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POLITICS, RELIGION AND GENDER. GOVERNING MUSLIM BODY COVERING IN EUROPE

Abstract: Although the so-called "headscarf-issue" has been a topic of public discussions in European countries since the mid 1980s, the debates about Muslim body covering like the hijab, the burqa or the niqab have intensified since 2004 so that up to now, most European countries have actually regulated the wearing of Muslim body covering in the public sphere. The headscarf has become an arena of passionate controversies about politics of integration and religious and cultural differences. Most interestingly, these struggles are deeply connected to gender differences. It is the body of Muslim women that became a battlefield of conflicts over values and identity politics within these debates. Moreover, the controversies over the Muslim headscarf are part of identity politics of the majority society that is marking Muslim communities as the "other" by questioning the presence of Islamic symbols in the public sphere. In this paper we are interested in exploring the social and political meaning negotiated in the policy debates over veiling in selected European countries. We will argue that headscarf debates and policies negotiated a new concept of citizenship by legitimizing new requirements and preconditions for full citizenship rights. To lay out our argument we will point out the central elements of the citizenship narrations in the headscarf debates by drawing on the results of a gender-sensitive frame-analysis of policy documents that are written documents of the actors involved in headscarf debates from 1989 to 2007 in Austria, Denmark, France, Germany, the Netherlands, and the United Kingdom. These are countries that were analyzed in the research project VEIL "Values, Equality and Differences in Liberal Democracies. Debates about Muslim headscarves in Europe", funded by the 6th Framework Programme of the European Commission (please see <http://www.veil-project.eu>). We thus show that the headscarf debates re-draw the boundaries between public and private in contemporary western liberal democracies by relegating covered Muslim women to a newly constructed private sphere and institutionalizes specific body-characteristics as preconditions for belonging at the intersection of religion and gender.

Key-words: Headscarf-Debate, politics of belonging, intersectionality, frame-analysis, body politics, differentiated citizenship

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Introduction

Since the 2000s, veiling practices, that is the covering of women's hair, face or body, have been heavily discussed all over Europe. Originally, the controversies started with the enforcement of a headscarf ban in Turkey in the 1990s, followed by a law that forbids the wearing of "conspicuous religious signs" in schools in France in 2004. As a highly visible symbol of religious and cultural difference, the Islamic headscarf has been the subject not only of disputes and claims, but also subjected to new legislation and court decisions at national levels in several European countries. However, compared to the occurrence of fierce public debates over Muslim head and body covering across Europe, it is surprising that policymakers in only a few nation states decided on restrictive headscarf regulations. We would have expected much more prohibitive legislation.

Though, in the previous years, the debates over Islamic body covering have changed: The politicization of the full face and body covering seems to have superseded the headscarf. Calls to ban the full face and body covering arose in the Netherlands, in Germany and Austria, in Switzerland, Italy and the UK. In 2011, prohibitive regulations on the full body covering came into force in France and Belgium. Turkey, France and some German federal states introduced prohibitive regulations on the headscarf, while other countries confirmed explicitly accommodating rules such as the Netherlands, the United Kingdom and Austria. Moreover, countries such as Denmark and Greece have stuck to non-regulation practices.

And by the way, public debates use the term *burqa* for garment covering the face and the body in order to allude to women in Afghanistan although the targeted women in European countries are wearing a *niqab*. However, with regards to sites of regulation (e.g. state institutions or private business), to instruments of regulation (e.g. laws, decrees or court decisions), to types of religious attire and to different groups of women affected by a regulation (such as pupils, teachers or public servants) we do not find a simple trifold country typology of headscarf regimes.

Debates over Muslim body covering are embedded in processes of state transformation, of a new welfare state compromise in the context of neo-liberal re-organization of European societies and economies as well as in the context of globally changing patterns of migration to Europe. Three features of these new state projects are important for citizenship policies: *First* a restrictive migration and border regime, *second* new regulations of access to citizenship as for instance in Germany, and *third* the redefinition of inclusion and exclusion as well as tolerance towards migrants and minorities. In Germany, which has never been a multicultural country, the federal chancellor Angela Merkel declared in 2010 the "end of multiculturalism" as in the

Netherlands in the 1990s by Paul Scheffer, in Austria the rightwing-populist party FPÖ denies migrants' and minorities the right to feel at home in Austria in the 2010 election campaign.

Due to the fact that citizenship is always practiced through and by emotions, narrations and myths of the imagined community debates over Muslim body covering, over a "piece of cloth", are performed rather emotionally. In Germany the long and sticky process of re-negotiating national identity in the process of re-unification builds the background for new politics of belonging. In Austria, on the other hand, negotiations of being an immigrant and multicultural country – with respect to the multicultural Hapsburg past – are the context of exclusive headscarf debates. It is quite astonishing that Austrian populist mobilization against immigrants and the Islam did not lead to prohibitive regulations; this might be explained by the Austrian tradition of consensus democracy, where the majority parties try to neutralize right-wing xenophobic outbursts. In both countries, however, politics of belonging result in rather few measures to improve the situation of covered Muslim women and to actively integrate them and recognize their citizenship rights.

The puzzling question of this paper, hence, is why these fierce debates if there is only little policy decision on headscarves? What is the social and political meaning negotiated in policy-debates over veiling across European countries? We want to argue that headscarf debates and policies negotiate a new concept of citizenship, of political, social and cultural rights in European countries. New requirements and preconditions for citizenship are negotiated and put in place through headscarf debates. And this new citizenship discourse is constructed at the intersection of gender, religion and nationality.

Not only countries with restrictive or ethno-cultural citizenship regimes or with prohibitive headscarf regulations but also tolerant countries with open citizenship regimes started to draw new and discrete boundaries within their societies, boundaries which symbolically exclude the "other" and include and construct the "We". These new politics can be labeled according to Nira Yuval-Davies and others as "politics of belonging" (Yuval-Davis/Anthias/Kofman 2005; Yuval-Davis 2007).

Although a conceptual difference between citizenship and belonging exists, the two concepts are blurred in recent debates. Citizenship – i.e. rights and obligations – needs to be lived and exercised according to Rainer Bauböck (1999: 3) and therefore citizenship rests more and more on "meeting the criteria of inclusion" (Anthias 2006: 22). Thus, citizenship needs identification and belonging. Politics of belonging differ from citizenship policies with respect to the emotional dimension of identification, with respect to symbolic characteristics and with respect to specific bodily requirements and habitual practices and behavior. These bodily characteristics and the

requested behavior are connected – as in the 19th century – to the sexual difference of people and to gender. Today, belonging and non-belonging are constructed at the intersection of religion and gender.

Thus, our argument is that debates about Muslim heads and body covering create an arena, in which the field of belonging and non-belonging is mapped out in new ways – and first of all in a gendered mode. We want to argue in this paper that gender differences are becoming a new marker for belonging and for the access to citizenship rights in a context of state transformation. Politics of belonging is a strategy to separate those who belong from those who do not belong to a national imaginary and community. These new regimes of belonging, the re-definition of citizenship in policy-debates about Muslim body covering are connected to the claim of integration, to cohesion and the demand to assimilation and less to recognition of differences and the right to – for instance religious – difference (Dobrowolsky/Tastsoglou 2006: 2; Yuval-Davis/Anthias/Kofman 2005: 529). Hence, we will interpret headscarf policies not only as forms of religious governance but also and foremost a new form of governing people, a new form of neoliberal governmentality in the Foucaultian sense – governing by norming people through bodily characteristics and through habitual practices and behavior. We want to show that and how headscarf policies work as a bio-political strategy, which combines politics of religion, of migration, of integration and of gender. Thus, the attention which is paid to Muslim women in headscarf debates is part of a neoliberal strategy of governing population and society, a discursive strategy of the production of an imaginary of the migrant willing to integrate and the other migrant not willing to integrate into mainstream society.

The VEIL methodology: Critical discursive institutionalism

The theoretical and empirical research results draw on the findings of the VEIL project, funded in the 6th European research framework of the European Commission from 2006 to 2009. The VEIL project was a collaborative study with a cross-national comparative method. Countries included in the VEIL project were Austria, Denmark, France, Greece, Germany, The Netherlands, Turkey, and the United Kingdom. Our main focus in this paper will be on Germany and Austria.

The VEIL methodology consists of two core elements: *first*, a frame analysis of policy documents related to headscarf debates and *second* on a comparative analysis of political opportunity structures, of institutional settings which shape headscarf policies in order to explain variations of headscarf policies such as citizenship regimes and integration policies, state-

church-relations and recognition of religious communities, gender equality and anti-discrimination policies. We label this common methodology as 'critical discursive institutionalism' (see Schmidt 2008; Sauer 2009, 2010).

The following analysis focuses on the discursive and framing strategies as an important dimension of religious governance. A frame is defined as "interpretative schemata that signifies and condenses the 'world out there' by selectively punctuating and encoding objects, situations, events, experiences, and sequences of action in one's present or past environment" (Snow/Benford 1992: 137). Frames are "organized ideas", which provide some "coherence to a designated set of elements" (Ferree *et al.* 2002: 105). Frames give meaning to certain policy situations; they connect a policy position to a wider set of ideas and ideologies. Moreover, frames do not only interpret policy problems, but also create policy problems (diagnostic frames) as well as policy solutions (prognostic frames) (Zald 1996). Considering reality as a socially constructed phenomenon also implies that knowledge of and particular accounts of 'the truth' are situated and always shaped by a specific historical, cultural and political context (Hajer/Versteeg 2005). People always shape a proposition in a way that is directly linked to particular "political and cultural contexts, and to political and cultural histories and ideologies" (Verloo 2005: 17).

A careful analysis of these processes aims to understand the ways in which societal issues are represented in the political domain, which particular understanding gains dominance at some point and why, and which understandings are discredited. The headscarf is thus conceptualized and represented differently by various actors who compete with each other over the meaning of religious attire and who offer different solutions to solve it. Hence, headscarf debates are political conflicts in which power plays an important role in influencing which representations gain standing and which ones disappear.

In the VEIL project, the particular definition of the headscarf problem (diagnosis) and the proposed solution to the problem (prognosis), as well as the argumentation and structure of norms have been translated into an analytic framework that consists of a coding scheme with a set of "sensitizing questions" on each element (Verloo/Lombardo 2007). This "analytic matrix" of the frame analysis included questions about who gets a *voice* or who has a *standing* in a policy document in order to identify who is involved in the construction of a frame and who supports this frame. The matrix further inquired about gender relations constructed in the document as well as norms discussed in the headscarf debates.

The material of the frame analysis was composed by policy documents used and produced in headscarf debates in the eight countries from 1989 to 2007. Policy documents in the VEIL project were written documents dealing with veiling. Such policy documents were produced by all actors and

institutions involved in public headscarf debates as for instance academic journals, churches and religious groups, courts, employers, media/journalists, Muslim groups and women's groups, groups of other minorities, parliaments and legislative bodies, state bureaucracies, political parties, public intellectuals, schools and universities. Our material also included some interviews with relevant policy actors. In each country under investigation, a minimum of 20 and a maximum of 40 documents were analyzed in-depth. The sampling of the documents was guided by a manual determining that the selected documents have to be grouped around policy decisions and policy incidents in the country from 1989 to 2007. Preferably, all actors and sites of headscarf debates should be represented in the selected documents.

The framing strategies of actors and institutions in the eight countries and the EU were solidified by developing eleven major frames from the material, such as gender and gender equality, victimization and agency, rights and citizenship frame, integration and non-integration, the salience of secularism/*laïcité*, identity and belonging, Europeanization and modernization.

Gender as a new marker for citizenship and belonging

Headscarf debates across Europe form arenas, in which two different forms of struggle over citizenship and belonging take place: A more inclusive strategy – such as in Austria, Greece, the Netherlands, UK – and an exclusive strategy – like in Germany, France and Denmark. Nevertheless, actors in the inclusive and the more exclusive universe of debates use similar frames for their purpose and hence create an open and contested universe of a bio-political discourse of belonging and non-belonging in their respective countries.

Politics of belonging and non-belonging rest on four major headscarf frames and narrations: *first* the frame of rights, of individual rights, of individual freedom to religion, *second* a state neutrality or secularism-frame (i.e. state-church-relation), *third* an integration frame and *fourth* a gender relations and gender equality-frame (Gersch/Rostock/Kilic 2011). These frames are connected to different argumentative patterns and values, which legitimize characteristics and practices of belonging and non-belonging.

In the following we will show by which frames, through which argumentative patterns boundaries of belonging are constructed and reconfigured, boundaries between the "We" and the "other" in the context of new bio-political strategies and in the context of a neoliberal state transformation. In order to follow this argument we will point out central elements of the citizenship narration in headscarf debates at the intersection of religion, gender, bodily characteristics and habitual practices and behavior.

Frame 1: Individual rights

Inclusive argumentations for citizenship conceive individual rights as a central pre-condition for citizenship. In our case this is the individual right of freedom to religion and to wear and deploy religious symbols as well as the right to cultural and religious difference. Not the assimilation into a cultural or religious community is a requirement for rights, but the other way round – the recognition of cultural and religious difference is the pre-condition for belonging and integration. Or put it different: The basis for citizenship is freedom. Those actors in headscarf debates who frame the wearing of Muslim body-covering as religious freedom in all our countries are in favor of religious difference and advocate for a tolerant headscarf regime and for an inclusive citizenship concept.

Covering practices of Muslim women are fought for within the rights frame in the Austrian debate by lawyers, the Islamic Religious Community Austria, the only officially recognized organization of Austrian Muslims, but also by Muslim groups in German headscarf debates as well as by Muslim intellectuals and Muslim women's groups and feminists in France and the Netherlands. The freedom to religion frame is also brought into the German debate by the former judge of the constitutional court, Wolfgang Böckenförde.

This rights frame is also connected with the argument of female freedom and self-determination of women, mainly brought into the debate by women politician in Austria (Sandra Frauenberger, the women's minister of the Land Vienna), by feminist migrant organizations such as "Peregrina" or the Austrian feminist magazine "an.schläge". Also, feminists and Muslim communities in the UK, the Netherlands and France use this frame. These actors claim the right of women to self-determination, which includes a Muslim women's right to express her religious belief and to demonstrate her religious conviction publicly. Hence, headscarves and covering practices are seen as an autonomous decision of a woman.

Debates which interpret the headscarf in the rights frame do not focus on belonging. They do not support boundary drawing but make an argument for inclusion on the grounds of rights, which all people possess. Thus, actors who want to prohibit headscarves do not make use of this frame.

Frame 2: State neutrality and secularity

The secularity and state neutrality frame legitimizes the prohibition of religious symbols in state institutions, in some German *Länder* only the prohibition of Muslim religious signs. This frame is rather prominent in France and Turkey. In Germany prominent social-democrats as for instance the former federal president of the country, Johannes Rau, and the former president of the

German Bundestag, Wolfgang Thierse are leaders of discourse coalition which tries to advocate for a headscarf ban in order to protect state neutrality towards religion. A similar frame has been used in the verdicts of the German constitutional court and in the administrative court of the *Land* Baden-Württemberg in the case of the covered teacher Feresta Ludin, who was relegated from school. In other countries of our sample, this frame is absent, although for instance Austria has similar state-church-relations as Germany.

The argumentation within the neutrality and secularity frame is most interesting for the new politics of belonging. Patterns in this frame redefine concepts of public and private, of what is allowed to be publicly visible and what has to remain invisible in the public sphere and hence has to be privatized. The foundation of citizenship is – according to the neutrality and secularity frame – based on the separation between public and private: Religion and religious symbols are generally tolerated, but they are not tolerated in the public realm of the state – and in the "*burqa*"-cases in France and Belgium, they are not tolerated in the public sphere of the streets. Of course – and this has to be stressed at this point – it is a major normative achievement of political modernity that religious beliefs shall not influence public or state decisions.

However, what is problematic with respect to this separation of private beliefs and public activity is, that this norm – as in the case of gender relations and gender differences – has always been used to legitimize exclusions as for instance the exclusion of the emotional, irrational women from the public realm and from state decision making bodies. Hence, the secularity frame runs the danger by prohibiting public visibility of Muslim religious signs – if also religious beliefs can be privatized has to be put into question – to legitimize and foster new exclusions. As body coverings are only worn by women, the separation of public and private in headscarf cases is modulated again by gender and vice versa: Gender becomes anew a mode of being relegated to the private sphere. Muslim women are hence excluded from the public sphere as well as from citizenship rights if they are not willing to uncover. The danger of exclusion of Muslim groups is even more likely due to the fact that for instance in some German *Länder* Christian symbols are not treated as religious symbols but as part of the western culture and of German history – and therefore need not be excluded from the public sphere nor from state institutions. Also, Muslim religious signs in French and German debates are not only framed as religious signs but as political manifestations – and hence they are perceived as dangerous.

Frame 3: Integration

A frame which is rather often used in headscarf debates is the so-called integration frame. Within this frame the lack of integration of covered Muslim

women is discussed. The headscarf is interpreted as an intentional form of self-exclusion of Muslim women. There is a discourse coalition in Germany between the well-known feminist Alice Schwarzer and the Christian-conservative Party CDU. Alice Schwarzer together with the then minister for culture and education of the German *Land* Baden-Württemberg Annette Schavan, who implemented the headscarf ban on teachers in public schools and whose argumentation became part of the judicial legitimization of the headscarf ban, perceives the headscarf as incompatible with – as they claim – "western values".

In Austria, the rightwing party FPÖ, namely the party leader Hans-Christian Strache, uses this argumentative pattern. The headscarf not only prohibits integration, they claim, but it is a political sign for the missing will to integrate into mainstream society, hence a sign for separation and parallel society. In French headscarf debates it is argued that wearing a headscarf is threatening the French national identity and republican values (Gresch/Rostock/Kilic 2011). In British debates, which developed against the wearing of a *niqab* since the turn of the century, the face veil is seen as contradicting "British values" (The journalist Catherine Bennet in *The Guardian* 2005) (Gresch/Rostock/Kilic 2011) and as a "visible statement of separation" – as Jack Straw, the former Foreign Secretary put it in 2006 (Andreassen/Lettinga 2011).

In this strand of debate, integration is framed as conformity with a set of western values and practices. The integration frame, hence, deploys a mode of exclusion, which rests on specific western and Christian values and on an occidental heritage. On the other hand, this frame creates a discourse of cohesion, community and belonging on the grounds of national cultural values (Gresch/Rostock/Kilic 2011: 65). Belonging to an imagined community requires a set of typical occidental characteristics and practices – namely the characteristics of being uncovered. Unveiling becomes a marker of national identity (Andreassen/Lettinga 2011).

Actors who are in favor of the wearing of headscarves and follow tolerant policies also use the integration frame, however giving it a different spin: Their argumentation – as for instance the Vienna minister for Women, Sandra Frauenberger in 2007 – says that recognition and participation have to be the first steps and therefore inclusion rests on the recognition of religious difference and the toleration of Muslim body-covering. Inclusion is the precondition for belonging and not the other way round. Therefore these actors state that integration has not to be achieved through specific characteristics and practices.

Frame 4: Gender equality

All actors in our country sample who advocate for prohibitive regulations frame Muslim body covering as a symbol for the oppression and submission of

Muslim women by Muslim men and, thus, a symbol for gender inequality (Andreassen/Lettinga 2011). Covering is perceived as *forced* veiling. German actors in favor of prohibitive headscarf regulations – a coalition of politicians from SPD, CDU and Greens – claim that it is impossible that women cover voluntarily. Also, in Austria the then minister for the interior Liese Prokop from the Christian conservative People's party advocated for a prohibitive headscarf regulation with this gender frame. And the right wing Austrian FPÖ, the Danish People's Party as well as the Dutch populist Geert Wilders – never before interested in gender equality – describe covered women as "unfree".

Also feminists in Germany and Austria such as Alice Schwarzer and Johanna Dohnal – the first Austrian federal women's minister in the 1990s – argue that the headscarf is a symbol for the exclusion of Muslim women from the public realm and a symbol for the dependence of Muslim women from men. Feminists in other countries – for instance Cisca Dresselhuys in the Netherlands – also follow this framing. Particularly secular Muslim feminists give warning of the accommodation of the headscarf, for instance Necla Kelek in Germany and Ayaan Hirsi Ali in the Netherlands.

These arguments take on the debates about multiculturalism versus feminism saying that liberal multiculturalism runs short in ignoring "private" gender inequality in minority communities. However, in headscarf debates the gender equality frame can be labeled as a victimization frame (Andreassen/Lettinga 2011: 18): Covered women are only perceived as victims of "their" men, as victims of patriarchal structures and norms and of an oppressive culture. Religious Muslim women are seen as manipulated and brainwashed – unaware of their oppressed situation, thus, with false consciousness and as "not being able to make 'free choices'" (Gersch(Rostock/Kilic 2011). As prisoners of their culture they do not have agency and therefore they have to be protected by the liberal state. The gender frame in restrictive headscarf debates, hence, has a paternalistic and patronizing tone. However, also politicians with a tolerant attitude – as for instance the Austrian Sandra Frauenberger – adhere to this frame that Muslim women are victims of their male relatives: But banning the veil, her argument goes, pushes women back to their patriarchal and sexist families.

Moreover, the gender equality frame distinguishes between a modern and gender equal "We" and a pre-modern, sexist and patriarchal "Other" – a separation, which is performed and marked by Muslim women (Young 2005: 88). In French debates, for instance, gender equality is associated with laïcité (Stasi commission). Also, political actors in all countries in favor of a headscarf ban are "nationalizing" gender equality (Andreassen/Lettinga 2011) – they "construct their specific national society as the preserver and securer of gender equality" (Andreassen/Lettinga 2011). Hence, gender "function(s) as a cultural group marker for modern Western cultures" (Andreassen/Lettinga

2011). In the same vein Muslim women are stigmatized as "Others", they are framed as traditional, family-oriented, anti-modern and irrational. Thus, Muslim women are – due to specific body-practices, namely covering, – excluded from the imagined community, they can't be full members of this community and therefore, they can't be granted full citizenship rights. This is for instance the argument of the French intellectual Elisabeth Badinter

Thus, these restrictive headscarf debates do frame gender equality and women's emancipation in a modernization narrative of uncovering or: of stripping for equality. Or put it different: The emancipation of Muslim women should be practiced by uncovering. Also, integration into majority society seems only possible by unveiling. Covered women, who do not hold the required bodily characteristics and do not follow the required practices and behavior are not allowed to become a full member and to belong to the imagined (national) community. Therefore they can't be granted citizenship rights.

To sum up: The embodiment of non-belonging

While European countries differ in their narrations of belonging and non-belonging, headscarf debates in tolerant, in restrictive as well as in non-decision countries produce at least a chilly climate by categorizing, norming and disciplining Muslim women. The headscarf is used to construct an imagined community, a national imaginary and to draw and reconfigure boundaries of belonging: The body practice of covering symbolizes and defines who belongs and who does not belong, who is a "normal" citizen and who not – and hence who has access to rights and who has not. Exclusive citizenship argumentations interpret publicly visible religious symbols and the body of covered Muslim women as signs of non-belonging which legitimize exclusion. On the other hand, inclusion requires assimilation to norms and practices of the mainstream society. Gender difference and the body of women are at the interface of this exclusive bio-political politics of belonging with respect to two dimensions – first the separation of public and private and second with relation to uncovering.

Let us briefly summarize the two dimensions: *First* headscarf debates re-draw the boundaries between public and private: Muslim religion has to be privatized, which means that religious signs have to be made invisible. This is for instance the argument of the French Stasi Commission. An invisible, internalized, privatized religious practice is the precondition for citizenship rights. This demand for the privatization of religion aims at institutionalizing new spaces, a new geography of religious governance, which rests on the relegation of Muslim women to a newly constructed private sphere. In this

form of religious governance Muslim women are depoliticized: Religion is not a public issue, it is not debatable and discussable by religious Muslim women. Thus, Muslim women are at the front line of negotiating and re-designing citizenship but they cannot take part in the negotiations. The "old" gender exclusive paradigm of rights has been shifted to Muslim women.

Second: Especially in prohibitive headscarf debates bodily habitual practices, behavior and body-characteristics – namely un-covering – are constructed as a precondition for belonging. Bodily practices are becoming a norm – the norm how good citizens should behave so that they can get access to rights (Gersch/Rostock/Kilic 2011: 70). Hence, the responsibility for belonging and for getting rights is given to the individual woman and she can only comply to the norm if she uncovers. The ambivalence of an emancipating strategy, which relies on uncovering and stripping – namely the sexualization and pornographization of the uncovered female body – is not reflected by those actors (Muller/Llewellyn 2011: 315).

To sum up: In the context of changing migration patterns and integration policies, debates about Muslim headscarves can be used to put in place a new politics of belonging, or better: a politics of exclusion. Muslim women are seen as embodied markers for distinct and incompatible cultures – the western-occidental-European and the eastern-oriental Muslim culture. In this narrative covered women embody the failure of integration (Andreassen/Lettinga 2011: 28). Headscarf debates thus "produce" female migrants and minority Muslim women who are not capable or willing of being integrated. Hence, politics of belonging create a dispositive in the Foucaultian sense of separation, exclusion and of selection. Headscarf debates create forms of bio-political disciplination and reglementation of minorities. Modernity, democracy, freedom and secularity are lines of argumentation, through which covered Muslim women are constructed as "others" and as not belonging to the imagined community. Within this dispositive migration as well as gender relations are becoming governable in a rather flexible way, and most of all: Gender inequality in mainstream society does not need to be targeted. In headscarf debates the occidental "We" is formed as gender equal against the oriental "Other" (Dietze 2009). Thus the mode of headscarf debates also normalizes unequal gender relations in mainstream societies. And hence, a new form of governmentality, which is legitimized through the female body and body-practices is implemented: Those whose bodies do not fit are excluded.

Anti-immigrant mobilization in European countries can call upon these dichotomist patterns of argumentation – and women are at the centre of these bipolar, antagonistic discourses. The body of Muslim women is becoming a battlefield of conflicts over immigration and integration in the process of new citizenship policies, which reshape citizenship also for citizens of the respective country.

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**POLITIKA, RELIGIJA I ROD. UPRAVLJANJE POKRIVANJEM
ISLAMSKOG TELA U EVROPI**

Premda je takozvani "problem hidžaba" tema javnih rasprava u evropskim zemljama još od sredine osamdesetih godina 20. veka, rasprave oko islamskih pokrivala za telo poput hidžaba, burke ili nikaba rasplamsale su se od 2004. godine tako da je do danas većina evropskih zemalja regulisala njihovo nošenje u javnoj sferi. Hidžab (marama za glavu) je postao mesto strastvenih nesuglasica u vezi sa politikama integracije i religijskim i kulturnim razlikama. Najzanimljivije je da su te borbe duboko povezane sa rodnim razlikama. Upravo je telo islamskih žena u ovim raspravama postalo bojno polje razmirica oko vrednosti i politika identiteta. Štaviše, rasprave oko hidžaba su deo politike identiteta većinskog društva koje, dovođenjem u pitanje prisustva islamskih simbola u javnoj sferi, muslimanske zajednice označava kao "drugog".

U ovom radu ćemo razmotriti društveno i političko značenje koje je u izabranim evropskim zemljama bilo predmet pregovaranja prilikom rasprava oko javnih politika u vezi sa pokrivanjem tela. Pokazaćemo da se, putem legitimizacije novih zahteva i preduslova za puna građanska prava, u diskusijama oko hidžaba i javnih politika pregovaralo oko novog koncepta državljanstva. Da bismo iznale svoj argument ukazaćemo na osnovne elementa naracija o državljanstvu u debatama o hidžabu, oslanjajući se na rezultate rodno senzitivne analize strategija i okvira dokumenata javne politike (*frame analysis*), pisanih dokumenata čiji su autori akteri koji su od 1989 do 2007 godine bili uključeni u diskusije o hidžabu u Austriji, Danskoj, Francuskoj, Nemačkoj, Holandiji i Velikoj Britaniji. Ove zemlje su analizirane u okviru istraživačkog projekta VEIL (veo/zar) - *Values, Equality and Differences in Liberal Democracies. Debates about Muslim headscarves in Europe* (Vrednosti, ravnopravnost i razlike u liberalnim demokratijama. Rasprave oko muslimanskog hidžaba u Evropi), koji je finansiran od strane 6. Okvirnog programa Evropske komisije (više informacija na: <http://www.veil-project.eu>).

Na taj način pokazujemo da rasprave o hidžabu, potiskujući pokrivene islamske žene u novokonstruisanu privatnu sferu, nanovo iscertavaju granice između javnog i privatnog u savremenim zapadnim liberalnim demokratijama i institucionalizuju specifične telesne odlike kao preduslov pripadnosti i ukrštanja religije i roda.

Ključne reči: rasprave o hidžabu, politike pripadanja, ukrštanje, analiza okvira javnih politika (*frame analysis*), politike tela, diferencirano državljanstvo