Our purpose in this paper is to study the evolution of citizenship as a means of conceptualising and organising the body politic in the states of Western Europe. In all these states, citizenship has been considered a vital tool of political management and also the means of allowing the individual to fulfil her potential as well as that of the community. Indeed, a focus on citizenship - as a tool of governance and also as an expression of individual and/or collective liberty - has been perhaps the defining characteristic of modern European political thought. Furthermore, the centrality of citizenship in the various views of socio-political organisation proposed by European thinkers and statesmen lends credibility to the hope that it might be capable of acting as the kernel around which a common European governance regime could grow.

Nonetheless, the ways in which the concept of citizenship has been elaborated over time in the various European states reveals little evidence of a synthesis or a reconciliation of the two principal opposing approaches to citizenship: that based on blood ties and ethnic membership (typified by the German case), and that based on civic responsibility, in turn centred on membership of a particular community (exemplified by the case of France). Our analysis of various national citizenship traditions in Europe reveals little evidence of convergence around a single model\(^1\). At best, we see with the seeming entrenchment of liberal democracy a 'thin' agreement about basic strategies of polity management which includes an accord to give a certain role to the citizen as part of the welfare state. However, we argue in this paper that an historical analysis of West European conceptualisation(s) and practice(s) of citizenship indicates much flexibility: such a survey reveals that Europeans have used different combinations of similar tools to respond to what are, *en gros*, similarly experienced patterns
of social, political and economic change. Broad, commonly experienced developmental trends in the history of European citizenship(s) are identifiable; in the modern period, Europeans have shaped their citizenships with reference to the \textit{Zeitgeist}, and, of course, vice versa. We maintain that this flexibility, coupled with the undoubtedly developmental and evolutionary features of the European citizenships, allows the claim that the latter can be reconfigured to allow the successful development of a 'European' (KU) citizenship. Indeed, the sustaining of EU citizenship may be what is needed to bridge the gap between the different models of citizenship espoused in the various member states and lend ballast to the integration process.

Concretely, we argue that making a success of EU citizenship is crucial for generating any sustained consensus of national citizenship traditions in the member states insofar as that is necessary or desirable. Just as the member states have merged with the EU in a fused, multi-level polity, national citizenships can be brought to meld with a common European response to the problems of governance caused by the very advent of this polity. In short, fusing citizenships in such a way will preserve national differences but allow Europeans to respond in an appropriately twenty-first century manner to the balancing act with which they and their forbears have struggled for hundreds of years: the rights and liberty of the individual versus those of the community; individual rights versus the maintenance of social order; equality versus the need for some kind of power hierarchy; and individual versus collective identity versus the 'Other'.

The structure of the paper is as follows. First, we investigate citizenship as a product of state-society relations, arguing that in terms of what might loosely be called modern 'European' political culture citizenship has always been given centrality (albeit in many different forms). Second, and at greater length, we present an historical survey of citizenship in 'European' political experience, tracing its rise and response to developments in socio-economic organisation since the Middle Ages. Deducing from this survey that citizenships in Europe respond at any given time to the same general stimuli, albeit in differing ways, we posit that the contemporary equivalent of previous citizenship-shaping factors is European integration. From this basis we argue that EU citizenship, created as part of this process, will not necessarily reduce the differences between the various national models but will certainly provide the means of their further evolution. It will also ensure the continued

\footnote{Please see the various working papers submitted as project deliverables from our Workshops}
ability to link the individual to the collective and the governance structure in the context of a Europe 'beyond the nation state'.

CITIZENSHIP AND STATE-SOCIETY RELATIONS

In this brief section we simply wish to present an indicative understanding of the links between citizenship and the condition of state-society relations in a polity. Our purpose here is to establish the ground for our assertion that changes in the latter complex are at least likely to shape the content and use of citizenship; we do not claim either original insight or a full review of the relevant concepts (which space does not allow).

Citizenship is primarily a function of the link between the individual and the governance structure. In other words, it is both the means by which the individual participates in the process of collective decision making and also the device which institutionalises the postfeudal approach to polity management, namely the gradual empowerment of the individual within (or by) the collective. Consequently, it can be considered as the link between the state (or government apparatus) and society (the organic collection of individuals, groups and practices/customs). Understanding a state's citizenship provisions sheds light on the society it contains, and vice versa, since it reveals how a given set of individuals view both themselves and philosophies of good government.

Citizenship is clearly part of the political culture of Western Europe, although it is also reflected through the prisms of the different national traditions contained therein. Generally, this political culture has stressed the primacy of the individual and the protection of individual rights as part of its emphasis on liberty and the legitimate use of power. However, it has also underlined the role of the individual in the community: citizenship has been located in the nexus between private freedom and engagement with the public sphere in pursuit of the common good.

Every society, however, builds a citizenship in its own image. By this we mean that each society describes itself, considers and develops political identity, and (re)conceives the individual, attributing rights and duties to the latter according to a pattern in keeping with its narratives and norms. Citizenship is thus constructed according to social practice and belief.

in Reading and Florence.
As a result, in Western Europe citizenship has been a variegated set of phenomena united by a common purpose: instrumentalising the link between state and society and breathing life into the process of government/governance. Moreover, this act of citizenship construction is not a one-stage act, but a process. As society and/or the nature of the state changes, so must the characteristics of the citizenship which works as a transmission belt between state and society.

Nonetheless, the extent to which one can expect to find overlapping traditions of citizenship between the EU's member states is largely dependent upon their possession of similar (or at least compatible) state and social structures. We reject as simplistic views of European society which stress national difference at the price of ignoring common historical experiences, but accept the view that these experiences are filtered through mechanisms which produce divergent results from similar stimuli. In the following part of our paper, which is necessarily brief given constraints of space, we explore several major cultural shifts common to (Western) Europe and argue that the shared flight from absolutism has produced different citiizenships in response to common problems, not a shared view of how the latter might be dealt with.

THE EVOLUTION OF CITIZENSHIP IN WESTERN EUROPE

In Mediaeval political culture we find the first roots of a modern concept of the citizen, a partial return to the concept first evolved in classical Greece and Rome. It is at this stage - the Middle Ages - that the metaphor of the individual as part of the body politic becomes widespread as part of the conceptualisation of the changing relations between the individual and the sovereign, eventually to find expression in notions of the social contract and the depersonalisation of the state. However, the evolving European views on citizenship underwent considerable revision over time. For example, in French thought before the Revolution, there was a clear disjunction between ideas of rights and membership; indeed in all early modern thinking on citizenship, the emphasis is on rights which all have as a result of their human condition (natural law) rather than from membership of a particular community.

This state of affairs was effectively banished with the events of 1789. Prior to the French revolution, liberty and equality were considered to be the prime concerns. Active citizenship -engagement with the polity and its outputs - was at best a secondary concern. However, with the Revolution came a new concept of the nation as the instrument by use of which rights
could best be realised. These rights might exist naturally in every human; but it required the nation to activate them and render them politically useful. The nation articulated and defended those rights against both the ancien regime and the outside world. It allowed for difference between members whilst attempting to remove social inequalities, eventually unleashing successful if highly embattled claims for inclusion from women and certain minority groups. A further revision of citizenship thinking caused by the Revolution was the link made between civil and political rights. In this model of citizenship, equality is given centrality. By this we mean that the quest for equality becomes the mobilising force for individual engagement with politics, and also its justification.

However, the Revolutionary model of citizenship was itself revised and critiqued, especially in the wake of the Jacobin Terrors and the widespread fears of the privileged classes that the undifferentiated masses would grasp power everywhere to the detriment of the state. Intellectually, the primary criticism of the model is the allegation that it places too great an emphasis on the individual and insufficient stress on the collective. For most nineteenth century thinkers it was a mistake to consider that individuals can spontaneously produce social order through their isolated activities. Instead, to take again the French example, what is necessary is to emphasise the collective by making rights dependent on the functions individuals accomplish in the social whole. There was little agreement amongst thinkers about the nature of the latter, or even about the nature of the individual; nonetheless, in the 1800s what counted in European citizenships was the belief that the individual identity of a person depends ultimately on his/her relationship with the collective/community.

In Germany, this concept received perhaps its fullest expression. In fact, the collective became viewed as an organic identity in its own right, an ethnos bigger than the sum of its parts whose full expression required the existence of a dedicated state structure. The individual was still important, but could not attain full expression or optimally articulate either rights or identity without being part of an ethnically-defined people, which in turn constituted a state. Political structure and ethnicity thus become vital to the realisation of individuality, and the task of citizenship is to facilitate the workings of the state. The latter occurs through the mechanism of the active engagement of the citizens -or members - of the state.
However, the nineteenth century also developed new ideas about citizenship from a social as opposed to national perspective. The industrial revolution, which spread across Europe in rapid if uneven fashion, was treated as a potentially destructive force for concepts of citizenship since it made social conflict much more evident and extensive. No longer could such conflict be considered localized or temporary; it was clearly caused by the basic pattern of the social system, the centrality it afforded not just liberty but property. Resolving the difficulty required a re-examination of all major concepts underpinning the citizenship discourse: the individual, rights, and social order. Certain thinkers continued to consider that a market society would eventually deliver the best of all possible worlds; others argued to differing degrees that the collective had a duty to mediate between opposing groups in society, and that citizenship included the right to satisfaction of certain basic needs. Essentially, this is the dispute between laissez-faire and social reform approaches to capitalism; a third view, developing from the second, challenged the very conception of legitimate social order which the others shared to at least some extent: Marxism.

For Marxists, the citizen is best served by class conflict whose goal is to overthrow an oppressive social order. It is true that Marx considered citizenship to be a concept based on ideas of liberty and property which ought to find their Nemesis with the eventual revolution. Nonetheless, in Marxist thought it is clear that the ultimate goal of the revolution is to serve the interests of the majority, and thus, in the supposedly transitional phase of capitalism defined by the state and formal democracy, citizenship is a matter of facilitating radical social change. The individual becomes an empowered agent, agitating for a new social order.

In Western Europe, as is scarcely novel to observe, social democracy became clearly dominant over communism as an ideology of the Left. Nonetheless, especially in the nineteenth century, it was unclear which view of citizenship would be championed by those on the Left: one which broke with traditional concepts in a burst of revolutionary zeal, or one which stressed struggle for reform, equality of rights and democratisation (rather than destruction of) the state. Social democracy, the path eventually chosen, saw the individual as less active, or at least less radical, in pushing for change. In fact, citizenship in this view is as much a function of entitlement (social equality) and the good of the state (reforms justified by maintaining a structure endangered by conflict) as individual activism.
In the present century, a certain synthesis of previous approaches to the question of citizenship was made in the form of the doctrine of constitutionalism and the entrenchment of liberal democracy as the established form of legitimate government. This is not to say that all previous differences were eradicated, or even that there was a common agreement about how they might best be reconsidered. Indeed, several early attempts at constitutionalism were unsuccessful attempts to reconcile opposing ideologies and views of citizenship (for example, the Weimar Republic). Nonetheless, this trend towards constitutionalism deliberately seeks to draw on existing discourses of citizenship: that of the revolution (liberty, property, equality), and the reformers' view of the nation/community as an entity which is tasked with helping and governing individuals. Rights are instrumentalised as the means of reconciling these two strands of thought: they establish a means of arbitration between individual liberty and the (needs of) the collective structures.

Nonetheless, this synthesis has not been unquestioned, as it has had to address issues of race, war and the totalitarian state. In the initial half of the twentieth century, discourses of citizenship which shared basic affinities despite their difference through a common focus on individual autonomy, rights, liberty and equality were often eclipsed by theories and practices of the totalitarian state. Ideas of the ethnos were shaped at the end of the nineteenth century by the developing sciences of anthropology and criminology, which contributed to ideas about racial difference (not to mention alleged superiority) and individuaVcollective identity, including the question of whether certain social classes were naturally less worthy or respectable than others. Moreover, this century has seen more clearly than before the use of expansionist war as an explicit tool of national success, deserving in turn of the individual's ultimate sacrifice: his life as the property of the collective (rather than the individual sovereign). The State became, in Fascist and Nazi ideology, the antithesis of citizenship as traditionally understood. Though both models stressed membership, totalitarians used it as a tool of manipulation and coercion of the individual rather than a means of her/his empowerment.

Although constitutionalism has been reinstated ever since the end of World War Two, and human rights have been given a new primacy since the UN Declaration in 1948, citizenship in Western Europe remains caught between not one Scylla and Charibdis, but several. The principal concerns of citizenship - the resolution of conflicts between individual rights and
freedoms versus those of the community; between individual rights and the need for social order; the drive for equality versus the need for certain hierarchies of power; the construction of individual and collective identities versus the 'Other' - have not been resolved in a common manner but instead according to several different liberal democratic blueprints. All West European citizenships are amalgams of solutions to these problems, combined in different ways across time and space. What they share is the fact that they are responses to the same, or at least similar, problems of economic and political organisation rooted in European conceptions of what constitutes just social order, social justice and the Good Life for both the individual and the collective. In this section of the paper we have reviewed certain major social trends in the history of European citizenship and clarified their impact on it. In previous research for the project, we have shown that although common experiences have shaped the development of broad approaches to citizenship in at least Western Europe, there has been no reconciliation of the different national responses to these trends except for the centrality of the concept of citizenship itself. It remains to discuss one further common experience - European integration - to establish whether this, as a deliberate process of political, economic and social change, might bring about a further overlapping of the member states' citizenship traditions.

EUROPEAN INTEGRATION: CATALYST FOR A SYNTHESIS OF EUROPEAN CITIZENSHIPS?

European integration is qualitatively different from the previously described common experiences since it is an explicitly chosen, periodically re-defined, collective strategy for broadly-based change beyond the control of any one member state. It is not so much a cultural development or a political philosophy (despite the existence of federalist advocates), but rather an ongoing process of primarily political restructuring. As such, it is clearly a process of polity-building: the Treaty commitment to 'ever closer union' demonstrates this much, although it leaves the definition of such a union for future decision. Consequently, it involves clear and significant consequences for the individual citizen and, more to the point here, European citizenships: no member state of the European Union (KU) can credibly claim sole jurisdiction over the provision of collective goods, and the EU has evolved to the extent that its policies and laws may act detrimentally towards the rights of individual citizens. As a result (and of course also because of the need to breathe life into freedom of movement, and thus the single market), the EU has developed its own citizenship. In short, the 'European
rescue of the nation state’ has entailed a re-casting of how citizenship is understood, awarded and expressed. Here is not the place to investigate the worth and scope of EU citizenship; indeed, we have done so elsewhere\(^2\). Instead, we focus on its potential to act as a bridge between the different national traditions of citizenship in the member states.

European integration is not a matter of harmonisation, but instead one of subsidiarily, agreed minimum standards and flexibility. Instead of replacing member governments, the EU has fused with them, creating a novel and unclearly hierarchised policy making system. This does not mean it is inconsequential; quite the opposite, since it was precisely the abandonment of the pursuit of harmonisation which allowed the realisation of the single market. However, it does mean that we are unlikely to see integration result in a new 'European' standard citizenship, since national differences will be eradicated only as far as is necessary to meet such goals as common visa requirements and immigration policies. These are matters at the heart of citizenship, to be sure; but in the EU they will probably be treated as a matter of policy rather than citizenship per se, decided by the Council of Ministers and the European Parliament not presented as part of a constitution or Basic Law. Moreover, the essential differences between national citizenship traditions can peacefully be circumvented only in this way: as an issue-specific political agreement, negotiated and not imposed.

This is a key factor. European citizenship traditions do not need to overlap, they simply require management and reshaping in a way which guarantees successful EU policy in matters with implications for citizenship. Obviously, completely different traditions cannot speak to each other with any hope of synthesis; but in the case of the KU, the liberal democratic consensus ensures a degree of common principle, and the rejection of harmonisation means the actual goal is less ambitious. As an ongoing process of negotiation, European integration provides the means to allow different actors to follow different trajectories to the same policy goal. European citizenship can thus be a bridge between the various traditions of the member states; it can also function as a means of protecting the citizen whilst the polity-construction process is continued.

Clearly, there is no guarantee that European citizenship will develop in any given direction, or that it will develop in either formal or more broadly-based terms (the question of what

\(^2\) See for example our previous project deliverable and our article in Millennium, ‘From an
constitutes EU citizenship - primary legislation or the broader *acquis* being as yet unresolved). It is also true that engagement with the EU policy making process by groups or individuals may change the way they feel about their national state/government and/or the KU, causing over time a kind of fealty spillover. Should this happen, EU citizenship would have played a key role in determining the outcome of integration as one of state-building. However, we maintain that current trends in integration make this unlikely in the medium term. Flexibility, the dominance of the agenda by the single currency, and the continuing refusal of the member governments to reach clear decisions about the scope and outcome of integration combine to indicate that while substantial progress remains possible the EU will continue according to its dominant working practice - negotiation, alliance construction and contestation, both between and amongst member states and the range of Union institutions - for a good while yet.

As a result, the future of European citizenships remains dependent on the still inchoate development of European integration. The degree to which the latter will fuse the former is still unclear, and we hope to investigate this as well as further matters in ensuing research. What is clear, however, is that the process of fusion will be one of negotiation. The process of constitutionalisation in the EU is dependent on this dynamic, and citizenship will be one of the key matters discussed, argued over, and obliquely (if substantially) altered by the experiment in polity-building that is the EU.