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Beyond Assimilation and Multiculturalism: A Critical Review of the Debate on Managing Diversity

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Abstract In the past few years, both assimilationist and multiculturalist approaches to the management of immigration and diversity have been called into question. This article is an attempt to critically review and examine the key points of the debate regarding assimilationism and multiculturalism, while arguing for an interculturalist model of socio-cultural incorporation that reconciles cultural diversity with social cohesion. This paper looks at both European and North American cases and contends that when support for diversity occurs within a framework of social justice and political equality, and when all members of society are permitted to fully participate in the public space, the result is a more cohesive, albeit plural, civic community.

Résumé Depuis quelques années, tant les approches assimilationistes que multi-culturalistes en matière de gestion de l'immigration et la diversité ont été remises en question. Dans cet article, on présente un compte-rendu critique et examine les éléments clés du débat portant sur l'assimilationisme et le multiculturalisme, tout en proposant un modèle interculturaliste d'intégration qui concilie la diversité culturelle et la cohésion sociale. Cet article étudie des cas européens et nord américains et affirme que lorsque l'appui à la diversité se fait dans un cadre de justice sociale et d'égalité politique où tous les membres de la société peuvent participer pleinement dans l'espace public, le résultat est une communauté civique plus cohésive, quoique multiculturelle.

Keywords Immigration · Diversity · Multiculturalism · Interculturalism · Accommodation · Social Cohesion

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Introduction

In recent decades, and as a result of globalization processes and the new international division of labor, migration movements have reached a scale and a complexity that are unprecedented in history (Castles & Miller 2009; IOM n.d.). This reality is transforming societies in a structural manner: socially, politically, and economically. A key consequence of international migration and of an ever more interconnected world is that ethno-cultural diversity has increased in most nations, leading to simultaneous processes of both globalization and localization. Countries of immigration must therefore manage and accommodate these apparently conflicting tendencies (Touraine 1998; Putnam 2007).

Host societies have incorporated migrants and approached ethno-cultural plurality in very diverse ways, with the balance sometimes tipping much more strongly in favor of a pluralist or an assimilationist orientation. Both ideologies, however, are in the process of being rethought. Following the polarizing *hijab* debate in France throughout the 1990s and the ensuing controversial French law in 2004 to ban Islamic headscarves from schools, in addition to the violent disturbances in certain French *banlieues* in 2005, some observers claimed that the French model, a highly assimilationist approach, had failed and that France would have to acknowledge multiculturalism (Yazbeck Haddad & Balz 2006; Murray 2006; Silverman 2007; Silberman et al. 2007). The converse critique was made of the multicultural model (e.g., Kepel 2005) following events as broad as the Rushdie Affair of 1989, the summer 2001 riots in northern towns of the United Kingdom (compounded by the impact of the 9/11 terrorist attacks in the USA that happened shortly thereafter), the 2004 murder of filmmaker Theo van Gogh in the Netherlands, and the 2005 London bombings, among other incidents (for an analysis of the British case, see Modood 2005; McGhee 2005, 2008; Hart 2005; for the Dutch case, see Korteweg 2006; Vasta 2007).

Indeed, many differences exist between continents, countries, and regions, and even between cities in the same country or province (see, for instance, Vertovec's 1998 comparative study of different European cities); and it is clear that there is not, nor can there be, a single model of integration or accommodation that is valid for all cases. Each model has to satisfy the particular characteristics (historical, demographic, economic, political, cultural, and so forth) of each location, and there would not be much point in transplanting a given model from one place to another. Nevertheless, it is possible to analyze different cases, find points in common, and highlight some principles that could be applicable beyond particular contexts.

This article critically reviews some of the most influential literature on theories of and approaches to the socio-cultural incorporation of immigrants, examining the key points of the debate regarding assimilationist and multiculturalist perspectives and offering a clear synthesis of the limitations and challenges of these two models. New directions for more successfully dealing with the realities of socio-cultural plurality are then highlighted through looking at theoretical models that have been proposed and at elements that I would argue need to be included in order to more productively

deal with issues of diversity, namely community rights, improved access to citizenship, a decentralized approach by government to accommodation, and greater government support for the settlement and incorporation of immigrants. The Canadian "interculturalist" model and its outcomes are given particular consideration. This article ultimately advocates for an incorporation-accommodation model that reconciles cultural diversity with civic equality and attempts to show that this approach is the most probable and realistic solution for achieving social, political, and economic cohesion in ethno-culturally diverse societies.

Dominant Models of Incorporation

Immigrants are incorporated into host societies in very diverse ways, in accordance with the historical, demographic, political, and social particularities of each country or region as well as, to a great extent, how notions of national community and belonging have historically been conceived. Forms of incorporation are, thus, closely linked with colonial history, the emergence of nation-states, and the resulting policies of exclusion and inclusion on the basis of citizenship.

Integration-incorporation models tend to be divided into three types: assimilationist or republican (based on the idea that equality can be achieved through the full adoption of the rules and values of the dominant society and through the avoidance of any considerations of diversity, as in the case of France); multiculturalist or pluralist (based on the respect for and protection of cultural diversity within a framework of shared belonging, as in the cases of Sweden, the Netherlands, the UK, and Canada); and a segregationist or exclusion model—which some thinkers (e.g., Joppke 1999) categorize as a sub-branch of multiculturalism—characterized by separation between, or fragmentation of, ethnic-cultural communities, and distinguished particularly by its restrictive legal framework regarding access to citizenship, based on the ethno-racial criterion of *jus sanguinis*, as in the cases of Austria, Germany, and Switzerland. Using different terminology, Soysal (1994) differentiates between countries with a corporatist model (which institutionally recognizes that the link between the state and ethnic minorities is similar to the connection between the state and other corporatized groups—e.g., the Netherlands and Sweden); an individualist model (which rejects the creation of policies focused on groups and instead places emphasis on individual immigrants and the processes of incorporating them into the job market as the basis for their integration—e.g., Great Britain); and a statist model (which also defines immigrants as individuals but takes a much more state-centric viewpoint than the individualist model regarding immigrants' incorporation—e.g., France).

To simplify even further, it could be said that two basic perspectives exist, neither of which is identified with a single political ideology, and both of which are practiced to differing degrees according to the particular countries: the assimilationist model and the pluralist model. The assimilationist model, from the French liberal tradition, is based on the need to respect common legal values and principles that are shared by all in order to foster a cohesive, inclusive society. Assimilation is based on the idea of monoculturality and of the full adoption (whether by submission or absorption) of the rules and values of the dominant society so that the minority

group becomes culturally indistinguishable from the dominant society. Conversely, the model of cultural pluralism, from the Anglo-Saxon tradition, which can be found in countries such as the UK, the Netherlands, and Canada, is based on the acknowledgment and protection of cultural diversity. Depending on the country, though, cultural pluralism is practiced with a greater or lesser emphasis on civic equality or on the separate consideration of minorities—or, to use Soysal's terms, with a focus that is either more individualist or more corporatist.

Both of these perspectives have limitations, and in practice, they combine, with increased pluralist or assimilationist tendencies depending on the country or region. For example, some analysts have referred to recent "neo-assimilationist" policies in traditionally multiculturalist countries like Denmark and the Netherlands (Favell 1998; Vasta 2007). Moreover, authors such as Grillo (2007) speak of "weak" or "strong" multiculturalism. In the first case, cultural diversity is only recognized in the private sphere, whereas in the institutional public sphere (work, education, etc.), policies encouraging the assimilation of immigrants and ethnic minorities predominate. In the case of "strong" multiculturalism, there is recognition of ethnic-cultural differences and communities in the public sphere and at the institutional level, such as official support for the first languages of immigrants or the real application of legislation concerning the right to religious freedom and worship. In the UK, an example of the former case, the main objective of immigration policy is the integration of the individual through equal opportunities and through legal measures preventing ethnic-racial discrimination. The result is that assimilation also predominates in the cultural sphere: anyone who is not assimilated becomes more separated from the dominant society. In Canada, an example of the latter case, active support is given to ethnic communities, and the mainstream is more diverse (in fact, there is less of a sense of distinction between minorities and the majority). People identify with the country and with the society as a whole, but without relinquishing other ethnic-cultural identity affiliations. It is worth asking, however, to what extent ethnic self-attachments and the compound forms of ethnic-cultural identity (e.g., Chinese-Canadian, Indian-Canadian) are a reflection of processes of ethnicization, racialization, and social discrimination rather than of free choices within a social structure that is assumed to be horizontal.

Assimilationism and Multiculturalism: Critiques and Misconceptions

Following the divisive *hijab* debate in France, which became a public issue from 1989 onward, and the riots and violent clashes that occurred in a number of French *banlieues* in 2005, the French assimilation model came under scrutiny, and critics claimed that France would have to adopt a more complex approach to integration. Conversely, the Dutch and British multicultural models were subjected to critique in light of a number of crucial events: namely, the 2001 riots in British milltowns, coupled with the ensuing Cantle Report; the 2002 elections in the Netherlands, which saw a surprising rise in support for the right-wing Pim Fortuyn-led party that campaigned on an anti-immigration platform; the 2004 murder of filmmaker Theo van Gogh in the Netherlands; and the London bombings of 2005. Such critical moments caused politicians to question whether official and public "tolerance" of

diversity was ultimately leading to social divisiveness. Certainly, the perceived failures and shortcomings of both assimilationism and multiculturalism, in the strict sense of these terms, have led to a re-evaluation of the validity of both of these approaches.

On the one hand, the assimilationist perspective and the total abolition of cultural diversity beyond the private sphere imply a failure to acknowledge the complexity of plurality. Furthermore, if this perspective also fails in terms of its ostensible goals of social cohesion, equity, and the creation of a truly participatory political space, then the result is the profound marginalization and social exclusion of sections of the population. A clear example of this was the events of 2005 in suburban areas of French cities—the type of civil unrest that has occurred at various points over the decades and which has less to do with cultural diversity *per se* than with social disadvantage and exclusion. In other words, the principal instigating factors were the enforced social and spatial isolation of a low-income population of immigrant origin, in turn distancing them from institutions and subjecting them to stigmatization; the continual cuts in spending on social services (e.g., on labor insertion or social housing programs); and ethnic discrimination within the job market. The urban violence was, therefore, a reaction born out of frustration with social, ethnified, and deculturalized marginalization, but it mistakenly became mired in culturalist interpretations (Yazbeck Haddad & Balz 2006; Murray 2006; Silverman 2007; Silberman et al. 2007; Grillo 2007, pp. 993–994).

On the other hand, the "cultural mosaic" or pluralist model can also foster processes of essentialization and segregation to the detriment of fundamental principles of equality and social cohesion. Further, multiculturalism can lead to inequality by violating the individual rights of people *within* a cultural group, namely women, who tend to be subject to discriminatory practices (see Shachar's 2001 discussion of "the paradox of multicultural vulnerability"). The attacks on the multiculturalist perspective in recent years have been specifically aimed at its implicit essentialism and at the danger that the recognition of cultural, religious, and linguistic diversity may lead to "Balkanization" or to the creation of parallel societies, thereby limiting social cohesion (Bauböck 1995, 1996, 2004; Kymlicka 1995; Vertovec 1996; Martiniello 1997; Baumann 1999; Carens 2000; Barry 2001; Parekh 2006).

Certainly, policies of the right to/of difference can help to maintain or to reproduce social inequalities and differential power and status relations—both between minorities and the majority, as well as between and within minority groups themselves (see, for instance, Faas's 2008 findings of the reification of ethno-national boundaries and of increased ethnic tension in certain British secondary schools in response to multicultural educational approaches).

Furthermore, with respect to the perpetuation of inequalities between groups, some communities may be disadvantaged in the multicultural model owing to the fact, for example, that certain groups have enjoyed more institutional resources according to their initial socio-economic levels and/or their privileged relationship with the state (e.g., the treatment of Chinese immigrants from Hong Kong in Canada compared to those arriving from the People's Republic of China; or the case of Cubans in the USA, who, unlike other Latin minorities, were the beneficiaries of a "model minority" promotion policy, which extolled the good points of the capitalist model during the Cold War). Multicultural linguistic policies in pluricultural states

might also contribute to the unequal treatment of different groups, as, for reasons relating to the country's history or to a language's economic-political power or its position in the global market, some minority languages may enjoy privileged positions compared to other minority languages. This is the case with Italian in Switzerland, which, in practice, does not have the same status as the other official languages, French and German; something similar occurs with the French language in Canada (see König 1999).

Moreover, with respect to status differentials in multicultural societies, it would be very naïve of us to overlook the fact that cultural, ethnic, religious, and national identities are not simple frameworks of symbolic meaning but that they also represent ideologies that are used to grant power to some and to subordinate others. There are many ways in which culture and difference have been used in a reductionist, essentializing manner to justify power relations and social divisiveness, from discourses of racism to sexism to "cultural fundamentalism" (Stolcke 1995; Vertovec 1996) or "cultural essentialism" (Grillo 2003). For instance, the political instrumentalization of religion can lead to the justification of discriminatory practices in cultural terms (e.g., female genital cutting), which at the same time can cause that particular religion to be equated with social intransigence and anti-democratic values, thus leading to a "clash of civilizations" line of argument (Huntington 1996).

All of these problems currently exist. Even so, the idea of multiculturalism and pluralism still suffer from many distortions. Importantly, in the past few years, particularly in European countries, there has been a backlash against multiculturalism both at the level of policy and public discourse, as noted by authors such as Favell (1998), Grillo (1998, 2007), Barry (2001), Brubaker (2001), Joppke (2004), Modood (2005), and Vasta (2007). The word "multiculturalism," and even the terms "cultural" or "ethnic" diversity, tend to generate immediate reactionary responses. To explain these reactions, it should first be noted that there is a tendency to interpret cultures as homogeneous entities, as fixed, immutable blocks, instead of seeing them as heterogeneous, changing constructions, as well as to assume that people only identify with one particular culture or set of values at once (see Sen's 2006 critical discussion of the notion of "singular affiliation"). This line of thought almost inevitably leads to the trap of finding a reductionist equivalence between multiculturalism and outcomes of segregation or ghettoization.

Criticisms of multiculturalism by authors such as Sartori (2002) make this reductionist mistake. Starting with the idea of cultural vastness, Sartori argues that there are some immigrants that are easier to integrate than others and so that granting citizenship to non-integratables (Muslim immigrants are depicted as the embodiment of absolute "otherness," here) leads to social disintegration. In Sartori's opinion, there is a "tolerance threshold" that seems to exist ontologically, and immigration implies a "superabundance of diversity," an undesirable "excess of alterity" (Grillo 2007). It is in this type of argument that Islam, for example, is confused with religious intransigence and that the religion, as a whole, and its practitioners, en bloc, are constructed as an opposing force to democracy (see Grillo 2003; Sen 2006; Meer & Modood 2009). Importantly, some researchers have argued that the reasons for the apparent failure of the social incorporation of certain immigrant groups and for patterns of inequality between majority and minority groups are largely because

of pervasive institutional discrimination and persistent racism rather than because of the inability of different ethno-cultural groups to live together (see Vasta 2007 regarding the Netherlands, and Grillo 2007 regarding the UK).

Secondly, in addressing the backlash against multiculturalism, it is important to point out that the existence of different ethnic/cultural identities and communities can be compatible with inclusion, equality, and social cohesion and that not all segregation has the same causes or meanings. "Segmented assimilation" theories (Portes & Zhou 1993, 1994; Zhou 1997), which came about as a criticism of classic "straight-line assimilation" theory (Gordon 1964; Alba & Nee 1997), describe the different processes of the socio-cultural incorporation of immigrants and their descendants in plural contexts. One of the forms of integration that has been observed is a pattern of rapid upward social mobility in parallel with the deliberate maintenance of ethnic values, rules, and behavior. This is the case with Chinese and Koreans in Toronto, Los Angeles, and Chicago; and with Vietnamese in New Orleans (Zhou 1997, p. 996; Zhou & Bankston 1998). That is to say, ethnic minorities can choose their community links, through choosing to live in a neighborhood amongst their co-ethnics, for instance, with the aim of obtaining social, cultural, and economic benefits associated with continued co-residence beyond those benefits that are obtained in the initial adaptation period of immigration. Social capital resulting from ethnic ties and networks may have a positive impact on educational and labor outcomes, for example, not only as a result of establishing internal ties (e.g., the network itself could offer labor opportunities within the community), but also as a result of fostering external linkages (e.g., giving primary information to newcomers, providing strategies for better engagement in mainstream political processes and in the society in general). Ethnic communities, then, can be a strong engine of social incorporation. In this way, policies of pluralism could give rise to greater social justice than a stance of unidirectional assimilation.

It should also be borne in mind that the development of community ties (whether local or cross-border) and of external networks are not mutually exclusive processes. What Putnam (2007, p. 143) has called "bonding" (*i.e.*, the forming of ties among people who are alike "in some important way," which fosters diversity) and "bridging" (*i.e.*, the forming of ties between people who are dissimilar "in some important way," which fosters solidarity) can occur simultaneously and are not necessarily contradictory processes. For example, as argued by Levitt (2008), religion, an attachment that has traditionally been associated exclusively with locality and particularism, can also be a path to civic engagement, progressive activism, and cosmopolitanism; it can thus result in bridging. Bloemraad's (2006) analysis of the experience of Vietnamese and Portuguese immigrants in the USA and Canada also shows that ethnic ties and networks, accompanied by public recognition and government support, are a key mechanism for facilitating the involvement of diverse groups in the mainstream political system.

In short, there are two reductionist poles to be avoided: anti-multiculturalism (the abomination of any sign of diversity and pluralism, negatively interpreting it to mean segregation and a lack of cohesion) and extreme cultural relativism (or uncritical multiculturalism, based on a naïve, essentialist conception of culture). And while it is necessary to counter both extreme positions, we must also be cognizant that the presence of differences does not necessarily imply inequality and that multiple

ethno-cultural affiliations are not incompatible with social cohesion (Grillo 2007; Modood 2007; Meer & Modood 2009; Parekh 2006; Alexander 2006).

Trends and Challenges

Generally speaking, the current trend is to formulate management models that, as adapted to the particularities of each country or region, reconcile cultural *diversity* with social, economic, and political *cohesion*. In other words, the attempt is to grant immigrants and minorities the same civil rights and the same socio-economic opportunities as the majority and, at the same time, to value diversity, but with a critical approach—that is, not from a defensive position, but with criticism directed both at the creation of a fragmented society with closed communities and at unequal power relations, which may exist both between groups and within groups. This type of approach is what Baumann proposes (1997) when he speaks of moving from a "dominant" discourse to a "demiotic" discourse of culture. Similarly, Parekh (2006, p. 372) argues in favor of an idea of identity, as connected to culture, that is not "defined in terms of rigid and aggressively guarded boundaries" but rather that allows a creative and an interactive multiculturalism, or, what Modood (2007) has called, a "civic multiculturalism" (see also Meer & Modood 2009; Giddens 2007; Bloemraad 2006).

But how can we ensure that the defense of legitimate differences does not represent a limitation of equality and the perpetuation of class differences? Or, from a different perspective, how can we ensure that the defense of essential democratic principles does not limit the right to plurality (which is, in fact, a democratic principle and a fundamental universal and individual right)? And on what terms should a cultural community or minority be recognized? What are the prerequisites for acceding to differentiated community rights (e.g., language, history, or the size of a group)? Where are the limits for group recognition in a context of accommodation? It is this tension between pluralism and democracy, between the right to/of difference (pluralism) and that of equality (non-discrimination) that represents the central point of the debate.

Individual and Community Rights

First, we have to return to the two fundamental dimensions of the issue: the individual and the community. In considering individual rights, we usually think of access to citizenship, standardization of rights, compensation for disadvantages, and equality of opportunities. This is the classic meaning of the rights of citizenship— civil, political, and social—as expressed by Marshall (1950), who refers to equal access to resources such as housing, work, education, health care, and political participation and representation: traditionally, the individual is the recipient here. Community rights, then, which refer to the social and cultural rights of groups based on community links (linguistic, territorial, cultural, religious, etc.), are most often the context in which identity issues are considered. This separation of individual rights from those of the community is problematic, however, and it has given way to short-sighted understandings of citizenship that overlook the identity/community level (see Levitt 2008, p. 786).

Traditional definitions of citizenship have focused on the (male) native-born working class (in the case of Marshall) and/or have given primacy to a neo-classical economic approach to migration, according to which the individual is seen as an atomized being rather than a relational one. A crucial oversight in such conceptualizations of citizenship is the failure to recognize that all immigrants are at the same time emigrants (Sayad 1998). This fact implies, to a greater or lesser extent, multi-dimensional affiliations/identities (Modood 2003; Sen 2006) and multi-dimensional connections on local and global scales (Kivisto 2001). Indeed, increasing mobility and the creation of transnational fields is a development that has led to *multi*-territorialization (not necessarily physical, but also political, economic, and/or ideological), rather than to *de*-territorialization (Appiah 1998; Smith & Guarnizo 1998; Levitt & Schiller 2004; Smith 2007; Levitt 2008).

It seems obvious, therefore, that there are aspects of diversity that need a public space, beyond the private sphere, such as in the case of linguistic diversity (*i.e.*, the importance of supporting multilingualism) and religious belief/practice (not in terms of institutional orthodoxy, but within a neutral institutional framework that guarantees equality of treatment). International legislation such as the Vienna Declaration (1989) and the Copenhagen Declaration (1991) are examples of agreements that explicitly address the protection of the rights of ethnic, cultural, and religious minorities.

The question always arises, however, to what extent should group cultural rights be protected in a liberal democracy? While Kymlicka (1995, 2003) broadly agrees with the recognition of minorities and their rights, especially those of national minorities, he thinks that a line must be drawn when the group-specific rights of ethnic groups appear to compromise individual freedoms. He therefore distinguishes between external protections, which he supports for all groups, and internal restrictions, which he thinks should be limited or non-existent. The latter term refers to the rights of cultural groups to impose rules or restrictions on their members in keeping with that culture's outlook, traditions, or laws, which restrict the choices and individual freedoms of the group's members (e.g., female genital cutting).

This view, while it seems fair and sensible, is somewhat impractical, I would argue, as it limits discussion and possibilities concerning cultural difference where they are most needed. It is not that the individual dimension of citizenship should be given diminished consideration in favor of community rights. However, as others have also argued, in a truly liberal context, community rights are an extension or a condition of individual freedom and equality (see Taylor 1994; Bauböck 2001; Parekh 2006; Giddens 2007; Modood 2007; Vasta 2007). The reality is that the collective is already present in individuals, who, inevitably, are socialized, politicized, and culturalized beings. For this reason, it is often not so easy to separate out individuals from their cultural group(s) and to pick and choose which cultural practices are appropriate and which are not in keeping with a commitment to "liberalism." Furthermore, no state is neutral, as Kymlicka himself has pointed out (see also Taylor 1994). Indeed, the only way to get around this stumbling block is to expand our traditional conception of liberalism by focusing on the right to individual—and hence, group—agency and to democratic process, which all liberal societies advocate.

Both Modood (2003, 2005, 2007), Meer and Modood (2009) and Shachar (2001) are helpful references here. Modood has written extensively about the case of Muslims living in Western countries and has argued that the social inclusion and

integration of Muslims, whom he sees as an ethno-religious group, will not be achieved if policies protecting rights are top-down decided and if the group itself is not involved in negotiating these rights. It is not that Muslims should be given free reign to live by their own set of laws, and to engage in potentially "illiberal" practices, within the larger society. However, it is not realistic to pretend that differences will just disappear over time and that individuals, whether male or female, can easily shake off their group identity and loyalties. Unless differential accommodation occurs and various Muslim groups and representatives are brought into the process of shaping laws that they, and all the citizens of the country in question, can live by (and yes, this may require amendments to certain laws), the benefit of living in a liberal democracy and feeling impelled to abide by its laws—even laws that may restrict some of their cultural freedoms—will not be as apparent to the group to which Modood refers. I would further argue that a crucial aspect of integration is the sense of belonging as a citizen to a particular country or place, and a true sense of citizenship can only result if an individual believes in and witnesses his or her own agency within the political process. We need to make the crucial leap from merely recognizing difference to granting "subjecthood" to groups who are deemed minority cultures (see Touraine 1998, p. 173).

Shachar (2001), who has discussed the gender implications of policies of cultural pluralism, similarly advocates for the need to involve cultural groups in the governance of contested issues, namely family law matters. On the one hand, Shachar recognizes that because of the gender discrimination that is normalized within certain cultural groups, the protection and freedoms of women and children belonging to those groups may in fact be jeopardized by multicultural policies that are designed expressly to promote group rights and respect cultural difference. She calls this the "paradox of multicultural vulnerability" (Ibid., p. 3). On the other hand, Shachar argues that this problem is best dealt with not by forcing women to choose between their culture versus the rights afforded to them by an "external" liberal state. Instead, she proposes a "joint governance" approach, specifically "transformative accommodation," which divides jurisdictional authority between the state and the cultural group and prevents either the group or the national government from holding exclusive control over a disputed social arena. By legitimizing a cultural group's claim of jurisdiction over its members, while not granting it a monopoly of power, "transformative accommodation" encourages the group (as well as the state) "to become more responsive to *all* its constituents" (Ibid., p. 117) and thus creates "a catalyst for internal change" (Ibid., p. 118), hopefully resulting in more equitable protections for the group's most vulnerable members while not forcing women to forego entirely their cultural affiliations.

Interculturalism and Civic Culture

What both Modood and Shachar have proposed are interculturalist solutions to managing diversity, and this approach seems the most ideologically sound to me, and also the most persuasive, based on empirical evidence, which will be presented later in this paper (see subsequent discussion of Canada). Interculturalism can be understood as the *interactive* process of living together in diversity, with the full participation and civic engagement of, and social exchange between, all members of

society beyond that of mere recognition and coexistence, in turn forming a cohesive and plural civic community. Interculturalism has the merit of focusing on the negotiation and conflict-resolution *process*, rather than solely on the problem, and of emphasizing the changing nature of cultures and societies. An interculturalist model acknowledges that all societies are composed of different groups and that minority culture groups also deserve the right to propose changes to the society, provided that these changes can be demonstrated to be in the best interests of the cultural group at large and that they do not violate the rights of any other group. This invites the possibility of mutual criticism between groups and mutual learning across difference. This approach, therefore, goes beyond the notion of recognition and open dialogue in that it offers the possibility of actual structural change in the society.

All this leads to a recognition of citizenship as a necessary element in social and political incorporation (Bauböck 1996; Bauböck et al. 2007). And in a context in which the processes of transnationalism, globalization, and localization all coexist, the notion of citizenship itself may require a bottom-up reformulation, one that considers both its infranational (regional, local) and supranational (continental, multinational, or worldwide) levels and redefines citizenship in political, social, and cultural terms (Delanty 2000). That is to say, citizenship should include, in a full and real sense, all of the rights and obligations—individual, universal, and at the level of the community and the state—that identify the participation or intervention in public matters of a member of society. In considering the multi-dimensionality of citizenship, the role of cultural rights and of socio-cultural capital should be understood as primary, not secondary, aspects of citizenship, seeing that people's cultural rights, as well as the socio-cultural capital of the groups or communities with which they are affiliated, most often affect other aspects of citizenship (Delanty 2000; Bauböck 2001; Bloemraad 2006; Modood 2007). Accordingly, some citizenship rights and forms of societal participation might be derived from the consideration of cultural community needs and concerns. Initiatives of this sort should not be regarded as a form of "reverse discrimination," but rather as actions that ultimately serve to promote social justice and harmony. Significantly, newly integrated members of society are more likely to invest themselves in supporting the laws and democratic principles of the state if they feel that these mechanisms protect their interests and well-being, which ultimately results in a more cohesive society (Bloemraad 2006, Chapters 4 and 5; Bauböck et al. 2007; Modood 2007; Alexander 2006).

Most European countries, however, continue to have some very restrictive criteria that continue to limit the attribution of full rights to many would-be citizens, which leads to social and political segmentation between citizens, foreigners, and denizens (Hammar 1990); between autochthonous and allochthonous individuals; between European Union members and non-members; and between legal residents and those with illegal status. Added to these restrictions are other factors used to determine pseudo-citizenship, such as origin, social class, sex, age, length of residence, and degree of integration achieved, together which serve to create further degrees of exclusion. It is clear that different levels of civic attachment may exist, depending on individuals' particular circumstances and their links to the different levels of the political unit (state/provincial, federal, etc.). But if access to citizenship and the attribution of nationality are not made more accessible, this restriction limits an individual's full participation in the social and economic life of society and is more

likely to produce consequences that will be negative for the society as a whole. Arguably, then, more importance should be placed on the rights derived from residency (*jus soli* and *jus domicilii*).

Proposals for new ways of conceiving citizenship and pluralism include "multiple," "transnational," "cosmopolitan," "multicultural," "multilogical," "differentiated," "post-ethnic," "de-ethnic," and "neo-republican" citizenship (for some of these categorizations, see Van Gusteren 1994). For example, authors such as Martiniello (1997), Vertovec (1998), Parekh (2006), and Modood (2007) emphasize the need for a multicultural community citizenship within a multicultural democracy. Kymlicka (1995, 2003) argues in favor of a post-ethnic, flexible, and hybrid multiculturalism, such as the Quebec model in Canada, while Bauböck (1995, 1996, 2004) suggests deconstructing the identification between citizenship and nationality. He argues that the best way of interpreting the impact of migration, globalization, and transnationalization on democratic citizenship is through the theorization of a "*trans*-national," rather than a *multi*-national, civic citizenship. Such a model would recognize the superimposition or coexistence of diverse political affiliations and the tendency toward a "bottom-up" (*i.e.*, not centralized, but with different levels and powers, from the local to the national level) federal cosmopolitanism. This growing importance of a "post-national" legislation model or a "post-unitary" citizenship has been widely argued (see also Soysal 1994; Sassen 2003; Faist & Kivisto 2007; for some counter-arguments, see Young 1995).

There is also increasing consensus that the management of diversity in multicultural democracies should be a process of bidirectional adaptation or of mutual accommodation—that is to say, that change is also required in the structure of the majority society (Bauböck 1996, 2004)—and I would support that view. Further, along with other authors, I would argue that successful incorporation models recognize that integration does not consist of making individuals indistinguishable at all levels and that equality at a structural level (*i.e.*, rights and obligations of citizenship) does not imply the elimination of differences that may coexist in the public space (Alexander 2006; Putnam 2007).

Otherwise put, the notion that social cohesion and civic equality require cultural homogeneity—an idea that dates back to the French Revolution—is a fallacious and dead-ended manner of thinking, as already noted by Lévi-Strauss (1952) in his seminal work *Race et Histoire*. This is not to say that the reality of diversity in a multicultural democracy is the simple and harmonious vision presented in a Benetton advertisement either. An interculturalist approach to the management of diversity, therefore, requires a large dose of maturity, as it must be capable of dealing with the different problems and conflicts generated by the very process of integration. In all cases, negotiation, within a democratic framework of real civic participation, will have to take place over which aspects of difference are compatible with the society and which are not, but without being paternalistic and without limiting the capacity for proposal, creation, and change among all the actors participating in the process (Bauböck et al. 2007). Allowing difference to enter into the "civil sphere" results in an enlarged and more heterogeneous space, but at the same time it leads to overall greater social cohesiveness (Alexander 2006).

More effective approaches to socio-cultural accommodation also appear to entail a comprehensive style of management that reaches across different levels of

government. In political terms, this outlook manifests as asymmetrical federalism. Federal models can be very different, ranging from Canada's provincial model and Belgium's model of communities and regions, to the *länder* (sovereign states) of Germany and Austria, to Switzerland's regime of canton sovereignty (confederation of autonomous cantons), or to Spain's system of historical autonomous communities. But the basic principle is to promote a model of intervention based on comprehensiveness, participation, coordination, and cooperation between different levels of government as well as between government administrators and social services. And the local sphere (regions, cities, neighborhoods), here, gains an increasing amount of importance in the development of strategies for managing immigration and diversity, as this is where most of the social action takes place and is transformed. The local institutional network (schools, associations, businesses, etc.) requires the powers and resources of the administration, and the governmental supports have to realize that at the local level, the realities are often as diverse as they are regionally. That is to say, different regions, municipalities, and neighborhoods may need to establish management strategies adapted to their own particular characteristics. Furthermore, even though management has to be contextualized and flexible, capable of continually adapting to new needs, it must also be carried out using common parameters and in a coordinated manner. In short, successful management strategies must establish a balance between cohesion and coordination, on the one hand, and decentralization and flexibility, on the other.

The case of Canada, which is one of the countries in the world that receives the most immigrants in absolute numbers and has the greatest cultural diversity (Chui et al. 2007)—an example of what Vertovec (2007) has termed "super-diversity"—continues to be a good example of the fact that social incorporation processes are more a problem of conception and management than of the volume or degree of diversity itself. The recent and important debate surrounding the "reasonable accommodation" of religious and cultural diversity in the predominantly French-speaking Canadian province of Quebec and some of the recommendations on this subject made by the provincially created "Bouchard-Taylor Commission"[1] are a good way of exemplifying the benefits of a decentralized approach to accommodation as well as the overall trend towards interculturalism by Canada as a whole. In the Commission's 2008 report, which considered the testimony and input of a very large and diverse cross-section of participants, one of the high-priority accommodation recommendations for combating discrimination and for fostering social reconciliation was, for instance, the promotion of an "open secularism" (as opposed to the practice of "restrictive secularism," as is favored in France). What this means is that while the state should not favor any one religion (*i.e.*, separation of church and state, and neutrality of the state with respect to religions), it also should not favor secular opinions over religious ones. The report claims that if the state is to uphold the moral equality of persons and support the freedom of conscience and religion, then instead of religious expressions being excluded from the public sphere, they should equally be welcomed into the public sphere or mainstream. In addition, the Commission's report stresses the importance of promoting the use of French as the primary language in Quebec (an important regional consideration), while encourag-

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[1] See http://www.accommodements.qc.ca/index-en.html

ing multilingualism and maintenance of first languages. The consultations also revealed that members of ethnic minorities are seeking employment gains much more than they are pursuing religious accommodation. Based on these concerns, the Commission recommended that the government give particular priority to speeding up the process of recognizing foreign-acquired professional skills and training.

A further example from Canada that shows the benefits of an interculturalist approach to managing diversity is the debate on Sharia law that took place in September 2005 in the province of Ontario (there are about 800,000 Muslims in Canada). The issue began when the Islamic Institute of Civil Justice, drawing upon rights granted in the 1991 provincial Arbitration Act, proposed setting up its own faith-based arbitration panels, based on Islamic religious law (Sharia), to settle family law disputes. A government-commissioned, controversial report issued in late December 2004, by well-known feminist and former attorney general Marion Boyd, effectively recommended permitting the use of Sharia law and other forms of religious arbitration as an option for resolving family disputes, with the provision that the 1991 Arbitration Act be changed to include additional safeguards for vulnerable parties, namely women and children (see Boyd 2004). In the end, this matter gave rise to considerable public debate, both among proponents of religious rights—rights of which are enshrined in the Canadian Charter—and especially among advocacy groups for women's rights (consisting in range from non-Muslim women and men, to religious Muslim women and men, to secular Muslim women and men). The outcome of all this debate was that the provincial government ultimately decided to prohibit all forms of religious-based arbitration in Ontario. Significantly, the premier of Ontario, rather than applying specific exclusions only to Muslims and Sharia law, decided to apply the law equally to all religious groups. Moreover, the important thing to stress here is that, unlike in most countries, in Canada, this potentially inflammatory or automatically vetoed subject could be discussed and negotiated, in a non-violent manner, with appropriate government resources allocated, and with the political engagement of all the different groups involved—and even with different sectors of the Canadian Muslim community feeling free to voice their disagreement with the viewpoints of their fellow Muslim compatriots.

The lesson to be learned here is that in democratic societies, the incorporation of difference and particularistic social causes within the larger civil sphere only occurs, as Alexander (2006) argues, when this becomes the moral choice of the largest number of people in that society. While this reality can, and historically often has, led to the discrimination of minority and/or marginalized groups (e.g., the racial segregation and oppression of American blacks prior to the civil rights movement), it also is the reason why societies can change and effect what Alexander calls "civil repair"; that is, these differences become recognized "as legitimate by constructing them as variations on the theme of a common humanity," thus leading forms of diversity to be welcomed into the mainstream and leading the mainstream to be characterized by increasing diversity (see Alexander 2006, p. 259 and p. 452). It is this same dynamic—the moral choices of the larger public—that serves to contain what might be considered the "illiberal" practices (e.g., certain aspects of Sharia law) of particular groups; if the practice cannot find universal resonance among the diverse members of the multicultural civil sphere, then it will not be permitted to enter into the civil sphere.

Differing Conceptions of Immigration

Significantly, underlying different management strategies are differences in conceptions and mentalities. Despite the internal differences that can be found both among European countries, reflected in the diverse models they have adopted, and among North American models, there is, nonetheless, a commonality in the perspectives assumed either by "old world" or "new world" countries concerning what immigration and diversity represent. Perhaps the main difference is that classic countries of immigration, like Canada, the USA, and Australia, are all relatively young countries that have experienced structural changes as a result of migrations over the past 100 years. This reality has had an impact on shaping a "new world" view of immigration and diversity, and of how they should be managed, that historically has been proactive, in contrast to the general European outlook.

On the "old continent," where immigration has come more recently and has been responded to in a more reactive fashion, immigration and diversity are still generally seen as a problem, as something that represent a high cost, a potential loss of social control and cultural rights, and a threat to national identity and the status quo. As a result, Europe, in general, has tended to hold onto the 1950s-1970s conception of immigration as a temporary phenomenon. For the most part, immigrants have been considered to be temporarily invited workers (*guest workers*) who must cost the country as little as possible because these immigrants' contribution is valued as being nothing more than the circumstantial contribution of labor; in this way, they are not perceived as imminent citizens, who will form permanent attachments to the host society and become part of the political process and social fabric (Bauböck et al. 2007, p. 65). Further, European laws that perpetuate short-term work contracts and impede immigrants and their children from becoming citizens and legal residents, when combined with labor market segmentation and the lack of work options available to immigrants, can lead to a reality of immigrants being stuck in an underclass (see Calavita 2005).

Moreover, it could be argued that whereas immigration, in part, has caused classic countries of immigration (e.g., Canada, USA, Australia) to view themselves as being in continual evolution, each territory in Europe tends to be viewed almost as though it were an already-constructed society with predetermined ethnic boundaries—that is, a fixed "socio-cultural nucleus," into which one simply has to insert oneself. The idea of "preservation" resounds much more so than that of "change." The message that is transmitted to immigrants in Europe is, at best, that they are welcome but that they do not belong completely until they have assimilated. And there is a real fear on the part of policy makers that immigrants will not achieve this assimilation. Meanwhile, on the flip side of the coin, immigrants, in many cases, do not really have the opportunity to assimilate because they are not regarded as having the same right to belong fully to the civil society or to the nation and they are not granted full privileges. They, therefore, become segregated, thus fulfilling the prophecies of policy makers. Clearly, if welcoming and integration policies are organized around these premises, whereby it is not deemed necessary by the mainstream society to carry out any structural changes, then the full, or even functional, integration of immigrant populations is very unlikely to occur. Generally speaking, the policies of European countries are highly protectionist—they do not allow immigrants much

leeway for action because no significant consideration has been given as to what these newcomers could offer or to the opportunities that they could provide for a country's improvement and growth.

In contrast to this, the changes produced, for example, in North American societies and cultures by migrations have been structural, and these changes have largely been deemed positive (Adams 2007; Bloemraad 2006, pp. 104–105, 287–288). It cannot be denied that, historically, North America has experienced periods of strong restriction on immigration, as well as racist and xenophobic policies (such as anti-Chinese and anti-Jewish policies), and restrictions of a different type continue to exist (problems with recognizing foreign-earned professional credentials, for instance, which is particularly an issue in Canada). Further, notably, the use of foreign temporary workers has substantially increased in both the USA and Canada.[2] Moreover, worries about the cultural consequences that immigration poses to North America's cultural identity continue to be raised today (e.g., Huntington 2004).

Nevertheless, the majority view in traditional immigrant-receiving countries like Canada and the USA is that immigration is a phenomenon that gives more than it takes away, as something with a beneficial social and economic impact. That is to say, rather than the central focus being placed upon a burdened state and what it will have to offer newcomers to the country, immigration, instead, is more often seen as representing an essential contribution to the host society and as a mutual opportunity. While the extent to which the USA and Canada are true meritocracies is, indeed, disputable, both "young" countries perpetuate this self-image and perceive themselves as countries "of becoming." The classic idea of the "American dream" or of "making it in America" exemplifies this ideology or self-mythology well. As a result, the acquisition of citizenship, a "green light" for establishing roots and for maximizing one's opportunities in the host country, is generally permitted and encouraged, in contrast to the European tendency to admit immigrants on a temporary work-contract basis that inherently restricts integration and settlement possibilities.

Interestingly enough, immigration is almost never an election issue in Canada, as all of the political parties advocate pro-immigration policies (Reitz 2004, p. 98) and the state has an official policy of multiculturalism. And as the policies of welcoming and settlement are very solid and, in fact, interventionist—which Bloemraad (2006) argues accounts for the higher levels of citizenship among immigrants coming to Canada as opposed to those in the USA, where the government attitude toward immigrant incorporation is more *laissez-faire*—recently arrived immigrants see Canadian society as a place in which they can develop and fully participate, economically, politically, socially, and culturally.[3] Further, the maintenance of their

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[2] For the USA, see the *World Economic and Social Survey 2004* (downloaded from http://www.international.gc.ca/cip-pic/discussions/geopolitics-geopolitique/summary-resume.aspx?lang=eng); for Canada, see the *Temporary Foreign Workers 2007* report prepared by Sandra Elgersma (downloaded from http://www2.parl.gc.ca/Content/LOP/ResearchPublications/prb0711-e.htm).

[3] See Bloemraad (2006, Chapter 4) and Statistics Canada: http://www.statcan.gc.ca/pub/89-614-x/89-614-x2005001-eng.pdf However, despite Canada's relative successes in managing immigration and diversity, it is not without problems of social and ethnic stratification and discrimination, which certainly affect many immigrant groups (e.g., see Reitz and Banerjee 2007).

own ethnic-cultural affiliations does not prevent immigrants in Canada or their children from developing a feeling of shared belonging or national identification (i.e., civic nationalism). In fact, respect for diversity of all types becomes a central Canadian societal value that unifies citizens and sometimes mobilizes them to political engagement (see Bloemraad 2006, Chapters 4 and 5). Moreover, as the aforementioned debate over Sharia law in Ontario helps to illustrate, the explicit acknowledgment of diversity by the government and by Canadian society at large consequently has led to an openness that perhaps some aspects of jurisprudence should be negotiated and agreed on by consensus, though always within a framework of respect for liberal democratic values. For all of these reasons, the "*us* versus *them*" dichotomy appears to be far less marked in Canada than in almost any country in Europe, where, from the very outset, the social climate is one of rejecting immigration and diversity and the social and political changes that they may entail, and the predominant policy is one of anti-immigration.

Only recently, since the late 1990s, has the idea begun to catch on in certain European countries that immigration has been an engine for social action, dynamism, and fundamental wealth. There is a growing awareness that immigration is not a temporary event and that establishing comprehensive policies that employ strategies of transversality, decentralization, bidirectionality, and interculturality will be of key importance in the management of immigration and diversity and in the cultivation of greater inclusion and social cohesion (see Rodríguez-García 2010).

Conclusion: Reconciling Diversity with Social Cohesion

During the past few years, both assimilationism and multiculturalism have been criticized because of their inefficiency in managing diversity and in achieving social cohesion. On the one hand, the assimilationist perspective and the total lack of support for cultural diversity beyond the private sphere imply a failure to acknowledge the complexity of plurality and have led to the marginalization and alienation of cultural groups who do not conform to the prescribed national prototype. On the other hand, the "cultural mosaic" model can foster processes of essentialization and segregation, putting fundamental principles of equality and social cohesion in jeopardy. The 2004 *hijab* ban in France, the disturbances in the French *banlieues* in 2005, the 2004 murder of filmmaker Theo van Gogh in the Netherlands, and the 2005 London bombings represented recent important turning points that called these ideologies into question.

Through examining the theoretical debates regarding models of incorporation and through drawing international and transatlantic comparisons, this article has highlighted the problems of assimilationist and multiculturalist approaches to managing diversity, has criticized the idea that civic equality requires cultural uniformity as a prerequisite, and has maintained the need to reconcile cultural diversity with social, political, and economic cohesion. This position is in keeping with Modood's (2007) argument for the need for a renewed multiculturalism that is wedded to democratic and civic values—that is, a type of inclusive pluralism that fosters a shared civic culture/community/nationalism.

As this article has argued, in a context in which processes of transnationalism and multi-territorialization, globalization and localization, and bridging and bonding all coexist, there is increasing consensus that the management of diversity in multicultural democracies should be an interculturalist process of bidirectional adaptation, or of mutual accommodation. Further, a bottom-up reformulation of citizenship seems to be a central element in the processes of incorporation. This reconceptualization would consider citizenship's multi-dimensionality; include, in a full and real sense, all of the rights and obligations—individual, universal, and at the level of the community and the state—that identify the participation or intervention in public matters of a member of society; and promote participation, civic engagement, critical dialogue, and negotiation among all the actors participating in the socio-political process (Parekh 2006, p. 369; Bloemraad 2006; Bauböck et al. 2007; Modood 2007; Giddens 2007; Alexander 2006; Touraine 1998).

Importantly, while the extremes of multiculturalism must be avoided, this term, particularly within European circles, has often become almost a "bad" word, connoted with its most negative and radical manifestations. Because multiculturalism has been misinterpreted as an ideology that somehow grants license to social polarization and ghettoization, it is now often viewed as a defunct option for managing immigration. However, when support for diversity occurs within a framework of social and political equality, and interaction across cultural difference becomes developed as a societal value, as is the case with an interculturalist approach, the heterogeneous and dialogic civic space that occurs is more likely to have the effect of leading to overall greater social cohesiveness, rather than to outcomes of segregation and exclusion. Therefore, not only is a diverse society not necessarily a divided society, but recognizing the human capacity and need to relate in complex and multidirectional ways seems crucial to devising integration policies and models that are more likely to be effective and to lead to the creation of more cohesive and equitable societies.

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