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Gender, State, and Citizenships

Challenges and Dilemmas in Feminist Theorizing

Jeff Hearn and Barbara Hobson

The concept of citizenships, in the plural, reflects different research traditions in citizenship theorizing: citizenship as legal status in a sovereign state, as a bearer of rights and obligations; citizenship as participation (civic republicanism); and citizenship as social membership. Each of these enhances capabilities of individuals to become participants in political, economic, and social spheres of life. Citizenships as a concept also embraces practices: how these aspects of citizenship are experienced in everyday encounters and the relationships of power – in families, workplaces, welfare offices, social movements – and their variations in institutional contexts.

We focus on how gender has become more salient in theorizing across these citizenship domains, extending the boundaries of social membership and inclusion (Hobson and Lister 2002; Lister 2003). Implicit in the pluralizing of citizenships is the recognition of the need for a dynamic concept that engages with multidimensional aspects of gender, citizenships, and social memberships within, below, and beyond the state. This approach allows us to capture both the diversity in locations and situations of individuals and groups and the multiscalar structures of governance: by national and transnational institutions and actors, as well as the opportunities and constraints for social movements to transform them. Finally, this chapter engages with the theoretical terrain of intersectionalities, viewing gender through the lens of complex inequalities across age, citizenship/migrant status, class, ethnicity/race, region, religion, and their intersections. Throughout we engage with the dilemmas and challenges in theorizing gender, citizenships, and social memberships: if and how gender matters in the framing of citizenship and what processes shape social divisions and citizenship identities.

This chapter comprises two main sections and a concluding discussion. The first focuses on feminist theorizing within two main research traditions in citizenship theorizing. The first is social membership: T. H. Marshall's

framework, its legacy in the welfare regime paradigm, and the dialogues on gender, states, and citizenship that arose from them; second, civic republicanism and participatory citizenship, addressing agency (citizenship in practice). In the second section, we focus on the changing landscape of feminist theorizing on citizenships emerging from critical analysis of men and masculinities, postcolonial critical race theory, intersectionality, migration, and transnationalism. We conclude with "Challenges, Dilemmas, and Debates," addressing the implications of these complexities and dilemmas and challenges in gendered citizenships, in particular, the fragmentation in solidarities reflected in the widening gap in capabilities and inequalities and polarization across citizenship identities expressed in new forms of nationhood, nationalism, and populism.

GENDERING THE MAIN FRAMES IN CITIZENSHIP THEORIZING

In this section, we outline some the most important frames that have been developed in gendering more mainstream approaches to citizenship. We consider the gendering of social membership, welfare regimes, participatory citizenship, before ending this part with three specific forms of claims and frames, namely, those based on gender difference, universalism, and pluralism.

Gendering Social Membership and Citizenship

Because of the centrality of his work in citizenship dialogues, we begin with T. H Marshall. His framework has offered conceptual space to incorporate gender dimensions in a gender-neutral framework. Marshall defined social citizenship "as a status bestowed on those who are full members of a community. All who possess the status are equal with respect to the rights and duties with which the status is endowed" (1950: 28–29). This gender-neutral formula did not explicitly exclude women, but in an era when full membership in community assumed a male breadwinner wage earner able to support a wife, social citizenship rights were constructed around male citizens. In Marshall's historical analysis of the emergence of social citizenship, the working-class man armed with the right to vote and mobilized in trade unions was a new category of citizen who required new types of rights (Marshall 1950: 106). This account of the worker-citizen did not embrace the rise of a new woman citizen and the gendered social rights being claimed around widows' pensions, maternal health, and aid to dependent children, as well as protections against dismissal for employed married women (Hobson and Lindholm 1997; Skocpol 1995). Nor did Marshall's sequencing of rights – evolving from civil, political, and social rights– recognize that for women in many Western societies, access to social rights preceded the right to vote (Fraser and Gordon 1994; Walby 1994).

Despite these androcentric assumptions, rooted in the Beveridge postwar era, feminist theorists found that Marshall's framework could provide fertile

ground for confronting histories of gendered exclusions and for redefining the borders of what it meant to have full membership of a community. First, Marshall's concept of the active state was welcomed by some feminist scholars of gender, states and citizenship as an antidote to the negative state and negative rights in classical liberal theory and neoliberalism (Dietz 1992; Glendon 1991). Implicit in the notion of the active state was a recognition of the ways in which social rights were enabling for women's greater participation in economic and political spheres. This aspect of Marshall's framework spawned gender research on the women-friendly welfare state, a term coined by the political scientist Helga Hernes (1987), which underscored the linkages between the existence of social rights and a feminist politics from above and below that created opportunities for later extensions in social citizenship rights through participatory rights (Dahlerup 2003; Siim 2000).[1]

Marshall's holistic definition of citizenship as inclusion and membership propelled citizenship frameworks that Marshall could not have imagined: for instance, for sexual/intimate citizenships that embrace sexual orientations, body integrity, and reproductive rights (Plummer 2001; Shaver 1994). Here, the rights to have rights (Isin and Wood 1999: 4) can be the lynchpin in the exercise of rights. Without the social right to abortion, the civil right to abortion is attenuated, and access becomes stratified (Shaver 1994). To be accorded full membership, gay couples not only have sought civil rights of partnership and marriage, but also access to the entitlements of heterosexual couples: pensions, parental leave benefits, and care leave. From this perspective, Marshall's concept of social rights and membership is elastic and dynamic (Lister 2003), reworked and reinvigorated in struggles to extend the boundaries of citizenship for greater inclusion and justice.

Gendering Welfare Regimes

The gendering of welfare states coincided with a revival of Marshall's legacy of social citizenship by the power resource school that reshaped welfare state theorizing and led to the emergence of a new paradigm: welfare regimes (Esping-Andersen 1990; Korpi 1989; see also Moller and Cai Chapter 31 in this volume). As was true in Marshall's framework of citizenship rights, a male subject was assumed and class was privileged; however, in the power resource school, although gender was conspicuously absent from the concepts and clustering of regimes, feminist scholars recognized that there was an opening for dialogues on gender, state, and citizenships. The basic framework of the power resource theory elaborated in the welfare regime paradigm assumes that: (1) the state acts as a system of (class) stratification, and (2) the distribution of welfare reflects power resources among different actors governing the relations

[1] With women's greater participation in politics and policy in many countries, scholars have employed the concept of State Feminism to reveal these linkages (Mazur and McBride 2007).

between states and markets and families (the institutional triangle) (Esping-Andersen 1990), as this did not address differences within families.

The core concept in the welfare regime paradigm was decommodification (Esping-Andersen 1990): how social rights could free individuals from dependence on the market for *his* livelihood. This provoked a feminist response, but, more importantly, it produced a flowering of feminist research on the gendering of the welfare state. Even in 1990, when Esping-Andersen's *The Three Worlds of Welfare Capitalism* was published, the majority of women in the Western welfare states analyzed were not in the labor force. Feminist researchers argued that for many women, commodification could have a beneficial liberating effect by weakening women's dependence on a male breadwinner wage (Lewis 1992; Orloff 1993), enhancing women's civil rights by enabling them to exit untenable marriages (Hobson 1990). Feminist theorizing introduced a gender-sensitive dimension of social citizenship: the capacity to form an autonomous independent household (Orloff 1993: 319), extended in Lister's concept of defamilialization as "The degree to which individuals can uphold a decent standard of living independently of family relationships, either through paid or social provisions" (1994: 37). This concept, elaborated further by feminist scholars, for example, O'Connor 1993; Saraceno and Keck 2011), who have offered alternatives to decommodification for evaluating social rights.

Feminist scholars challenged the assumption that states not only play a role in stratification by class by regulating markets and redistributing resources to families, but also that states stratify gender, redistributing resources *within* families around paid and unpaid work. A burgeoning of gendered regime typologies appeared in which women's unpaid work in the family and the social rights for care work were at the forefront. These insights were incorporated into Lewis' (1992) formulation of Gender Regimes, which revolved around the degree to which gendered policy logics and discourse could weaken or strengthen the male breadwinner, as ideal regime types that addressed how policy frameworks could mitigate or sustain lone mother poverty (Hobson 1994; Kilkey and Bradshaw 1999); Korpi (2000) incorporated a gender/class dimension with respect to how institutional configurations of welfare states shape women's capabilities for employment and economic independence. In the book, *Making Men into Fathers*, Hobson and Morgan (2002) introduced a fatherhood regime typology, based upon variations in institutional arrangements across countries that shape the degree of tension between fathers' obligations as economic providers, and fathers' right to care. Fatherhood practices are embedded in power relations within the family, welfare state, and labor market institution. Sainsbury (1996) offered another typology for gendering of welfare state regimes, considering the degree of individualization in social citizenship rights, which implicitly challenged the notion of the family as a unit of shared interests (Hobson 1990).

Through feminist scholarship care has become a central category in welfare state analysis, revealing the dynamic relationships in the intersections of the state,

market, and family. How care is organized and financed (the private and public mix of care) formed the basis for care regime typologies (Anttonen and Sipilä 1990; Boje and Leira 2000). In their concept of social care, Daly and Lewis (2000) address the tensions and fragmentation in these relationships, often dichotomized in welfare regime literature: public and private, formal and informal, paid and unpaid, types of provision, cash and care services, all of which shape citizenship rights. The borders demarcating differences in care regimes have become less distinct in retrenched welfare states, as reflected in two processes signaling a weakening of social citizenship rights. First, the expansion of private markets in care services, sustained by low-waged migrant labor that has been occurring across welfare regime types (Hobson, Hellgren, and Serrano 2018; Shire 2015; Williams 2017). The second is the shifting of care obligations back to family members (more often women), particularly for caring for the elderly (van den Broek and Dykstra 2016), generating a new concept in gendering of the welfare state lexicon, refamilialization (Sareceno and Keck 2011).

Lister's concept of defamilialization has accrued new meanings in a changing social landscape of women's increased labor force, the declining level of male jobs (Hobson and Fahlén 2012), and the continuing importance of unpaid work in the family (Leon 2014). However, the class/gender dimension is missing in this discussion with respect to the types of jobs that will be created in the service sector (Kershaw 2012), since many of these jobs lack social rights, are part-time and precarious (Hobson et al. 2018; Lutz 2008; Shire 2015). Defamilialization has been mapped onto instrumental EU discourse for greater productivity through women's employment, encapsulated in Lewis' formulation of the adult worker model (1992), which denies gender differences in care responsibilities. This adaptation of Lister's original meaning of defamilialization shades out a crucial attribute in the gendering of welfare regimes: that caregiving and social care represent a crucial dimension of citizenship, an activity to be valued itself, which has a profound impact on how we define citizenship rights (Deacon and Williams 2004; Knijn and Kremer 1997). The example of care, emotionality, and (inter) dependency in redefining citizenship is particularly instructive here, in alerting to the need for a reformulation of men's relations to and of care (Scambor, Wojnicka, and Bergmann 2013).

Gendering the welfare regime paradigm has had an impact on theoretical and empirical research on the dimensions of social citizenship (Hobson and Lister 2002; Lewis 2009; Orloff 2009: 331). However, there has been growing skepticism among gender scholars on the value of this endeavor, in light of the changes in welfare states and convergences in neoliberal tendencies (Korpi, Ferrarini, and Englund 2013; Orloff 2009).[2] Even the relevance of the welfare regime paradigm as a heuristic device has been disputed, with its grounding in the nation-state in an era of global

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[2] Along with many other scholars Jenson (2015), analyzing the neoliberal shifts in economics and politics, argues that boundaries between public and private, and state, market, and community-based forms of welfare have become blurred.

capitalism and transnational institutions, delimiting the scope of states to defend the borders of social rights or the possibilities of individuals to claim them (Bonoli and Natalie 2012; Lewis 2009). Furthermore, the gendering of welfare states was focused on capitalist Western societies. For instance, one component of the concept of defamilialization – being able to live independently without relying on family members (or welfare provisioning) – has had little resonance in countries where the family has been a site of resistance to authoritarian regimes (Ferree 2000), as well as for black families in the racialized US welfare state (Mink 1999).

From the perspective of developing countries, scholars have questioned the applicability of the concepts in welfare regime theorizing of decommodification and defamilialization. Razavi and Staab (2018) argue that these concepts do not capture the complex ways in which family and work are organized in rural societies. Nor does the institutional triangle – that is, the interactions between state, market, and family – provide theoretical space for alternative sources of welfare beyond nation-states, for instance from global companies and actors. States with weak capacities for providing welfare may be dependent upon corporate contributions, particularly from global firms, and in some cases this is mandatory (Backlund-Rambaree 2017). Also, the extensive outsourcing of services from Western welfare states to developing countries has made available employment for substantial numbers of women. Often these firms, both public and private, offer higher salaries than average in these countries, though with minimal benefits and few social protections in employment. Using the case of Indian women in the call center sector, Abraham (2010: 41) refers to this as an example of the transfiguration from social to market-oriented citizenship.

Participatory Citizenship

Moving from the structures shaping social membership and inclusion, we turn to theorizing participatory citizenship with its roots in civic republicanism. Though dating back to ancient Greece and the ideal of civic duty and the political obligations of the polity, resurgence in twentieth-century democratic theories and frameworks, communitarianism, deliberative democracy was a response to the need for creating a more active mobilized citizenry.

Some feminist scholars have expressed reservations about civic republicanism as a framework because of its emphasis on *obligations, the duty to participate*, as an aspect of communitarianism (Sevenhuijsen 1998). This aspect of civic participation opened the gates for attacks on welfare mothers as passive dependent citizens, which reflects a failure to understand that their caring work is work (Levitas 1998; Mink 1999). Participatory citizenship, the duty to participate embodied in civicness, should be understood in terms of women's lack of resources, including time (since they bear the brunt of unpaid care work, money, and social networks) (Lister 2003; Stolle and Lewis 2002).

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Along these same lines, feminist scholars have challenged Habermas' (1990) formulation of deliberative democracy from the perspective of social and economic inequalities in societies. More privileged groups dominate this sphere, men more often than women, whose viewpoints may not be taken into account (Fraser 1997a; Young 2000). The barriers limiting participatory citizenship can cut across gender: the less educated often lack skills, experience, confidence, and capabilities to participate in deliberative democratic forums (Benhabib 1992; Bonvin, Laruffa, and Rosenstein 2018; Meehan 1995; Phillips 1995). Iris Young claims that subordinated groups, minorities, poor people, and women historically created "subaltern counter publics," associational life that provides forums for its members to raise issues among themselves (Young 2000: 171–172). As Fraser has argued, "political democracy requires substantive social equality" (Fraser 1997b: 80).

Despite these caveats about the limits of civic republicanism as a framework for activating participatory citizenship, nevertheless it offered conceptual space for building women's agency into theories of citizenship (Hobson and Lister 2002; Jones 1990; Siim 2000). In valorizing citizenship from below, politics with a small *p*, the notion of participatory citizenship broadened the meaning of the political, allowing for the incorporation of women's politics (Hobson and Lister 2002) other than formal representation in parliament or political parties, venues where women often lack a critical mass. Citizenship from below could embrace many forms: participation in social movements, grassroots organizing through NGOS, and community service.[3] Jones used the concept of citizenship as practice, defining it "as an action practiced by a people of certain identity in a specifiable locale" (1994: 261), promoting a sense of community. Grassroots mobilization from below has also been very important in some developing countries, where women have little or no influence or access to formal politics, for example in Latin America (Safa 1990).

Having said this, recent scholarship has underscored that the practice of citizenship is not necessarily limited to a bounded territory, but can involve different sites of communication and mobilization, a discursive space or platform, and a supranational political organization (Epstein and Fuchs 2017: 7). Not be forgotten is that the agency in "acts of citizenship" (Isin and Nielsen 2008) can be practiced by those without full membership in the polity, where civic belonging embraces a shared sense of entitlement. Many historical examples exist of women mobilizing before they had the vote to expand social rights (Epstein and Fuchs 2017). A classic example is Skocpol's (1995) account of women's activism in the Progressive era, which shaped the foundations of US welfare. Women's collective agency was mobilized through national federations of local women's clubs, a process that involved collaboration with

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[3] Janoski (1998: 28) focuses on workers' councils as an example of participatory citizenship and politics from below (also see Folbre et al. 2018).

reform-minded professional women to spur legislation on pensions and maternal health.

Participatory citizenship was a discursive frame in women's mobilizations in Sweden in the 1920s and 1930s to create a civic engagement among women (many of whom did not exercise their right to vote). Without representation in unions of political parties, organized women's groups, which cut across party lines, gained influence and voice in policy-making in the early years of social democracy, claiming political space in the building the *Folkhem* (people's home) (Hobson and Lindholm 1997).

Albeit, these examples of women's civic engagement and participatory citizenship, feminist scholars have underscored the fact that structural and institutional constraints limit women's agency in the political sphere (Tastsoglou and Dobrowolsky 2006), but also that active citizenship requires material conditions to enable women's agency (Pettman 1999). Finally, within the context of women's agency, a crucial point to be made is that activation of collective agency is intertwined with political opportunities and the recognition of claims for participation and voice are bounded by framing of citizenship in historical and sociopolitical contexts.

Claims and Frames

The representation of political gender identities in discourse and policy is a dimension of participatory citizenship that has generated a rich theoretical literature and a contested set of debates. These involve citizenship frames and claim structures that are linked to them as well as the political opportunities that they enable and disable. With respect to gender, two main frames have dominated the research terrain: should women's claims of citizenship rights be framed (1) in terms of distinctiveness or difference or (2) within universalist frameworks for justice? Rather than advocating one or the other position, theorizing on the framing of citizenship has been cast in terms of dilemmas or tensions.

The pathbreaking work of Carole Pateman (1989) on the patriarchal welfare state captured the tensions in these two frames of citizenship, especially in her oft-quoted formulation of Wollstonecraft's dilemma, referring back to that eighteenth-century feminist philosopher and women's rights activist. For Pateman, women were presented with two routes to the ideals of citizenship as workers or carers: One route is based upon a universalistic gender-neutral social world connected to paid work. Here, women are considered as lesser men, since the norms have been built upon a male model. The other acknowledges women's special talents, needs, and caring capacities that differ from those of men, whose citizenship is based on rights and duties attached to paid work. Given that women's contribution as carers is undervalued, then they appear as lesser citizens. Wollstonecraft's dilemma has been a point of departure for theorizing gendered citizenship: fleshed out, contested, and

reformulated. The consensus among most feminist scholars is that it is unresolvable, which Pateman (1989: 196) herself recognized.

In *Making All the Difference*, the legal theorist Martha Minow (1990) articulates the same zero-sum game in the dilemma of difference, specifically addressing frames and claims with respect to claims for maternal leave and racial discrimination, using examples from US legal cases. She argues that by emphasizing difference, we highlight deviance or stigma, but by ignoring it we leave in place all the problems that arise from a false neutrality. For Minnow, the dilemma is unresolvable, although in the practice of citizenship, strategic choices are made within different contexts. Carole Bacchi has elaborated this position most fully in her book *Same Difference* (1990). In that study, she highlights examples of how feminists have employed different strategies, emphasizing gender distinctiveness and gender neutrality at different moments in time and across societies.

Wollstonecraft's two-horned dilemma has grown multiple appendages and layers of complexity. We elaborate some of these below focusing on three general citizenship frames that encapsulate tensions and debates in the dilemma of difference and pathways to move beyond them: claims based on, first, gender difference, then, universalism, and, finally, pluralism (Hobson and Lister 2002).

Gender-Differentiated Citizenship

Rooted in histories of maternalist movements and politics of the early twentieth century (Koven and Michel 1993), the gender-differentiated citizenship frame celebrates the private sphere as women's domain to exert influence and compassion in public life, as well as validating women's contributions and distinct voices as carers, protectors of children and vulnerable groups (Elshtain 1981; Werbner 1999). Seeking to go beyond maternalist feminism, which naturalizes women's role as carer, and yet retains the moral force of care as guiding principle in social and political spheres, Tronto (1990) and others have put forward the ethic of care, counterpoised against the ethic of justice and rights (Dean 2009; Kittay 1999). This stance has been criticized for reproducing a similar rhetoric of "essentialized carers," who are in practice gender-coded as women carers (Leira and Saraceno 2002). Another position is that a less gender-specific version of the ethic of care can exist within a universalistic frame of care as responsibility for all citizens, recognizing that gender and other inequalities are embedded within it (Sevenhuijsen 1998). More generally, scholars have argued that the gender-differentiated framing of citizenship leaves little room for women's political agency to reset the imbalance in care work (Lister 2003) and denies men's movements advocating their rights to be fathers as caregivers (Collier and Sheldon 2008; Hobson 2002). When coupled to conservative political movements, gender-differentiated citizenship has been harnessed by political actors to justify efforts to limit women's participatory rights or counter women's movements to expand participatory rights (Gal and Kligman 2000).

Universalism: Gender-Neutral Citizenship

There is a long tradition of feminist claims for equal rights and nondiscrimination, dating back to the Enlightenment when women's difference meant exclusion and lesser value (Pateman 1989; Phillips 1991). The gender-neutral citizenship takes as its point of departure universalism in rights. However, when fitted into a male template, this reflects a false universalism, since it denies gender power differentials and inequalities (Hobson and Lister 2002: 22). Even those who envision a universalistic citizenship frame, where gender is irrelevant, recognize that this is not possible while the gender playing field is unequal (Phillips 1992). Embracing the universalist position, Moller Okin (1989) argued that gendered rights could be incorporated into Rawls' theory of justice and the veil of ignorance that assumes we would construct a just world if we could imagine ourselves not knowing who or where we would be within it. Moller Okin provides us with a virtual image of this cognitive process in which judges asked to rule on rights for pregnancy leave, in the middle of their deliberations, grow enormous pregnant bellies. It is difficult to convert Rawls' abstract exercise into the expansion of rights or the practice of citizenship (Sen 1993). However, there are examples where gender and other claims for inclusion have been articulated within the universalist frame of human rights, which resonate in Benhabib's (1992) concept of feminist universalism.

One consequential example is women's claims for inclusionary citizenship at the UN Beijing conference in 1995, which were made within the frame of human rights derived from the Convention for the Elimination of all Forms of Discrimination Against Women in Europe (CEDAW 1979), which encompasses a broad framework to guarantee basic human rights and fundamental freedoms to women "on an equal basis with men" through the "political, social, economic, and cultural fields," as well as specific health education and employment (CEDAW 1979). Sexual citizenship has been coupled with human rights, for instance, in the successful campaigns for gay marriage, most notably in Ireland.

Gender-Pluralist Citizenship

Gender-pluralist citizenship acknowledges the post-structural critique of collective agency (Butler 1990), but also embraces citizenships, collective agency, and pluralist politics. Going beyond the gendered binary, this framework affirms that women and men can be members of multiple groups and holders of multiple identities (Isin and Wood 1999; Lister 2011), as conveyed in frames that suggest the potential of pluralistic politics, such as *solidarity in difference* (Lister 1998), *reflective solidarity* (Dean 1996), and *transversal politics* (Yuval-Davis 1997).

The translation of these abstract concepts into the practice of citizenship in collective action and political arenas underscores the tensions within the frame of pluralist citizenship. One of these tensions is revealed in the hierarchies within social groups in which the very same groups that claim to represent them based on their group disadvantage can be their oppressors or fail to

address their grievances. This has been highlighted in the research on aboriginal women (Kymlicka 1995) and Muslim women (Yuval Davis 1997). Another underside of the pluralist frame has become visible with the amalgamation of claims of disadvantaged groups in national and transnational bureaucracies, which conceal the differences in power positionings and power resources to achieve political voice (Williams 2003; Woodward 2004). Whether the theoretical casing of pluralist citizen or the frames of difference in solidarity or transversalism can resolve the dilemma of difference is a question that continues to be debated. Lister, who has written the core book on gender and citizenship, acknowledges the limits of the pluralist frame: that it deprives us of citizenship's function as a universal yardstick against which marginalized groups can measure their progress toward full inclusion (Lister 2003; Pascall 1993). It can also lead to the fragmentation of political constituencies and political claims (Dietz 2003), and, specifically, shade out the particularized experiences of groups with histories of disadvantage and social exclusion.

Importantly, Iris Marion Young's (1990) formulation of a politics that recognized differentiated citizenship as grounded in the assumption that groups cannot be socially equal unless their specific experience was recognized. She envisioned a polity in which institutional mechanisms could provide oppressed groups a voice in the political arena (Young 2000). Rather than its feasibility, the main criticisms leveled against Young's formulation of group representation have underlined its theoretical limitations: it would result in the reification or freezing of identities, a main point of contention in the debates within the context of recognition struggles and group identities (Fraser 2003); and that it did not provide mechanisms for addressing differences in resources (economic and social capital that underlie who participates in the public sphere), even within marginalized social groups (Hobson 2003).

How to find institutional mechanisms that would support diversity and difference within an inclusionary citizenship also emerged within the theoretical debates around gender mainstreaming. Recognizing the transformative potential of mainstreaming beyond its use as a technocratic tool for extending the spheres of elite women's presence in decision-making, feminist scholars argued that one could not look at gender inequality in isolation. Rather it would necessitate inclusive equality models addressing diversity and multiple forms of inequality (Verloo 2005; Squires 2005). The transformative potential of mainstreaming, according to Squires and others, would entail activating civil society via deliberative democratic forums sensitive to diversity. However, this vision of a pluralist participatory model in policy-making leaves unresolved the dilemma of who speaks for the most disadvantaged and marginalized: hence the transformative potential of mainstreaming remains unfulfilled. The implications of this example are twofold: the interplay between recognition and redistribution cannot be divorced from political voice and influence (Phillips 2003); and that

citizenship exclusion is multidimensional, involving complex sets of power relations within the state and beyond.

CHANGING THE LANDSCAPE OF FEMINIST THEORIZING ON THE STATE AND CITIZENSHIPS: MULTIPLE DIMENSIONS, SCALES, AND STRUCTURES

This section moves on from feminist theorizing on citizenship in dialogue with mainstream analyses of social membership and participatory citizenships to address more directly the more proactive challenges posed by multidimensionality that occur across different scales and dimensions. These complex challenges arise from many directions. The borders of gender, state, and citizenships have been redrawn in response to challenges from multiple research fronts: critical studies on men and masculinities; postcolonialism and critical race theory; intersectionality as a framework for engaging with the complexities in citizenship identities and exclusionary processes in citizenship and social membership, for example around migration; as well as the impact of further transnational processes and actors. All of these suggest more fundamental possibilities for rethinking the gendering, and indeed gendered critique of, citizenship.

Critical Analysis on Men and Masculinities

Over the last 40 years or more there has been a growing development of critical studies and research on men and masculinities, drawing on the insights of feminist and critical gender and sexuality studies, which has been referred to variously as, for example, Critical Masculinity Studies or Critical Studies on Men and Masculinities (Kimmel, Hearn, and Connell 2005). In this, men, boys, and masculinities are explicitly gendered, just as much as women, girls, and femininities. To say this is certainly not to reproduce simple binaries, as, in different ways, such research seeks to *deconstruct* how male, man/men, masculine, and masculinity/ies are still generally taken for granted, normalized, and naturalized categories. This also applies even within critical accounts of citizenship. In these studies, men and masculinities are examined within historical, cultural, relational, materialist, deconstructive, antiessentialist frames (Connell, Hearn, and Kimmel 2005). Men and masculinities are thus seen within historical gender relations, through a wide variety of analytical and methodological approaches. These approaches have implications for the analysis of gender and citizenship.

Men's relations to citizenship have historically been framed by the city-state and more recently the nation-state, and their supposedly gender-neutral, in practice often male, often racialized, ethnicized, classed citizenry. Thus, the focus of the explicit gendering of men and masculinities involves their denaturalization, and is part of a broader attempt to move beyond binary

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thinking on gender relations (see Lorber 2005). In the modern age, the nation-state has often been seen as hegemonic, a powerful form of hegemony, and indeed a powerful means of upholding different historical forms of patriarchy, patriarchal relations, and men's privilege. Likewise, the gendered, raced, classed state and nation have often been conceived as ungendered or nongendered, or unraced or unclassed; or sometimes alternatively represented as a raced, classed female, "a woman," the motherland, to be protected, promoted, ruled by men; or, yet still, may be constructed as a raced, classed male, as in "the fatherland." This has involved and involves, in different combinations and degrees, inequalities and discriminations in formal political representation, social and cultural rights, and access to state machinery, including most obviously the military.

It is within these contexts that much of modern relations of men, masculinities, and (public) politics has been conducted (Brown 1988; Clark and Lange 1979; Connell 1987, 1990; Hearn 1987; Lloyd 1984); indeed this includes the very construction of politics itself, and what counts as politics. While women's organizing has been central in many national liberation movements and in welfare state development, the nation-state has also been characteristically gendered as male. This is in the sense that its "making" has usually been a project historically led by men, and at least initially for men or certain classes of men, including in the bestowing of citizenship. It is onto this male political citizen base that women's political participation has been grafted in many, though not all, countries. More generally, some forms of (male) citizenship, based on notions of male individualism, are in tension with forms of male-dominated nationalism based on notions of collective, often homogenizing, lineage, culture, language, and exclusion of difference, including violent confrontations occurring in the name of such mythic entities as nation, "the people," religion, or "blood" (Kimmel 2002). While some of these latter identifications may seem somewhat archaic, this is by no means so, as with current revivals of nationalistic, nativist, and even neo-fascist references to an implicit "us," as suggested in, for example, "America First" and similar phrases (Churchwell 2018). Ironically, autochthonous references can even be made in countries founded on migration, most obviously the USA. Different state formations mediate more or less between such individualisms and collectivisms.

At times, "Men," "Nation," state, and citizenry have been represented as almost indivisible. This is perhaps clearest in times of war, but also relevant in terms of seeing nations as the nation-state or the state, or in terms of the (deep) state machinery, the military and paramilitary apparatus, the state security services, the departments of internal affairs, state foreign policy machinery, and so on (Hearn 2015; Yuval-Davis 1997). This is even though many, perhaps most, nationalisms, for example Hindu nationalism (Banerjee 2005), do not coincide exactly with territorial nation-states.

Having said this, it is important to immediately acknowledge major variations in the relations of men, masculinities, and the gendering of

citizenship at the national level. For example, the 1906 granting of full political rights to all adult men and women in Finland followed closely on the nationalist movement (Moring 2006). Despite formal degendering, citizenship often remains patriarchal in form, not least through continuation of prenationalistic discourses and practices, sometimes around particular notions of "equality," as in the Soviet regimes (Novikova and Kambourov 2003), or more generally in lack of freedom from gender-based violence, surely one of the most obvious if least recognized negations of citizenship (Franzway 2016). Other examples derive from liberation struggles for nationhood and national citizenship. Women's involvement in nation formation, as in struggles against colonial and imperialist powers, has often been formidable, only to be later partially undermined with moves to "peace" (Knauss 1987; Ponzanesi 2014), for example in Iran, South Africa, recent postwar Eritrea.

Approaching the nation and nationhood through the lens of explicit critical analysis of men and masculinities suggests many possible avenues for both theorizing and empirical study of citizenship. It can lead to a reformulation of the various historical marginalizations and exclusions of women toward a more fully gendered conceptualization of citizenship in terms of the differential gendered inclusion in political and economic entitlements, access, belonging, rights, and obligations. Yet, the explicit gendering and naming of men is uneven in different arenas of citizenship policy. The "man problem" remains obscure(d), partly because so much policy is about men, yet not recognized as such (Hearn and Pringle 2006), and partly because *explicit* policy on men is at uneven stages of formulation, sometimes as part of a gender-equality or broader antioppressive, egalitarian project, sometimes promoting men's interests further still. In this process, the emergence of men as gendered subjects (Holter 2005) has been articulated partly in relation to women's and feminist struggles, but also to other forms of affiliation and organizing, such as racial justice, labor struggles, and gay, queer, and transgender rights. In a long-term modernist sense, in many parts of the world one can discern gradual moves from taken-for-granted assumptions about men and masculinities in policy, to more implicit genderings, often with the gender-neutral (male) subject, to more explicit genderings of men and masculinities (Hearn 2015).

The social category of men has figured strongly in reforms in citizenship and policy, most obviously in the institutionalization of the power of men, fathers, and husbands, as heads of families and households; family law, legal practice, and the control of crime; promotion of public health; and most tellingly in social reform during and after wartime (Harris 1961). Looking back historically, this includes the realization of the poor health of young men in the Boer War and the First World War, the meeting of classes in the Second World War, the creation of welfare states in its aftermath, and so on (Hearn 1998). More broadly, the relation of the welfare state and the warfare state has long been documented and debated (Wilensky 1975), with clear implicit commentaries on different

groupings of men and different masculinities, within very different welfare scenarios (Walby 2009).

In some policy arenas, men, and sometimes masculinities, have been explicitly named, as part of formal governmental or quasi-governmental intervention. In particular, in many countries, state policies on fathers, fatherhood, and father leave have become a focal point of explicit gender politics around men, and a means of elaborating the citizen rights of some men, around legal and reproductive rights and obligations of fathers, often formulated differentially for biological fathers and social fathers, and in terms of child care and postdivorce relations to children (Collier and Sheldon 2008; Hobson 2002; Oechsle, Müller, and Hess 2012). This is especially so in societies with a strong orientation to the rights of fathers, albeit in very different ways, reinforcing and/or subverting patriarchal or nonpatriarchal gender relations. At root, there is a strong tension between the assertion of fathers' rights, or putative and potential fathers' rights, over mothers, children, and indeed adult children, and the gradual move to more involvement of fathers and other men in caring, child care, and unpaid domestic work, including possible rights to care.

Detailed and explicit laws and policies directed toward gendered interventions with men have often seemed relatively rare. More often, men, and masculinities, have been implicitly named, and implicitly gendered in policy interventions. As with gendered policies that are more tied to women, explicitly gendered policies in relation to men are much more likely when they concern issues that appear to be close to the body, notably men's health, violence, and sexuality, than when they concern issues that may appear more distant from men's bodies. In this way, men's gendered policy associations are mostly framed within a form of nation-based welfarism rather than an engagement with, say, capitalist production, finance, energy, foreign policy, transport, or the environment, which tend to be transnational in form. Such latter policies are not explicitly gendered for women or men, even if they are implicitly, and may become more clearly gendered through gender mainstreaming.

One of the first books overviewing men and social policy was Pringle's (1995) *Men, Masculinities and Social Welfare*, focusing mainly on social services, social work, and social care, and ways in which social policy engages and should engage with men, as well as general principles and even dangers, such as collusion, for men working in social welfare. Despite all these complications around men and masculinities, political debates on citizenship have often continued to be couched in strangely gender- and race-neutral terms – or more precisely "the citizen" has frequently been (represented as) both genderless and male, bringing us back to notions of the "adult model worker" and the "male breadwinner model." Such obscuring of gender is challenged by feminist scholarship and critical gender commentaries, and increasingly by intersectional analyses (Christensen and Jensen 2014; Christensen and Larsen 2008; Hearn 2004a, 2011).

Postcolonial, Decolonial, and Critical Race Theory: Toward Intersectionality

A major source of multidimensional critique with strong implications for debates on gendered citizenship are critical race theory, and postcolonial and decolonial(izing) theorizing: in these analyses issues of race, racism, antiracism, coloniality, and thus intersections with gender are highlighted. Gender cannot be isolated, and the coloniality of gender is often emphasized (Lugones 2010). Such approaches critique imperialism, colonialism, neo-imperialism, and neocolonialism; both imperialism and colonialism are seen as supported, perhaps impelled, by ideologies which maintain "that certain territories and people require and beseech domination, as well as forms of knowledge affiliated with domination" (Said 1993: 9). Postcolonial, decolonial, and critical race perspectives draw on a wide set of influences, including Marxism, critical theory, theories of globalization and global capitalism, post-structuralism, postmodernism, feminisms, deconstruction, and indigeneity, thus presenting a possible ecology of knowledges (Santos 2014). They are typically antiessentialist, historical, geographical, disruptive, deconstructive, multi- or transdisciplinary, located and locational in positioning, and concerned with representation, resistance, and multiplicity.

Key foundational intellectuals, critics, and activists include Du Bois (1903) and Fanon (1952, 1961), writing on the postcolonial condition of black people within white-racist and imperialist culture, their psychological alienation and damage, and the movement beyond the fixedness of white/black, and colonizer/colonized. Feminist postcolonial, decolonial, and critical race theorists have elaborated on such work, through a gendered intersectional lens, as in the work of Spivak (1988a, 1988b) on the subaltern and the silent/silenced in discourse that cannot be spoken of/for/by someone else. More specifically, postcolonial critiques highlight the "liminal" negotiation of cultural identity across differences of race, class, gender, and cultural traditions as a key aspect of postcoloniality, as discussed by Bhabha (1994: 2) in *The Location of Culture*:

It is in the emergence of the interstices – the overlap and displacement of domains of difference – that the intersubjective and collective experiences of nationness, community interest, or cultural value are negotiated. How are subjects formed "in-between", or in excess of, the sum of the "parts" of difference (usually intoned as race/class/gender, etc.)? How do strategies of representation or empowerment come to be formulated in the competing claims of communities where, despite shared histories of deprivation and discrimination, the exchange of values, meanings and priorities may not always be collaborative and dialogical, but may be profoundly antagonistic, conflictual and even incommensurable?

Black feminist, postcolonial, and critical race scholarship thus has fundamental critical implications for debates on citizenship, by problematizing universalizing citizenship claims, not least through recognizing the complex inequalities around black, non-Western, migrant, non-citizens' lives (Collins

1990; Mohanty 1984, 2003). Marginality, hybridity, and border crossings of all kinds paradoxically become central, raising questions of universality and difference to the fore of citizenship: a theme discussed earlier and which recurs in the remainder of this chapter.

These themes feed directly into the framing, and problematizing, of debates on citizenship, often through the notion of intersectionality; similarly, further feminist critiques have destabilized gender as a unitary analytical category (Butler 1990; Phillips 1995; Walby 2004). Accordingly, there is growing recognition of multiple identities, loyalties, and social divisions within such categories as gender, class, race, ethnicities, sexualities, citizenship status, age, and able(bodied)ness, as well as the acknowledgement of histories of colonialism, slavery, and race, in which middle- and upper-class women were complicit in colonialist and racist policies (Glenn 2004; Mohanty 2003; Mohanty, Russo, and Torres 1991). Intersectionality is both an analytical tool for mapping these complex sets of relationships and inequalities and a framework for analyzing the structures shaping how they mutually influence each other. Intersectionality is not only a field of inquiry but involves praxis, experiences of inequalities and resistances, and challenges to these through mobilizations for social justice (Choo, Crenshaw, and McCall 2013; Collins and Bilge 2016), highly relevant to citizenship and social membership. Rather than intersectionality belonging to feminism, the argument has been made that the reverse is true (Collins and Bilge 2016; Ferree 2018), within a critical theory and practice.

Intersectionality as a specifically named concept first appeared in the work of Crenshaw (1989). Its diverse roots can be traced to the antislavery movement, pluralist political theory, and the works of Marx, Weber, and Durkheim, as well as antiracist and Marxist feminisms. Three pioneering works most relevant to gender, state, and citizenships, focused on the central role of the state in structuring the intersections in race, gender, and class and the inscriptions of power underlying them. Fraser and Gordon (1994) traced the genealogy of dependency and its evolutions: how gender, class, and race become interwoven in the trope of the dependent, black, single mother in US history. Boris' (1995) concept of the racialized gendered state, applied to the US case, captured the systematic exclusions of people of color and ethnic groups and their gendered dimensions through immigration reforms, policies that disqualified them from entitlements. Williams' (1995) complex models, in which gender, class, and race/ethnicity are embedded in constructions of family, work, nationhood, migration, and welfare settlements, anticipated the ways in which intersectional perspectives would offer leverage for interpreting the changing face of citizenships and diversities and their consequences for social membership.

Intersectionality is an inherently complex concept, as well as one on which there is little agreement on its meaning, value, and uses (Collins and Bilge 2016; Ferree 2018). Crenshaw (1989) used the concept to make visible the experiences

of social groups at neglected points of intersection, particularly the experiences of women of color at the intersection of race, class, and gender, which exemplifies what McCall (2005) referred to as intra-categorical. Looking beyond this approach, McCall (2005) has argued for a process-oriented strategy encompassing the broader structures underpinning multiple and complex inequalities, which she refers to as inter-categorical.[4] From this standpoint, intersectionality can be viewed as a theoretical framework in which social categories are understood as fluid, contingent, and contextualized within dominant institutions and hierarchies, and shaped by political and social settings (Choo and Ferree 2010; Misra 2018; Walby, Armstrong, and Strid 2012). Informed by sociological perspectives, the focus on intersectionalities has turned toward social systems, ideologies, and structures that underlie social inequalities: capitalism, nationalism, colonialism, neoliberalism and populisms, and processes of migration, globalization, and welfare state retrenchment (Choo and Ferree 2010; Williams 2017), with their interlocking hierarchies of value, power, and authority (Lutz, Herrera Vivar, and Supik 2011).

Intersectionality and Migration

Intersectionality analysis has altered the landscape in gendered theorizing on citizenship and social membership in myriad ways. First, a gendered intersectional approach involves multiple inequalities, multiple structures, and multiple policy domains (Walby et al. 2012; Williams 2012, 2017), encompassing those at the transnational and global levels. Second, when applied to transnational migration, this multidimensional approach offers conceptual space for exploring complex inequalities in which migrant status, nationality, and global region intersect with other overlapping social divisions, class, gender, ethnicity/race, age, marital status (Kofman and Raghuram 2015). These intersections are embodied in the image of the global care chain, where the flows of migrants from the poorer to richer nations, from the Global South to North, and from East to West Europe mirror widening inequalities across regions where households from poorer nations sacrifice caretakers for their own families to benefit the well-resourced households in richer nations (Ehrenreich and Hochschild 2003; Lutz 2008; Parreñas 2001).

Though migrant statuses and graduated citizenships are characteristically gendered, with differential rights and obligations (Donaldson et al. 2009), within mainstream migration debates and research gender has often been marginalized or assumed as male (Dobrowolsky and Tastsoglou 2006;

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[4] McCall's (2005) three classifications have become a point of departure in the theory and methodological research on intersectionality: anti-categorical, which rejects all categories; intra-categorical, in which race, class, and gender are combined into a single category; and inter-categorical, in which social divisions are mutually constitutive of each other.

O'Reilly 2012: 58–59; Pessar and Mahler 2003: 812). Migrant statuses and graduated citizenships are not a determined set of circumstances, but rather a frame of conditions in which both migrants and governments have various degrees of room for maneuver, not least as determined via hierarchies in citizenships, in terms of country of origin, race, and ethnicity. In some cases, national borders are or seem absolute, especially for noncitizens, those suffering racist or (hetero)sexist exclusions, persecution and possible death penalty, or who are stateless and who cannot return home. In others, the scope and intensity of transnational practices varies considerably. That said, "the lives of migrants, refugees and people of ethnic minority origins are probably affected by this multiplicity of citizenships even more than those of people who belong to hegemonic majorities" (Yuval-Davis 2007: 8, also 2013: 59).

Migration, transnationalism, and other transnational processes shape complex inequalities in multiple ways. The care chain, with its constant flow of migrants across borders, reflects the changing configurations in citizenship theorizing, what (Soysal 1994) refers to as postnational membership, and Ong's (1999) concept of flexible citizenship. These underscore the importance of interpreting social membership in terms of complexities and gradations in citizenship and migrant statuses and situations in specific institutional contexts (Isin and Wood 1999) and viewing them through a gendered intersectional lens. This entails engaging with the specific migration regime within each nation-state with respect to the conditions of entry and rights to remain in country. There is a wide spectrum: from achieved citizenship at one end and the undocumented at the other; in between these extremes are various levels of social membership, for example permanent residents who have access to social rights, and, even in some countries, can vote in local elections. Within legal migrant statuses, distinctions exist between visa-exempted, those with residence in an EU country, for instance, or through bilateral national agreements, and those with work permits whose rights to remain are limited by their labor contract.

Within these statuses, there are social divisions and distinctions that curtail rights and thwart social membership. The right to remain in a country, if based upon marital status with dependency on a partner who has the legal right to remain, undercuts the basic civil right to leave harmful relationships. Women suffer violence in these relationships (Choo 2016; Yuval-Davis 2007). Undocumented migrants are the most vulnerable, since the threat of deportation is always present, which leaves them open to exploitation without recourse to challenge loss of wages or indecent working conditions (Triandafyllidou 2013). Here the right to have rights implies basic civil rights as well as access to social protections (Somers 2011). In some Asian countries with national permit systems, migrant workers are not able to choose their own workplaces and can be denied the rights to start unions or protest poor working conditions; their contracts, often administered by state agencies, can be terminated at any time (Choo 2016: 169).

In European countries where these rights are often formally protected, employment may or may not provide access to the employment rights that others living in the same country enjoy (Anderson 2000; Shire 2015), given the high levels of informality in the care and domestic sectors (International Labour Organization 2011). Regarding access to rights, migrants in Europe who are EU citizens and permanent residents are privileged under EU law with rights, such as health care (not available to migrants in all countries) and freedom to move across borders within Europe to seek employment. Certain rights, as well as social benefits, may apply to asylum seekers, though not often to economic migrants. These can entail the right to bring family members, although this has become more restrictive in many Northern European countries (Williams 2017). Asylum seekers are more likely to have opportunities for free language training and stipends for education, the latter enhancing their potential for greater inclusion and integration (Hobson et al. 2018).

There are numerous other examples of transnational migrant hierarchies, between different formal statuses, for example skilled, semi-skilled, less skilled casualized workers, student/researcher mobility, unemployed migrants, asylum seekers, refugees, and "illegal migrants." Such distinctions in turn frequently have explicit or implicit gendered forms or effects. These distinctions are also often codified in complex ways, for example Japan has 28 different residence statuses for foreigners, of which 16 are work-related (Naobumi and Brase 2012). Of particular significance are the lack of citizenship rights of spouses, au pairs or "hostesses," typically women, but also men, who migrate from less privileged regions and with little or no local language skills. Their plight can be especially difficult following divorce or termination of employment, and for certain kinds of precarious workers. Forced marriage and the persistence of what are in effect modern forms of slavery and indenture make for clearly dire circumstances, as do those facing expulsion on grounds of nonnormative sexuality that may not be recognized as asylum grounds, even when return may mean criminalization and even death.

As Brubaker and others have argued, the borders of citizenship are made to limit outsiders but also to strengthen cohesion within (Brubaker 1996; Choo 2016). However, the multidimensions in social membership, and gradations among migrant statuses, rights, and protections can no longer be understood within in the binary of citizen and noncitizen, inclusion and exclusion dependent upon national and regional contexts (Turner 1999). In *Decentering Citizenship*, Choo (2016) engages with these complexities in a rich ethnographic study of Filipina migrant women in South Korea. Although excluded from full or equal membership, they are positioned differently as brides (mothers), labor (care and factory workers), and hostesses who are lowest on the hierarchy in the struggles for rights, security, and respect in their day-to-day interactions with employers, co-workers, and state bureaucracies. They also have the weakest potential to attract support from

civil society actors. Implicit in the notion of decentering citizenship is that citizenship is a process, often partial and incomplete, fluid and dynamically shaped by multiple actors, intersecting with the politics of gender race, ethnicity, class and nation. In these two respects, citizenship and migration share commonalities. The current wave of transnational migration has added new complexities to theorizing citizenship shaped by structural inequalities at local, national, and transnational levels (Choo 2016; Dobrowolsky and Tastsoglou 2006),

Migration has become increasingly prominent in gender research. This is not merely in response to the feminization of transnationalization (Castles and Miller 2003), but also because of the relationship of migration to shifting patterns in social reproduction (Kofman and Raghuram 2015), and intersections in the commodification of care, women's increased participation in the labor force and global inequalities: who cares for whom and with what social costs (Michel 2018; Hobson et al. 2018). Migration is also intertwined with broader processes of welfare state change, reconfiguring the relationships between states, markets, and families and welfare states, where generous tax subsidies for domestic services represent a redistribution upward to middle- and upper-class households who can afford these services (Carbonnier and Morel 2015; Hobson et al. 2018), reflecting increasing class and gender inequalities. For these and other reasons, it is a mistake to reproduce a dualism between migrants and nonmigrants in the analysis of citizenships.

A gendered research on migration and care, both in-depth case studies and comparative analyses, reveals how even the gradations in citizenship and migrant status are embedded in layers of context and are experienced by individuals from diverse situations and migration trajectories. For instance, several scholars have shown that documented and undocumented are not fixed categories and lines between formal and informal employment are often blurred (Hellgren 2015). Work permits and legal contracts may bind a migrant care worker to her employer: in many Asian countries, care/domestic workers are bound by what are effectively slave contracts, organized by brokers and employment agencies (Laliberté 2017), where the employer has total power over the migrant care worker. Although less extreme, Anderson and Ruhs (2010) show the power imbalance and its ill effects on migrant care workers resulting from the employer–employee contract in the UK, where the permission to remain in the country is dependent upon having a specific employment contract.

Even in countries with a high tolerance for informality where the undocumented migrant care workers are not much worse off than the documented, such as Spain, the need to have regular employment in order to achieve residence status reinforces the dynamics of power and dependency between the employee and employer (Hobson et al. 2018). Understanding more fully the drivers and consequences of these complex inequalities demands more multiscalar (Mahon and Michel 2017; Michel and Peng 2017)

and multilevel lenses (Williams 2017) to capture the macro-level (politics and policies), the meso-level (stakeholders) (Hellgren 2015), and the micro-level interactions in daily practices (Williams 2012; Kilkey et al. 2010; Hobson et al. 2018).

Incorporating intersectionalities into citizenship and social membership is not merely an academic exercise, but one rooted in lived experiences, where context matters, and where universalized and objectified categories of citizenship dissolve with more complex analysis of diverse subjects situated in different institutional frameworks and within different policy domains (Isin and Nielsen 2008; Collins and Bilge 2016). Williams' (2012) formulation of multiple and intersecting regimes, welfare, care, and migrant employment recognizes the convergences and variations in migrant care domestic work, as does Simonazzi's (2009) national employment models.

Transnational dimensions, involving both institutions and actors beyond the state (Mahon and McBride 2008), and social movements, many of which travel across borders, are key elements (Paternotte 2015) in theorizing citizenship and social membership, and interpreting how complex inequalities are being played out within, beyond, and beneath the nation-state.

Transnational Processes and Transnational Actors

It will be clear by now that even critical gendered studies of citizenship are often primarily located within the confines of the nation-state. Such methodological nationalism is increasingly challenged by attention to transnational processes and transnational actors. Moving beyond national, societal, and cultural contexts has been prompted by various global(ized) and transnational researches over recent years. Many of these have been developed under the rubric of "globalization," subsequently refined as "glocalization" (Robertson 1995; Robertson and Khondker 1998). In this, it is assumed that the specificities of place are becoming transcended through economic, political, and cultural linkages (Waters 1995). At the same time, there is considerable literature questioning the usefulness and accuracy of the notion of globalization (Hirst and Thompson 1999; Petras and Veltmeyer 2001; Rugman 2000). One aspect of the critique concerns how nation-states, national boundaries, and nationally organized labor remain important (Edwards and Elger 1999; Gibson-Graham 1999; Kite 2004; Waddington 1999). In many respects, transnationalization seems a more accurate concept than globalization (Hearn 2004b). This necessitates considering interrogating differential meaning(s) of "the transnational."

Different transnational processes and transnational actors problematize taken-for-granted national citizenships. To attend to such questions also involves the (de)construction of privileged "centers," such as "Europe," "the North," as well as deconstruction of the "core" perspective embodied in some theoretical ideas. Transnationalizations take many forms, with many implications for intersectional gender relations. They involve multiple forms

of difference, presence, and absence for men and women, in power, and who are dispossessed materially, in terms of aspects of citizenship. Moreover, speaking of transnational relations raises a paradox: they refer to the nation, yet at the same time also to relations across nations. The nation is simultaneously affirmed and deconstructed, and often involves the emergence of a set of intensified phenomena. Transnationalizations encompass different kinds of movements, material or virtual, but also result in more or less stable, material and territorial entities, which tend to stabilize through new structures.[5]

In other words, transnational processes and actors force consideration of more expansive and open-ended conceptions of citizenship, as well as how governments respond to this challenge. This is not only a matter of migrations, but also follows from the impact of many transnational institutional actors. These range from multinational corporations to supranational governance by the IMF and World Bank to transnational cultural organizations, transnational NGOs, and transnational agents for change, social movements, platforms, communities, social locations, and identities that problematize nations and blur national boundaries. Some of these processes are profoundly contradictory. For example, the OECD and OSCE are engaged in promoting both the neoliberal order and gender and social welfare policies (Mahon 2009).

Transnational networks and advocacy groups include international nongovernment agencies (INGOs) which may also provide various forms of basic welfare, such as health, including education and other welfare services, in parts of Africa and Asia. They may also support the activities of groups at the margins who lack representation and voice in formal politics, as can UN, ILO, and Council of Europe protocols, which can be used to empower those without or with less voice (Keck and Sikkink 1998; also Abraham et al. 2010; Ferree and Tripp 2006). Relevant transnational legal apparatuses include the ILO Administrative Tribunal, the European courts, and the International Court of Human Rights, even if legal interventions may not an option for those without legal access. The European Union (EU) provides a unique societal laboratory to assess the implications of gender-equality and gender-related policies for gendered European citizenship. It prompts such questions as: How do gender-equality policies address core issues of gender inequality that present obstacles to an equal citizenship? How do gender and further social dimensions intersect in constructions of both national and transnational/EU citizenship? And how

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[5] The element of "trans" in transnational refers to three different notions:

- *moving across* or *between* two or more somethings, in this case across national boundaries or between nations;
- *metamorphosing*, problematizing, blurring, transgressing, breaking down, even dissolving something(s), in this case nations or national boundaries;
- *creating new configurations*, intensified transnational, supranational, or, to different degrees, deterritorialized, dematerialized, or virtual entities (Hearn and Blagojević 2013: 9).

useful is it to rethink citizenship operating, for some aspects at least, at the transnational level?

Transnational processes and actors shift debates on citizenship toward the recognition of transnational social spaces, flows, and forms of deterritorialization, translocality, and transnationality (Appadurai 1996; Hannerz 1996; Ong 1999), and in which citizenship becomes more understandable as belonging located within social space, not primarily experienced or understood as the geographical space of nationally located place that is occupied. Transnational processes and actors operating within the context of neoliberal globalization and transnational patriarchal relations, coupled with postcoloniality and global processes, have created new and changing material and representational hierarchies, deeply affecting constructions, legalities, and experiences of and demands for national and transnational citizenship. Multidimensionality in citizenship thus means not only a variety of citizenships – political, social, economic, ethnic, bodily, sexual, intimate, belonging (as examined in the EU FEMCIT project[6]) – but also their various forms and extensions across and between borders and social spaces. Citizenship is increasingly multidimensional, with complex intersections in and between gender, state, and transnationality, operating at and across different scales, of actors, institutions, and borders – some fluid, some rigid – both geographically and theoretically.

CHALLENGES, DILEMMAS, AND DEBATES

In this final section, we consider some recent debates emerging from multidimensionality in gender and citizenships and multilevel frameworks (global, glocal, and transnational actors, and institutions) (Olesky, Hearn, and Golańska 2011). These raise challenges for research on gender, state, and citizenships. First, political and theoretical challenges arise in broad shifts in the possibilities for new forms of nationhood, nationalism, and populism, with both progressive and retrogressive sociopolitical movements having emerged, often with very clear gender agendas. This would include studies of the relationship of whiteness, nationalism, neoliberal authoritarianism, and right-wing nationalist movements and their impact on citizenship claims. The urgent need for these kinds of citizenship studies is clear in the dramatically and explicitly racialized politics of citizenship in the USA, antirefugee politics in parts of Europe, and the entrenchment of autocracies and "ethnic cleansing" in diverse locations. In the European context, one of the most specific current manifestations of such contestations concerns the relations of gender and multiculturalism (see Halsaa, Roseneil, and Sümer 2012; Predelli and Halsaa 2012), and the variety of state policy interventions, thus in turn suggesting new forms of gender-pluralist citizenships.

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[6] See https://bit.ly/2FB7ozu.

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More specifically, the headscarf/burqa debates have become one of the most contested and divisive within Europe. Nine European countries have banned the wearing of clothing covering the face in public spaces, such as schools, universities, courts of law, and, in some countries, for example the Netherlands, in parks and on public transportation.[7] Feminist debates catalyzed by Okin and Cohen's provocative (1999) book *Is Multiculturalism Bad for Women?* have highlighted the tensions in cultural rights and gender equality, recognizing that accommodation to cultural difference could translate into oppression of women and children within traditional cultural and religious groups. Asserting the need for a more nuanced analysis, scholars such as Shachar (2001), Phillips (2007), and Song (2009) have argued that gender hierarchies structure all cultures, underscoring the dynamic intercultural interactions between minority and majoritarian norms. Abu-Lughod (2013) asserts in *Do Muslim Women Need Saving?* that the role of the veil must be interpreted in the context of lived lives and historical eras. She contends that in the name of saving Muslim women from the subjugation of the veil, interventions can place limits on their freedom, borne out by the wave of bans on the burqa in public spaces. These nuanced perspectives have been shaded out in the current political climate with the rise of nationalist populist parties, in which the burqa are interwoven in public discourse in an attempt to construct a majoritarian vision of national identity: what it means to be British, Dutch, French, or Austrian. These movements have not only co-opted the gender-equality position as a motivation for campaigns to deny citizenship to Muslims (Roggeband and Lettinga 2016), but have also framed the debates in either/or terms: religious rights versus pluralism; accommodation versus civic participation; integration versus terrorist threat.

Second, in many parts of the world there is increasing recognition of, as well as concerted resistance to, gender and sexual diversity; this concerns not just lesbian, gay, bisexual, and straight, but also intersex, queer, nonbinary, and transgender and agender citizenships (see, e.g., Plummer 2001; Munro and Warren 2004). Together, these bring political, legal, and policy claims on and against the state, and highlight shifting intersectionalities and new gender/sexual hierarchies (Hearn, Aboim, and Shefer 2018; Misra and Bernstein, Chapter 32, this volume). Some of these developments, which may destabilize the notion of gender, though far from new, appear to be facilitated by new technologies. Indeed, virtuality and cyberworlds, in their reformulation of space and place, create possibilities for the enhancement of dissident gender/sexual citizenships that have long been marginalized, as well as for antagonistic hate speech across national boundaries that undermines gender/sexual citizenship (Hearn 2006).

Third is the prospect of and possibilities for global citizenship. The impact of gendered globalizing capitalism and the diffusion of neoliberal ideology,

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[7] European countries include: Austria, Belgium, Bulgaria, Denmark, France, Germany, Latvia, Netherlands, and Norway: see https://en.wikipedia.org/wiki/Hijab.

policies, and practices can undermine national citizenships, raising the question of the need for perspectives on citizenship beyond the nation-state. However, the urgent need for frames of global citizenship is perhaps clearest in relation to the urgent issues of environment and climate change. Gendered patterns of (over)consumption, energy use, transportation, and extraction – stemming in part from tendencies of certain men, masculinities, and indeed male-dominated industrial sectors toward domination and exploitation over others and the planet, with little regard for ecological consequences (Enarson and Pease 2016) – lead on to climate migrants and "climate noncitizens." The future plight of humanity, and even recognition of the rights of nonhumans, prompt an orientation toward new forms of global ecological citizenship (Dobson 2003; Smith and Pangsapa 2008), future citizenships, and the citizenship of future generations, sometimes framed within eco-feminist politics.

Finally, new inequalities can be discerned in citizenships, for example through growing divides within and across regions, between the superrich and the dispossessed, insiders and outsiders, those with secure jobs and access to social rights and the precariat, those in less secure jobs, and more often women. But, now the outsourcing of a much wider range of employment, for example in IT and graphic design, means a new layer of precarious workforce: highly skilled men and women (Standing 2011). The gap in inequalities is widening between Global North and South, and between East and West Europe. Here the salience of citizenship and migration statuses, reflecting differences in access to civil, political, and social rights, comes back full-circle to Marshall. There is growing interest in some countries for a social wage, citizens' wage, or universal basic income, even if these often assume and may reproduce the binary of insiders and outsiders (Folbre et al. 2018). These demands are spreading at the same time as some national and transnational processes are weakening social citizenships. Marketized citizenship, privatization of public resources, and outsourcing on a global scale tend to result in reductions in state social welfare services. Outsourcing of digital services, and increasingly skilled professional work, via transnational companies may provide a modicum of welfare for those employed, but may also undermine pressures for more extensive frameworks for social citizenships.

Furthermore, a whole variety of internal divides are arising within national citizenships, for example by age(ing) and generation, by changing gender/sexual identifications, such as nonbinary identities, through state internal markets and market-oriented citizenships, and through the impact of new technologies, especially with, in some countries, the near compulsory digitalization of (access to) state services, and the existence of digital divides, where we see the intersections in age, gender, class, and generation.

All of these trends highlight complex inequalities and multidimensionality, and pose challenges for developing theoretical frameworks for their analysis and interpretation. The relations of gender, intersectionality, and citizenship are

thus both subject to dynamic change and unfinished, in research, politics, policy, and practice.

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