ migrant as Muslim emerges more explicitly throughout the Danish parliamentary debate (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024) as parliamentarians discuss examples of individuals who should not be granted citizenship. Here, ‘external’ discourses on Muslim individuals or Islam, including related to terrorism, the Islamic organisations Hizb ut Tahrir and Hamas, are linked to the figure of the ‘undeserving’ migrant. For example, it is mentioned that one of the naturalisation applicants under the law proposal has celebrated the death of the cartoonist Lars Vilks (known for a controversial cartoon of the Prophet Muhammad) and has displayed what is labelled as ‘anti-democratic’ behavior by writing some tweets against homosexuals and threatening to commit rape against women (10:11 ff.).

The behaviour of the ‘undeserving’ migrant is linked to gender inequality and oppression of women and sexual minorities in what can be categorised as a femonationalist and homonationalist discourse (Farris, 2017; Puar, 2017). The ‘undeserving’ migrants is described as someone characterised by “terrorist sympathies, hatred of Jews and homosexuals” (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024, 10:13 ff.), someone who “praises Hizb ut-Tahrir and Hamas and wants to destroy the state of Israel” (10:48 ff.) and is linked to the crimes of rape and murder.

The construction of the ‘undeserving’ migrants as Muslim becomes evident thanks to two questions asked by Zenia Stampe (Social Liberal Party) throughout the debate (‘Folketingstidende 2024-25, tillæg F (L63), møde 15’, 2024), both in relation to the proposal of introducing stricter requirements. These questions reveal who is “the problem” the new requirements should address and the social hierarchies which inform and are reinforced by definitions of citizenship. The first question is directed to Mikkel Bjørn (Danish People's Party): “*Would Muslims be able to become Danish citizens if it were up to Mr. Mikkel Bjørn to decide?*” (12:22 ff.), to which he replies: “We have no way of investigating what people believe

in their heads. *But it is quite clear that if you live an Islamic life in your daily activities in Denmark, the Danish People's Party does not believe that this is something that gives rise to an immediate need for Danish citizenship*" (12:22 ff.). The second question instead addresses the Minister for Immigration and Integration who intervenes towards the end of the debate: "Would it be possible to work towards a model that is objective in the sense that if you have to screen, everyone is screened, and that some form of ethnic profiling is not carried out, so that everyone called *Mohammad* and *Ali* goes through some kind of filter, whereas Miles and James do not go through the same filter?" (12:52 ff.).

This femonationalist discourse is also found in the Dutch context. The construction of the figure of the 'undeserving' migrant in Dutch parliamentary debates and political discourse is grounded on the assumption "that the "migrant with poor prospects" comes from a traditional, paternalistic, authoritarian, misogynistic culture" (Bonjour and Duyvendak, 2018, p. 894). A distinction is therefore drawn between female migrants who are constructed as helpless victims and male migrants who are instead oppressive and violent. Thus, for example the Conservative Liberal Minister Rutte state "when mostly young women come from faraway places to the Netherlands to live a life of dependency and isolation, then that's not good. Not for these women. Not for their children. Not for the integration process, nor for the Dutch society at large" (Rutte in Bonjour and Duyvendak, 2018, p. 894).

The analysis of Dutch civic integration materials conducted by Kirk and Suvarierol (2014) uncovers the same discourses in regards to migrants and the construction of migrant women as oppressed and migrant men as oppressive. Thus, for example, guidance materials for teachers underline the importance of teaching knowledge of "the laws and regulations on abortion, euthanasia, homosexuality, sexuality (and...) knowing that all kind of violence is punishable" (p.247-248) grounded on the assumption that migrants previously lack this knowledge. This discourse has also been found by Blankvoort et al. (2024) in the guidance texts for cities and

municipalities which underline the importance of teaching migrants about gender norms and women's rights and "what it means to be a woman in the Netherlands" (Divosa in Blankvoort *et al.*, 2024, p. 470).

The provision and the guidance materials behind the Participation Declaration workshop, which is part of the Dutch civic integration programme, is also grounded in the assumption that gender equality is a Dutch value, foreign to the migrants due to cultural difference. Oomen and Leenders (2020) report for example that one of the trainers insisted on the difference between Syrian and Dutch culture in regards to women's right, even when challenged by one of the participants (p. 266). A dominant theme in the Participation Declaration workshop, and the related guidance materials, is also LGBTQ+ rights which, like gender equality, are framed as a national value. Oomen and Leenders (2020) report of a trainer who, during one of these workshops, stated "The most important thing here is freedom. You can just be gay without being hanged. This is what happens in Iraq, Syria". (p. 285). With this statement the trainer reproduces the distinction between the national Dutch and the "Other" and LGBTQ+ rights are implicated in processes of Othering and politics of belonging.

In Denmark and the Netherlands alike, discourses on citizenship and belonging intersect with femonationalist (and homonationalist) ones, contributing to exclusionary practices and the stigmatisation of Muslim men. As pointed out by Farris (2017), femonationalism appears both as a convergence of racism and emancipatory discourses on gender equality, and as an ideological formation reproducing the dichotomy between West and Rest by associating gender equality with Western 'modernity' and secularity and gender inequality with Islam and religious norms. This discourse relies also on a construction of the nation as 'exceptional' and in 'a state of exception', a manifestation labelled by Puar (2017) as 'sexual exceptionalism'.

7. Discussion

The analysis of how citizenship is socially constructed in Denmark and the Netherlands uncovered important aspects in terms of how citizenship is understood and enacted and how it might evolve.

A first concerning point is the widespread understanding of citizenship as a privilege, where barriers to access are accepted and legitimised by all parties across the political spectrum and institutionalised in civic integration policies. This understanding is also accepted at the European level where citizenship is tied to a discourse on EU fundamental values and where civic integration is seen as fundamental for migrants to be legitimate members of the community (Council of the European Union, 2004). What is missing from discourses on citizenship in both Denmark and the Netherlands is the recognition that with citizenship comes the 'right to have rights' (Arendt, 2017). Without it, individuals face increased vulnerability and lack of protection, and even the inability to demand such protection. As the political climate in many countries becomes more and more unstable, with increasingly polarised discourses over migration and rights, non-citizens live in increased precariousness where their right to reside risks being revoked suddenly and arbitrarily by those in power. This is evident, for example, in the US where legal residents have seen their permits revoked for having expressed dissent and protest (Al Jazeera Staff, 2025; Walters, 2025), but highlighted also by an increasingly widespread discourse on 'remigration' marked by the first Remigration Summit (Ionta, 2025) which challenge current laws on migration and human rights,. Making citizenship contingent on meeting specific criteria creates a double-standard: while birth-right citizens are granted the right to make mistake, non-citizens are not allowed the same privilege. A single post on social media or a criminal offense might make them undeserving of citizenship – or even of residence, stripping them of their right to have rights. As other scholars have highlighted elsewhere (among others Balibar, 2009; Blitz, 2014b; Arendt, 2017), a legal gap

exists in the protection of fundamental rights which must be addressed at both international and national level.

A second important aspect which emerges from the analysis of the data is that, despite the furthering of European integration, citizenship is still understood as national, contributing to nationalist politics of belonging (Yuval-Davis, 2011). Thus, citizenship comes with normative prescriptions of what it means to be a national citizen and what it takes to become one, legitimising processes of exclusion and Othering. Can citizenship move towards a transnational understanding? Can we move beyond the “homo nationalis” (Balibar, 2009) towards a transnational, cosmopolitan identity? For this to happen, a significant switch needs to take place in the way citizenship is defined and institutionalised. This is a long process which will require a fundamental change in the way we perceive ourselves and Others. A first step in this direction would be separating notions of nationhood and national identity from definitions of citizenship in civic integration programmes, for example by limiting the content to the practicalities of living in the country such as how the hospital works, how taxes work etc... This could have more empowering effects as it would help migrants exercise their rights, while refraining from normative constructions of the national “Us” and the Other.

Lastly, another crucial aspect emerged from the analysis is that femonationalist discourses are becoming increasingly institutionalised. While analysis of femonationalism, especially in Denmark, have focused on the discourse of far-right parties, the analysis of data related to civic integration uncovered that femonationalist discourses are adopted by a wider range of actors and reproduced in learning materials and guidance materials, thus exiting party discourses per se and being translated into practice. The exclusionary mechanisms of citizenship affect mostly non-Western (Muslim) migrants, legitimised by a femonationalist discourse in which gender equality becomes a marker of difference. The reproduction of colonial distinction between West and Rest and the stigmatisation of migrant men and women in femonationalist discourses

highlights the impact of colonialism in today's society, underlining the importance of deconstructing discourses of Western superiority and exceptionality (Farris, 2017). This also calls for an increased consciousness among feminist actors of the intersecting social hierarchies still at play in our society so that the fight for gender equality does not end up perpetuating inequalities. Additionally, the analysis of the data also uncovered a homonationalist discourses in regard to citizenship with a focus on LGBTQ+ rights (Puar, 2017), underlining the racialised, gendered and sexual character of national borders (Norocel, 2020) and pointing to the institutionalisation of not only femonationalism but also homonationalism in civic integration policies.

While Danish and Dutch discourses on citizenship are rather similar and both revolve around a focus on national liberal values, I do not view this as a novel trend towards a liberal convergence (Joppke, 2007a, 2007b, 2007c) or the culturalization of citizenship (Duyvendak, Geschiere and Tonkens, 2016). Instead, I follow Farris (2017) in arguing that current discourse on citizenship represent a reinterpretation of nationalist and colonial narratives in which liberal values, including gender equality, are mobilised to construct national borders and the superiority of Western, European countries and justify the exclusion of non-Western Others. While this aspect of colonialism has been analysed in the case of the Netherlands' civic integration programmes (for instance Wekker, 2016; Blankvoort *et al.*, 2021) Denmark's colonial past is generally overlooked and further research is needed to investigate how it impacts today's political and social landscape, including in definitions of citizenship.

8. Conclusion

The spread of civic integration programmes in Europe has sparked a debate over their implications for citizenship and whether we are moving away from national definitions of citizenship towards a common liberal approach (Joppke, 2007a; Duyvendak, Geschiere and

Tonkens, 2016; Borevi, Jensen and Mouritsen, 2017). This thesis explored the relationship between citizenship, nationalism and gender by asking how definitions of citizenship in Denmark and the Netherlands contribute to inclusionary/exclusionary practices. By comparing these two countries, which have some of the most restrictive civic integration policies, the aim was to explore how gender and nationalism are mobilised in discourses on citizenship and integration and how borders are drawn and legitimised.

The thesis analysed Dutch and Danish civic integration materials and political discourse through the lens of feminist theories on citizenship which look at three different aspects: the definition of the rights and the responsibilities of the state and the individual, the dimension of participation where citizenship underlines civic engagement, and the politics of belonging where citizenship contributes to constructing political identities and feeling of belonging, acting as a bordering practice with differentiated impacts on different groups (Lister, 1997; Christensen and Siim, 2010; Yuval-Davis, 2011). Additionally, the thesis adopted the concept of femonationalism (Farris, 2017) to explore the relationship between citizenship, gender and nationalism and the mobilisation of gender equality in the racialised and gendered construction of national borders.

The analysis of the data revealed that both in Denmark and in the Netherlands, citizenship is defined as a privilege, an understanding which has become more mainstream and is now shared across the political spectrum. Albeit with different arguments related to the national context, both Denmark and the Netherlands sees citizenship as entailing specific duties towards the state which the migrant must fulfil to deserve citizenship. The state instead performs a monitoring role, overseeing access to the (nation-) state through civic integration policies. The definition of citizenship as a privilege contributes to the construction of social hierarchies where the figure of the 'deserving' migrant is opposed to that of the 'undeserving' migrant. The 'deserving' migrant is expected to participate by learning the language and history of the

country and contributing to the community. They are also asked to respect the national values and develop an emotional attachment to the nation-state in order to deserve citizenship.

Definitions of citizenship in both the Danish and Dutch context are linked with national identity and contribute to the construction of the nation. In this discourse, citizenship is equated to nationality and acts as a bordering practice restricting access to the national community. Discourses on citizenship also contribute to the construction of gendered national borders through a femonationalist discourse in which gender equality is framed as a core value of the nation, while gender inequality is seen as a problem concerning migrants. Thus, 'undeserving' migrants are constructed as a threat to the national value of gender equality, but also respect for LGBTQ+ rights, reproducing the dichotomy between the 'modern' West and the backward 'Rest' (Farris, 2017)

These three main discourses, which are central in definitions of citizenship in both Denmark and the Netherlands, construct and legitimise barriers to citizenship, contributing to exclusionary practices. Thus, I agree with Farris (2017) in seeing civic integration – and their related discourses on citizenship-as a reinterpretation of nationalist and colonial processes of Othering, constructing nationalist, racialised and gendered borders

Such definitions of citizenship are problematic because they fail to recognise that with citizenship comes the right to have rights (Arendt, 2017). By defining citizenship as something to be deserved and by legitimising barriers to citizenship, this discourse contributes to creating social hierarchies, exposing non-citizen to increased precariousness. Increasing attention should be given to this aspect, filling the legal gap in protecting the right to have rights (Arendt, 2017). What is more, the analysis highlighted that despite increased globalisation and European integration, the relationship between citizenship and the nation is still dominant as citizenship is equated to nationality. This understanding of citizenship contributes to constructing

normative constructions of national identity, thereby contributing to exclusionary mechanisms. Additionally, femonationalist discourses (Farris, 2017) in which gender equality becomes a marker of difference restricting access to the nation are increasingly mainstream and institutionalised in civic integration policies. Femonationalist discourses are also associated with homonationalist ones (Puar, 2017), where gender equality and LGBTQ+ rights are mobilised in constructing belonging and national borders. Femonationalism and homonationalism thus exit party discourse and are implemented in civic integration policies.

The findings of this thesis point to important areas for future research. The institutionalisation of femonationalism underlines the still important impact of colonialism on today's society as nationalist discourses intersect with colonial ones reproducing the dichotomy West vs. Rest (Farris, 2017). While this aspect has been researched extensively in relation to the Netherlands, it remains understudied in Denmark and in the Nordic context more generally. Additionally, while this thesis has been limited to understanding of citizenship at the national level, it would be interesting to explore how these definitions of citizenship evolve as civic integration policies are implemented or challenged at the local level and in public discourse, and how they impact migrants and native citizens' self-perception.

References

- Al Jazeera Staff (2025) *US revokes nearly 1,500 student visas: Who are the targets?*, *Al Jazeera*. Available at: <https://www.aljazeera.com/news/2025/4/18/us-revokes-nearly-1500-student-visas-who-are-the-targets> (Accessed: 13 May 2025).
- Anthias, F. and Yuval-Davis, N. (1989) 'Introduction', in N. Yuval-Davis and F. Anthias (eds) *Woman-Nation-State*. London: Palgrave Macmillan Limited (Book, Whole). Available at: <https://doi.org/10.1007/978-1-349-19865-8>.
- Arendt, H. (2017) *The origins of totalitarianism*. London: Penguin Classics (Penguin modern classics).
- Balibar, É. (2009) *We, the People of Europe?: Reflections on Transnational Citizenship*. Princeton University Press. Available at: <https://doi.org/10.1515/9781400825783>.

- Bartlett, L. and Vavrus, F. (2017) 'Comparative Case Studies: An Innovative Approach', *Nordic Journal of Comparative and International Education (NJCIE)*, 1(1). Available at: <https://doi.org/10.7577/njcie.1929>.
- Bech, E.C., Borevi, K. and Mouritsen, P. (2017) 'A "civic turn" in Scandinavian family migration policies? Comparing Denmark, Norway and Sweden', *Comparative Migration Studies*, 5(1), p. 7. Available at: <https://doi.org/10.1186/s40878-016-0046-7>.
- Berg, L. and Lundahl, M. (2017) '(Un-)veiling the west: Burkini-gate, Princess Hijab and dressing as struggle for postsecular integration', *Culture Unbound*, 8(3), pp. 263–283. Available at: <https://doi.org/10.3384/cu.2000.1525.1683263>.
- Billig, M. (2010) 'Introduction', in *Banal Nationalism*. 1 Oliver's Yard, 55 City Road, London EC1Y 1SP United Kingdom: SAGE Publications Ltd, pp. 1–12. Available at: <https://doi.org/10.4135/9781446221648>.
- Blankvoort, N. *et al.* (2021) 'Decolonising civic integration: a critical analysis of texts used in Dutch civic integration programmes', *Journal of Ethnic and Migration Studies*, 47(15), pp. 3511–3530. Available at: <https://doi.org/10.1080/1369183X.2021.1893668>.
- Blankvoort, N. *et al.* (2024) "'New" Dutch Civic Integration: learning "Spontaneous Compliance" to address inherent difference', *Critical Discourse Studies*, 21(4), pp. 463–481. Available at: <https://doi.org/10.1080/17405904.2023.2179648>.
- Blitz, B.K. (2014a) 'Chapter 1: Migration and freedom', in *Migration and Freedom*. United Kingdom: Edward Elgar Publishing, pp. 1–17. Available at: <https://china-elgaronline-com.zorac.aub.aau.dk/monochap/9781781955833.00007.xml> (Accessed: 5 February 2025).
- Blitz, B.K. (2014b) 'Chapter 2: Investigating freedom of movement', in *Migration and Freedom*. United Kingdom: Edward Elgar Publishing, pp. 18–36. Available at: <https://china-elgaronline-com.zorac.aub.aau.dk/monochap/9781781955833.00007.xml> (Accessed: 5 February 2025).
- Bloor, M. and Bloor, T. (2007) *The practice of critical discourse analysis: an introduction*. 1. publ. London: Hodder Arnold.
- Bonjour, S. (2013) 'Governing diversity: Dutch political parties' preferences on the role of the state in civic integration policies', *Citizenship Studies*, 17(6–7), pp. 837–851. Available at: <https://doi.org/10.1080/13621025.2013.834136>.
- Bonjour, S. and Duyvendak, J.W. (2018) 'The "migrant with poor prospects": racialized intersections of class and culture in Dutch civic integration debates', *Ethnic and Racial Studies*, 41(5), pp. 882–900. Available at: <https://doi.org/10.1080/01419870.2017.1339897>.
- Borevi, K., Jensen, K.K. and Mouritsen, P. (2017) 'The civic turn of immigrant integration policies in the Scandinavian welfare states', *Comparative Migration Studies*, 5(1), pp. 9, s40878-017-0052–4. Available at: <https://doi.org/10.1186/s40878-017-0052-4>.
- Browning, C.S. (2007) 'Branding Nordicity: Models, Identity and the Decline of Exceptionalism', *Cooperation and Conflict*, 42(1), pp. 27–51. Available at: <https://doi.org/10.1177/0010836707073475>.

Christensen, A.-D. and Siim, B. (2010) 'Citizenship and Politics of Belonging – Inclusionary and Exclusionary Framings of Gender and Ethnicity', *Kvinder, Køn & Forskning* [Preprint], (2–3). Available at: <https://doi.org/10.7146/kkf.v0i2-3.28010>.

Colella, D. (2021) 'Femonationalism and anti-gender backlash: the instrumental use of gender equality in the nationalist discourse of the Fratelli d'Italia party', *Gender & Development*, 29(2–3), pp. 269–289. Available at: <https://doi.org/10.1080/13552074.2021.1978749>.

Council of the European Union (2004) 'Press Release: 2618th Council Meeting, Justice and Home Affairs 14615/04 (Presse 321)'. Available at: https://migrant-integration.ec.europa.eu/sites/default/files/2008-08/docl_1274_415560448.pdf (Accessed: 4 June 2025).

De Waal, T. (2020) 'Conditional Belonging: Evaluating Integration Requirements from a Social Equality Perspective', *Journal of Intercultural Studies*, 41(2), pp. 231–247. Available at: <https://doi.org/10.1080/07256868.2020.1724906>.

Dutch Council for Refugees (2024) 'Social welfare', *Asylum Information Database | European Council on Refugees and Exiles*, 7 October. Available at: <https://asylumineurope.org/reports/country/netherlands/content-international-protection/social-welfare/> (Accessed: 7 April 2025).

Duyvendak, J.W., Geschiere, P. and Tonkens, E.H. (2016) *The culturalization of citizenship: belonging and polarization in a globalizing world*. 1st edn. London: Palgrave Macmillan. Available at: <https://doi.org/10.1057/978-1-137-53410-1>.

Ekman, M. (2022) 'The great replacement: Strategic mainstreaming of far-right conspiracy claims', *Convergence: The International Journal of Research into New Media Technologies*, 28(4), pp. 1127–1143. Available at: <https://doi.org/10.1177/13548565221091983>.

European Commission (2023) *Denmark: New social support rules for some migrants*. Available at: https://migrant-integration.ec.europa.eu/news/denmark-new-social-support-rules-some-migrants_en (Accessed: 1 April 2025).

European Commission (2025a) *Governance of migrant integration in Denmark*. Available at: https://migrant-integration.ec.europa.eu/country-governance/governance-migrant-integration-denmark_en (Accessed: 1 April 2025).

European Commission (2025b) *Governance of migrant integration in the Netherlands*. Available at: https://migrant-integration.ec.europa.eu/country-governance/governance-migrant-integration-netherlands_en (Accessed: 7 April 2025).

'European Commission Communication COM(2005) 389 final on A Common Agenda for Integration: Framework for the Integration of Third-Country Nationals in the European Union' (2005). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52005DC0389> (Accessed: 6 April 2025).

'European Commission Communication COM(2020) 758 final on Action plan on Integration and Inclusion 2021-2027' (2020). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0758> (Accessed: 6 April 2025).

European Parliament (2025) 'Equality between men and women - Fact Sheets on the European Union'. Available at: <https://www.europarl.europa.eu/factsheets/en/sheet/59/equality-between-men-and-women> (Accessed: 20 May 2025).

Fairclough, N. (2010) *Critical discourse analysis: the critical study of language*. 2. Harlow: Longman (Book, Whole). Available at: <https://doi.org/10.4324/9781315834368>.

Fairclough, N. (2012) 'Introduction', in N. Fairclough, G. Cortese, and P. Ardizzone (eds) *Discourse and Contemporary Social Change*. 1st, New ed edn. Bern: Peter Lang AG, Internationaler Verlag der Wissenschaften (Linguistic Insights, 54), pp. 9–21. Available at: <https://doi.org/10.3726/978-3-0351-0351-9>.

Fairclough, N. (2013) 'Critical discourse analysis and critical policy studies', *Critical Policy Studies*, 7(2), pp. 177–197. Available at: <https://doi.org/10.1080/19460171.2013.798239>.

Farris, S.R. (2017) *In the Name of Women's Rights : The Rise of Femonationalism*. Durham: Duke University Press Books. Available at: <https://search.ebscohost.com/login.aspx?direct=true&db=nlebk&AN=1507204&site=ehost-live> (Accessed: 5 March 2023).

Feola, M. (2024) *The Rage of Replacement: Far Right Politics and Demographic Fear*. 1st ed. Minneapolis: University of Minnesota Press.

Folketinget (2017) *Lovforslag om indfødsret (statsborgerskab)*, *Folketinget*. Available at: <https://www.ft.dk/da/aktuelt/tema/indf%C3%B8dsret> (Accessed: 26 March 2025).

'Folketingstidende 2024-25, tillæg F (L63), møde 15' (2024). Available at: https://www.folketingstidende.dk/samling/20241/salen/M15/20241_M15_referat.pdf#L63 (Accessed: 15 May 2025).

Government of the Netherlands (2011) *Becoming a Dutch citizen - Dutch citizenship*. Ministerie van Algemene Zaken. Available at: <https://www.government.nl/topics/dutch-citizenship/becoming-a-dutch-citizen> (Accessed: 7 April 2025).

Government of the Netherlands (2019) *Civic integration (inburgering) in the Netherlands - Integration in the Netherlands - Government.nl*. Ministerie van Algemene Zaken. Available at: <https://www.government.nl/topics/integration-in-the-netherlands/civic-integration-in-the-netherlands> (Accessed: 7 April 2025).

Government of the Netherlands (2022) *New Civic Integration Act 2021 - Integration in the Netherlands*. Ministerie van Algemene Zaken. Available at: <https://www.government.nl/topics/integration-in-the-netherlands/civic-integration-act> (Accessed: 7 April 2025).

Government of the Netherlands (2023) *Registering for the civic integration exam - Integration in the Netherlands*. Ministerie van Algemene Zaken. Available at: <https://www.government.nl/topics/integration-in-the-netherlands/civic-integration-in-the-netherlands/registering-for-the-civic-integration-exam> (Accessed: 7 April 2025).

Hall, J.A. and Korsgaard, O. (2015) 'Introduction', in J.A. Hall, O. Korsgaard, and O.K. Pedersen (eds) *Building the Nation*. McGill-Queen's University Press (N.F.S. Grundtvig and

Danish National Identity), pp. 3–26. Available at: <https://www.jstor.org/stable/j.ctt13x0p07.4> (Accessed: 17 May 2025).

Huntington, S.P. (1993) 'The Clash of Civilizations?', *Foreign Affairs*, 72(3), pp. 22–49. Available at: <https://doi.org/10.2307/20045621>.

Hvenegård-Lassen, K. and Maurer, S. (2012) 'Bodies and Boundaries', in *Whiteness and Postcolonialism in the Nordic Region*. 1st edn. United Kingdom: Routledge, pp. 119–139. Available at: <https://doi.org/10.4324/9781315547275-10>.

Immigratie-en Naturalisatiedienst, Ministerie van Asiel en Migratie (2025) *Benefits from public funds*. Immigratie- en Naturalisatiedienst. Available at: <https://ind.nl/en/benefits-from-public-funds> (Accessed: 7 April 2025).

Ingram, H.M. and Schneider, A.L. (2004) 'Introduction', in A.L. Schneider and H.M. Ingram (eds) *Deserving and Entitled: Social Constructions and Public Policy*. Albany, UNITED STATES: State University of New York Press, pp. 1–28. Available at: <http://ebookcentral.proquest.com/lib/aalborguniv-ebooks/detail.action?docID=3407794> (Accessed: 17 May 2025).

Ionta, N. (2025) "'Remigration' conclave: Europe's far-right to plot mass deportations at Italian gathering', *Euractiv*, 12 May. Available at: <https://www.euractiv.com/section/politics/news/remigration-conclave-europes-far-right-to-plot-mass-deportations-at-italian-gathering/> (Accessed: 13 May 2025).

Jensen, K.K. *et al.* (2021) 'Roadblocks to citizenship: selection effects of restrictive naturalisation rules', *Journal of Ethnic and Migration Studies*, 47(5), pp. 1047–1065. Available at: <https://doi.org/10.1080/1369183X.2019.1667757>.

Jensen, L. and Loftsdóttir, K. (2021) 'Welfare State Exceptionalism in the Nordic Countries and Britain', in *Exceptionalism*. Routledge.

Jones, G. (2016) 'What Is New about Dutch Populism? Dutch Colonialism, Hierarchical Citizenship and Contemporary Populist Debates and Policies in the Netherlands', *Journal of Intercultural Studies*, 37(6), pp. 605–620. Available at: <https://doi.org/10.1080/07256868.2016.1235025>.

Joppke, C. (2007a) 'Beyond national models: Civic integration policies for immigrants in Western Europe', *West European Politics* [Preprint]. Available at: <https://doi.org/10.1080/01402380601019613>.

Joppke, C. (2007b) 'Do Obligatory Civic Integration Courses for Immigrants in Western Europe Further Integration?', *Focus Migration*, Policy Brief No.8, pp. 1–7. Available at: <https://www.bpb.de/system/files/pdf/MRDKHG.pdf> (Accessed: 20 May 2025)

Joppke, C. (2007c) 'Transformation of Immigrant Integration: Civic Integration and Antidiscrimination in the Netherlands, France, and Germany', *World Politics*, 59(2), pp. 243–273. Available at: <https://doi.org/10.1353/wp.2007.0022>.

Kirk, K.M. and Suvarierol, S. (2014) 'Emancipating Migrant Women? Gendered Civic Integration in The Netherlands', *Social Politics: International Studies in Gender, State & Society*, 21(2), pp. 241–260. Available at: <https://doi.org/10.1093/sp/jxu005>.

Kiwan, D. (2008) 'A Journey to citizenship in the United Kingdom', *International Journal on Multicultural Societies*, 10(1), pp. 60–75. Available at: <https://unesdoc.unesco.org/ark:/48223/pf0000160918> (Accessed: 17 May 2025)

Larsen, E., Moss, S.M. and Skjelsbaek, I. (2021) 'Introduction', in *Gender Equality and Nation Branding in the Nordic Region*. 1st edn. Abingdon, Oxon, New York, NY: Routledge (Routledge Studies in Gender and Global Politics). Available at: <https://doi.org/10.4324/9781003017134>.

Larsen, E.L. (2015) 'An Ongoing Influence: The Political Application of Grundtvig's Ideas in the Debate on Danish Society, 2001–09', in J.A. Hall, O. Korsgaard, and O.K. Pedersen (eds) *Building the Nation: N.F.S. Grundtvig and Danish National Identity*. McGill-Queen's University Press, pp. 381–395. Available at: <https://www.jstor.org/stable/j.ctt13x0p07.24> (Accessed: 17 May 2025).

de Leeuw, M. and van Wichelen, S. (2012) 'Civilizing migrants: Integration, culture and citizenship', *European journal of cultural studies*, 15(2), pp. 195–210. Available at: <https://doi.org/10.1177/1367549411432029>.

Lister, R. (1997) *Citizenship: feminist perspectives*. Houndmills: Macmillan.

Lister, R. et al. (2007a) 'Gendered citizenship: migration and multiculturalism', in *Gendering citizenship in Western Europe: New challenges for citizenship research in a cross-national context*. 1st edn. Bristol, UK: Policy Press, pp. 77–108. Available at: <https://doi.org/10.46692/9781847422378>.

Lister, R. et al. (2007b) *Gendering citizenship in Western Europe: New challenges for citizenship research in a cross-national context*. 1st edn. Bristol, UK: Policy Press. Available at: <https://doi.org/10.46692/9781847422378>.

Lister, R. et al. (2007c) 'Introduction', in *Gendering citizenship in Western Europe: New challenges for citizenship research in a cross-national context*. 1st edn. Bristol, UK: Policy Press, pp. 1–14. Available at: <https://doi.org/10.46692/9781847422378>.

Loftsdóttir, K. and Jensen, L. (2012) 'Introduction: Nordic Exceptionalism and the Nordic "Others"', in *Whiteness and Postcolonialism in the Nordic Region*. 1st edn. United Kingdom: Routledge, pp. 1–11. Available at: <https://doi.org/10.4324/9781315547275-2>.

Löwenheim, O. and Gazit, O. (2009) 'Power and Examination: A Critique of Citizenship Tests', *Security Dialogue*, 40(2), pp. 145–167. Available at: <https://doi.org/10.1177/0967010609103074>.

Madsen, T., Morton, T. and Power, S.A. (2024) 'An investigation of politicians' responses to urban diversity and disadvantage: The case of the Danish "parallel societies"', *British Journal of Social Psychology*, 63(1), pp. 186–204. Available at: <https://doi.org/10.1111/bjso.12673>.

Marshall, T.H. and Bottomore, T. (2015) *Citizenship and Social Class*. Pluto Press. Available at: <https://doi.org/10.2307/j.ctt18mvns1>.

McClintok, A. (1993) 'Family Feuds: Gender, Nationalism and the Family', *Feminist Review*, 44, pp. 61–80.

Ministerie van Sociale Zaken en Werkgelegenheid, Bureau ICE (2014) 'Naar Nederland: Handleiding, Nederlands - English'. Available at: https://a.storyblok.com/f/304559/x/cfc7136f2e/engels_handleiding-naar-nederland.pdf (Accessed: 3 May 2025).

Moscatelli, F. (2024) *La crociata anti-Islam della Lega a Pontida, La Stampa*. Available at: https://www.lastampa.it/politica/2024/07/23/news/battaglia_lepanto_lega-14497742/ (Accessed: 13 May 2025).

Möser, C. (2022) 'The Scandal of Women's Emancipation. Femonationalism, Right-Wing Sexual Politics, and Anti-Feminism', *Social Politics: International Studies in Gender, State & Society*, 29(4), pp. 1544–1565. Available at: <https://doi.org/10.1093/sp/jxac012>.

Mouritsen, P. (2013) 'The resilience of citizenship traditions: Civic integration in Germany, Great Britain and Denmark', *Ethnicities*, 13(1), pp. 86–109. Available at: <https://doi.org/10.1177/1468796812451220>.

Mouritsen, P., Kriegbaum Jensen, K. and Larin, S.J. (2019) 'Introduction: Theorizing the civic turn in European integration policies', *Ethnicities*, 19(4), pp. 595–613. Available at: <https://doi.org/10.1177/1468796819843532>.

Munkers, C. (2010) *Dansk, danskere, danskhedstest... - Hvordan fremstilles danskheden i forbindelse med indfødsretsprøven? - en kritisk diskursanalyse*. Master's Thesis. Copenhagen Business School.

Naar Nederland (n/a). Available at: <https://www.naarnederland.nl/zelfstudiepakket/zelfstudiepakket-engels> (Accessed: 3 May 2025).

Nagel, J. (1998) 'Masculinity and nationalism: gender and sexuality in the making of nations', *Ethnic and racial studies*, 21(2), pp. 242–269. Available at: <https://doi.org/10.1080/014198798330007>.

Norocel, O.C. (2020) *Nostalgia and Hope: Intersections Between Politics of Culture, Welfare, and Migration in Europe*. 1st ed. Cham: Springer International Publishing AG (IMISCOE Research Series).

van Oers, R. (2008) 'From Liberal to Restrictive Citizenship. The Case of the Netherlands', <http://unesdoc.unesco.org/images/0016/001607/160772M.pdf#page=42> [Preprint]. Available at: <https://repository.ubn.ru.nl/handle/2066/73901> (Accessed: 3 March 2025).

van Oers, R. (2013a) 'Repairing the Failures of the Past: The Introduction of a Citizenship Test in the Netherlands', in *Deserving Citizenship: Citizenship Tests in Germany, the Netherlands and the United Kingdom*. Boston, UNITED STATES: BRILL, pp. 41–66. Available at: <http://ebookcentral.proquest.com/lib/aalborguniv-ebooks/detail.action?docID=1474942> (Accessed: 29 April 2025).

van Oers, R. (2013b) 'The Citizenship Tests Compared', in *Deserving Citizenship: Citizenship Tests in Germany, the Netherlands and the United Kingdom*. Boston, UNITED STATES: BRILL, pp. 113–146. Available at: <http://ebookcentral.proquest.com/lib/aalborguniv-ebooks/detail.action?docID=1474942> (Accessed: 29 April 2025).

Olesen, O.B. (2025) 'Vi kan ikke bevare vores liberale demokrati, hvis vores befolkning ikke er liberale demokrater', *Liberal Alliance*, 12 January. Available at: <https://www.liberalalliance.dk/blog/vi-kan-ikke-bevare-vores-liberale-demokrati-hvis-vores-befolkning-ikke-er-liberale-demokrater/> (Accessed: 13 May 2025).

Oomen, B. and Leenders, E. (2020) 'Symbolic Laws, Street-Level Actors: Everyday Bordering in Dutch Participation Declaration Workshops', in M. Ambrosini, M. Cinalli, and D. Jacobson (eds) *Migration, Borders and Citizenship. Migration, Diasporas and Citizenship*. Palgrave Macmillan, Cham, pp. 265–294. Available at: https://doi.org/10.1007/978-3-030-22157-7_12.

Özkırmı, U. (2003) *Theories of nationalism: a critical introduction*. 1. publ., 3. pr. Basingstoke: Macmillan [u.a.].

Pieterse, J.N. (1996) 'Globalisation and Culture: Three Paradigms', *Economic and political weekly*, 31(23), pp. 1389–1393.

Pryke, S. (1998) 'Nationalism and sexuality, what are the issues?', *Nations and nationalism*, 4(4), pp. 529–546.

Puar, J. (2013) 'Rethinking Homonationalism', *International journal of Middle East studies*, 45(2), pp. 336–339. Available at: <https://doi.org/10.1017/S002074381300007X>.

Puar, J.K. (2017) 'Introduction: Homonationalism and Biopolitics', in *Terrorist Assemblages: Homonationalism in Queer Times*. Duke University Press, pp. 1–36. Available at: <https://www.jstor.org/stable/j.ctv125jg6f.5> (Accessed: 27 April 2024).

Puar, J.K. (2022) 'Whither Homonationalism?', in A. Sifaki, C.L. Quinan, and K. Lončarević (eds) *Homonationalism, femonationalism and ablenationalism: critical pedagogies contextualised*. Abingdon, Oxon ; New York, NY: Routledge, pp. 2–8.

Putnam, R.D., Leonardi, R. and Nanetti, R.Y. (1994) *Making Democracy Work: Civic Traditions in Modern Italy*. Princeton University Press. Available at: <https://doi.org/10.1515/9781400820740>.

Rem, D. and Gasper, D. (2018) 'Citizens and Citizenship: The Rhetoric of Dutch Immigrant Integration Policy in 2011', *International journal of social quality*, 8(1), pp. 21–48. Available at: <https://doi.org/10.3167/IJSQ.2018.080103>.

Sager, M. and Mulinari, D. (2018) 'Safety for whom? Exploring femonationalism and care-racism in Sweden', *Women's Studies International Forum*, 68, pp. 149–156. Available at: <https://doi.org/10.1016/j.wsif.2017.12.002>.

Sifaki, A., Quinan, C.L. and Lončarević, K. (2022) 'When Homonationalism Meets Femonationalism Meets Ablenationalism: Contextualised Interventions in Feminist Teaching', in A. Sifaki, C.L. Quinan, and K. Lončarević (eds) *Homonationalism, femonationalism and ablenationalism: critical pedagogies contextualised*. Abingdon, Oxon ; New York, NY: Routledge, pp. 16–28.

Siim, B. (2007) 'The Challenge of Recognizing Diversity from the Perspective of Gender Equality: Dilemmas in Danish Citizenship', *Critical Review of International Social and*

Political Philosophy, 10(4), pp. 491–511. Available at:
<https://doi.org/10.1080/13698230701660196>.

Siim, B. (2021) 'Gender, Citizenship and Intersectionality: Contending with Nationalisms in the Nordic Region', in *Feminisms in the Nordic Region*. Cham: Springer International Publishing (Gender and Politics), pp. 47–66. Available at: https://doi.org/10.1007/978-3-030-53464-6_3.

Siim, B. and Stoltz, P. (2024) 'Intersectional and Transnational Approaches to Gender and Citizenship: Contributions and Contestations', in B. Siim and P. Stoltz (eds) *The Palgrave Handbook of Gender and Citizenship*. Cham: Springer International Publishing, pp. 1–24. Available at: https://doi.org/10.1007/978-3-031-57144-2_1.

Sinha, M. (2016) 'Gender and Nation (2004)', in C.R. McCann and S.-K. Kim (eds) *Feminist Theory Reader: Local and Global Perspectives*. London: Taylor and Francis, pp. 254–272. Available at: <https://doi.org/10.4324/9781315680675>.

Spencer, P. and Wollman, H. (2002) *Nationalism: a critical introduction*. London ; Thousand Oaks, Calif: Sage.

Spencer, P. and Wollman, H. (2005) *Nations and Nationalism - A Reader*. Edinburgh University Press.

Stoltz, P., Mulinari, D. and Keskinen, S. (2021) 'Contextualising Feminisms in the Nordic Region: Neoliberalism, Nationalism, and Decolonial Critique', in *Feminisms in the Nordic Region*. Cham: Springer International Publishing (Gender and Politics), pp. 1–21. Available at: https://doi.org/10.1007/978-3-030-53464-6_1.

Stoltz, P. and Siim, B. (2014) 'Special issue on "Nationalism, Gender Equality and Welfare—Intersectional Contestations and the Politics of Belonging"', *NORA - Nordic Journal of Feminist and Gender Research*, 22(4), pp. 247–249. Available at: <https://doi.org/10.1080/08038740.2014.965198>.

Sümer, S., Halsaa, B. and Roseneil, S. (2014) 'Gendered Citizenship in a Multidimensional Perspective: The Challenges Facing Norway within the Nordic Model', *NORA - Nordic Journal of Feminist and Gender Research*, 22(4), pp. 283–298. Available at: <https://doi.org/10.1080/08038740.2014.964769>.

Suvarierol, S. and Kirk, K. (Kate) (2015) 'Dutch civic integration courses as neoliberal citizenship rituals', *Citizenship Studies*, 19(3–4), pp. 248–266. Available at: <https://doi.org/10.1080/13621025.2015.1006578>.

Svensson, M. and Stoltz, P. (2010) 'Rights and Responsibilities in a Gendered World: Equality In/Between China and the Nordic Countries', in P. Stoltz et al. (eds) *Gender Equality, Citizenship and Human Rights*. United Kingdom: Taylor & Francis Group. Available at: <https://doi.org/10.4324/9780203854457>.

Thapar-Björkert, S. (2013) 'Gender, Nations, and Nationalisms', in *The Oxford Handbook of Gender and Politics*. Oxford University Press (Oxford Handbooks), pp. 800–827. Available at: <https://doi.org/10.1093/oxfordhb/9780199751457.013.0032>.

Thomson, J. (2020) 'Gender and Nationalism', *Nationalities Papers*, 48(1), pp. 3–11.
Available at: <https://doi.org/10.1017/nps.2019.98>.

Udlændinge- og Integrationsministeriet (2020a) 'Indfødsretsprøven sommer 2020'. Available at: <https://danskogproever.dk/media/z1qhvv0v/indfoedsretsproeven-2020-06.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2020b) 'Indfødsretsprøven vinter 2020'. Available at: <https://danskogproever.dk/media/gcppyafs/indfoedsretsproeven-2020-11.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2021a) *Cirkulæreskrivelse om naturalisation*. Available at: <https://www.retsinformation.dk/eli/retsinfo/2021/9461> (Accessed: 1 April 2025).

Udlændinge- og Integrationsministeriet (2021b) 'Indfødsretsprøven sommer 2021'. Available at: <https://danskogproever.dk/media/jk4inhpt/indfoedsretsproeven-2021-06.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2021c) 'Indfødsretsprøven vinter 2021'. Available at: <https://danskogproever.dk/media/4hznqjjq/indfoedsretsproeven-2021-11.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2022a) 'Indfødsretsprøven sommer 2022'. Available at: <https://danskogproever.dk/media/ostotbif/indfoedsretsproeven-2022-06.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2022b) 'Indfødsretsprøven vinter 2022'. Available at: <https://danskogproever.dk/media/0gsm03il/indfoedsretsproeven-2022-11.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2023a) 'Indfødsretsprøven sommer 2023'. Available at: <https://danskogproever.dk/media/0qgkii0s/indfoedsretsproeven-2023-05.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2023b) 'Indfødsretsprøven vinter 2023'. Available at: <https://danskogproever.dk/media/x3vcejpl/indfoedsretsproeven-2023-11.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2024a) 'Indfødsretsprøven sommer 2024'. Available at: <https://danskogproever.dk/media/ylmfltdq/indfoedsretsproeven-2024-05.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2024b) 'Indfødsretsprøven vinter 2024'. Available at: <https://danskogproever.dk/media/0ajdmdql/indfoedsretsproeven-2024-11.pdf> (Accessed: 12 May 2025).

Udlændinge- og Integrationsministeriet (2024c) 'Læremateriale til Indfødsretsprøven - danske samfundsforhold, dansk kultur og historie'. Udlændinge- og Integrationsministeriet, Styrelsen for International Rekruttering og Integration. Available at: <https://danskogproever.dk/media/natdfdrw/laeremateriale-til-indfoedsretsproeven.pdf> (Accessed: 20 May 2025).

Udlændinge- og Integrationsministeriet (2025a) *Selvforsørgelses- og hjemrejseprogrammet og introduktionsprogrammet*. Available at: <https://uim.dk/arbejdssomraader/integration/modtagelse-og-integration-af-nye-borgere/den-beskaeftigelsesrettede-integrationsindsats/selvforsoergelses-og-hjemrejseprogrammet-og-introduktionsprogrammet/> (Accessed: 1 April 2025).

Udlændinge- og Integrationsministeriet (2025b) *Selvforsørgelses- og hjemrejseydelse eller overgangsydelse*. Available at: <https://www.borger.dk/arbejde-dagpenge-ferie/Dagpenge-kontanthjaelp-og-sygedagpenge/Kontanthjaelp/selvforsoergelses--og-hjemrejseydelse-eller-overgangsydelse> (Accessed: 1 April 2025).

Udlændinge- og Integrationsministeriet and Integration (2025) *Conditions for foreign citizens' acquisition of Danish citizenship*. Available at: <https://lifeindenmark.borger.dk/settle-in-denmark/danish-citizenship/conditions-for-foreign-citizens--acquisition-of-danish-citizenship> (Accessed: 1 April 2025).

Walters, J. (2025) 'Denied, detained, deported: the faces of Trump's immigration crackdown', *The Guardian*, 10 May. Available at: <https://www.theguardian.com/us-news/2025/apr/28/trump-immigration-people-detained-deported-cases> (Accessed: 13 May 2025).

Wekker, G. (2016) *White innocence: paradoxes of colonialism and race*. Durham London: Duke University Press.

Wigger, I. (2019) 'Anti-Muslim racism and the racialisation of sexual violence: "intersectional stereotyping" in mass media representations of male Muslim migrants in Germany', *Culture and religion*, 20(3), pp. 248–271. Available at: <https://doi.org/10.1080/14755610.2019.1658609>.

Yuval-Davis, N. (1996) 'Women and the Biological Reproduction of "The Nation"', *Women's Studies International Forum*, 19(1/2), pp. 17–24.

Yuval-Davis, N. (2006) 'Belonging and the politics of belonging', *Patterns of Prejudice*, 40(3), pp. 197–214. Available at: <https://doi.org/10.1080/00313220600769331>.

Yuval-Davis, N. (2007) 'Intersectionality, Citizenship and Contemporary Politics of Belonging', *Critical Review of International Social and Political Philosophy*, 10(4), pp. 561–574. Available at: <https://doi.org/10.1080/13698230701660220>.

Yuval-Davis, N. (2011) *The Politics of Belonging: Intersectional Contestations*. 1 Oliver's Yard, 55 City Road, London EC1Y 1SP United Kingdom: SAGE Publications Ltd. Available at: <https://doi.org/10.4135/9781446251041>.

Yuval-Davis, N., Anthias, F. and Kofman, E. (2005) 'Secure borders and safe haven and the gendered politics of belonging: Beyond social cohesion', *Ethnic and Racial Studies*, 28(3), pp. 513–535. Available at: <https://doi.org/10.1080/0141987042000337867>.